



September 19, 2007

Ms. Shannon Harbour, P.E.  
Nevada Division of Environmental Protection  
Bureau of Corrective Actions  
2030 E. Flamingo Road, Suite 230  
Las Vegas, Nevada 89119-0818

**Subject: Phase 2 Sampling and Analysis Plan to Conduct Soil Characterization, Tronox Parcels "C" and "D" Site, Henderson, Nevada**

Dear Shannon:

On behalf of Tronox, Basic Environmental Company (BEC) appreciates the opportunity to submit this letter Phase 2 Sampling and Analysis Plan (SAP) to conduct soil characterization of Tronox Parcels "C" and "D" (portions of APN Nos. 178-12-201-005 and 178-12-101-003). Parcels C and D will collectively be referred to as the Site for the purposes of this SAP. The Site is located within the Tronox facility, south of Warm Springs Road, 1/2 mile west of the intersection with Boulder Highway, in Henderson, Nevada. Figure 1 illustrates the location of the subject Site within the Tronox property. Figure 1 also shows the various Tronox source areas. Figures 2 and 3 show details of Parcels C and D themselves. Legal boundaries of Parcels C and D will be provided to the Nevada Division of Environmental Protection (NDEP) prior to issuance of the requested No Further Action Determinations (NFADs).

**Background**

The Site, which represents a portion of the Tronox property, is comprised of primarily of vacant land, and includes portions of the historic "French drain system" along the southern portion of the Site, constructed by the original complex owners, in association with the historic Trade Effluent Settling Ponds. BEC also recognizes that other historic uses/disposals on or near the Site may have occurred. A Phase 1 investigation has been performed on the Site. The Phase 1 investigation, Site visits and historical aerial photographs analysis indicate a number of debris piles primarily from homeless encampments. These include one large debris pile that appears to be located in a natural drainage area and has been strewn across the Site from storm events. It does not appear that any burning occurred in relation to this debris pile. The debris piles have been removed prior to sampling. The debris piles were not associated with industrial waste or disposal. Given the vicinity of BMI Industrial Companies, it is also possible that the Site or portions thereof could also have been indirectly impacted by such operations.

A groundwater treatment system (GWTS), located between, but not on, Parcels C and D (see Figures 2 and 3), is operated under a Consent Order between the State of Nevada and Stauffer Chemical Company to remediate contaminated groundwater. Parcels C and D have been demarcated specifically to exclude the GWTS. The GWTS area has been demarcated as Parcel E (see Figure 1). This GWTS has been operational since December 1983. Presently, the GWTS is operated by Pioneer Americas, LLC (Pioneer) with technical assistance provided by the Montrose Chemical Corporation of California (Montrose) and Stauffer Management Company LLC (Stauffer). These entities are collectively referred to as the Companies. A number of

monitoring wells are located within the Site, which are used by the Companies for monitoring. For example, the GWTS Consent Order requires quarterly groundwater sampling and analyses for selected volatile organic compounds (VOCs) and other organic compounds. High levels of several VOCs have been detected in upgradient Consent Order monitor wells. Maximum contaminant levels (MCLs) were exceeded in the groundwater sample collected during the first quarter 2007 from upgradient Consent Order monitor well H-21R, located approximately 300 feet west of the Site, for the following compounds: 1,4-dichlorobenzene, benzene, and chlorobenzene. Whereas, low parts per billion (ppb) levels of VOCs were detected in samples collected from monitoring wells MC50, MC51 and MC53, downgradient of the GWTS and within the Site. Tronox conducted groundwater sampling as part of their Phase A investigation in November-December 2006, as well as sampling conducted for their quarterly performance report in February 2007. Results of both the Montrose and Tronox groundwater sampling events are presented in Table 1.

In order to address the potential presence of VOCs in groundwater and any potential impacts at the surface, this SAP proposes to collect soil vapor data in addition to sampling the soils for VOCs. Although high levels of VOCs may exist in groundwater in the southeast portion of the property, there is no indication that there are any on-Site sources of groundwater impacts. It is possible; however, based upon NDEP field observations, that the various extraction well heads leak contaminated groundwater onto the land surface. It is unclear whether these surface impacts are actually on Parcels C or D; or whether they on Parcel E, which is the parcel that holds the GWTS interception and recharge systems.

This Sampling and Analysis Plan will focus on the upper 10 feet of soil in order to obtain an NFAD from the NDEP in order to support future industrial/commercial use on this Site. No residential use is planned. Tronox anticipates that the site NFAD will contain a deed restriction precluding residential use of the property.

### **Objective**

The objective of the field investigation is to identify and characterize the distribution of Site-related chemicals (SRCs) in the vicinity of the future land use features (e.g., warehouses, commercial office buildings) and historical site features (e.g., historic French drain system, debris piles, possible burn areas, etc.). Surface and shallow subsurface samples that will be collected are depth-discrete soil matrix samples. Sample locations have been placed to both evaluate potential future land use exposures (although future plans are not fully defined at this time), and to characterize potential source areas on the Site. Source areas within the Tronox property are shown on Figure 1. The sample locations provide spatial coverage of the Site (Figures 2 and 3). The rationale for location of the sampling points is to ensure that the entire Site is reasonably and completely covered for sampling purposes in order to obtain data that are representative of the Site, that specific locations within the Site that were potentially impacted are also sampled, and that the sampled concentrations can be meaningfully used in subsequent risk assessments, if needed. Ultimately, the purpose of this sampling is to support the NFADs for Parcels C and D.

### **Scope of Work**

The following is the proposed scope of work for investigating the Site and meeting the SAP objectives. The scope of work has been divided into three main tasks: 1) Field Implementation; 2) Data Evaluation; and 3) Reporting.

***Task 1: Field Implementation***

The purpose of the intrusive investigation is to collect data sufficient to meet the objectives of the SAP. All sampling and sample handling procedures will be consistent with the NDEP-approved BRC Field Sampling and Standard Operating Procedures (FSSOP; BRC, ERM and MWH 2007a).

The proposed analyte list is composed of VOCs, semi-volatile organic compounds (SVOCs), total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons (PAHs), dioxins/furans, metals, organochlorine pesticides, perchlorate, ions (including chloride, nitrate, nitrite, and sulfate), radionuclides, and asbestos. This list includes all of the compounds (with a few additional modifications as discussed subsequently) on Tronox's "reduced list" as shown in Table 2. Tronox's reduced list was developed as a subset of the entire suite of Tronox SRCs based on the findings of the Tronox Phase A Source Area Investigation.

The modifications are as follows: first, in general instead of analyzing for specific members of certain analyte categories like metals, VOCs and SVOCs, the entire suite will be analyzed and reported; second, the organophosphate pesticide and chlorinated herbicide suites were eliminated since only three detections were in these analytical suites (dimethoate and demeton-o) which were at least an order of magnitude below their respective U.S. Environmental Protection Agency (USEPA) Region 9 industrial preliminary remediation goals (PRGs); third, polychlorinated biphenyls (PCBs) were eliminated since only a single Aroclor was detected once (in the central portion of the Tronox property at 20 feet below ground surface (bgs), well south of the Site) below its respective PRG; and lastly, not all SRCs are proposed to be analyzed at all depths in this SAP (for example, asbestos and dioxins/furans are proposed to be analyzed in surface soil samples only). Summary results of the Tronox Phase A investigation for PCBs, organophosphate pesticides, and chlorinated herbicides are provided in Table 3.

Given the absence of direct operations on this Site of a nature commensurate to that which took place on the Tronox plant site itself, the proposed SRC list and proposed sampling should characterize those sources that were located on the Site, as well as likely chemicals that may have been deposited on the Site via fugitive dust emissions from the Tronox operations and property and/or other neighboring BMI plants. The proposed analyte list for this SAP is presented in Table 2. Unless otherwise noted in the footnotes in Table 2, all analytes will be analyzed at all locations. BEC notes that this analyte list may not be appropriate for any future planned investigations (such as the proposed Tronox Phase B investigation) at the Site (which will extend from below 10 feet bgs to groundwater).

***Pre-Field Activities***

The pre-field activities will be conducted in accordance with applicable standard operating procedures (SOPs; BRC, ERM and MWH 2007a). The BRC Quality Assurance Project Plan (QAPP; BRC and MWH 2007b) and Health and Safety Plan (HASP; BRC and MWH 2005) prepared for the BMI Common Areas will be used for this proposed scope of work. All work will be completed under the direction of a State of Nevada Certified Environmental Manager.

***Soil Borings***

The SOPs referred to in the following discussion are documented in the FSSOP. BEC will implement field screening using photoionization detectors (PIPs) (using two lamps) in accordance with SOP-39. SOP-1 will be followed for all drilling activities including Hollow

Stem Auger drilling. The field geologist will prepare logs for each boring indicating the Unified Soil Classification System (USCS) soil classification (SOP-17), an estimate of field moisture content, sampling depths, progress of drilling (SOP-15), final completion depth, and the nature and resolution of any problems encountered.

Soil sample and auger boring locations will be surveyed using a handheld GPS to a horizontal accuracy of 3 meters (approximately 10 feet) or better. Soil cuttings generated during soil sampling and drilling activities will be collected on visqueen, analyzed, and appropriately disposed off. Due to the nature of the shallow sampling, it is not anticipated that a significant amount of excess soil will be generated as a result of the sampling, or that the soils will require special handling. Also, because the groundwater at the Site is generally 25 to 30 feet bgs, it is not anticipated that groundwater will be encountered during drilling of the shallow borings. The quality assurance/quality control (QA/QC) procedures that will be followed during the field investigation are detailed in Section B of the QAPP (BRC, ERM and MWH 2007b).

Soil matrix samples will be collected based on random sample locations placed within a 4-acre grid across the Site. The grid has been modified in this revision of the SAP based on the following: 1) started the grid along the western parcel boundary (for each parcel independently), 2) combined partial grids with either other partial grids or whole grids (which resulted in irregular shaped grid cells), and 3) made all grids approximately four acres in size. Grid sizes range from 1.5 to 4.3 acres. The random sample locations were supplemented with judgmental sampling locations targeting specific site features (e.g., miscellaneous pile locations). The rationale for the various judgmental sampling locations is provided below:

- Parcel C, grid cell ‘C-A1’ – historic french drain location;
- Parcel C, grid cell ‘C-A1’ – historic french drain location;
- Parcel C, grid cell ‘C-B1’ – historic french drain location;
- Parcel C, grid cell ‘C-D1’ – historic french drain location;
- Parcel C, grid cell ‘C-B1’ – drainage/roadway location; and
- Parcel D, grid cell ‘D-C2’ – debris pile/natural drainage area location.

Soil borings will be advanced with a hollow-stem auger to a total depth of 10 feet below ground surface (bgs). Soil samples will be collected at approximately zero (i.e., surface) and 10 feet bgs. Soil samples will be analyzed for the analyte list provided in Table 2, with limitations as noted in the footnotes to this table. Soil boring locations are shown on Figures 2 and 3.

#### *Soil Vapor*

Soil vapor samples will also be collected from the each of the random and judgmental locations identified above and shown on Figures 2 and 3. Soil vapor samples will be collected from a depth of ten feet bgs. SOP-37 will be followed for soil vapor sampling. Soil samples will be analyzed for the analyte list provided in Table 2.

#### ***Task 2: Data Evaluation***

Once the data are collected, BEC will subject the data to validation per procedures agreed to previously with the NDEP and consistent with the QAPP (BRC, ERM and MWH 2007b). Only those data determined by the QA/QC review to be suitable for use will be considered for the site data set. A separate Data Validation Summary Report will be prepared and submitted to NDEP.

***Task 3: Reporting***

Upon receipt of laboratory analytical results, an investigation report will be prepared. The report shall contain, but not be limited to, the following items:

- A summary of the sampling procedures conducted;
- Sampling location map;
- Soil boring logs;
- An evaluation and summary of the collected data;
- Tables(s) summarizing soil results; and
- If appropriate, plan view maps indicating the locations of detected constituents in soil.

