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July 11, 2008

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

**Subject: Revised Documents for Phase B Area IV Work Plan
Tronox LLC, Henderson, Nevada**

Dear Ms. Harbour:

Enclosed is the revised Plate A, Table 2, and Table 3 requested for the Tronox LLC Henderson Facility Phase B Area IV work plan. These revisions are being provided in response to the June 18, 2008 NDEP comments to the Area IV Work Plan and the June 23, 2008 NDEP conference call.

These tables reflect the changes in sampling and analysis requested.

If you have any comments or questions concerning this correspondence, please contact me at your convenience (702) 651-2234.

Sincerely,

Susan Crowley
Staff Environmental Specialist

Overnight Mail

Attachment: as stated
CC: See attached Distribution List



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Area 4 WP.xls

Tronox. Adding value beyond the product.

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			& Hard Data		
Bailey	Keith	Environ Answers	X	X	
Krish	Ed	ENSR	X	X	
Bilodeau	Sally	ENSR	X	X	
Flack	Mike	ENSR	X	X	
Ho	Brian	ENSR	X	X	
Kennedy	Robert	ENSR	X	X	
Bradley	Lisa	ENSR	X	X	
Lambeth	Jeff	Veolia			
Guerriero	Joe	AIG		X	
Giroux	Barry	GEI		X	
Stowers	Kirk	Broadbent			
Sahu	Rahnijit	BMI		X	
Crouse	George	Syngenta		X	
Erickson	Lee	Stauffer		X	
Kelly	Joe	Montrose			
Sundberg	Paul	Montrose		X	
Gibson	Jeff	AmPac			
Richards	Curt	Olin		X	
Bellotti	Michael	Olin		X	
Wilkinson	Craig	Timet		X	
Mack	Joel	Montrose Counsel			

