



May 7, 2010

Derrick Willis
Tronox LLC - Henderson
560 West Lake Mead
Henderson, NV 89015

SDG / EMSL: Order ID# 091003270 – Additional HOLD Sample
Project: 2027.001, Tronox LLC Henderson, 560 West Lake Mead Drive, Henderson, NV
Client COC ID: 2027.001.02102

Dear Derrick:

Attached please find the results of your soil samples from the above referenced order number. These samples were analyzed for asbestos via the Modified Elutriator Method for the Determination of Asbestos in Soils and Bulk Material adopted from EPA-540-R97-028 EPA Superfund. In addition the samples were also analyzed for percent moisture.

Included in the individual concentrations are the six regulated asbestos types. These are Chrysotile and Amphibole Asbestos (Amosite, Actinolite, Tremolite, Crocidolite, and Anthophyllite). Countable asbestos structures are those that meet the reporting requirements based on size as stated in the EPA Superfund Method, with modifications per the State of Nevada Dept of Environmental Protection. These (protocol) structures must be $<0.4\mu\text{m}$ in diameter and $>5\mu\text{m}$ in length. Long asbestos structures are protocol structures $>10\mu\text{m}$ in length.

Non regulated Amphiboles if present will be noted but not included in the concentration.

Note: Samples 0007, 0010, & 0012 are on HOLD and not included in this report.

If you have any questions or need further information please do not hesitate to contact me.

Sincerely,

Daniel B. Kocher

Asbestos Project Manager
EMSL Analytical, Inc.
510-895-3675

EMSL Analytical Lab Qualifiers:

J/Estimated Qualifier denoting a sample has asbestos detected but at a level lower than the detection limit



EMSL Analytical, Inc.

107 Haddon Avenue, Westmont, NJ 08108
Phone: (800) 220-3675 Fax: (856) 858-1292
Email: WestmontAsbLab@emsl.com

Attn: Derrick Willis
Tronox LLC - Henderson
PO Box 55
Henderson, NV 89009
Phone: (947) 375-7004

Customer ID: TRNX26
Customer PO: 02027.01.2102
Received: 4/9/10 11:30 AM
EMSL Order: 091003270
Date Prepared: 5/6/2010
Analysis Date(s): 5/7/2010

Project: Tronox LLC Henderson, 560 W. Lake Mead Dr., Henderson, NV / 02029.01.2102
Date Sampled: 04/07/2010

Report Date: 5/7/2010

EPA 540-R-97-028 -Superfund Method

Draft Modified Elutriator Method for the Determination of Asbestos in Soils and Bulk Material Method (Revision 1)

Table with 4 columns: Parameter, Value, Unit, and Additional Info. Includes rows for EMSL Sample Number, Customer Sample Number, Minimum Level of analysis, Magnification used, Aspect ratio, Mass of Respirable Dust on Filter, Area of collection filter, Grid openings Area, Grid Openings Analyzed, Min Str. Length/ Max Str. Diameter, Analyst(s), Dust Generator-Total Dried Sample Weights, Soil % Moisture, Air Flow Rate Through ME opening, Air Flow Rate Through IST opening, and Estimated Total Air Flow Through Elutriator.

Analytical Sensitivity: 2.98E+06 Structure/g PM10 Limit of Detection: 8.91E+06 Structure/g PM10

Test for Uniformity (Chi-Square result) Random (83) Note: Numerous Chrysotile structures <5 microns.

Main data table with columns: Structure Class, Min ID Level Required, Counts (Primary, Total), Density (Str/mm²), Conc. (Str/g PM10), Poisson 95% Confidence Interval (Lower Limit, Upper Limit). Rows include Asbestos Structures > 5um, ≤ 10um, Asbestos Structures >10 um (Long), and Total Protocol Asbestos Structures.

Asbestiform Amphibole Present: Actinolite

Note: The concentration of asbestos and the 95% Confidence Intervals are reported on the basis of the Poissonian distribution and the Total Structure count. Structure counts above 31 may be better expressed with a Gaussian distribution. EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported above and may not be reproduced, except in full, without written approval by EMSL. EMSL is not responsible for sample collection activities or analytical method limitations. Interpretation and use of results are the responsibility of the client.