Given the depth to groundwater at the Site (approximately 25 to 30 feet bgs, as measured at on-site monitoring wells), and the fact that future development will likely cover the Site with paved areas and buildings, migration of chemicals at the Site to groundwater is considered unlikely. However, once the data are collected this will be evaluated in the report. It should also be noted that development of the site will not preclude future groundwater investigation or remediation activities that may need to be conducted by Tronox.

Following collection and analysis of soil samples, the data will be discussed with the NDEP. This will include a comparison to the recently approved BRC-TIMET background data set (BRC/TIMET 2007). If required upon this evaluation, a risk assessment will be conducted to evaluate the potential risks to future on-site human receptors. The receptors identified to be evaluated in the risk assessment will be consistent with the proposed development of the Site. These receptors will include construction workers, indoor commercial workers, and outdoor maintenance workers. Because the proposed development does not include residential units, on-site residents will not be evaluated. The risk assessment will be conducted using standard USEPA guidance, input parameters, and methods. A risk assessment work plan will be submitted to NDEP after sample results have been obtained and NDEP approval will be obtained prior to conducting the risk assessment.

**Schedule**

Once final approval of the SAP is received from NDEP, field implementation activities can commence within one to two weeks. BEC will provide NDEP with at least one week notice prior to the initiation of field activities at the Site. It is anticipated that this work can be completed within one week, depending on field conditions. The soil samples will be submitted to the laboratories and placed on a standard turn around time, which is 28 days for the complete analyte list. A report will be completed within three weeks after the final data are received from the laboratory and validated.

**Closing Remarks**

See attached for appropriate certification language and signature. Please direct any remaining questions or comments you may have to me at 626-382-0001.

Sincerely,

Basic Environmental Company



Ranajit Sahu, CEM  
Project Manager

cc: Brian Rakvica, NDEP, BCA, Las Vegas, NV 89119  
Jim Najima, NDEP, BCA, Carson City, NV 89701

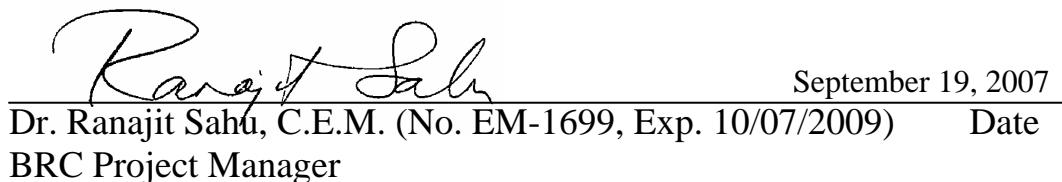
Attachments: Table 1 – Recent Groundwater Results for Monitoring Wells within/Adjacent to Parcels C and D  
Table 2 – Project List of Analytes – Soil/Soil Vapor  
Table 3 – Tronox Phase A PCB, Organophosphorous Pesticide and Chlorinated Herbicide Results Summary  
Figure 1 – Tronox/BEC Parcel Map with Tronox Source Areas  
Figure 2 – Proposed Sample Locations – Parcel “C”  
Figure 3 – Proposed Sample Locations – Parcel “D”

### **References**

- Basic Remediation Company (BRC) and MWH. 2005. BRC Health and Safety Plan, BMI Common Areas, Clark County, Nevada. October.
- Basic Remediation Company (BRC), ERM, and MWH. 2007a. BRC Field Sampling and Standard Operating Procedures, BMI Common Areas, Clark County, Nevada. August.
- Basic Remediation Company (BRC), ERM, and MWH. 2007b. BRC Quality Assurance Project Plan. BMI Common Areas, Clark County, Nevada. August.
- Basic Remediation Company (BRC) and Titanium Metals Corporation (TIMET). 2007. Background Shallow Soil Summary Report, BMI Complex and Common Areas Vicinity. March 16.

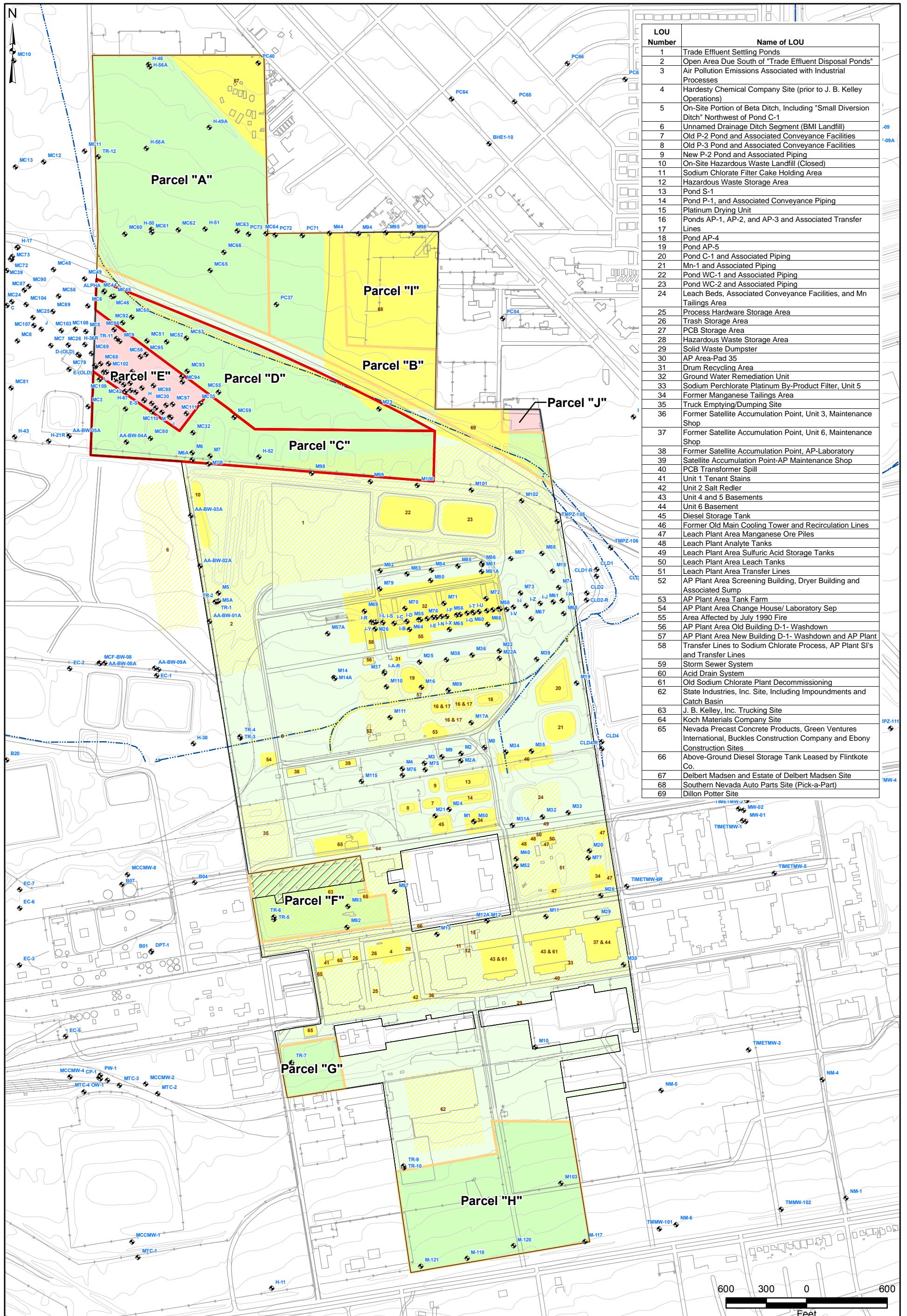
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I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state and local statutes, regulations and ordinances. I hereby certify that all laboratory analytical data was generated by a laboratory certified by the NDEP for each constituent and media presented herein.



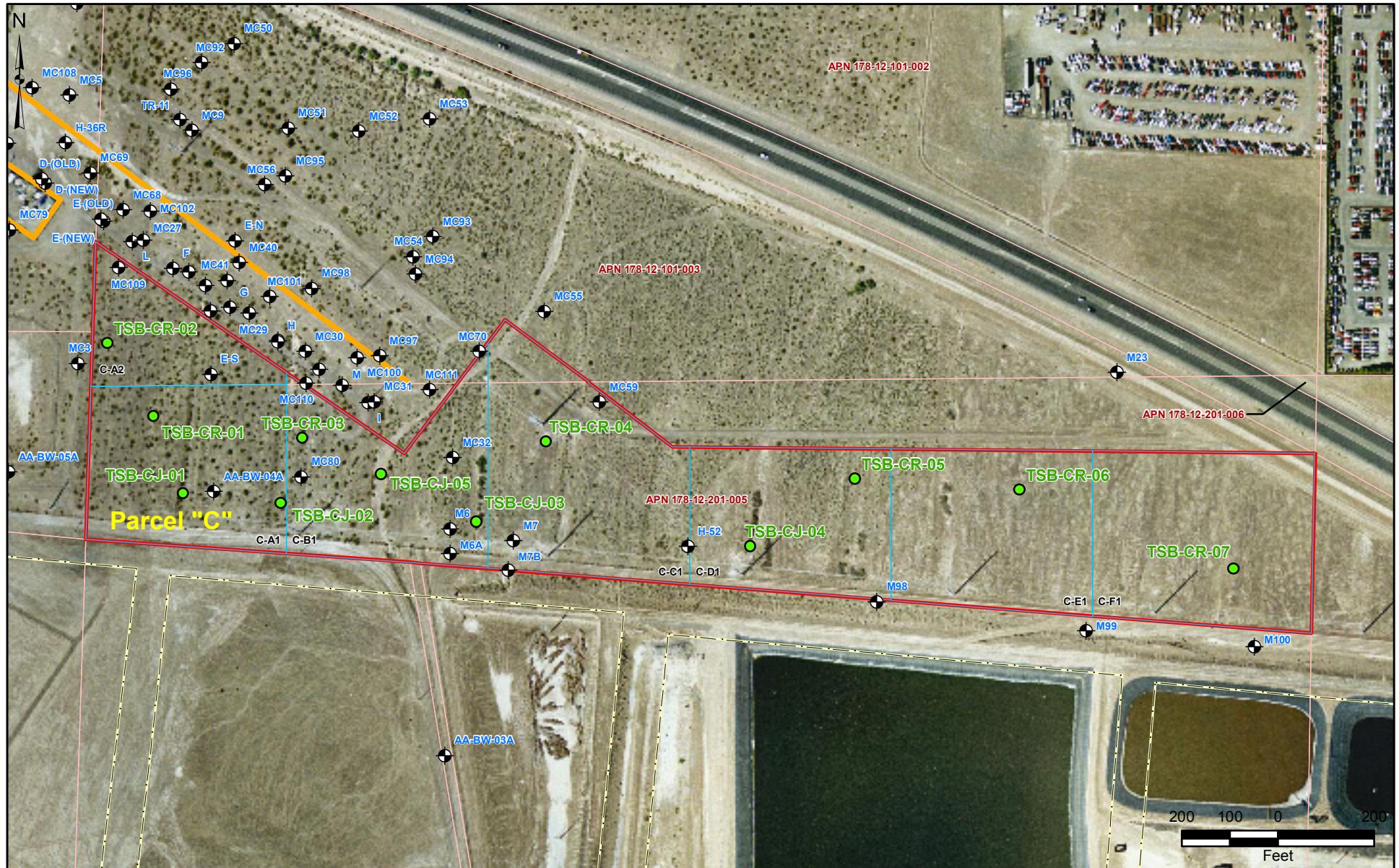
September 19, 2007  
Dr. Ranajit Sahu, C.E.M. (No. EM-1699, Exp. 10/07/2009) Date  
BCR Project Manager

## **FIGURES**



**FIGURE 1**  
**TRONOX/BEC PARCEL MAP**

Prepared by: MKJ Date: 09/17/07 Job No. 0069073 File: GIS/BEC/TRONOX/FIGURE\_1.MXD



● Proposed Sampling Location

● Monitoring Well

[ ] Historical Effluent Ponds

— Pioneer/Montrose GW Treatment System

4-Acre Random Sampling Grid (Grid ID = "C-X#")

Sample ID Nomenclature:  
TSB-CR(I)-01  
Parcel ID Random Judgmental Sample  
Sample Number

BEC / Tronox Sampling and Analysis Plan  
BMI Common Areas, Henderson, Nevada

FIGURE 2

PROPOSED SAMPLING LOCATIONS - PARCEL "C"



Prepared by:  
ERM

Date:  
09/12/07

JOB No. 0069073  
FILE: GIS/BEC/TRONOX/FIGURE\_2.MXD

Fall 2006 Aerial from Clark County GIS.



