MEMORANDUM



environmental management, inc.

From: Deni Chambers **Date:** January 28, 2011

Derrick Willis

Renee Kalmes, Exponent

To: Shannon Harbour

Nevada Division of Environmental Protection (NDEP)

RE: RZ-C and RZ-E Data Tables

Tronox Facility, Henderson, Nevada

COMMENTS:

The attached data tables (Tables 1-13 for RZ-C and Tables 1-13 for RZ-C) provide a complete set of data collected in the Remediation Zone (RZ) -C and -E areas. All "stepout" confirmation data obtained in mid- to late-2010 are included in these tables; however, as noted, these data have not yet been validated. The non-validated data will be addressed in the step-out sampling data validation summary report (DVSR) scheduled to be submitted to the Nevada Division of Environmental Protection (NDEP) on January 28, 2011.

The orange highlighting indicates data that will not be considered in the post-remediation health risk assessment (HRA) due to soil removal and soil scraping activities. Only specific chemical data excluded from HRA calculations are highlighted. In instances where chemicals are not risk drivers, but excavation is occurring due to other chemicals, the existing data for all non-risk driving chemicals, as well as analytes presented in other tables that are not above comparison criteria, will be retained in the HRA and are not highlighted in orange.

Additionally, data highlighted in purple will also be excluded from the HRA calculations. For RZ-C and RZ-E the purple highlighted data primarily represent areas impacted by perchlorate at depths that are intended to be remediated by in-situ technologies, as discussed in the Retention Basin Memo scheduled to be submitted to NDEP on January 28, 2011. It is important to note that the background comparisons for metals and radionuclides have not been finalized; although some radionuclide detections exceed the BCLs, the data are not highlighted because it is expected that background comparisons will demonstrate that radionuclide concentrations in these areas are within background.

Following the step-out DVSR submittal, a Closure and Post-Remediation Health Risk Assessment Report will be prepared. As part of the post-remediation HRA, a data

usability evaluation will be conducted on all validated data and the final set of validated data used in the HRA will be presented.

Please contact us if you have any questions on this matter.

Attachments

RZ-C Data Tables 1 - 13

RZ-E Data Tables 1 - 13