Robyn Denton

Approved Signatory

EMSL Analytical, Inc
Elutriator Prep Worksheet



EMSL Ord./sample: 091003270 -0010
Client Sample ID: SSAQ4-03-0.33BPC

Date: 5/6/2010
System: 4
Operator: AC

Sample Drying:
Temperature (C): 55
Start Date: 5/4/2010
End Date: 5/5/2010

Sample Weight (g) Total Dried Sample Weight (g)
Pre Drying 414.73 g >3/8" 67.57 g
Post Drying 394.48 g <3/8" 56.45 g (In Tumbler)
% moisture 4.9 <3/8" 270.5 g (Not Used)

	Start Date	Start Time	Stop Date	Stop Time
Conditioning	05-May-10	14:15	6-May-10	9:40
Tumbling	06-May-10	9:40	6-May-10	14:40

Tumbling Speed
30 rpm

% Moisture from surrogate sample
Pre Dry [] g % Moisture
Post Dry [] g
Reviewed: []
Date: []

1426 100 mL/min
ME IST



Following results are needed for calculation of asbestos concentration in the total sample mass

Resp. Mass		mo (mg)=		213		Resp.%=		ME Filter Information			
Emission rate		k=		0.0035		0.37733					
Filter ID #	Filter ME	Prewrite (mg)	Post-Weight (mg)	Col. Time (minutes)	mf (mg)	Total Time (min)	In(mo-mf)	t(min)	In(mo-mf)	In(mo)	
1	ME	25.277	43.299	20	18.022	20	5.273	20	5.2729	5.3613	
2	ME	24.961	36.389	11	29.450	31	5.212	31	5.2125	5.3613	
3	ME	23.314	31.050	10	37.186	41	5.169	41	5.1694	5.3613	
4	ME	22.642	29.400	10	43.944	51	5.130	51	5.1302	5.3613	
5	ME	22.407	29.284	10	50.821	61	5.089	61	5.0887	5.3613	
6	ME	22.654	27.569	10	55.736	71	5.058	71	5.0579	5.3613	
7	ME	22.493	28.024	11	61.267	82	5.022	82	5.0221	5.3613	
8	ME	22.954	27.778	11	66.091	93	4.990	93	4.9898	5.3613	
9	ME	23.137	28.452	13	71.406	106	4.953	106	4.9530	5.3613	
10	ME	22.684	29.077	15	77.799	121	4.907	121	4.9068	5.3613	
11	ME	22.396	29.340	16	84.743	137	4.854	137	4.8540	5.3613	
12	ME	23.137	30.807	18	92.413	155	4.792	155	4.7924	5.3613	
13	ME	22.705	32.463	21	102.171	176	4.708	176	4.7080	5.3613	
14	ME	22.369	30.183	21	109.985	197	4.635	197	4.6349	5.3613	
15	ME	22.761	31.058	23	118.282	220	4.551	220	4.5509	5.3613	
16	ME	23.036	30.109	23	125.355	243	4.473	243	4.4733	5.3613	
17	ME	22.401	28.676	23	131.630	266	4.399	266	4.3990	5.3613	
	ME										
	ME										
	ME										
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Remove Contents of cells that have no data