Grid Location	LOU Number	Phase B Boring No.	Sample ID Number	Sample Depths ¹ (ft, bgs)	Perchlorate (EPA 314.0)	Metals (EPA 6020)	Hex Cr (EPA 7199)	TPH-DRO/ORO (EPA 8015B)	VOCs ² (EPA 8260B)	Wet Chemistry ³	Total Cyanide (EPA 9012A)	OCPs ⁴ (8081A)	SVOCs ⁵ (EPA 8270C)	Radio-nuclides ⁶	Dioxins/Furans ⁷	PCBs ⁸ (EPA 8082 and 1668A)	Asbestos ⁹ (EPA/540/R-97/028)	Geo-technical Tests ¹⁰	Location Description and Characterized Area Rationale
Borings are organized by grid location as shown on Plate A - Starting point is on the northwestern most grid in Area IV (P-5) and ending with the southeastern most grid in Area IV (U-7).																			
Q-4	4, 27		SA101-20	20	X	X	X	X	X	X		Hold	X	X					Assessment through LOU 27 would compromise containment. Boring also locate to evaluate potential surface releases in from LOU 4.
Q-4	4, 27		SA101-30	30	X	X	X	X	X	X		Hold	X	X					
Q-4	4, 27		SA101-40	40	X	X	X	X	X	X		X	X	X					
Q-4	26	SA120	SA120-0.0	0.0														X	Boring located to evaluate LOU 26 (Trash Storage Area) and is north (downgradient) from Unit 1 for general area-wide coverage. Located within the footprint of LOU 26 at a location considered to represent the worst case location for the assessment of potential releases.
Q-4	26		SA120-0.5	0.5	X	X	X	X	X	X		X	X	X	X				
Q-4	26		SA120-10	10	X	X	X	X	X	X		Hold	X	X					
Q-4	26		SA120-20	20	X	X	X	X	X	X		Hold	X	X					
Q-4	26		SA120-30	30	X	X	X	X	X	X		Hold	X	X					
Q-4	26		SA120-40	40	X	X	X	X	X	X		X	X	X					
Q-4	26, 4	SA121	SA121-0.0	0.0														X	Boring located to evaluate LOU 26 (Trash Storage Area), LOU 4 (former Hardesty Chemical Company Site), and the boring is north (downgradient) of Unit 2 for general area coverage. Located within the footprint of LOU 26 and 4 at a location considered to represent the worst case location for the assessment of potential releases.
Q-4	26, 4		SA121-0.5	0.5	X	X	X	X	X	X		X	X	X	X				
Q-4	26, 4		SA121-10	10	X	X	X	X	X	X		Hold	X	X					
Q-4	26, 4		SA121-20	20	X	X	X	X	X	X		Hold	X	X					
Q-4	26, 4		SA121-30	30	X	X	X	X	X	X		Hold	X	X					
Q-4	26, 4		SA121-40	40	X	X	X	X	X	X		X	X	X					
Q-4	4, 60	SA148	SA148-0.0	0.0														X	Boring located to evaluate southern area of LOU 4 (former Hardesty Chemical Company Site) and a pipeline segment of LOU 60 (Acid Drain System). Located on the northern edge of LOU 4 to evaluate potential surface releases and also locate above LOU 60 to evaluate potential pipeline releases.
Q-4	4, 60		SA148-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X				
Q-4	4, 60		SA148-10	10	X	X	X	X	X	X	X	Hold	X	X					X
Q-4	4, 60		SA148-20	20	X	X	X	X	X	X	X	Hold	X	X					X
Q-4	4, 60		SA148-30	30	X	X	X	X	X	X	X	Hold	X	X					X
Q-4	4, 60		SA148-33	33	X	X	X	X	X	X	X	X	X	X					X
Q-4	4	SA203	SA203-0.0	0														X	Boring located to evaluate pipeline route connecting northern and southern areas of LOU 4 (former Hardesty Chemical Company Site). Located along the former pipeline route to evaluate potential worst case release at a jog in the line.
Q-4	4		SA203-0.5	0.5	X	X	X	X	X	X		X	X	X	X				
Q-4	4		SA203-10	10	X	X	X	X	X	X		Hold	X	X					
Q-4	4		SA203-20	20	X	X	X	X	X	X		Hold	X	X					
Q-4	4		SA203-30	30	X	X	X	X	X	X		Hold	X	X					
Q-4	4		SA203-40	40	X	X	X	X	X	X		X	X	X					