● Proposed Sampling Location

● Monitoring Well

[ ] Historical Effluent Ponds

— Pioneer/Montrose GW Treatment System

- - - Historical Northwestern Ditch

4-Acre Random Sampling  
Grid (Grid ID = "D-X#")

Sample ID Nomenclature:  
TSB-DR(j)-01  
Parcel ID Random Judgmental Sample  
Sample Number

Fall 2006 Aerial from Clark County GIS.

BEC / Tronox Sampling and Analysis Plan  
BMI Common Areas, Henderson, Nevada

FIGURE 3

PROPOSED SAMPLING  
LOCATIONS - PARCEL "D"



Prepared by:  
ERM

Date:  
09/12/07

JOB No. 0069073  
FILE: GIS/BEC/TRONOX/FIGURE\_3.MXD

## TABLES

**TABLE 1**  
**RECENT GROUNDWATER RESULTS FOR MONITORING WELLS**  
**WITHIN/ADJACENT TO PARCELS C AND D**  
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Analytical Method	Parameter	MCL	Location Date	MC-46 <sup>a</sup> 01/17/2007	MC-50 <sup>a</sup> 01/18/2007	MC-51 <sup>a</sup> 01/24/2007	MC-53 <sup>a</sup> 01/17/2007	M7B <sup>b</sup> 11/30/2006	M23 <sup>c</sup> 2/2007	M98 <sup>b</sup> 11/30/2006
Organic Acids	4-Chlorobenzenesulfonic acid	--	µg/L	<50	<50	<50	<50	NA	NA	NA
	Benzenesulfonic acid	--	µg/L	<50	<50	<50	<50	NA	NA	NA
	Diethyl phosphorodithioic acid	--	µg/L	<50	<50	<50	<50	NA	NA	NA
	Dimethyl phosphorodithioic acid	--	µg/L	<250	<250	<250	<250	NA	NA	NA
	Phthalic acid	--	µg/L	<50	<50	<50	<50	NA	NA	NA
EPA 160.1	Total Dissolved Solids	500	mg/L	NA	NA	NA	NA	<b>7650</b>	<b>5710</b>	<b>3900</b>
EPA 160.2	Total Suspended Solids	--	mg/L	NA	NA	NA	NA	37 J	NA	21 J
EPA 310.1	Alkalinity (as CaCO <sub>3</sub> )	--	mg/L	NA	NA	NA	NA	< 5 U	NA	< 5 U
	Bicarbonate Alkalinity	--	mg/L	NA	NA	NA	NA	98	NA	90
	Total Alkalinity	--	mg/L	NA	NA	NA	NA	98	NA	90
EPA 314.0	Perchlorate	18 / 24.5	µg/L	NA	NA	NA	NA	61000	649000	21800
EPA 350.1	Ammonia (as N)	--	µg/L	NA	NA	NA	NA	< 50 U	NA	< 50 U
EPA 425.1	MBAS	--	mg/L	NA	NA	NA	NA	4	NA	0.22
EPA 9012A	Cyanide	200	µg/L	NA	NA	NA	NA	R	NA	R
EPA 9040B	pH (liquid)	6.5-9	none	NA	NA	NA	NA	7.2 J	NA	7.1 J
EPA 9050A	Specific conductance	--	umhos/cm	NA	NA	NA	NA	4310	NA	2420
EPA 9056	Bromide	--	mg/L	NA	NA	NA	NA	84.1 J	NA	< 125 U
	Chlorate	--	mg/L	NA	NA	NA	NA	8	NA	25
	Chloride	250	mg/L	NA	NA	NA	NA	<b>4160</b>	NA	<b>1120</b>
	Nitrate	--	mg/L	NA	NA	NA	NA	< 10 U	NA	2.6
	Nitrite	1	mg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	ortho-Phosphate	--	mg/L	NA	NA	NA	NA	< 250 U	NA	33.5
	Sulfate	250	mg/L	NA	NA	NA	NA	<b>1690</b>	NA	<b>1100</b>
EPA 9060	Total organic carbon	--	mg/L	NA	NA	NA	NA	< 50 U	NA	< 50 U
EPA 6020	Aluminum	0.05	mg/L	NA	NA	NA	NA	<b>0.234 J</b>	NA	< 0.157 U
	Antimony	0.006	mg/L	NA	NA	NA	NA	< 0.05 U	NA	< 0.01 U
	Arsenic	0.01	mg/L	NA	NA	NA	NA	<b>0.0799 J</b>	NA	<b>0.184</b>
	Barium	2	mg/L	NA	NA	NA	NA	0.0383 J	NA	0.0163 J
	Beryllium	0.004	mg/L	NA	NA	NA	NA	< 0.0018 U	NA	< 0.0018 U
	Boron	--	mg/L	NA	NA	NA	NA	4.17	NA	3.2
	Cadmium	0.005	mg/L	NA	NA	NA	NA	< 0.0012 U	NA	< 0.0012 U
	Calcium	--	mg/L	NA	NA	NA	NA	613	NA	273
	Chromium, Total	0.1	mg/L	NA	NA	NA	NA	< 0.056 U	<b>0.82</b>	0.1 J
	Cobalt	--	mg/L	NA	NA	NA	NA	< 0.0063 U	NA	< 0.0063 U
	Copper	1.3	mg/L	NA	NA	NA	NA	0.0065 J	NA	0.0052
	Iron	0.3	mg/L	NA	NA	NA	NA	< 0.188 UJ	NA	< 0.188 UJ
	Lead	0.015	mg/L	NA	NA	NA	NA	< 0.0098 U	NA	< 0.0098 U
	Magnesium	--	mg/L	NA	NA	NA	NA	394	NA	147
	Manganese	0.05	mg/L	NA	NA	NA	NA	< 0.0342 U	NA	< 0.0068 U
	Molybdenum	--	mg/L	NA	NA	NA	NA	0.0264 J	NA	0.0271 J
	Nickel	--	mg/L	NA	NA	NA	NA	0.0195 J	NA	< 0.0103 U
	Platinum	--	mg/L	NA	NA	NA	NA	< 0.002 U	NA	< 0.002 U
	Potassium	--	mg/L	NA	NA	NA	NA	22.8	NA	8.11
	Selenium	0.05	mg/L	NA	NA	NA	NA	< 0.02 U	NA	< 0.02 U
	Silver	0.1	mg/L	NA	NA	NA	NA	< 0.0041 U	NA	< 0.0041 U
	Sodium	--	mg/L	NA	NA	NA	NA	1400	NA	847
	Strontium	--	mg/L	NA	NA	NA	NA	17.2	NA	6.62
	Thallium	0.002	mg/L	NA	NA	NA	NA	< 0.0064 U	NA	< 0.0064 U
	Tin	--	mg/L	NA	NA	NA	NA	< 0.004 U	NA	< 0.004 U
	Titanium	--	mg/L	NA	NA	NA	NA	0.0108 J	NA	< 0.0078 U
	Tungsten	--	mg/L	NA	NA	NA	NA	< 0.05 U	NA	< 0.01 U
	Uranium	--	mg/L	NA	NA	NA	NA	0.0436	NA	0.0411
	Vanadium	--	mg/L	NA	NA	NA	NA	< 0.16 U	NA	0.133 J
	Zinc	0.5	mg/L	NA	NA	NA	NA	< 0.0214 UJ	NA	< 0.02 UJ
EPA 7199	Hexavalent chromium	--	mg/L	NA	NA	NA	NA	< 0.004 UJ	NA	0.0932 J
EPA 7470A	Mercury	0.002	mg/L	NA	NA	NA	NA	< 0.000093 U	NA	< 0.000093 U
EPA 903.1	Radium-226 - soluble	5	pCi/L	NA	NA	NA	NA	0.457 J	NA	0.43 J
EPA 904.0	Radium-228 - soluble	5	pCi/L	NA	NA	NA	NA	0.947 J-	NA	0.465 J-
EPA 8151	2,4,5-TP (Silvex)	--	mg/L	NA	NA	NA	NA	< 1 U	NA	< 1 U
EPA 8082	Aroclor 1016	0.5	µg/L	NA	NA	NA	NA	< 0.1 U	NA	< 0.1 U
	Aroclor 1221	0.5	µg/L	NA	NA	NA	NA	< 0.1 U	NA	< 0.1 U
	Aroclor 1232	0.5	µg/L	NA	NA	NA	NA	< 0.1 U	NA	< 0.1 U
	Aroclor 1242	0.5	µg/L	NA	NA	NA	NA	< 0.1 U	NA	< 0.1 U
EPA 8082	Aroclor 1248	0.5	µg/L	NA	NA	NA	NA	< 0.1 U	NA	< 0.1 U
	Aroclor 1254	0.5	µg/L	NA	NA	NA	NA	< 0.1 U	NA	< 0.1 U
	Aroclor 1260	0.5	µg/L	NA	NA	NA	NA	< 0.1 U	NA	< 0.1 U

**TABLE 1**  
**RECENT GROUNDWATER RESULTS FOR MONITORING WELLS**  
**WITHIN/ADJACENT TO PARCELS C AND D**  
**(Page 2 of 8)**