EMSL Ord./sample:	091003270-0010
Client Sample ID:	SSAQ4-03-0.33BPC

IST Filter Information

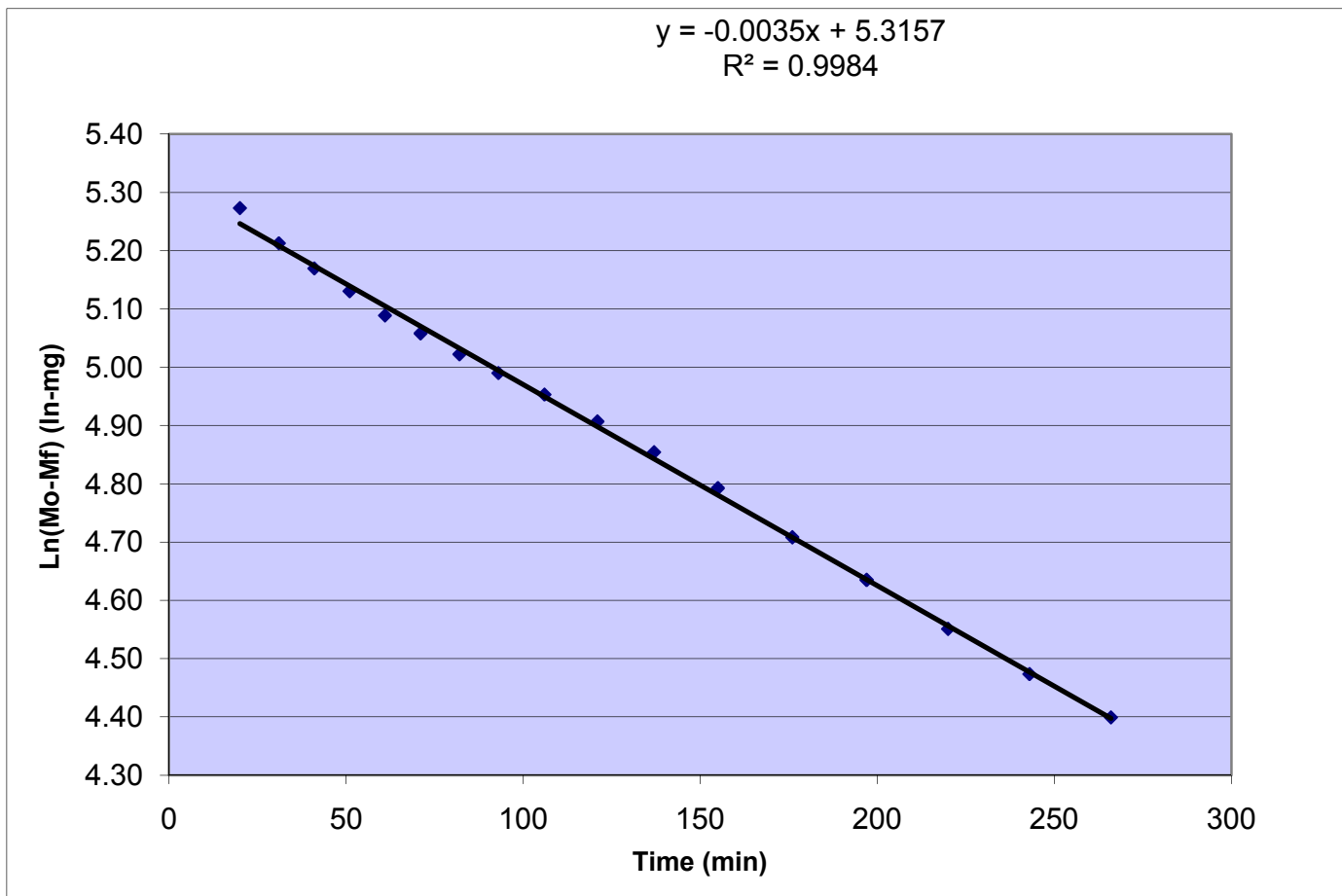
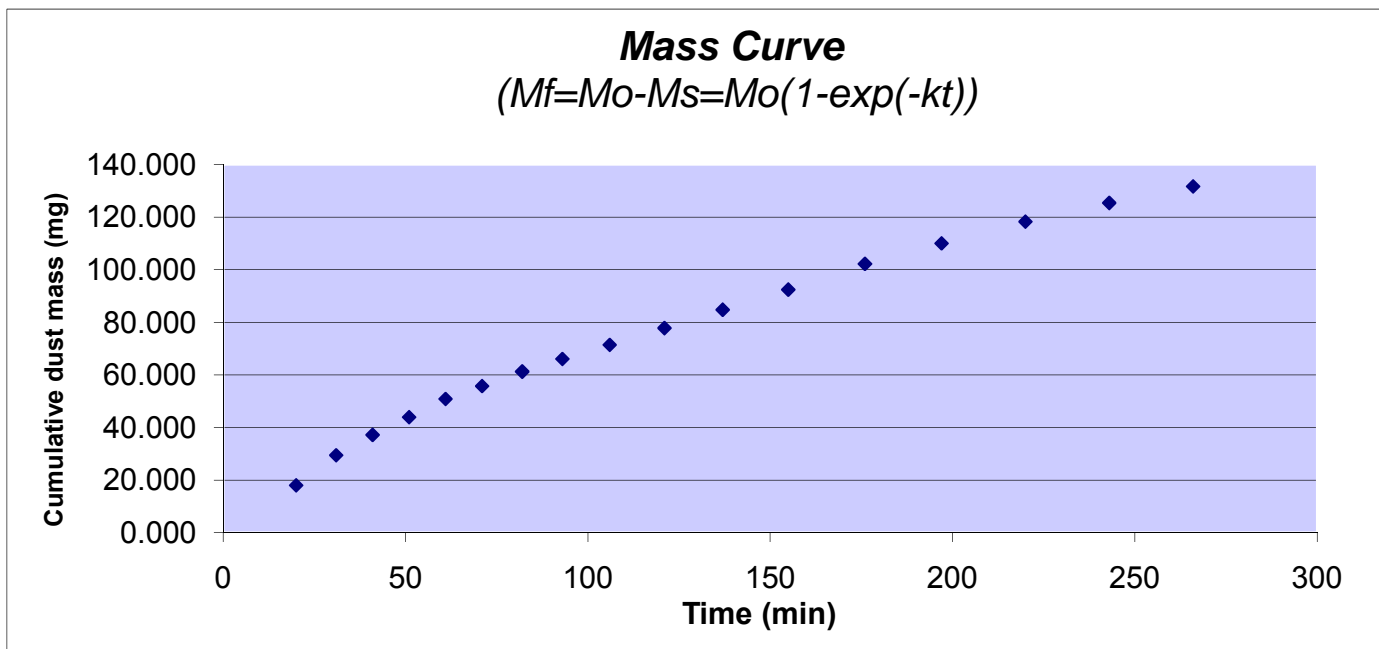
Enter Filter numbers that are to be sent.