Q-4	4, 60	SA204	SA204-0.0	0														X	Boring located to evaluate southern area of LOU 4 (former Hardesty Chemical Company Site) and a pipeline segment of LOU 60 (Acid Drain System). Located to evaluate potential worst case location for surface releases in LOU 4. Also directly adjacent to LOU 60 to evaluate potential historical pipeline releases. Boring will be converted into well M-143.
Q-4	4, 60		SA204-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X				
Q-4	4, 60		SA204-10	10	X	X	X	X	X	X	X	Hold	X	X					
Q-4	4, 60		SA204-20	20	X	X	X	X	X	X	X	Hold	X	X					
Q-4	4, 60		SA204-30	30	X	X	X	X	X	X	X	Hold	X	X					
Q-4	4, 60		SA204-40	40	X	X	X	X	X	X	X	X	X	X					
Q-5	4, 28, 59	RSAQ5	RSAQ5-0.0	0														X	Boring located to evaluate LOU 4 (Former Hardesty Chemical Company Site), LOU 28 (Hazardous Waste Storage Area), LOU 59 (Storm Sewer Drain), and for area-wide coverage. Random boring located directly adjacent to LOU 59 pipeline to evaluate potential pipeline releases and for general stepout coverage for LOUs 4 and 28.
Q-5	4, 28, 59		RSAQ5-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X				
Q-5	4, 28, 59		RSAQ5-10	10	X	X	X	X	X	X	X	Hold	X	X					
Q-5	4, 28, 59		RSAQ5-20	20	X	X	X	X	X	X	X	Hold	X	X					
Q-5	4, 28, 59		RSAQ5-30	30	X	X	X	X	X	X	X	Hold	X	X					
Q-5	4, 28, 59		RSAQ5-40	40	X	X	X	X	X	X	X	X	X	X					
Q-5	28, 59	SA205	RSA205-0.0	0														X	Boring located as northward stepout boring from Phase A boring SA04 (for Hex Cr) to evaluate LOU 59 as requested by NDEP in comments on Phase A Investigation report and LOU 28 and 59. Located to satisfy NDEP Phase A comments and to evaluate potential pipeline releases from LOU 59.
Q-5	28, 59		RSA205-0.5	0.5	X	X	X	X	X	X		X	X	X	X				
Q-5	28, 59		RSA205-10	10	X	X	X	X	X	X		Hold	X	X					
R-3	60, Unit 1	RSAR3	RSAR3-0.0	0.0														X	Boring located to evaluate LOU 60 (Acid Drain System), Unit 1, and for general area-wide coverage. Random boring located directly adjacent to LOU 60 at a high risk location (inlet).
R-3	60, Unit 1		RSAR3-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X				
R-3	60, Unit 1		RSAR3-10	10	X	X	X	X	X	X	X	Hold	X	X					X
R-3	60, Unit 1		RSAR3-20	20	X	X	X	X	X	X	X	Hold	X	X					X
R-3	60, Unit 1		RSAR3-30	30	X	X	X	X	X	X	X	Hold	X	X					X
R-3	60, Unit 1		RSAR3-40	40	X	X	X	X	X	X	X	X	X	X					X
R-3	Unit 1	SA110	SA110-0.0	0.0														X	Boring located to evaluate Unit 1 and for general area-wide coverage and not associated with a specific LOU.
R-3	Unit 1		SA110-0.5	0.5	X	X	X	X	X	X		X	X	X	X				
R-3	Unit 1		SA110-10	10	X	X	X	X	X	X		Hold	X	X					
R-3	Unit 1		SA110-20	20	X	X	X	X	X	X		Hold	X	X					
R-3	Unit 1		SA110-30	30	X	X	X	X	X	X		Hold	X	X					
R-3	Unit 1		SA110-40	40	X	X	X	X	X	X		X	X	X					
R-3	59, 65b, Unit1	SA192	SA192-0.0	0.0														X	Boring located to evaluate LOU 59 (Storm Sewer Drain), LOU 65b (former Buckles Construction Company Site) and Unit 1 and not associated with a specific LOU. Located directly adjacent to LOU 59 pipeline to evaluate potential releases. Also located in accessible area of LOU 65b to evaluate surface releases, and within Unit 1 for area coverage.
R-3	59, 65b, Unit1		SA192-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X				
R-3	59, 65b, Unit1		SA192-10	10	X	X	X	X	X	X	X	Hold	X	X					
R-3	59, 65b, Unit1		SA192-20	20	X	X	X	X	X	X	X	Hold	X	X					
R-3	59, 65b, Unit1		SA192-30	30	X	X	X	X	X	X	X	Hold	X	X					
R-3	59, 65b, Unit1		SA192-40	40	X	X	X	X	X	X	X	X	X	X					