Analytical Method	Parameter	MCL	Location Date Units	MC-46 <sup>a</sup> 01/17/2007	MC-50 <sup>a</sup> 01/18/2007	MC-51 <sup>a</sup> 01/24/2007	MC-53 <sup>a</sup> 01/17/2007	M7B <sup>b</sup> 11/30/2006	M23 <sup>c</sup> 2/2007	M98 <sup>b</sup> 11/30/2006
EPA 8081A	2,4'-DDD	--	µg/L	<2.4	<4.8	<1.9	<0.47	NA	NA	NA
	2,4'-DDE	--	µg/L	<2.4	<4.8	<1.9	<0.47	NA	NA	NA
	2,4'-DDT	--	µg/L	<2.4	<4.8	<1.9	<0.47	NA	NA	NA
	4,4-DDD	--	µg/L	<2.4	<4.80 C-1	<1.9	<0.47	<0.05 U	NA	<0.05 U
	4,4-DDE	--	µg/L	<2.4	<4.8	<1.9	<0.47	<0.05 U	NA	<0.05 U
	4,4-DDT	--	µg/L	<2.4	<4.8	<1.9	<0.47	<0.05 U	NA	<0.05 U
	Aldrin	--	µg/L	<2.4	<4.8	<1.9	<0.47	<0.05 U	NA	<0.05 U
	alpha-BHC	--	µg/L	<2.4	<4.8	<1.9	<0.47	<0.05 U	NA	<0.05 U
	alpha-Chlordane	2	µg/L	NA	NA	NA	<0.05 U	NA	<0.05 U	
	beta-BHC	--	µg/L	8.2	14	6.5	2	<0.05 U	NA	<0.05 U
	Chlordane (Tech)	2	µg/L	<24	<48	<19	<4.7	<0.5 U	NA	<0.5 U
	delta-BHC	--	µg/L	<4.7	<9.5	<3.8	<0.94	0.078	NA	<0.05 U
	Dieldrin	--	µg/L	<2.4	<4.8	<1.9	<0.50	<0.05 U	NA	<0.05 U
	Endosulfan I	--	µg/L	<2.4	<4.8	<1.9	<0.47	<0.05 U	NA	<0.05 U
	Endosulfan II	--	µg/L	<2.4	<4.8	<1.9	<0.47	<0.05 U	NA	<0.05 U
	Endosulfan Sulfate	--	µg/L	<4.7	<9.5	<4.00	<0.94	<0.05 U	NA	<0.05 U
	Endrin	2	µg/L	<2.4	<4.8	<1.9	<0.47	<0.05 U	NA	<0.05 U
	Endrin aldehyde	--	µg/L	<2.4	<4.8	<1.9	<0.47	<0.05 U	NA	<0.05 U
	Endrin ketone	--	µg/L	<2.4	<4.8	<1.9	<0.47	<0.05 U	NA	<0.05 U
	gamma-BHC (Lindane)	0.2	µg/L	<2.4	<4.8	<1.9	<0.47	0.2	NA	<0.05 U
	gamma-Chlordane	2	µg/L	NA	NA	NA	<0.05 U	NA	0.17 J	
	Heptachlor	0.2	µg/L	<2.4	<4.8	<1.9	<0.47	0.25 J	NA	<0.05 U
	Heptachlor epoxide	0.4	µg/L	<2.4	<4.8	<1.9	<0.47	<0.05 U	NA	<0.05 U
	Methoxychlor	40	µg/L	<2.4	<4.8	<1.9	<0.47	<0.1 U	NA	<0.1 U
	Toxaphene	3	µg/L	<120	<240	<95	<24	<2 U	NA	<2 U
EPA 8141A	Azinphos-methyl	--	µg/L	NA	NA	NA	<2.5 UJ	NA	<2.5 UJ	
	Bolstar	--	µg/L	NA	NA	NA	<1 U	NA	<1 U	
	Chlorpyrifos	--	µg/L	NA	NA	NA	<1 U	NA	<1 U	
	Coumaphos	--	µg/L	NA	NA	NA	<1 U	NA	<1 U	
	Demeton-O	--	µg/L	NA	NA	NA	<1 U	NA	<1 U	
	Demeton-S	--	µg/L	NA	NA	NA	<1 U	NA	<1 U	
	Diazinon	--	µg/L	NA	NA	NA	<1 U	NA	<1 U	
	Dichlorvos	--	µg/L	NA	NA	NA	<1 U	NA	<1 U	
	Dimethoate	--	µg/L	NA	NA	NA	<1 U	NA	<1 U	
	Disulfoton	--	µg/L	NA	NA	NA	<0.5 U	NA	<0.5 U	
	EPN	--	µg/L	NA	NA	NA	<1.2 U	NA	<1.2 U	
	Ethoprop	--	µg/L	NA	NA	NA	<0.5 U	NA	<0.5 U	
	Ethyl parathion	--	µg/L	NA	NA	NA	<1 U	NA	<1 U	
	Famphur	--	µg/L	NA	NA	NA	<1 U	NA	<1 U	
	Fensulfothion	--	µg/L	NA	NA	NA	<2.5 U	NA	<2.5 U	
	Fenthion	--	µg/L	NA	NA	NA	<2.5 U	NA	<2.5 U	
	Malathion	--	µg/L	NA	NA	NA	<1.2 U	NA	<1.2 U	
	Merphos	--	µg/L	NA	NA	NA	<5 U	NA	<5 U	
	Methyl parathion	--	µg/L	NA	NA	NA	<4 U	NA	<4 U	
	Mevinphos	--	µg/L	NA	NA	NA	<6.2 U	NA	<6.2 U	
	Naled	--	µg/L	NA	NA	NA	<1 UJ	NA	<1 UJ	
	Phorate	--	µg/L	NA	NA	NA	<1.2 U	NA	<1.2 U	
	Ronnel	--	µg/L	NA	NA	NA	<10 U	NA	<10 U	
	Stirphos	--	µg/L	NA	NA	NA	<3.5 U	NA	<3.5 U	
	Sulfotep	--	µg/L	NA	NA	NA	<1.5 U	NA	<1.5 U	
	Thionazin	--	µg/L	NA	NA	NA	<1 U	NA	<1 U	
	Tokuthion	--	µg/L	NA	NA	NA	<1.6 U	NA	<1.6 U	
	Trichloronate	--	µg/L	NA	NA	NA	<0.5 U	NA	<0.5 U	
EPA 8260B	1,1,1,2-Tetrachloroethane	--	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	1,1,1-Trichloroethane	200	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	1,1,2,2-Tetrachloroethane	--	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	1,1,2-Trichloroethane	5	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	1,1-Dichloroethane	--	µg/L	<2	<2	<2	<2	2.1 J	NA	<5 U
	1,1-Dichloroethene	7	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	1,1-Dichloropropene	--	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	1,2,3-Trichlorobenzene	--	µg/L	<5	5.4	<5	<5	<5 U	NA	<5 U
	1,2,3-Trichloropropane	--	µg/L	<10	<10	<10	<10	<5 U	NA	<5 U
	1,2,4-Trichlorobenzene	70	µg/L	<5	17	<5	<5	<5 U	NA	<5 U
	1,2,4-Trimethylbenzene	--	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	1,2-Dibromo-3-chloropropane	0.2	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	1,2-Dibromoethane	--	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U

**TABLE 1**  
**RECENT GROUNDWATER RESULTS FOR MONITORING WELLS**  
**WITHIN/ADJACENT TO PARCELS C AND D**  
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Analytical Method	Parameter	MCL	Location Date Units	MC-46 <sup>a</sup> 01/17/2007	MC-50 <sup>a</sup> 01/18/2007	MC-51 <sup>a</sup> 01/24/2007	MC-53 <sup>a</sup> 01/17/2007	M7B <sup>b</sup> 11/30/2006	M23 <sup>c</sup> 2/2007	M98 <sup>b</sup> 11/30/2006
EPA 8260B	1,2-Dichlorobenzene	600	µg/L	<2	2.2	<2	<2	<5 U	NA	<5 U
	1,2-Dichloroethane	5	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	1,2-Dichloropropane	5	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	1,3,5-Trimethylbenzene	--	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	1,3-Dichlorobenzene	--	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	1,3-Dichloropropane	--	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	1,4-Dichlorobenzene	75	µg/L	2.7	3.9	<2	<2	<5 U	NA	<5 U
	2,2-Dichloropropane	--	µg/L	<2	<2	<2	<2	<10 U	NA	<10 U
	2-Butanone	--	µg/L	NA	NA	NA	NA	<5 U	NA	<5 U
	2-Chlorotoluene	--	µg/L	<5	<5	<5	<5	<10 UJ	NA	<10 UJ
	2-Hexanone	--	µg/L	NA	NA	NA	NA	<5 U	NA	<5 U
	2-Methoxy-2-methyl-butane	--	µg/L	NA	NA	NA	NA	<5 U	NA	<5 U
	4-Chlorotoluene	--	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	4-Isopropyltoluene	--	µg/L	NA	NA	NA	NA	<10 U	NA	<10 U
	4-Methyl-2-pentanone	--	µg/L	NA	NA	NA	NA	<10 U	NA	<10 U
	Acetone	--	µg/L	NA	NA	NA	NA	<5 U	NA	<5 U
	Benzene	5	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	Bromobenzene	--	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	Bromo-chloromethane	--	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	Bromoform	80	µg/L	<5	<5	<5	<5	<10 UJ	NA	<10 UJ
	Chloroform		µg/L	3.6	4	31	6.6	<5 U	NA	9.6 J+
	Dibromochloromethane	--	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	Bromomethane	--	µg/L	<5	<5	<5	<5	<5 UJ	NA	<5 UJ
	Carbon tetrachloride	5	µg/L	<5	<5	<5	<5	2.3 J	NA	810 J+
	Chlorobenzene	100	µg/L	<2	<2	<2	<2	<5 UJ	NA	<5 UJ
	Chloroethane	--	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	Chloromethane	--	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	cis-1,2-Dichloroethene	70	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	cis-1,3-Dichloropropene	--	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	Dibromomethane	--	µg/L	<2	<2	<2	<2	<5 UJ	NA	<5 UJ
	Dichlorodifluoromethane	--	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	Dimethyl Disulfide	--	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	Ethyl t-butyl ether	--	µg/L	NA	NA	NA	NA	<5 U	NA	<5 U
	Ethylbenzene	700	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	Ethylene dibromide	--	µg/L	NA	NA	NA	NA	<5 U	NA	<5 U
	Hexachlorobutadiene	--	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	isopropyl ether	--	µg/L	NA	NA	NA	NA	<5 U	NA	<5 U
	Isopropylbenzene	--	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	p-Isopropyl tolue	--	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	Methyl tert butyl ether	--	µg/L	NA	NA	NA	NA	<5 U	NA	<5 U
	Methylene chloride	5	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	Naphthalene	--	µg/L	<5	<5	<5	<5	<5 UJ	NA	<5 UJ
	n-Butylbenzene	--	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	n-Propylbenzene	--	µg/L	<2	<2	<2	<2	<10 UJ	NA	<10 UJ
	sec-Butylbenzene	--	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	Styrene	--	µg/L	<2	<2	<2	<2	<5 U	NA	0.54 J+
	t-Butyl alcohol	--	µg/L	NA	NA	NA	NA	<5 U	NA	<5 U
	tert-Butylbenzene	--	µg/L	<5	<5	<5	<5	<5 U	NA	<5 U
	Tetrachloroethene	5	µg/L	<2	<2	<2	3.2	<5 U	NA	<5 U
	Toluene	1,000	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	trans-1,2-Dichloroethylene	100	µg/L	<2	<2	<2	<2	<5 UJ	NA	<5 UJ
	trans-1,3-Dichloropropene	--	µg/L	<2	<2	<2	<2	<5 U	NA	<5 U
	Trichloroethene	5	µg/L	<2	<2	<2	<2	<10 U	NA	<10 U
	Trichlorofluoromethane	--	µg/L	<5	<5	<5	<5	<10 U	NA	<10 U
	Vinyl chloride	2	µg/L	<5	<5	<5	<5	<10 U	NA	<10 U
	m,p-Xylene	10,000	µg/L	<2	<2	<2	<2	<10 U	NA	<10 U
	o-Xylene	10,000	µg/L	<2	<2	<2	<2	<10 U	NA	<10 U
	Xylene (Total)	10,000	µg/L	NA	NA	NA	NA	<10 U	NA	<10 U
EPA 8270C	Benz(a)anthracene	--	µg/L	NA	NA	NA	NA	<10 U	NA	<10 U
	Benzo(a)pyrene	0.2	µg/L	NA	NA	NA	NA	<10 U	NA	<10 U
	Benzo(b)fluoranthene	--	µg/L	NA	NA	NA	NA	<10 U	NA	<10 U
	Benzo(g,h,i)perylene	--	µg/L	NA	NA	NA	NA	<10 U	NA	<10 U
	Benzo(k)fluoranthene	--	µg/L	NA	NA	NA	NA	<10 U	NA	<10 U
	bis(2-Ethylhexyl)phthalate	--	µg/L	NA	NA	NA	NA	<10 U	NA	<10 U
	Butyl benzyl phthalate	--	µg/L	NA	NA	NA	NA	<10 U	NA	<10 U

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Analytical Method	Parameter	MCL	Location Date Units	MC-46 <sup>a</sup> 01/17/2007	MC-50 <sup>a</sup> 01/18/2007	MC-51 <sup>a</sup> 01/24/2007	MC-53 <sup>a</sup> 01/17/2007	M7B <sup>b</sup> 11/30/2006	M23 <sup>c</sup> 2/2007	M98 <sup>b</sup> 11/30/2006
EPA 8270C	Chrysene	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Dibenz(a,h)anthracene	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Diethyl phthalate	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Dimethyl phthalate	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Di-n-butyl phthalate	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Di-n-octyl phthalate	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Fluoranthene	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Fluorene	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Hexachlorobenzene	1	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Indeno(1,2,3-cd)pyrene	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Naphthalene	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Nitrobenzene	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Octachlorostyrene	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Phenanthrene	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Pyrrene	--	µg/L	NA	NA	NA	NA	< 10 U	NA	< 10 U
	Pyridine	--	µg/L	NA	NA	NA	NA	< 20 U	NA	< 20 U

a = From Montrose, Pioneer and Stauffer Quarterly Monitoring Report, First Quarter 2007, Henderson Groundwater Treatment System.

b = From Tronox Source Area Investigation, Phase A, May 2007.

c = From Tronox Quarterly Performance Report, Perchlorate Recovery System, January-March 2007, May 2007.