Filter ID #	Filter	Prewriteght (mg)	Post-Weight (mg)	ΔMF (mg)
1	IST	27.074	27.192	0.118
2	IST	27.618	27.748	0.130
3	IST	27.477	27.619	0.142
4	IST	27.595	27.729	0.134
5	IST	27.439	27.564	0.125
	IST			0.000
	IST			0.000
	IST			0.000
	IST			0.000
	IST			0.000

Filters sent to another lab for analysis
3
4

Filter Lot Used	Filter Type: Pore Size	
80812200 J	MCE	0.2
microns		

EMSL Ord./sample:	091003270-0010
Client Sample ID:	SSAQ4-03-0.33BPC





EPA 540-R-97-028 -Superfund Method

Draft Modified Elutriator Method for the Determination of Asbestos in Soils and Bulk Material Method
(Revision 1)

Bench Sheet Data

Client:	Derrick Willis, Tronox LLC - Henderson				
EMSL Sample ID:	091003270-0010	GO area (mm ²):	0.013	Scope:	04-01
Customer Sample:	SSAQ4-03-0.33BPC	Grid Box :	0410-Elut-06: N (1-3)	Mag:	10,000
		Pore Size (micron):	0.2	Analyst(s):	R. Denton
Project ID:	2027.001.2102 / Tronox LLC Henderson, 560 W. Lake Mead Dr., Henderson, NV			Analysis Date:	05/07/2010

Grid ID	Grid Opening	Structure Type	Structure Number		Dimensions (µm)		Level of ID	Mineral Type	Image Number	Structure Comments
			Primary	Total	Length	Width				
N1	G10	None Detected								
N1	G8	None Detected								
N1	G6	F	1	1	5.5	0.75	NAM	Non Asb. Mineral		Mg, Al, Si, K, Ca, Fe
N1	H4	MD22	2		22.5	2.5	CD	Chrysotile		
N1	H4	MB		2	22.5	0.35	CD	Chrysotile	10211	
N1	H4	MB		3	20.5	0.35	CD	Chrysotile		
N1	H1	None Detected								
N1	J2	None Detected								
N1	J4	None Detected								
N1	J6	None Detected								
N1	J8	None Detected								
N2	C10	None Detected								
N2	C8	None Detected								
N2	C6	None Detected								
N2	B2	None Detected								
N2	D2	None Detected								
N2	E9	F	3	4	5.5	2	NAM	Non Asb. Mineral		Al,Si,K
N2	E7	None Detected								
N2	E5	None Detected								
N2	E3	F	4	5	8.5	0.24	CD	Chrysotile		
N2	G10	None Detected								
N2	G8	F	5	6	8.75	0.15	CD	Chrysotile		
N2	G6	None Detected								
N2	G4	None Detected								
N2	H1	None Detected								
N2	H3	None Detected								
N2	H5	None Detected								
N2	H7	None Detected								
N2	H9	None Detected								
N2	J1	None Detected								
N2	J3	None Detected								
N2	J5	None Detected								
N2	J7	None Detected								
N3	A3	None Detected								
N3	A5	None Detected								



EPA 540-R-97-028 -Superfund Method

Draft Modified Elutriator Method for the Determination of Asbestos in Soils and Bulk Material Method
(Revision 1)

Bench Sheet Data

EMSL Sample ID:	091003270-0010
Customer Sample:	SSAQ4-03-0.33BPC

Analyzed By:	R. Denton
Analysis Date:	05/07/2010

Grid ID	Grid Opening	Structure Type	Structure Number		Dimensions (µm)		Level of ID	Mineral Type	Image Number	Structure Comments
			Primary	Total	Length	Width				
N3	A7	None Detected								
N3	A9	None Detected								
N3	B10	None Detected								
N3	B8	None Detected								
N3	B6	None Detected								
N3	B4	None Detected								
N3	B2	None Detected								
N3	C1	None Detected								
N3	C3	None Detected								
N3	C5	None Detected								
N3	C7	MD11	6		20	5	ADX	Actinolite		
N3	C7	MF		7	15	0.38	ADX	Actinolite	10212	
N3	D1	None Detected								
N3	D3	None Detected								
N3	D5	F	7	8	10.2	0.15	CD	Chrysotile		
N3	D7	None Detected								
N3	D9	None Detected								
N3	E2	None Detected								
N3	E4	None Detected								
N3	E6	None Detected								
N3	E8	None Detected								
N3	E10	None Detected								
N3	F9	None Detected								
N3	F7	None Detected								
N3	F5	None Detected								
N3	F3	None Detected								
N3	F1	None Detected								
N3	G2	None Detected								
N3	G4	None Detected								
N3	G6	None Detected								
N3	G8	None Detected								
N3	G10	F	8	9	11.55	0.2	CD	Chrysotile		
N3	G10	F	9	10	12.75	0.35	CD	Chrysotile		
N3	H7	None Detected								
N3	I5	None Detected								
N3	I2	None Detected								
N3	J10	None Detected								



