

## Shannon Harbour

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**From:** Brian Rakvica  
**Sent:** Monday, December 14, 2009 8:53 AM  
**To:** 'Keith Bailey'; 'Susan Crowley'; deni.chambers@ngem.com; Shannon Harbour; 'tom'; 'Derrick Willis'; 'Diebenow, Julie'; 'Baker, Ken'; 'K. Saravanan'  
**Subject:** RE: Tronox Area II Supplemental Sampling

Keith.

Thanks, this is acceptable.

Brian

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**From:** Keith Bailey [mailto:okbailey@flash.net]  
**Sent:** Monday, December 14, 2009 8:52 AM  
**To:** Brian Rakvica; 'Susan Crowley'; deni.chambers@ngem.com; Shannon Harbour; 'tom'; 'Derrick Willis'; 'Diebenow, Julie'; 'Baker, Ken'; 'K. Saravanan'  
**Subject:** RE: Tronox Area II Supplemental Sampling

Brian and Shannon,

To clarify:

- TPH. Tronox proposes to sample for TPH at the Area II locations where TPH was detected. Since we did not detect gasoline range TPH in the previous Area II sampling work, we propose to sample for diesel and oil range TPH in the supplemental sampling (sample depths to 24 inches).
- Broad suites. Tronox will analyze for the broad suites as preferred by NDEP.
- Added analytes. Tronox will add the analytes requested by NDEP.

Thanks for the rapid response.

Keith

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**From:** Brian Rakvica [mailto:brakvica@ndep.nv.gov]  
**Sent:** Sunday, December 13, 2009 10:52 AM  
**To:** Keith Bailey; Susan Crowley; deni.chambers@ngem.com; Shannon Harbour  
**Cc:** Brian Rakvica  
**Subject:** RE: Tronox Area II Supplemental Sampling

Keith,

to insure there is no mis-communication...

NDEP has three conditions as follows:

- Based on a recent revision to the Nevada Administrative Code (NAC) 445A (Action Levels for Contaminated Sites), TRX may elect to discard sampling for TPH and instead sample using broad suites for VOCs, SVOCs, and metals.

12/14/2009

>>>Based on your response, it is not clear what TRX intends for this item.

- NDEP would prefer that broad suite analysis be used for VOCs, SVOCs, metals, OCPs, etc. that are proposed in this additional sampling plan. If TRX elects not to analyze using broad suites, then TRX should note that additional analytes may drive further remediation when broad suites are used during confirmation sampling.

>>>Based on your response, NDEP understands that TRX will complete the broad suite analyses.

- Based on a review of the submitted data, please add the following analytes, due to exceedances of the NDEP Basic Comparison Levels:
  - SA86: aldrin and alpha-BHC
  - SA106: Perchlorate
  - SA129: Aroclor 1260, magnesium, aldrin, perchlorate
  - SA165: aldrin

>>>Based on your response, NDEP understands that these analyses will be added to the sampling effort.

Please clarify re: the first bullet and any corrections to NDEP's understanding.

Thanks,

Brian

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**From:** Keith Bailey [okbailey@flash.net]  
**Sent:** Saturday, December 12, 2009 4:08 PM  
**To:** Brian Rakvica; Shannon Harbour; 'Susan Crowley [Contractor]'; 'tom'; 'Ellington, Toni'; 'Baker, Ken'; 'Diebenow, Julie'; 'K. Saravanan'  
**Cc:** deni.chambers@ngem.com; Jim Najima; 'Carolyn Tanner'; 'Derrick'  
**Subject:** RE: Tronox Area II Supplemental Sampling

Brian,

As NDEP requests, we will proceed with the broad suites for the contaminants exceeding the BCLs. We hope the data will show the extent of contamination and will eliminate the need for post remediation confirmation sampling. We will need a few more sample bottles, but Northgate will prioritize the sampling to allow drilling to proceed Monday.

Keith

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**From:** Brian Rakvica [mailto:brakvica@ndep.nv.gov]  
**Sent:** Friday, December 11, 2009 7:35 PM  
**To:** Keith Bailey; Shannon Harbour; 'Susan Crowley [Contractor]'; 'tom'; 'Ellington, Toni'; 'Baker, Ken'; 'Diebenow, Julie'  
**Cc:** deni.chambers@ngem.com; Brian Rakvica; Jim Najima; Carolyn Tanner (ctanner@ag.nv.gov)  
**Subject:** RE: Tronox Area II Supplemental Sampling  
**Importance:** High

12/14/2009

Keith,

See attached, hard copy to follow by mail.

Please advise how TRX plans to proceed, it is not NDEP's intention to delay the Monday sampling, we just need to know how these issues will be addressed.

I will be available all weekend if TRX has questions.

E-mail is best but my mobile is 702-271-0480.

Thanks,

Brian

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**From:** Keith Bailey [okbailey@flash.net]

**Sent:** Friday, December 11, 2009 2:58 PM

**To:** Shannon Harbour; Brian Rakvica; 'Susan Crowley [Contractor]'; 'tom'; 'Ellington, Toni'; 'Baker, Ken'; 'Diebenow, Julie'

**Subject:** Tronox Area II Supplemental Sampling

Shannon,

Attached is a proposal from Northgate/NGE LLC to perform supplemental sampling in Area II at the Tronox Henderson site. The proposed sampling at 31 borings will be similar to the additional sampling work conducted this week on Area I, with the exception that more analytes will be analyzed since more were found in the 0.5 foot Phase B samples.

We plan to perform the work beginning next Monday, December 14<sup>th</sup>.

If you have any questions or comments, please let us know.

Thanks for your help.

Keith

12/14/2009