NA = Not analyzed.

C-1 Calibration Verification recovery was above the method control limit for this analyte, however the average % difference for all analytes met method criteria. See Calibration Summary form. [Custom Value]

J = The result is an estimated quantity. The associated numerical value is the approximate concentration of the analyte in the sample.

L = Laboratory Control Sample and/or Laboratory Control Sample Duplicate recovery was above the acceptance limits. Analyte not detected, data not impacted.

R = The sample result is rejected and unusable.

U = The analyte was analyzed for, but was not detected above the sample reporting limit

UJ = The analyte was not detected above the sample reporting limit and the reporting limit is approximate.

- = Result is biased low

+ = Result is biased high

**TABLE 1**  
**RECENT GROUNDWATER RESULTS FOR MONITORING WELLS**  
**WITHIN/ADJACENT TO PARCELS C AND D**  
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Analytical Method	Parameter	MCL	Location Date	M98 <sup>c</sup> 2/2007	M99 <sup>c</sup> 2/2007	M100 <sup>b</sup> 12/2006	M100D <sup>b</sup> 12/4/2006	M100 <sup>c</sup> 2/2007	MC45 <sup>b</sup> 12/6/2006
Organic Acids	4-Chlorobenzenesulfonic acid	--	µg/L	NA	NA	NA	NA	NA	NA
	Benzenesulfonic acid	--	µg/L	NA	NA	NA	NA	NA	NA
	Diethyl phosphorodithioic acid	--	µg/L	NA	NA	NA	NA	NA	NA
	Dimethyl phosphorodithioic acid	--	µg/L	NA	NA	NA	NA	NA	NA
	Phthalic acid	--	µg/L	NA	NA	NA	NA	NA	NA
EPA 160.1	Total Dissolved Solids	500	mg/L	<b>3610</b>	<b>5750</b>	<b>1670</b>	<b>1630</b>	<b>1680</b>	<b>10500</b>
EPA 160.2	Total Suspended Solids	--	mg/L	NA	NA	12 J	7 J	NA	6 J
EPA 310.1	Alkalinity (as CaCO <sub>3</sub> )	--	mg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Bicarbonate Alkalinity	--	mg/L	NA	NA	126	136	NA	286
	Total Alkalinity	--	mg/L	NA	NA	126	136	NA	286
EPA 314.0	Perchlorate	18 / 24.5	µg/L	17000	780000	51400 J+	50700 J+	43000	7940 J+
EPA 350.1	Ammonia (as N)	--	µg/L	NA	NA	3620	3770	NA	< 50 U
EPA 425.1	MBAS	--	mg/L	NA	NA	0.41	0.34	NA	1.8 J
EPA 9012A	Cyanide	200	µg/L	NA	NA	R	R	NA	R
EPA 9040B	pH (liquid)	6.5-9	none	NA	NA	7.5 J	7.6 J	NA	7.1 J
EPA 9050A	Specific conductance	--	umhos/cm	NA	NA	1360 J+	1410 J+	NA	4020 J+
EPA 9056	Bromide	--	mg/L	NA	NA	0.22 J	0.23 J	NA	< 25 U
	Chlorate	--	mg/L	NA	NA	85	108	NA	< 5 U
	Chloride	250	mg/L	NA	NA	165	168	NA	<b>4460</b>
	Nitrate	--	mg/L	NA	NA	12.8	12.9	NA	< 2 U
	Nitrite	1	mg/L	NA	NA	<b>1.9</b>	<b>2.2</b>	NA	<b>80.6</b>
	ortho-Phosphate	--	mg/L	NA	NA	119	121	NA	< 50 U
	Sulfate	250	mg/L	NA	NA	<b>3520</b>	<b>3530</b>	NA	<b>1870</b>
EPA 9060	Total organic carbon	--	mg/L	NA	NA	< 50 U	< 50 U	NA	< 50 U
EPA 6020	Aluminum	0.05	mg/L	NA	NA	< 0.0786 U	< 0.0786 U	NA	<b>0.224 J+</b>
	Antimony	0.006	mg/L	NA	NA	< 0.005 U	< 0.005 U	NA	0.0011
	Arsenic	0.01	mg/L	NA	NA	<b>0.0853</b>	<b>0.0889</b>	NA	<b>0.175</b>
	Barium	2	mg/L	NA	NA	0.024	0.0236	NA	0.0395
	Beryllium	0.004	mg/L	NA	NA	< 0.00088 U	< 0.00088 U	NA	< 0.0018 U
	Boron	--	mg/L	NA	NA	1.91 J	1.88 J-	NA	1.2 J-
	Cadmium	0.005	mg/L	NA	NA	< 0.00057 U	< 0.00057 U	NA	0.00014 J
	Calcium	--	mg/L	NA	NA	123	120	NA	213
	Chromium, Total	0.1	mg/L	0.09	<b>1.1</b>	<b>0.29</b>	<b>0.292</b>	<b>0.26</b>	< 0.0028 U
	Cobalt	--	mg/L	NA	NA	< 0.0031 U	< 0.0031 U	NA	0.0037
	Copper	1.3	mg/L	NA	NA	0.0042 J	0.0028 J	NA	0.0077
	Iron	0.3	mg/L	NA	NA	R	R	NA	R
	Lead	0.015	mg/L	NA	NA	< 0.0049 U	< 0.0049 U	NA	0.0028 J
	Magnesium	--	mg/L	NA	NA	50.8	50.3	NA	230
	Manganese	0.05	mg/L	NA	NA	< 0.0244 UJ	< 0.0241 UJ	NA	<b>0.553 J-</b>
	Molybdenum	--	mg/L	NA	NA	0.01 J	0.0095 J	NA	0.03
	Nickel	--	mg/L	NA	NA	< 0.0052 U	< 0.0052 U	NA	0.0072
	Platinum	--	mg/L	NA	NA	< 0.001 U	< 0.001 U	NA	< 0.0001 U
	Potassium	--	mg/L	NA	NA	6.68	6.62	NA	34.3
	Selenium	0.05	mg/L	NA	NA	< 0.01 U	< 0.01 U	NA	0.0023 J
	Silver	0.1	mg/L	NA	NA	< 0.002 U	< 0.002 U	NA	< 0.0002 U
	Sodium	--	mg/L	NA	NA	304	302	NA	3480
	Strontium	--	mg/L	NA	NA	3.94 J	3.89 J	NA	9.14 J-
	Thallium	0.002	mg/L	NA	NA	< 0.0032 U	< 0.0032 U	NA	< 0.0004 U
	Tin	--	mg/L	NA	NA	< 0.002 U	< 0.002 U	NA	0.005
	Titanium	--	mg/L	NA	NA	0.006 J	< 0.0039 U	NA	< 0.018 U
	Tungsten	--	mg/L	NA	NA	< 0.005 UJ	< 0.005 UJ	NA	< 0.01 UJ
	Uranium	--	mg/L	NA	NA	0.0227	0.0222	NA	0.0227
	Vanadium	--	mg/L	NA	NA	0.207 J-	0.209 J-	NA	0.56 J-
	Zinc	0.5	mg/L	NA	NA	< 0.0256 U	< 0.024 U	NA	< 0.0256 U
EPA 7199	Hexavalent chromium	--	mg/L	NA	NA	0.286 J	0.287 J	NA	0.0051 J
EPA 7470A	Mercury	0.002	mg/L	NA	NA	0.000093 U	0.000093 U	NA	< 0.000093 U
EPA 903.1	Radium-226 - soluble	5	pCi/L	NA	NA	0.195 J-	0.0806 UJ	NA	< 0.0802 U
EPA 904.0	Radium-228 - soluble	5	pCi/L	NA	NA	0.294 UJ	0.388 UJ	NA	0.503 UJ
EPA 8151	2,4,5-TP (Silvex)	--	mg/L	NA	NA	< 1 U	< 1 U	NA	NA
EPA 8082	Aroclor 1016	0.5	µg/L	NA	NA	< 0.1 U	< 0.1 U	NA	< 0.1 U
	Aroclor 1221	0.5	µg/L	NA	NA	< 0.1 U	< 0.1 U	NA	< 0.1 U
	Aroclor 1232	0.5	µg/L	NA	NA	< 0.1 U	< 0.1 U	NA	< 0.1 U
	Aroclor 1242	0.5	µg/L	NA	NA	< 0.1 U	< 0.1 U	NA	< 0.1 U
EPA 8082	Aroclor 1248	0.5	µg/L	NA	NA	< 0.1 U	< 0.1 U	NA	< 0.1 U
	Aroclor 1254	0.5	µg/L	NA	NA	< 0.1 U	< 0.1 U	NA	< 0.1 U
	Aroclor 1260	0.5	µg/L	NA	NA	< 0.1 U	< 0.1 U	NA	< 0.1 U