EPA 540-R-97-028 -Superfund Method

Draft Modified Elutriator Method for the Determination of Asbestos in Soils and Bulk Material Method
(Revision 1)

Bench Sheet Data

EMSL Sample ID:	091003270-0010
Customer Sample:	SSAQ4-03-0.33BPC

Analyzed By:	R. Denton
Analysis Date:	05/07/2010

Grid ID	Grid Opening	Structure Type	Structure Number		Dimensions (µm)		Level of ID	Mineral Type	Image Number	Structure Comments
			Primary	Total	Length	Width				
N3	J8	None Detected								
N3	H9	None Detected								

107 Haddon Avenue, Westmont, NJ 08108

Phone: (800) 220-3675

Fax: (856) 858-1292

Email: WestmontAsbLab@emsl.com



EPA 540-R-97-028 -Superfund Method
 Draft Modified Elutriator Method for the Determination of Asbestos in Soils
 and Bulk Material Method (Revision 1)
 Structure Sketch Sheet for Direct Data Entry

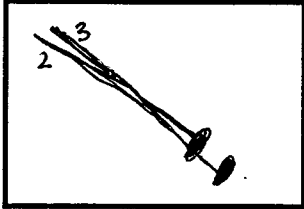
EMSL Order ID: 091003270-0010

Client: Tronox LLC - Henderson

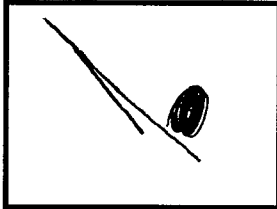
Client Sample: SSAQ4-03-0.33 BPC

Page 1 of 1

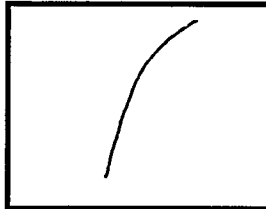
Primary Structure # 2



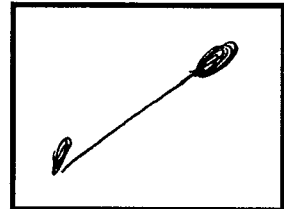
Primary Structure # 4



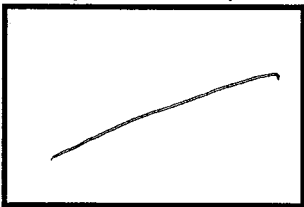
Primary Structure # 5



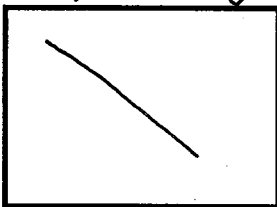
Primary Structure # 6



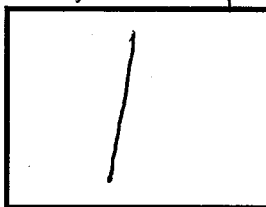
Primary Structure # 7



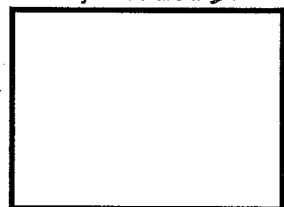
Primary Structure # 8



Primary Structure # 9

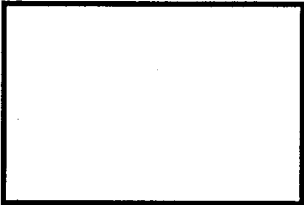


Primary Structure # 10

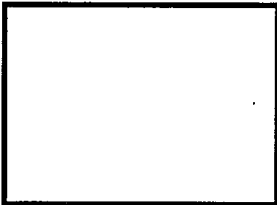


RD 5/7/10

Primary Structure #



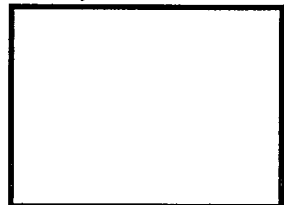
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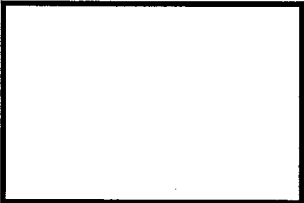
Primary Structure #