Grid Location	LOU Number	Phase B Boring No.	Sample ID Number	Sample Depths ¹ (ft, bgs)	Perchlorate (EPA 314.0)	Metals (EPA 6020)	Hex Cr (EPA 7199)	TPH-DRO/ORO (EPA 8015B)	VOCs ² (EPA 8260B)	Wet Chemistry ³	Total Cyanide (EPA 9012A)	OCPs ⁴ (8081A)	SVOCs ⁵ (EPA 8270C)	Radio-nuclides ⁶	Dioxins/Furans ⁷	PCBs ⁸ (EPA 8082 and 1668A)	Asbestos ⁹ (EPA/540/R-97/028)	Geo-technical Tests ¹⁰	Location Description and Characterized Area Rationale
Borings are organized by grid location as shown on Plate A - Starting point is on the northwestern most grid in Area IV (P-5) and ending with the southeastern most grid in Area IV (U-7).																			
S-6	n/a		RSAS6-20	20	X	X	X	X	X	X		Hold	X	X					
S-6	n/a		RSAS6-30	30	X	X	X	X	X	X		Hold	X	X					
S-6	n/a		RSAS6-40	40	X	X	X	X	X	X		X	X	X					
S-7	n/a	RSAS7	RSAS7-0.0	0.0														X	Boring located upgradient of WAPA site, for general area-wide coverage and not associated with a specific LOU.
S-7	n/a		RSAS7-0.5	0.5	X	X	X	X	X	X		X	X	X	X				
S-7	n/a		RSAS7-10	10	X	X	X	X	X	X		Hold	X	X					
S-7	n/a		RSAS7-20	20	X	X	X	X	X	X		Hold	X	X					
S-7	n/a		RSAS7-30	30	X	X	X	X	X	X		Hold	X	X					
S-7	n/a		RSAS7-40	40	X	X	X	X	X	X		X	X	X					
T-3	59	RSAT3	RSAT3-0.0	0.0														X	Boring located to evaluate LOU 59 (Storm Sewer System) and for general area-wide coverage. Random boring adjacent to LOU 59 piping to evaluate potential piping releases.
T-3	59		RSAT3-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X				
T-3	59		RSAT3-10	10	X	X	X	X	X	X	X	Hold	X	X					
T-3	59		RSAT3-20	20	X	X	X	X	X	X	X	Hold	X	X					
T-3	59		RSAT3-30	30	X	X	X	X	X	X	X	Hold	X	X					
T-3	59		RSAT3-40	40	X	X	X	X	X	X	X	X	X	X					
T-4	59	RSAT4	RSAT4-0.0	0.0														X	Boring located to evaluate LOU 59 (Storm Sewer System) and for general area-wide coverage. Random boring adjacent to LOU 59 piping to evaluate potential piping releases.
T-4	59		RSAT4-0.5	0.5	X	X	X	X	X	X		X	X	X	X				
T-4	59		RSAT4-10	10	X	X	X	X	X	X		Hold	X	X					
T-4	59		RSAT4-20	20	X	X	X	X	X	X		Hold	X	X					
T-4	59		RSAT4-30	30	X	X	X	X	X	X		Hold	X	X					
T-4	59		RSAT4-40	40	X	X	X	X	X	X		X	X	X					
T-5	n/a	RSAT5	RSAT5-0.0	0.0														X	Boring located approximately 200 feet west of Tronox Purchasing/Training Building to evaluate soils for general area-wide coverage and not associated with a specific LOU.
T-5	n/a		RSAT5-0.5	0.5	X	X	X	X	X	X		X	X	X	X				
T-5	n/a		RSAT5-10	10	X	X	X	X	X	X		Hold	X	X					
T-5	n/a		RSAT5-20	20	X	X	X	X	X	X		Hold	X	X					
T-5	n/a		RSAT5-30	30	X	X	X	X	X	X		Hold	X	X					
T-5	n/a		RSAT5-40	40	X	X	X	X	X	X		X	X	X					
T-5	59	SA115	SA115-0.0	0.0														X	Boring located to evaluate LOU 59 (Storm Sewer System) and for general area-wide coverage. Located adjacent to LOU 59 piping and manhole/inlet to evaluate high risk piping release locations (piping and inlet structure).
T-5	59		SA115-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X				
T-5	59		SA115-10	10	X	X	X	X	X	X	X	Hold	X	X					
T-5	59		SA115-20	20	X	X	X	X	X	X	X	Hold	X	X					
T-5	59		SA115-30	30	X	X	X	X	X	X	X	Hold	X	X					
T-5	59		SA115-40	40	X	X	X	X	X	X	X	X	X	X					
T-5	59	SA116	SA116-0.0	0.0														X	Boring located to evaluate LOU 59 (Storm Sewer System) and for general area-wide coverage. Located adjacent to LOU 59 piping for general coverage and adjacent to SG68 for VOC comparison purposes.
T-5	59		SA116-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X				
T-5	59		SA116-10	10	X	X	X	X	X	X	X	Hold	X	X					
T-5	59		SA116-20	20	X	X	X	X	X	X	X	Hold	X	X					
T-5	59		SA116-30	30	X	X	X	X	X	X	X	Hold	X	X					
T-5	59		SA116-40	40	X	X	X	X	X	X	X	X	X	X					
T-6	59, 62	SA119	SA119-0.0	0.0														X	Boring located to evaluate LOU 59 (Storm Sewer System) adjacent to former State Industries building (Building T-5) and LOU 62 (State Industries, Inc. Site). Located adjacent to LOU 59 piping and manhole/inlet where waste water from the surface impoundments associated with LOU 62 was released to, as well as for general coverage for LOU 62 (on and off Tronox site).
T-6	59, 62		SA119-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X				
T-6	59, 62		SA119-10	10	X	X	X	X	X	X	X	Hold	X	X					
T-6	59, 62		SA119-20	20	X	X	X	X	X	X	X	Hold	X	X					
T-6	59, 62		SA119-30	30	X	X	X	X	X	X	X	Hold	X	X					
T-6	59, 62		SA119-40	40	X	X	X	X	X	X	X	X	X	X					
T-6	n/a	RSAT6	RSAT6-0.0	0.0														X	Boring located to evaluate soils for general area-wide coverage and not associated with a specific LOU.
T-6	n/a		RSAT6-0.5	0.5	X	X	X	X	X	X		X	X	X	X				
T-6	n/a		RSAT6-10	10	X	X	X	X	X	X		Hold	X	X					
T-6	n/a		RSAT6-20	20	X	X	X	X	X	X		Hold	X	X					
T-6	n/a		RSAT6-30	30	X	X	X	X	X	X		Hold	X	X					
T-6	n/a		RSAT6-40	40	X	X	X	X	X	X		X	X	X					
T-6	59	SA118	SA118-0.0	0.0														X	Boring located to evaluate LOU 59 (Storm Sewer System). Random boring adjacent to LOU 59 piping to evaluate potential high risk piping releases.
T-6	59		SA118-0.5	0.5	X	X	X	X	X	X		X	X	X	X				
T-6	59		SA118-10	10	X	X	X	X	X	X		Hold	X	X					
T-6	59		SA118-20	20	X	X	X	X	X	X		Hold	X	X					
T-6	59		SA118-30	30	X	X	X	X	X	X		Hold	X	X					
T-6	59		SA118-40	40	X	X	X	X	X	X		X	X	X					
T-7	59	RSAT7	RSAT7-0.0	0.0														X	Boring located to evaluate LOU 59 (Storm Sewer System) and for general area-wide coverage. Random boring adjacent to LOU 59 piping to evaluate potential piping releases.
T-7	59		RSAT7-0.5	0.5	X	X	X	X	X	X		X	X	X	X				
T-7	59		RSAT7-10	10	X	X	X	X	X	X		Hold	X	X					
T-7	59		RSAT7-20	20	X	X	X	X	X	X		Hold	X	X					
T-7	59		RSAT7-30	30	X	X	X	X	X	X		Hold	X	X					
T-7	59		RSAT7-40	40	X	X	X	X	X	X		X	X	X					