**TABLE 1**  
**RECENT GROUNDWATER RESULTS FOR MONITORING WELLS**  
**WITHIN/ADJACENT TO PARCELS C AND D**  
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Analytical Method	Parameter	MCL	Location Date Units	M98 <sup>c</sup> 2/2007	M99 <sup>c</sup> 2/2007	M100 <sup>b</sup> 12/2006	M100D <sup>b</sup> 12/4/2006	M100 <sup>c</sup> 2/2007	MC45 <sup>b</sup> 12/6/2006
EPA 8081A	2,4'-DDD	--	µg/L	NA	NA	NA	NA	NA	NA
	2,4'-DDE	--	µg/L	NA	NA	NA	NA	NA	NA
	2,4'-DDT	--	µg/L	NA	NA	NA	NA	NA	NA
	4,4-DDD	--	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	4,4-DDE	--	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	4,4-DDT	--	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	Aldrin	--	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	alpha-BHC	--	µg/L	NA	NA	0.082	0.087	NA	0.79
	alpha-Chlordane	2	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	beta-BHC	--	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	10 J-
	Chlordane (Tech)	2	µg/L	NA	NA	< 0.5 U	< 0.5 U	NA	< 0.5 U
	delta-BHC	--	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	0.98
	Dieldrin	--	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	Endosulfan I	--	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	Endosulfan II	--	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	Endosulfan Sulfate	--	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	Endrin	2	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	Endrin aldehyde	--	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	Endrin ketone	--	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	gamma-BHC (Lindane)	0.2	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	gamma-Chlordane	2	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	Heptachlor	0.2	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	Heptachlor epoxide	0.4	µg/L	NA	NA	< 0.05 U	< 0.05 U	NA	< 0.05 U
	Methoxychlor	40	µg/L	NA	NA	< 0.1 U	< 0.1 U	NA	< 0.1 U
	Toxaphene	3	µg/L	NA	NA	< 2 U	< 2 U	NA	< 2 U
EPA 8141A	Azinphos-methyl	--	µg/L	NA	NA	< 2.5 U	< 2.5 U	NA	< 2.5 U
	Bolstar	--	µg/L	NA	NA	< 1 U	< 1 U	NA	< 1 U
	Chlorpyrifos	--	µg/L	NA	NA	< 1 U	< 1 U	NA	< 1 U
	Coumaphos	--	µg/L	NA	NA	< 1 U	< 1 U	NA	< 1 U
	Demeton-O	--	µg/L	NA	NA	< 1 U	< 1 U	NA	< 1 U
	Demeton-S	--	µg/L	NA	NA	< 1 UJ	< 1 UJ	NA	< 1 U
	Diazinon	--	µg/L	NA	NA	< 1 U	< 1 U	NA	< 1 U
	Dichlorvos	--	µg/L	NA	NA	< 1 U	< 1 U	NA	< 1 U
	Dimethoate	--	µg/L	NA	NA	< 1 U	< 1 U	NA	< 1 U
	Disulfoton	--	µg/L	NA	NA	< 0.5 U	< 0.5 U	NA	< 0.5 U
	EPN	--	µg/L	NA	NA	< 1.2 U	< 1.2 U	NA	< 1.2 U
	Ethoprop	--	µg/L	NA	NA	< 0.5 U	< 0.5 U	NA	< 0.5 U
	Ethyl parathion	--	µg/L	NA	NA	< 1 U	< 1 U	NA	< 1 U
	Famphur	--	µg/L	NA	NA	< 1 U	< 1 U	NA	< 1 U
	Fensulfothion	--	µg/L	NA	NA	< 2.5 U	< 2.5 U	NA	< 2.5 U
	Fenthion	--	µg/L	NA	NA	< 2.5 U	< 2.5 U	NA	< 2.5 U
	Malathion	--	µg/L	NA	NA	< 1.2 U	< 1.2 U	NA	< 1.2 U
	Merphos	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Methyl parathion	--	µg/L	NA	NA	< 4 U	< 4 U	NA	< 4 U
	Mevinphos	--	µg/L	NA	NA	< 6.2 U	< 6.2 U	NA	< 6.2 U
	Naled	--	µg/L	NA	NA	< 1 UJ	< 1 UJ	NA	< 1 U
	Phorate	--	µg/L	NA	NA	< 1.2 U	< 1.2 U	NA	< 1.2 U
	Ronnel	--	µg/L	NA	NA	< 10 U	< 10 U	NA	< 10 U
	Stirphos	--	µg/L	NA	NA	< 3.5 U	< 3.5 U	NA	< 3.5 U
	Sulfotep	--	µg/L	NA	NA	< 1.5 U	< 1.5 U	NA	< 1.5 U
	Thionazin	--	µg/L	NA	NA	< 1 U	< 1 U	NA	< 1 U
	Tokuthion	--	µg/L	NA	NA	< 1.6 U	< 1.6 U	NA	< 1.6 U
	Trichloronate	--	µg/L	NA	NA	< 0.5 U	< 0.5 U	NA	< 0.5 U
EPA 8260B	1,1,1,2-Tetrachloroethane	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	1,1,1-Trichloroethane	200	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	1,1,2,2-Tetrachloroethane	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	1,1,2-Trichloroethane	5	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	1,1-Dichloroethane	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	1,1-Dichloroethene	7	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	1,1-Dichloropropene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	1,2,3-Trichlorobenzene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	1.6 J
	1,2,3-Trichloropropane	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	1,2,4-Trichlorobenzene	70	µg/L	NA	NA	< 5 U	< 5 U	NA	7.1
	1,2,4-Trimethylbenzene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	1,2-Dibromo-3-chloropropane	0.2	µg/L	NA	NA	< 5 UJ	< 5 UJ	NA	< 5 U
	1,2-Dibromoethane	--	µg/L	NA	NA	0.48 J	0.6 J	NA	5.6

**TABLE 1**  
**RECENT GROUNDWATER RESULTS FOR MONITORING WELLS**  
**WITHIN/ADJACENT TO PARCELS C AND D**  
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Analytical Method	Parameter	MCL	Location Date Units	M98 <sup>c</sup> 2/2007	M99 <sup>c</sup> 2/2007	M100 <sup>b</sup> 12/2006	M100D <sup>b</sup> 12/4/2006	M100 <sup>c</sup> 2/2007	MC45 <sup>b</sup> 12/6/2006
EPA 8260B	1,2-Dichlorobenzene	600	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	1,2-Dichloroethane	5	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	1,2-Dichloropropane	5	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	1,3,5-Trimethylbenzene	--	µg/L	NA	NA	0.6 J	0.73 J	NA	< 5 U
	1,3-Dichlorobenzene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	1,3-Dichloropropane	--	µg/L	NA	NA	1.5 J	0.72 J	NA	8.3
	1,4-Dichlorobenzene	75	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	2,2-Dichloropropane	--	µg/L	NA	NA	< 10 U	< 10 U	NA	< 10 U
	2-Butanone	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	2-Chlorotoluene	--	µg/L	NA	NA	< 10 U	< 10 U	NA	< 10 UJ
	2-Hexanone	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 UJ
	2-Methoxy-2-methyl-butane	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	4-Chlorotoluene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	4-Isopropyltoluene	--	µg/L	NA	NA	< 10 UJ	< 10 UJ	NA	< 10 UJ
	4-Methyl-2-pentanone	--	µg/L	NA	NA	< 10 U	< 10 U	NA	< 10 U
	Acetone	--	µg/L	NA	NA	< 5 U	< 5 U	NA	0.22 J
	Benzene	5	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Bromobenzene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Bromoform	80	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Chloroform		µg/L	NA	NA	< 10 UJ	< 10 UJ	NA	< 10 U
	Dibromochloromethane		µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Bromomethane		µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Carbon tetrachloride		5	µg/L	NA	NA	36	38	NA
	Chlorobenzene		100	µg/L	NA	NA	< 5 U	< 5 U	NA
	Chloroethane		--	µg/L	NA	NA	< 5 U	< 5 U	NA
	Chloromethane		--	µg/L	NA	NA	< 5 U	< 5 U	NA
	cis-1,2-Dichloroethene	70	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	cis-1,3-Dichloropropene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Dibromomethane	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 UJ
	Dichlorodifluoromethane	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 UJ
	Dimethyl Disulfide	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Ethyl t-butyl ether	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Ethylbenzene	700	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Ethylene dibromide	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Hexachlorobutadiene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	isopropyl ether	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Isopropylbenzene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 UJ
	p-Isopropyl toluene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Methyl tert butyl ether	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Methylene chloride	5	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Naphthalene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	n-Butylbenzene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	n-Propylbenzene	--	µg/L	NA	NA	< 10 UJ	< 10 UJ	NA	< 10 UJ
	sec-Butylbenzene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Styrene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	0.55 J
	t-Butyl alcohol	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	tert-Butylbenzene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Tetrachloroethene	5	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Toluene	1,000	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	trans-1,2-Dichloroethylene	100	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	trans-1,3-Dichloropropene	--	µg/L	NA	NA	< 5 U	< 5 U	NA	< 5 U
	Trichloroethene	5	µg/L	NA	NA	< 10 U	< 10 U	NA	< 10 UJ
	Trichlorofluoromethane	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Vinyl chloride	2	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	m,p-Xylene	10,000	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	o-Xylene	10,000	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Xylene (Total)	10,000	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
EPA 8270C	Benz(a)anthracene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Benzo(a)pyrene	0.2	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Benzo(b)fluoranthene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Benzo(g,h,i)perylene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Benzo(k)fluoranthene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	bis(2-Ethylhexyl)phthalate	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Butyl benzyl phthalate	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U

**TABLE 1**  
**RECENT GROUNDWATER RESULTS FOR MONITORING WELLS**  
**WITHIN/ADJACENT TO PARCELS C AND D**  
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Analytical Method	Parameter	MCL	Location Date Units	M98 <sup>c</sup> 2/2007	M99 <sup>c</sup> 2/2007	M100 <sup>b</sup> 12/2006	M100D <sup>b</sup> 12/4/2006	M100 <sup>c</sup> 2/2007	MC45 <sup>b</sup> 12/6/2006
EPA 8270C	Chrysene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Dibenz(a,h)anthracene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Diethyl phthalate	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Dimethyl phthalate	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Di-n-butyl phthalate	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Di-n-octyl phthalate	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Fluoranthene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Fluorene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Hexachlorobenzene	1	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Indeno(1,2,3-cd)pyrene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 UJ
	Naphthalene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 UJ
	Nitrobenzene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Octachlorostyrene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Phenanthrene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Pyrrene	--	µg/L	NA	NA	< 10 UJ	< 10 U	NA	< 10 U
	Pyridine	--	µg/L	NA	NA	< 20 UJ	< 20 UJ	NA	< 20 U

a = From Montrose, Pioneer and Stauffer Quarterly Monitoring Report, First Quarter 2007, Henderson Groundwater Treatment System.

b = From Tronox Source Area Investigation, Phase A, May 2007.

c = From Tronox Quarterly Performance Report, Perchlorate Recovery System, January-March 2007, May 2007.

NA = Not analyzed.

C-1 Calibration Verification recovery was above the method control limit for this analyte, however the average % difference for all analytes met method criteria. See Calibration Summary form. [Custom Value]

J = The result is an estimated quantity. The associated numerical value is the approximate concentration of the analyte in the sample.

L = Laboratory Control Sample and/or Laboratory Control Sample Duplicate recovery was above the acceptance limits. Analyte not detected, data not impacted.

R = The sample result is rejected and unusable.

U = The analyte was analyzed for, but was not detected above the sample reporting limit

UJ = The analyte was not detected above the sample reporting limit and the reporting limit is approximate.

- = Result is biased low

+ = Result is biased high

**TABLE 2**  
**PROJECT LIST OF ANALYTES – SOIL/SOIL VAPOR**  
**(Page 1 of 8)**

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC		Soil Sample Analysis		Soil Vapor (10 ft bgs)
				Soil	Ground-water	Surface (0 ft bgs)	Subsurface (10 ft bgs)	
Ions	EPA 300.0	Bromide	24959-67-9			X	X	
		Bromine	7726-95-6			X	X	
		Chlorate	14866-68-3			X	X	
		Chloride	16887-00-6	X	X	X	X	
		Chlorine (soluble)	7782-50-5			X	X	
		Chlorite	14998-27-7			X	X	
		Fluoride	16984-48-8			X	X	
		Nitrate (as N)	14797-55-8	X	X	X	X	
		Nitrite (as N)	14797-65-0			X	X	
		Orthophosphate	14265-44-2			X	X	
		Sulfate	14808-79-8	X	X	X	X	
	EPA 314.0	Perchlorate	14797-73-0	X	X	X	X	
Polychlorinated Dibenzodioxins/ Dibenzofurans	EPA 8290	1,2,3,4,6,7,8,9-Octachlorodibenzofuran	39001-02-0			X		
		1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	3268-87-9			X		
		1,2,3,4,6,7,8-Heptachlorodibenzofuran	67562-39-4			X		
		1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	35822-46-9			X		
		1,2,3,4,7,8,9-Heptachlorodibenzofuran	55673-89-7			X		
		1,2,3,4,7,8-Hexachlorodibenzofuran	70648-26-9			X		
		1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	39227-28-6			X		
		1,2,3,6,7,8-Hexachlorodibenzofuran	57117-44-9			X		
		1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	57653-85-7			X		
		1,2,3,7,8,9-Hexachlorodibenzofuran	72918-21-9			X		
		1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	19408-74-3			X		
		1,2,3,7,8-Pentachlorodibenzofuran	57117-41-6			X		
		1,2,3,7,8-Pentachlorodibenzo-p-dioxin	40321-76-4			X		
		2,3,4,6,7,8-Hexachlorodibenzofuran	60851-34-5			X		
		2,3,4,7,8-Pentachlorodibenzofuran	57117-31-4			X		
		2,3,7,8-Tetrachlorodibenzofuran	51207-31-9			X		
		2,3,7,8-Tetrachlorodibenzo-p-dioxin	1746-01-6			X		
Asbestos	Elutriator/TEM	Asbestos	1332-21-4	X		X		
Metals	EPA 6020/6010B	Aluminum	7429-90-5		X	X	X	
		Antimony	7440-36-0	X	X	X	X	
		Arsenic	7440-38-2	X	X	X	X	
		Barium	7440-39-3		X	X	X	
		Beryllium	7440-41-7		X	X	X	
		Boron	7440-42-8	X	X	X	X	
		Cadmium	7440-43-9		X	X	X	
		Calcium	7440-70-2	X	X	X	X	