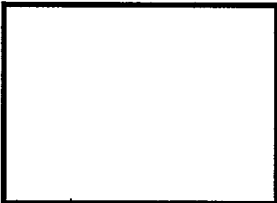
Primary Structure #



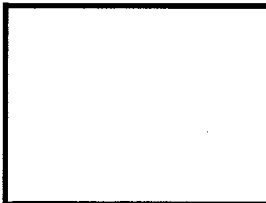
Primary Structure #



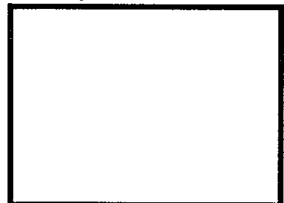
Primary Structure #



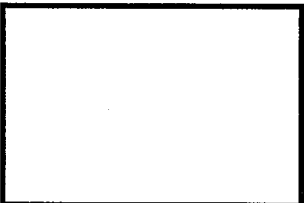
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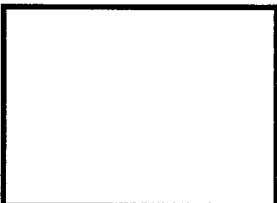
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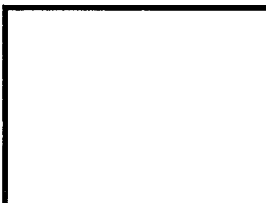
Structure #



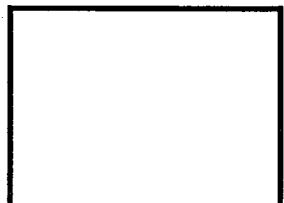
Structure #



Structure #



Structure #



Analyst: R. Denfor

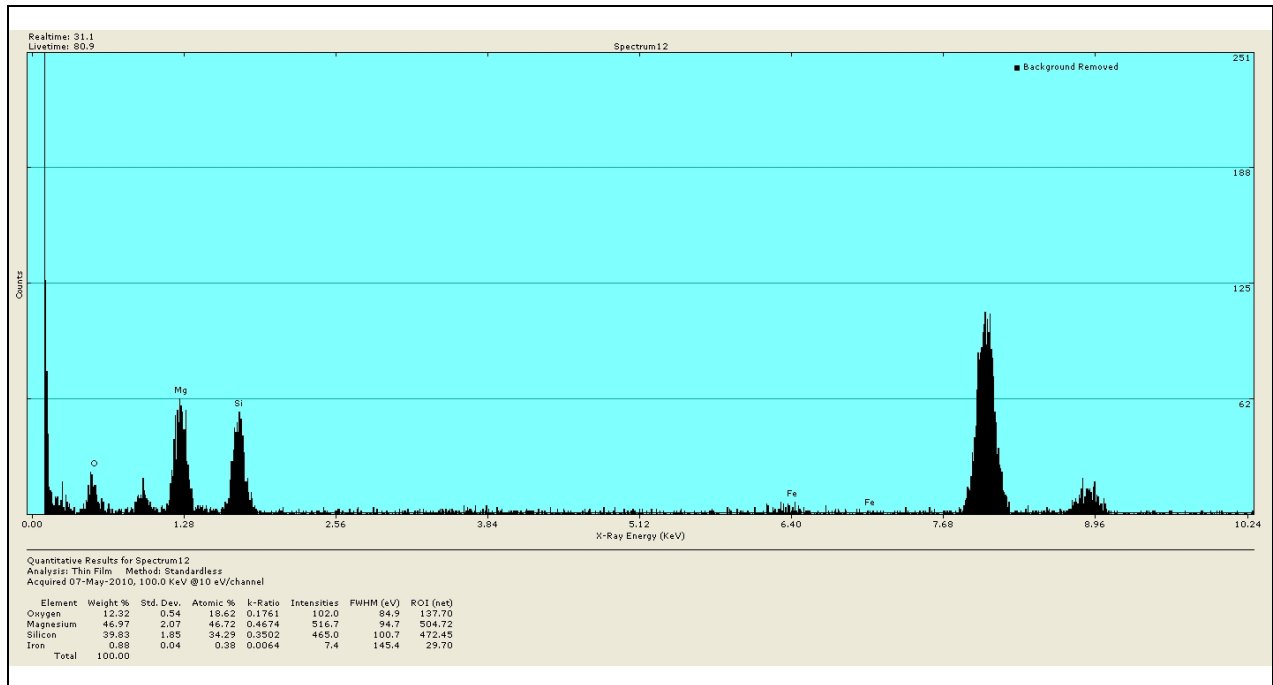
Date: 07 May 2010

Scope: 04-01



EMSL Analytical, Inc. ♦ 200 Rt. 130 North, Cinnaminson, NJ 08077 ♦ (800) 220-3675

