



environmental management, inc.

**From:** Deni Chambers, Principal-in-Charge  
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**Date:** April 5, 2010

**To:** Shannon Harbour, P.E.  
Nevada Division of Environmental Protection

**RE:** Response to NDEP March 25, 2010 Comments on Tronox Phase B  
Remediation Schedule, dated March 19, 2010 and Additional Modifications to  
the Schedule

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**Response to NDEP March 25, 2010 Comments on Tronox Phase B Remediation  
Schedule, dated March 19, 2010**

1. *General comment: The schedule does not contain a task for the periodic update of this schedule. TRX should submit a revised, updated schedule monthly by the 5<sup>th</sup> day of each month commencing on April 5, 2010. The schedule should be updated with actual dates as appropriate through the 30<sup>th</sup> day of the preceding month. (e.g. The Phase B Area III Data Validation Summary Report (DVSR) was approved by NDEP on March 17, 2010. The updated April schedule should reflect this date so that any tasks that are linked to this approval will be updated accordingly.)*

**Response:** The attached schedule has been updated to include the monthly schedule update and actual deliverable dates for the preceding month.

2. *Lines 252 – 280, DVSRs for Remediation Zone (RZ) sampling, NDEP has the following comments:*
  - a. *TRX should add a line between “Submit to Tronox/Chartis” (Lines 255, 262, 269, and 276) and “Submit to NDEP (Lines 256, 263, 270, and 277) for the “Revise and Finalize DVSR”.*

**Response:** This comment has been addressed. Please see lines 273, 281, 289, and 297.

- b. *For consistency the “Revise and Finalize DVSR” should be set at 5 days and the “Submit to NDEP” should be set at 0 days.*

**Response:** This comment has been addressed. Please see lines 273, 274, 281, 282, 289, 290, 297 and 298.

- c. *Please note that NDEP will establish milestones in a subsequent letter for the submittal of the RZ DVSRs. The milestones will be set at the end date of the current lines for “NDEP Review” (Lines 257, 264, 271, and 278) so the submittal dates in the revised schedule should be consistent with these milestones.*

**Response:** TRX understands that NDEP will use these dates to establish milestones for the submittal of the DVSRs.

3. *Line 193, please identify this Task as Pre-Confirmation Sampling for consistency with the actual Deliverable.*

**Response:** This comment has been addressed. Please see line 207.

4. *Lines 291, 300, 309, and 318 (EP Preparation), should not have a predecessor of Line 289FF (RAW Approval); Line 288FF would be a more appropriate predecessor for EP Preparation. Please move the predecessor of RAW Approval to Lines 293, 302, 311, and 320 (Revise and Finalize EP). Please note that this will move up the start and end dates of these Tasks. For example, the submittal date for the EP for RZ-B will become May 27, 2010.)*

**Response:** These comments have been addressed and the predecessors have been modified. Please see lines 320, 329, 338 and 347.

5. *Lines 375 and 390, please check and revise the start date as appropriate. There appears to be a typo in the year (2009).*

**Response:** This typo has been corrected. Please see line 404 and 420.

6. *Line 428, please change predecessors 378 and 379 to 387 and 389, respectively so that demolition of Area RZ-D is referenced.*

**Response:** This comment has been addressed. Please see line 463.

7. *Lines 478 – 523, NDEP has the following comments:*  
a. *TRX should consider running column studies in conjunction with the pilot test demonstration.*

**Response:** The column test data will be needed to finalize the pilot test demonstration.

- b. *At a minimum, TRX should begin the necessary sampling and analysis of the pilot study area as there are only a couple of remediation polygons that were generated because of perchlorate only; other areas will not be able to be used for the pilot study because of the excavation timeline delaying the commencement of the test.*

**Response:** TRX would like to discuss the proposed pilot test scope of work and associated milestones after NDEP has had an opportunity to review the pilot test workplan.



- c. *TRX has not added a decision alternative to full-scale implementation. Please add an alternative pathway and schedule for the scenario where flushing is not a feasible remediation method.*

**Response:** Please see response to comment 7b.

- d. *TRX should note that source control of the perchlorate impacted soils needs to be demonstrated by December 31, 2010 per the December 14, 2009 FOAV and Order.*

**Response:** Please see response to comment 7b.

- e. *TRX may schedule a conference call if necessary to discuss this issue prior to the submittal of the updated Schedule.*

**Response:** Please see response to comment 7b.

### **Additional Revisions to the Phase B Soil Remediation Schedule**

In addition to addressing the above comments, Northgate has made the following revisions to the schedule based on continued scope development of specific tasks.

1. The waste profile acceptance durations (line 176 to line 178) have been lengthened to reflect actual (Mn Tails Profile) and anticipated (Site-wide profile and Has Waste landfill profile) acceptance dates.
2. The duration of the laboratory analyses tasks has been modified to reflect our anticipated dates for screening and final analysis (lines 242 to 246 and lines 248 to 252). In addition, line 239 has been changed from “mobile laboratory analysis” to “screening laboratory analysis” to more accurately reflect the task.
3. Successor tasks for the step-out sampling (line 235) have been added. These include step-out sampling data validation EDDs and summary tables (lines 267 and 268) and data validation summary report (lines 303 to 309).
4. Modifications to the Parcel “CDFGH” remediation timeline were made due to access issues related to Parcels C and D (lines 441 to 445).
5. The schedule for the Environmental Covenants document has been modified to incorporate the development of a working document (pre-sampling) and a more complete document subsequent to receipt of the pre-confirmation sampling program results, as this data will help refine the areas that will require environmental covenants (lines 485 to 493).