**TABLE 2**  
**PROJECT LIST OF ANALYTES – SOIL/SOIL VAPOR**  
**(Page 2 of 8)**

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC		Soil Sample Analysis		Soil Vapor (10 ft bgs)
				Soil	Ground-water	Surface (0 ft bgs)	Subsurface (10 ft bgs)	
Metals (continued)	EPA 6020/6010B	Chromium	7440-47-3	X	X	X	X	
		Cobalt	7440-48-4		X	X	X	
		Copper	7440-50-8			X	X	
		Iron	7439-89-6		X	X	X	
		Lead	7439-92-1	X	X	X	X	
		Lithium	1313-13-9			X	X	
		Magnesium	7439-95-4		X	X	X	
		Manganese	7439-96-5	X	X	X	X	
		Molybdenum	7439-98-7		X	X	X	
		Nickel	7440-02-0		X	X	X	
		Niobium	7440-03-1			X	X	
		Palladium	7440-05-3			X	X	
		Phosphorus	7723-14-0			X	X	
		Platinum	7440-06-4			X	X	
		Potassium	7440-09-7			X	X	
		Selenium	7782-49-2			X	X	
		Silicon	7440-21-3			X	X	
		Silver	7440-22-4			X	X	
		Sodium	7440-23-5	X	X	X	X	
		Strontium	7440-24-6	X	X	X	X	
		Sulfur	7704-34-9			X	X	
		Thallium	7440-28-0		X	X	X	
		Tin	7440-31-5			X	X	
		Titanium	7440-32-6			X	X	
		Tungsten	7440-33-7			X	X	
		Uranium	7440-61-1		X	X	X	
		Vanadium	7440-62-2		X	X	X	
		Zinc	7440-66-6			X	X	
		Zirconium	7440-67-7			X	X	
	EPA 7196A	Chromium (VI)	18540-29-9	X	X	X	X	
Organochlorine Pesticides	EPA 8081A	2,4-DDD	53-19-0			X	X	
		2,4-DDE	3424-82-6			X	X	
		4,4-DDD	72-54-8			X	X	
		4,4-DDE	72-55-9			X	X	
		4,4-DDT	50-29-3			X	X	
		Aldrin	309-00-2			X	X	
		alpha-BHC	319-84-6		X	X	X	
		alpha-Chlordane	5103-71-9			X	X	

**TABLE 2**  
**PROJECT LIST OF ANALYTES – SOIL/SOIL VAPOR**  
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Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC		Soil Sample Analysis		Soil Vapor (10 ft bgs)
				Soil	Ground-water	Surface (0 ft bgs)	Subsurface (10 ft bgs)	
<b>Organochlorine Pesticides (continued)</b>	<b>EPA 8081A</b>	beta-BHC	319-85-7	X	X	X	X	
		Chlordane	57-74-9			X	X	
		delta-BHC	319-86-8		X	X	X	
		Dieldrin	60-57-1			X	X	
		Endosulfan I	959-98-8			X	X	
		Endosulfan II	33213-65-9			X	X	
		Endosulfan sulfate	1031-07-8			X	X	
		Endrin	72-20-8			X	X	
		Endrin aldehyde	7421-93-4			X	X	
		Endrin ketone	53494-70-5			X	X	
		gamma-BHC (Lindane)	58-89-9		X	X	X	
		gamma-Chlordane	5103-74-2			X	X	
		Heptachlor	76-44-8		X	X	X	
		Heptachlor epoxide	1024-57-3			X	X	
		Methoxychlor	72-43-5			X	X	
		Toxaphene	8001-35-2			X	X	
<b>Polynuclear Aromatic Hydrocarbons</b>	<b>EPA 8310<sup>1</sup></b>	Acenaphthene	83-32-9			X	X	
		Acenaphthylene	208-96-8			X	X	
		Anthracene	120-12-7			X	X	
		Benzo(a)anthracene	56-55-3			X	X	
		Benzo(a)pyrene	50-32-8	X		X	X	
		Benzo(b)fluoranthene	205-99-2			X	X	
		Benzo(g,h,i)perylene	191-24-2			X	X	
		Benzo(k)fluoranthene	207-08-9			X	X	
		Chrysene	218-01-9			X	X	
		Dibenzo(a,h)anthracene	53-70-3			X	X	
		Indeno(1,2,3-cd)pyrene	193-39-5			X	X	
		Phenanthrene	85-01-8			X	X	
		Pyrene	129-00-0			X	X	
<b>Radionuclides</b>	<b>HASL A-01-R</b>	Thorium-228	14274-82-9	X	X	X	X	
		Thorium-230	14269-63-7	X	X	X	X	
		Thorium-232	7440-29-1		X	X	X	
		Uranium-233/234	13966-29-5		X	X	X	
		Uranium 235/236	15117-96-1	X	X	X	X	
		Uranium-238	7440-61-1	X	X	X	X	
	<b>EPA 903.0 / 903.1</b>	Radium-226	13982-63-3	X	X	X	X	
	<b>EPA 904.0</b>	Radium-228	15262-20-1	X	X	X	X	

**TABLE 2**  
**PROJECT LIST OF ANALYTES – SOIL/SOIL VAPOR**  
**(Page 4 of 8)**

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC		Soil Sample Analysis		Soil Vapor (10 ft bgs)
				Soil	Ground-water	Surface (0 ft bgs)	Subsurface (10 ft bgs)	
Semivolatile Organic Compounds	EPA 8270C <sup>2</sup>	1,2,4,5-Tetrachlorobenzene	95-94-3			X	X	
		1,2-Diphenylhydrazine	122-66-7			X	X	
		1,4-Dioxane	123-91-1		X	X	X	
		2,2'/4,4'-Dichlorobenzil	3457-46-3			X	X	
		2,4,5-Trichlorophenol	95-95-4			X	X	
		2,4,6-Trichlorophenol	88-06-2			X	X	
		2,4-Dichlorophenol	120-83-2			X	X	
		2,4-Dimethylphenol	105-67-9			X	X	
		2,4-Dinitrophenol	51-28-5			X	X	
		2,4-Dinitrotoluene	121-14-2			X	X	
		2,6-Dinitrotoluene	606-20-2			X	X	
		2-Chloronaphthalene	91-58-7			X	X	
		2-Chlorophenol	95-57-8			X	X	
		2-Methylnaphthalene	91-57-6			X	X	
		2-Nitroaniline	88-74-4			X	X	
		2-Nitrophenol	88-75-5			X	X	
		3,3-Dichlorobenzidine	91-94-1			X	X	
		3-Nitroaniline	99-09-2			X	X	
		4,4'-Dichlorobenzil	3457-46-3			X	X	
		4-Bromophenyl phenyl ether	101-55-3			X	X	
		4-Chloro-3-methylphenol	59-50-7			X	X	
		4-Chlorophenyl phenyl ether	7005-72-3			X	X	
		4-Chlorothioanisole	123-09-1			X	X	
		4-Chlorothiophenol	106-54-7			X	X	
		4-Nitroaniline	100-01-6			X	X	
		4-Nitrophenol	100-02-7			X	X	
		Acenaphthene	83-32-9			X	X	
		Acenaphthylene	208-96-8			X	X	
		Acetophenone	98-86-2			X	X	
		Aniline	62-53-3			X	X	
		Anthracene	120-12-7			X	X	
		Azobenzene	103-33-3			X	X	
		Benzo(a)anthracene	56-55-3			X	X	
		Benzo(a)pyrene	50-32-8	X		X	X	
		Benzo(b)fluoranthene	205-99-2			X	X	
		Benzo(g,h,i)perylene	191-24-2			X	X	
		Benzo(k)fluoranthene	207-08-9			X	X	
		Benzoic acid	65-85-0			X	X	

**TABLE 2**  
**PROJECT LIST OF ANALYTES – SOIL/SOIL VAPOR**  
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Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC		Soil Sample Analysis		Soil Vapor (10 ft bgs)
				Soil	Ground-water	Surface (0 ft bgs)	Subsurface (10 ft bgs)	
Semivolatile Organic Compounds (continued)	EPA 8270C <sup>2</sup>	Benzyl alcohol	100-51-6			X	X	
		bis(2-Chloroethoxy)methane	111-91-1			X	X	
		bis(2-Chloroethyl) ether	111-44-4			X	X	
		bis(2-Chloroisopropyl) ether	108-60-1			X	X	
		bis(2-Ethylhexyl) phthalate	117-81-7		X	X	X	
		bis(Chloromethyl) ether	542-88-1			X	X	
		bis(p-Chlorophenyl) sulfone	80-07-9			X	X	
		bis(p-Chlorophenyl)disulfide	1142-19-4			X	X	
		Butylbenzyl phthalate	85-68-7			X	X	
		Carbazole	86-74-8			X	X	
		Chrysene	218-01-9			X	X	
		Dibenzo(a,h)anthracene	53-70-3			X	X	
		Dibenzofuran	132-64-9			X	X	
		Dichloromethyl ether	542-88-1			X	X	
		Diethyl phthalate	84-66-2			X	X	
		Dimethyl phthalate	131-11-3			X	X	
		Di-n-butyl phthalate	84-74-2			X	X	
		Di-n-octyl phthalate	117-84-0			X	X	
		Diphenyl disulfide	882-33-7			X	X	
		Diphenyl sulfide	139-66-2			X	X	
		Diphenyl sulfone	127-63-9			X	X	
		Fluoranthene	206-44-0			X	X	
		Fluorene	86-73-7			X	X	
		Hexachlorobenzene	118-74-1	X		X	X	
		Hexachlorobutadiene	87-68-3			X	X	
		Hexachlorocyclopentadiene	77-47-4			X	X	
		Hexachloroethane	67-72-1			X	X	
		Hydroxymethyl phthalimide	118-29-6			X	X	
		Indeno(1,2,3-cd)pyrene	193-39-5			X	X	
		Isophorone	78-59-1			X	X	
		m,p-Cresol	106-44-5			X	X	
		Naphthalene	91-20-3		X	X	X	
		Nitrobenzene	98-95-3			X	X	
		N-nitrosodi-n-propylamine	621-64-7			X	X	
		N-nitrosodiphenylamine	86-30-6			X	X	
		o-Cresol	95-48-7			X	X	
		Octachlorostyrene	29082-74-4			X	X	
		p-Chloroaniline (4-Chloroaniline)	106-47-8			X	X	

**TABLE 2**  
**PROJECT LIST OF ANALYTES – SOIL/SOIL VAPOR**  
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Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC		Soil Sample Analysis		Soil Vapor (10 ft bgs)
				Soil	Ground-water	Surface (0 ft bgs)	Subsurface (10 ft bgs)	
Semivolatile Organic Compounds (continued)	EPA 8270C <sup>2</sup>	p-Chlorobenzenethiol	106-54-7			X	X	
		Pentachlorobenzene	608-93-5			X	X	
		Pentachlorophenol	87-86-5			X	X	
		Phenanthrene	85-01-8			X	X	
		Phenol	108-95-2			X	X	
		Phthalic acid	88-99-3			X	X	
		Pyrene	129-00-0			X	X	
		Pyridine	110-86-1			X	X	
		Thiophenol	108-98-5			X	X	
		Tentatively Identified Compounds (TICs)				X	X	
Volatile Organic Compounds	EPA 8260B / TO-14 (Soil Vapor)	1,1,1,2-Tetrachloroethane	630-20-6			X	X	
		1,1,1-Trichloroethane	71-55-6			X	X	X
		1,1,2,2-Tetrachloroethane	79-34-5			X	X	
		1,1,2-Trichloroethane	79-00-5			X	X	X
		1,1-Dichloroethane	75-34-3			X	X	X
		1,1-Dichloroethene	75-35-4		X	X	X	X
		1,1-Dichloropropene	563-58-6			X	X	
		1,2,3-Trichlorobenzene	87-61-6			X	X	
		1,2,3-Trichloropropane	96-18-4			X	X	
		1,2,4-Trichlorobenzene	120-82-1			X	X	
		1,2,4-Trimethylbenzene	95-63-6			X	X	
		1,2-Dichlorobenzene	95-50-1		X	X	X	X
		1,2-Dichloroethane	107-06-2			X	X	X
		1,2-Dichloroethene	540-59-0			X	X	
		1,2-Dichloropropane	78-87-5			X	X	X
		1,3,5-Trichlorobenzene	108-70-3			X	X	
		1,3,5-Trimethylbenzene	108-67-8			X	X	
		1,3-Dichlorobenzene	541-73-1			X	X	X
		1,3-Dichloropropene	542-75-6			X	X	
		1,3-Dichloropropane	142-28-9			X	X	
		1,4-Dichlorobenzene	106-46-7		X	X	X	X
		2,2-Dichloropropane	594-20-7			X	X	
		2,2-Dimethylpentane	590-35-2			X	X	
		2,2,3-Trimethylbutane	464-06-2			X	X	
		2,3-Dimethylpentane	565-59-3			X	X	
		2,4-Dimethylpentane	108-08-7			X	X	
		2-Chlorotoluene	95-49-8			X	X	
		2-Hexanone	591-78-6			X	X	