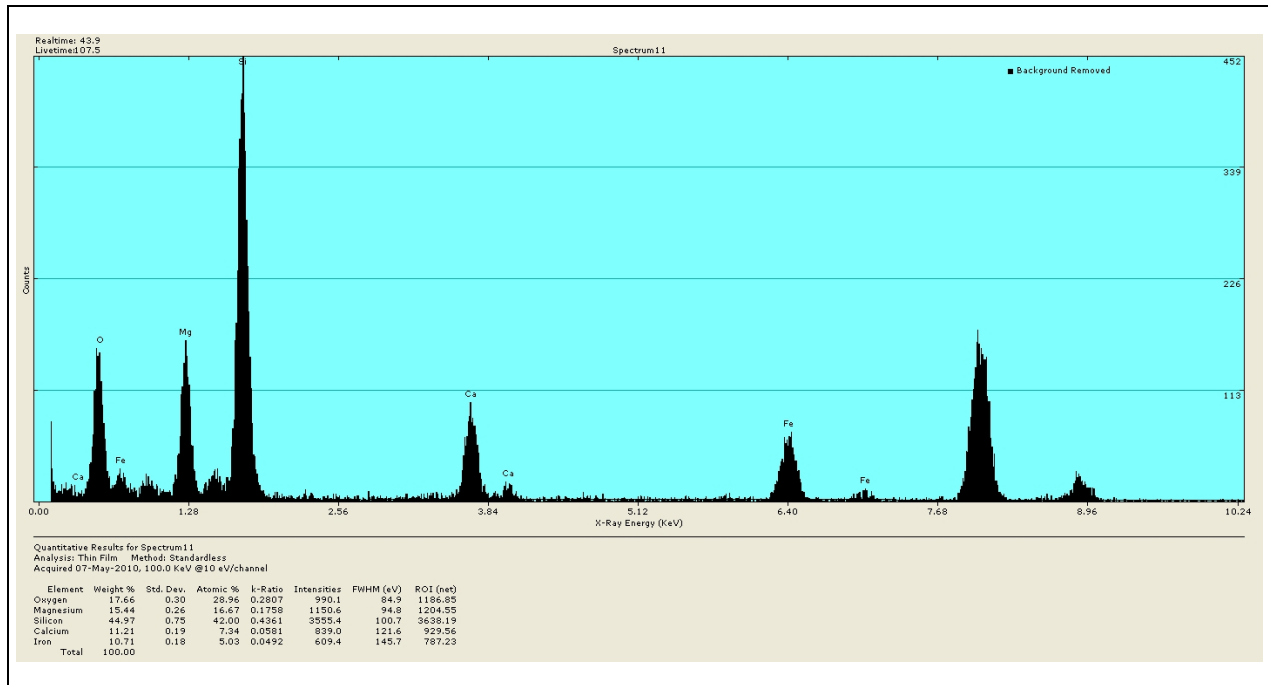
TEM EPA Superfund
EDXA Spectrum
SDG / Order # 091003270-0010
Sample # SSAQ4-03-0.33BPC
Identification: Chrysotile





EMSL Analytical, Inc. ♦ 200 Rt. 130 North, Cinnaminson, NJ 08077 ♦ (800) 220-3675

TEM EPA Superfund
EDXA Spectrum
SDG / Order # 091003270-0010
Sample # SSAQ4-03-0.33BPC
Identification: Actinolite





environmental management, inc.

1100 Quail Street, Suite 102
Newport Beach, CA 92660 (949) 260-9293

CHAIN-OF-CUSTODY / Analytical Request Document

Please revise sample name to "SA192-0.33-BPC" also revise sample name reported as "SA-120-0.33-BPC" to be "SA120-0.33-BPC"

Required Ship to Lab:

Required Project Information:

Required Invoice Information:

Lab Name: EMSL Analytical, Inc	Site ID #: 102	TRONOX LLC HENDERSON	Send Invoice to: Susan Crowley Tronox LLC.
Address: 107 Haddon Avenue	Project #	2027.01	Address: PO Box 55
Westmont, NJ 08108	Site Address	560 W Lake Mead Drive	City/State: Henderson, NV 89009
Lab PM: Stephen Siegel	City	Henderson	State, Zip
Phone/Fax: (800)220-3673 X 1209	Site PM Name	Derrick Willis	PO #
Lab PM email: ssiegel@emsl.com	Phone/Fax: (949)375-7004	Send EDD to: Frank.Hagar@ngem.com	CC Hardcopy report to: PDF Electronic Version Only -- FTP Upload
Applicable Lab Quote #:	Site PM Email: derrick.willis@ngem.com	CC Hardcopy report to: See Additional Comments Below	

