

September 1, 2011

Ms. Shannon Harbour  
State of Nevada  
Department of Conservation & Natural Resources  
Division of Environmental Protection  
901 S. Stewart Street, Suite 4001  
Carson City, Nevada 89701

**Re: Sampling Plan for Evaluation of Potential Asbestos Impacts from Tronox, LLC  
Asbestos Abatement Activities**

Dear Ms. Harbour:

On behalf of the Nevada Environmental Response Trust (the "Trust"), ENVIRON International Corporation (ENVIRON) has prepared this Sampling Plan for Evaluation of Potential Asbestos Impacts from Tronox, LLC Asbestos Abatement Activities for the Trust's site located in Henderson, Nevada (the "Site"). This sampling plan has been prepared to evaluate potential impacts to surface soil following a reported release of wash water to the ground surface by a contractor working for Tronox, LLC, during asbestos abatement activities on the Unit 1 Sub Building at the Site.

Based on our conversations with Devon Gordon of McGinley and Associates, ENVIRON understands that Walker Specialty Construction Inc. of Las Vegas, Nevada, on behalf of Tronox, LLC, was performing asbestos abatement activities on the Unit 1 Sub Building during mid-June 2011. On June 20 and 21, 2011, Devon Gordon observed a garden hose on the ground surface along the western side of the Unit 1 Sub Building, which appeared to have allowed abatement activity wash water to be discharged to the bare soil ground surface near the northwest corner of the Unit 1 Sub Building. Photographs provided by McGinley and Associates of the discharge area are attached.

**Proposed Sample Locations and Analytical Testing Program**

To evaluate potential impacts to surface soil in the vicinity of the presumed release, ENVIRON proposes to collect two soil samples for asbestos analysis, including one soil sample located in close proximity to the hose discharge point and a second soil sample approximately six feet toward the west. To target shallow soils more likely to have been affected, soil samples will be collected from a depth of 0 to 2 inches. The proposed soil sample locations have been marked with wood stakes and are shown in the attached photographs (note: new fencing placed by Tronox in the area). The proposed soil samples include:

- DS-B14-1 (in close proximity to the hose discharge point)
- DS-B14-2 (approximately 6 ft toward the west)

Soil samples will be collected directly into laboratory-prepared sample jars using a decontaminated steel hand trowel. Each sample will be labeled with the sample ID, date, time, and sampler's initials. The labeled samples will be placed in doubled zip-closure bags and stored on ice in an insulated container for transportation to the analytical laboratory under chain-of-custody documentation. Soil sampling equipment will be decontaminated prior to collection

of each sample. All equipment that comes into contact with soil will be thoroughly washed with a Liquinox™ detergent spray and deionized water rinse.

The soil samples will be analyzed for asbestos using Polarized Light Microscopy (PLM) using USEPA Method 600/R-93-116, as specified in Appendix E, Subpart E, 40 Code of Federal Regulations, Part 763, Section 1. Samples will be analyzed by Forensic Analytical Laboratories, Inc., a National Voluntary Laboratory Accreditation Program (NVLAP) laboratory, or other qualified and certified laboratory.

### **Review of Results and Reporting**

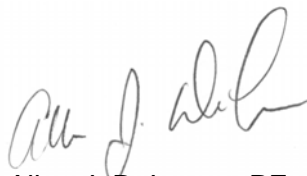
Analytical results will be reviewed by ENVIRON and provided to the Nevada Division of Environmental Protection (NDEP) in a letter report for your review.

If you have any questions or need further information, please contact John Pekala at (707) 815-7474 or [jpekala@environcorp.com](mailto:jpekala@environcorp.com).

Sincerely,

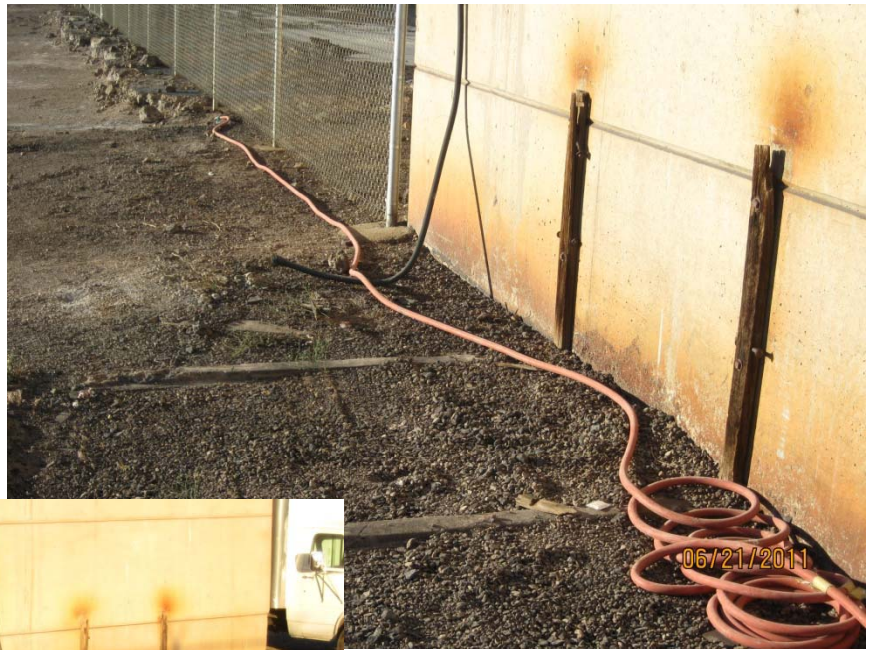


John M. Pekala, PG  
Senior Manager



Allan J. DeLorme, PE  
Managing Principal

Attachment



Photographs of Wash Water Discharge Area. Photos courtesy of McGinley and Associates.





Photographs of Proposed Soil Sampling Locations.