**TABLE 2**  
**PROJECT LIST OF ANALYTES – SOIL/SOIL VAPOR**  
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Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC		Soil Sample Analysis		Soil Vapor (10 ft bgs)
				Soil	Ground-water	Surface (0 ft bgs)	Subsurface (10 ft bgs)	
Volatile Organic Compounds (continued)	EPA 8260B / TO-14 (Soil Vapor)	2-Methylhexane	591-76-4			X	X	
		2-Nitropropane	79-46-9			X	X	
		3,3-Dimethylpentane	562-49-2			X	X	
		3-Ethylpentane	617-78-7			X	X	
		3-Methylhexane	589-34-4			X	X	
		4-Chlorobenzene	108-90-7			X	X	
		4-Chlorotoluene	106-43-4			X	X	
		4-Methyl-2-pentanone (MIBK)	108-10-1			X	X	
		Acetone	67-64-1			X	X	
		Acetonitrile	75-05-8			X	X	
		Benzene	71-43-2	X	X	X	X	X
		Bromobenzene	108-86-1			X	X	
		Bromodichloromethane	75-27-4			X	X	
		Bromoform	75-25-2			X	X	
		Bromomethane	74-83-9			X	X	
		Carbon disulfide	75-15-0			X	X	
		Carbon tetrachloride	56-23-5			X	X	X
		Chlorobenzene	108-90-7	X	X	X	X	
		Chlorobromomethane	74-97-5			X	X	
		Chlorodibromomethane	124-48-1			X	X	
		Chloroethane	75-00-3			X	X	
		Chloroform	67-66-3	X	X	X	X	X
		Chloromethane	74-87-3		X	X	X	
		cis-1,2-Dichloroethene	156-59-2			X	X	X
		cis-1,3-Dichloropropene	10061-01-5			X	X	
		Cymene (Isopropyltoluene)	99-87-6			X	X	
		Dibromochloroethane	73506-94-2			X	X	
		Dibromochloromethane	124-48-1		X	X	X	
		Dibromochloropropane	96-12-8			X	X	
		Dibromomethane	74-95-3			X	X	
		Dichloromethane (Methylene chloride)	75-09-2	X		X	X	X
		Dimethyldisulfide	624-92-0			X	X	
		Ethanol	64-17-5			X	X	
		Ethylbenzene	100-41-4			X	X	X
		Freon-11 (Trichlorofluoromethane)	75-69-4		X	X	X	
		Freon-113 (1,1,2-Trifluoro-1,2,2-trichloroethane)	76-13-1			X	X	
		Freon-12 (Dichlorodifluoromethane)	75-71-8			X	X	
		Heptane	142-82-5			X	X	

**TABLE 2**  
**PROJECT LIST OF ANALYTES – SOIL/SOIL VAPOR**  
**(Page 8 of 8)**

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC		Soil Sample Analysis		Soil Vapor (10 ft bgs)
				Soil	Ground-water	Surface (0 ft bgs)	Subsurface (10 ft bgs)	
Volatile Organic Compounds (continued)	EPA 8260B / TO-14 (Soil Vapor)	Isoheptane	31394-54-4			X	X	
		Isopropylbenzene	98-82-8			X	X	
		m,p-Xylene	mp-XYL			X	X	X
		Methyl ethyl ketone (2-Butanone)	78-93-3			X	X	
		Methyl iodide	74-88-4			X	X	
		MTBE (Methyl tert-butyl ether)	1634-04-4			X	X	
		n-Butyl benzene	104-51-8			X	X	
		n-Propylbenzene	103-65-1			X	X	
		Nonanal	124-19-6			X	X	
		o-Xylene	95-47-6			X	X	X
		sec-Butylbenzene	135-98-8			X	X	
		Styrene	100-42-5			X	X	
		tert-Butyl benzene	98-06-6			X	X	
		Tetrachloroethene	127-18-4		X	X	X	X
		Toluene	108-88-3			X	X	X
		trans-1,2-Dichloroethene	156-60-5			X	X	
		trans-1,3-Dichloropropene	10061-02-6			X	X	
		Trichloroethene	79-01-6		X	X	X	X
		Vinyl acetate	108-05-4			X	X	
		Vinyl chloride	75-01-4			X	X	X
		Xylenes (total)	1330-20-7			X	X	
		Tentatively Identified Compounds (TICs)				X	X	
Total Petroleum Hydrocarbons	EPA 8015	Diesel	64742-46-7	X		X	X	
		Gasoline	8006-61-9			X	X	
		Grease	68153-81-1			X	X	

**Notes:**

The laboratory will be instructed to report the top 25 Tentatively Identified Compounds (TICs) under method 8260B and 8270C.

<sup>1</sup>For polynuclear aromatic hydrocarbons, Method 8270C is the primary analytical method, but Method 8310 may be used if necessary.

<sup>2</sup>Method 3540 for extraction and Method 3640 for cleanup are to be used as appropriate.

**TABLE 3**  
**TRONOX PHASE A PCB, ORGANOPHOSPHOROUS PESTICIDE AND CHLORINATED HERBICIDE RESULTS SUMMARY**  
**(Page 1 of 2)**

Method	Matrix	Chemical	Count	Hits	Minimum Detect	Maximum Detect	Minimum DL	Maximum DL	PRG/MCL
Polychlorinated Biphenyls (PCBs)	Soil (mg/kg)	Aroclor-1016	130	0	--	--	0.034	0.055	21.2
		Aroclor-1221	130	0	--	--	0.034	0.055	0.74
		Aroclor-1232	130	0	--	--	0.034	0.055	0.74
		Aroclor-1242	130	0	--	--	0.034	0.055	0.74
		Aroclor-1248	130	0	--	--	0.034	0.055	0.74
		Aroclor-1254	130	0	--	--	0.034	0.055	0.74
		Aroclor-1260	130	1	0.47	0.47	0.034	0.055	0.74
	Groundwater (ug/L)	Aroclor-1016	30	0	--	--	0.1	0.1	0.5
		Aroclor-1221	30	0	--	--	0.1	0.1	0.5
		Aroclor-1232	30	0	--	--	0.1	0.1	0.5
		Aroclor-1242	30	0	--	--	0.1	0.1	0.5
		Aroclor-1248	30	0	--	--	0.1	0.1	0.5
		Aroclor-1254	30	0	--	--	0.1	0.1	0.5
		Aroclor-1260	30	0	--	--	0.1	0.1	0.5
Organophosphorous Pesticides	Soil (mg/kg)	Azinphos-Methyl	36	0	--	--	0.014	0.017	--
		Bolstar	36	0	--	--	0.014	0.017	--
		Chlorpyrifos	36	0	--	--	0.021	0.026	1,847
		Coumaphos	36	0	--	--	0.014	0.017	--
		Demeton-O	36	1	0.092	0.092	0.041	0.05	24.6
		Demeton-S	36	0	--	--	0.016	0.019	24.6
		Diazinon	36	0	--	--	0.023	0.028	554
		Dichlorvos	36	0	--	--	0.024	0.03	5.9
		Dimethoate	36	3	0.011	0.013	0.023	0.028	123
		Disulfoton	36	0	--	--	0.05	0.062	24.6
		Epn	36	0	--	--	0.014	0.017	6.16
		Ethoprop	36	0	--	--	0.016	0.019	--
		Ethyl Parathion	36	0	--	--	0.019	0.023	3,694
		Famphur	36	0	--	--	0.014	0.017	--
		Fensulfothion	36	0	--	--	0.014	0.017	--
		Fenthion	36	0	--	--	0.034	0.043	--
		Malathion	36	0	--	--	0.016	0.019	12,312
		Merphos	36	0	--	--	0.031	0.039	--
		Methyl Parathion	36	0	--	--	0.021	0.026	154
		Mevinphos	36	0	--	--	0.016	0.019	--
		Naled	36	0	--	--	0.034	0.043	1,231
		Phorate	36	0	--	--	0.021	0.026	123
		Ronnel	36	0	--	--	0.019	0.023	30,780
		Stirphos	36	0	--	--	0.016	0.019	72

**TABLE 3**  
**TRONOX PHASE A PCB, ORGANOPHOSPHOROUS PESTICIDE AND CHLORINATED HERBICIDE RESULTS SUMMARY**  
**(Page 2 of 2)**

Method	Matrix	Chemical	Count	Hits	Minimum Detect	Maximum Detect	Minimum DL	Maximum DL	PRG/MCL
Organophosphorous Pesticides	Soil (mg/kg)	Sulfotep	36	0	--	--	0.021	0.026	308
		Thionazin	36	0	--	--	0.019	0.023	--
		Tokuthion	36	0	--	--	0.021	0.026	--
		Trichloronate	36	0	--	--	0.021	0.026	--
	Groundwater (ug/L)	Azinphos-Methyl	30	0	--	--	2.5	2.5	--
		Bolstar	30	0	--	--	1	1	--
		Chlorpyrifos	30	0	--	--	1	1	--
		Coumaphos	30	0	--	--	1	1	--
		Demeton-O	30	0	--	--	1	1	--
		Demeton-S	30	0	--	--	1	1	--
		Diazinon	30	0	--	--	1	1	--
		Dichlorvos	30	0	--	--	1	1	--
		Dimethoate	30	0	--	--	1	1	--
		Disulfoton	30	0	--	--	0.5	0.5	--
		Epn	30	0	--	--	1.2	1.2	--
		Ethoprop	30	0	--	--	0.5	0.5	--
		Ethyl Parathion	30	0	--	--	1	1	--
		Famphur	30	0	--	--	1	1	--
		Fensulfothion	30	0	--	--	2.5	2.5	--
		Fenthion	30	0	--	--	2.5	2.5	--
		Malathion	30	0	--	--	1.2	1.2	--
		Merphos	30	0	--	--	5	5	--
		Methyl Parathion	30	0	--	--	4	4	--
		Mevinphos	30	0	--	--	6.2	6.2	--
		Naled	30	0	--	--	1	1	--
		Phorate	30	0	--	--	1.2	1.2	--
		Ronnel	30	0	--	--	10	10	--
		Stirphos	30	0	--	--	3.5	3.5	--
		Sulfotep	30	0	--	--	1.5	1.5	--
		Thionazin	30	0	--	--	1	1	--
		Tokuthion	30	0	--	--	1.6	1.6	--
		Trichloronate	30	0	--	--	0.5	0.5	--
Chlorinated Herbicides	Soil (mg/kg)	2,4,5-TP (Silvex)	3	0	--	--	0.021	0.025	4,925
	Groundwater (ug/L)	2,4,5-TP (Silvex)	4	0	--	--	1	1	50

-- = None detected/none established.

DL = detection limit

PRG = U.S. Environmental Protection Agency (USEPA) Region 9 preliminary remediation goal

MCL = USEPA Maximum Contaminant Level