ITEM #	SAMPLE ID Samples IDs MUST BE UNIQUE	SAMPLE LOCATION	MATRIX CODE G=GRAB C=COMP	SAMPLE TYPE	SAMPLE DATE	SAMPLE TIME	#OF CONTAINERS	Analysis	Preservative	Filtered
	SA-192-0.33-BPC	BPC	C	N	4/9/10	0750	3	Ashes 540	R.94	028 (up)
	SSAR3-0.33-BPC	BPC	C	N	4/9/10	0835	3			
	SA193-0.33-BPC	BPC	C	N	4/9/10	0920	3			
	SA120-0.33-BPC	BPC	C	N	4/9/10	1010	3			
	SA213-0.33-BPC	BPC	C	N	4/9/10	1055	3			
	SSAQ4-01-0.00-BPC	BPC	C	N	4/9/10	1115	3			
	SSAQ4-01-0.33-BPC	BPC	C	N	4/9/10	1140	3			
	SA121-0.33-BPC	BPC	C	N	4/9/10	1240	3			
	SSAQ4-03-0.00-BPC	BPC	C	N	4/9/10	1300	3			
	SSAQ4-03-0.33-BPC	BPC	C	N	4/9/10	1320	3			
	SSAR4-03-0.00-BPC	BPC	C	N	4/9/10	1400	3			
	SSAR4-03-0.33-BPC	BPC	C	N	4/9/10	1415	3			
	SAZ9-0.33-BPC	BPC	C	N	4/9/10	1505	3			
	SA09-0.33-BPC	BPC	C	N	4/9/10	1625	3			

Please analyze SSAQ4-03-0.33BPC with a 5-day TAT

Requested by Joni Fisher NGENM 5/2/2010

Additional Comments/Special Instructions:

RELINQUISHED BY / AFFILIATION: *Derrick Willis* DATE TIME: 4/9/10 1715

ACCEPTED BY / AFFILIATION: _____ DATE TIME: _____

SHIPPING INFO: _____

SAMPLER NAME AND SIGNATURE: _____ DATE SIGNED: _____

Temp in OC: _____ Samples on Ice?: Y/N Sample intact?: Y/N Trip Blank?: Y/N

COC # 02629.01.2102
Total # of Samples: 1
Regular X
Rush 5-DAY
Mark One

091003270 - Amended

Lanzing, Terri

From: Kocher, Daniel
Sent: Tuesday, May 04, 2010 2:13 PM
To: Lanzing, Terri
Subject: FW: Emailing: EMSL_CoC_0002 - Activ-1.pdf, 091003270-0004_report with correction.pdf, 091003270-0001_report with correction.pdf
Attachments: EMSL_CoC_0002 - Activ-1.pdf; EMSL 2010_SDG List 050310cja.xls

Terri:

On this one, activate 091003270-0001 make due Friday 05/7/10 @ 5:00 pm.

Thank you.

Daniel B. Kocher
Business Manager & Project Manager
EMSL San Leandro
EMSL Sacramento
(888) 455-3675 | (856) 303-2500 x 2614
Cell phone (408) 206-4255

"How can I help you do your job better and help you accomplish your goals?"

From: Cindy Arnold [mailto:cindy.arnold@ngem.com]
Sent: Tuesday, May 04, 2010 1:58 PM
To: Kocher, Daniel; Lanzing, Terri
Cc: Joni L. Fisher; frank.hagar
Subject: FW: Emailing: EMSL_CoC_0002 - Activ-1.pdf, 091003270-0004_report with correction.pdf, 091003270-0001_report with correction.pdf

Daniel,

Please amend your tracking log to show the sample requested on the attached COC was **activated for analysis (5 day TAT)** – see attached tracking log

From: Joni L. Fisher [mailto:joni.fisher@ngem.com]
Sent: Sunday, May 02, 2010 3:48 AM
To: Daniel Kocher; Terri Lanzing
Cc: frank.hagar@ngem.com; 'Cindy Arnold'; 'Vivian Willis'; 'Derrick Willis'
Subject: Emailing: EMSL_CoC_0002 - Activ-1.pdf, 091003270-0004_report with correction.pdf, 091003270-0001_report with correction.pdf

Daniel,

Attached is an activated COC to add an asbestos analysis for a sample that was previously on hold. The sample name is SSAQ4-03-0.33BPC and we are requesting a 5-day TAT for this activation.

I also have a couple of sample name corrections as noted on the attached files.

5/4/2010

Can you please add me to the distribution list for reporting?

Call me if you have questions,



Joni L. Fisher, P.G.
Associate Geologist

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