



environmental management, inc.

From: Deni Chambers, Principal-in-Charge Date: September 7, 2010

To: Shannon Harbour, PE

Nevada Division of Environmental Protection (NDEP)

RE: Environmental Conditions Assessment, Groundwater Treatment and Capture Zone

Evaluation Monthly Status Memorandum and Schedule Update.

August 2010, Tronox Facility, Henderson, Nevada

Activities Completed During Last Period August 2010

PHASE B ECA PROGRAM

Deliverables

- Response to Comments and Revised Data Validation Summary Report (DVSR) for RZ-E, dated August 3, 2010, submitted August 2, 2010
- Draft Dioxin Surface Sample figures and memo, submitted August 2, 2010
- Errata to Revised Manganese Tailings Sampling Memo of July 26, 2010, dated and submitted August 3, 2010
- CCC/ECA Schedule Update and Monthly Summary Report, dated August 5, 2010, submitted August 4, 2010
- Errata to Revised Work Plan for Additional Sampling of a Portion of the Former Trade Effluent Pond Berm in the Northwest Portion of Remediation Zone D, dated and submitted August 6, 2010
- Response to Comments and Revised EDD for Data Validation Summary Report Pre-Confirmation Sampling RZ- B, dated and submitted August 12, 2010
- Errata to the Removal Action Work Plan for Phase B Soil Remediation of Remediation Zones RZ-B through RZ-E, dated August 13, 2010, submitted August 12, 2010
- Response to August 19, 2010 Nevada Division of Environmental Protection (NDEP) Comments on Tronox Phase B Soil Remediation Program Schedule, dated August 4, 2010, dated and submitted August 13, 2010
- Details Regarding Excavation in Vicinity of Infiltration Trenches, dated August 12, 2010, submitted August 18, 2010
- Revised Spreadsheets to TEP Sampling Memo, dated and submitted August 18, 2010
- Addendum to Hazardous Waste Landfill (LOU 10) Sampling Plan, dated and submitted August 18, 2010
- Engineering Evaluation of Slope Stability GW-11 and WC Pond Embankments, Phase B Soil Remediation of RZ-D, dated and submitted August 18, 2010
- Revised RZ-B Excavation Plan, dated August 20, 2010, submitted August 19, 2010
- Engineering Evaluation of Slope Stability GW-11 and WC Pond Embankments, dated August 18, 2010, submitted August 23, 2010
- Response to Comments on Revised DVSR for RZ-C, dated August 25, 2010, submitted August

24, 2010

- Errata to Revised Parcels A/B Tech Memo, dated and submitted August 24, 2010
- Response to Comments on Revised EDD, DVSR for RZ-D, dated August 26, submitted August 25, 2020
- Response to Comments and Revised Excavation Plan for RZ-D, dated August 31, submitted August 30, 2010

Meetings

 NDEP-TRX-NGEM WebEx Meeting to discuss Tronox's weekly update and NDEP's comments to Tronox's Revised RZ-D Excavation Plan, dated July 26, 2010, August 11, 2010

Field Activities

• Unit Building 1 excavation and debris removal

LEACHING/GROUNDWATER PROGRAM

Deliverables

- Technical Memorandum: Calculation of Leaching-Based, Site-Specific Levels (LSSLs) for the Soil-to-Groundwater Pathway Using NDEP Guidance, dated and submitted August 23, 2010
- Work Plan to Conduct In-Situ Permeable Reactive Barrier Pilot Test for Perchlorate-Impacted Groundwater, dated August 27, 2010, submitted August 31, 2010

Field Activities

- (Capture Zone Evaluation) Finished development of newly-installed wells at Athens Road well field and on-Site.
- (Capture Zone Evaluation) Conducted slug testing of newly-installed wells screened in the Upper Muddy Creek formation (UMCf) in the middle water-bearing zone (WBZ).
- (Capture Zone Evaluation, GWETS) Baseline sampling of newly-installed wells and replacement monitoring wells for perchlorate, chromium, and TDS.
- (GWETS) Completed plans and specifications for connecting 4" recovery wells downgradient of barrier wall to GWETS; submitted bid requests and began contractor selection process.
- (GWETS) Completed draft plans and specifications for hook-up of seven additional Interceptor wells (I-AA, I-AB, I-AC, I-AD, I-W, I-X, and I-Y).

GROUNDWATER SYSTEM OMM

Deliverables

- Annual Compliance Report for Chromium and Perchlorate, July 2009 June 2010, Tronox LLC, Henderson, NV, dated August 27, 2010
- Errata to Annual Compliance Report, dated September 1, 2010

Field Activities

(GWETS) Completed third quarter groundwater sampling.

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Activities to be Completed During Next Period September 2010 (and anticipated submittal dates)

PHASE B ECA PROGRAM

Deliverables

- Revised Excavation Plan for RZ-C (September 1)
- Environmental Covenants Update (September 1)
- Response to Comments and Revised Engineering Evaluation of Slope Stability memo (September 3)
- Revised memo and Response to Comments on Details Regarding Excavation in Vicinity of Infiltration Trenches (September 3)
- Revised DVSR and Response to Comments, RZ-D (September 8)
- Revised DVSR and Response to Comments, RZ-E (September 9)
- Indoor Air Quality Report (September 22)

Meetings

 Conference Call with NDEP to discuss data usability and accuracy for Parcels closure report (to be scheduled week of September 6)

Field Activities

- Remediation Zone B Excavation, Transportation, and Disposal
- Remediation Zone D Excavation, Transportation, and Disposal

LEACHING/GROUNDWATER PROGRAM

Deliverables

- Background Analysis and Errata to Leaching Memo (September 9)
- Monthly Status Memorandum and Schedule Update for the month of September, 2010 (October 5)

Field Activities

Memorandum

- (Capture Zone Evaluation) Install pumps and piping at 4" wells downgradient of barrier wall (estimated complete by October 1, 2010).
- (Capture Zone Evaluation) Water level measurements, groundwater sampling (estimated complete by September 22, 2010).
- (GWETS) Select contractors, schedule well hook-ups and electrical work for additional Interceptor recovery wells (estimated complete by September 24, 2010).

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