Grid Location	LOU Number	Phase B Boring No.	Sample ID Number	Sample Depths ¹ (ft, bgs)	Perchlorate (EPA 314.0)	Metals (EPA 6020)	Hex Cr (EPA 7199)	TPH-DRO/ORO (EPA 8015B)	VOCs ² (EPA 8260B)	Wet Chemistry ³	Total Cyanide (EPA 9012A)	OCPs ⁴ (8081A)	SVOCs ⁵ (EPA 8270C)	Radio-nuclides ⁶	Dioxins/Furans ⁷	PCBs ⁸ (EPA 8082 and 1668A)	Asbestos ⁹ (EPA/540/R-97/028)	Geo-technical Tests ¹⁰	Location Description and Characterized Area Rationale	
Borings are organized by grid location as shown on Plate A - Starting point is on the northwestern most grid in Area IV (P-5) and ending with the southeastern most grid in Area IV (U-7).																				
T-8	59	RSAT8	RSAT8-0.0	0.0													X		Boring located to evaluate LOU 59 (Storm Sewer System) and for general area-wide coverage. Random boring adjacent to LOU 59 piping and manhole/inlet to evaluate potential releases (piping and inlet).	
T-8	59		RSAT8-0.5	0.5	X	X	X	X	X	X		X	X	X	X					
T-8	59		RSAT8-10	10	X	X	X	X	X	X		Hold	X	X						
T-8	59		RSAT8-20	20	X	X	X	X	X	X		Hold	X	X						
T-8	59		RSAT8-30	30	X	X	X	X	X	X		Hold	X	X						
T-8	59		RSAT8-40	40	X	X	X	X	X	X		X	X	X						
T-8	59	SA210	SA210-0.0	0.0													X		Boring located to evaluate LOU 59 (storm Sewer System). Located areally to evaluate point of exit from the Tronox site rather than at a worst-case scenario.	
T-8	59		SA210-0.5	0.5	X	X	X	X	X	X		X	X	X	X					
T-8	59		SA210-10	10	X	X	X	X	X	X		Hold	X	X						
T-8	59		SA210-20	20	X	X	X	X	X	X		Hold	X	X						
T-8	59		SA210-30	30	X	X	X	X	X	X		Hold	X	X						
T-8	59		SA210-40	40	X	X	X	X	X	X		X	X	X						
U-4	62	RSAU4	RSAU4-0.0	0.0													X		Boring located to evaluate former western pond in LOU 62 (State Industries, Inc. Site). Located within footprint and in the center of the former pond to provide general coverage of pond area for potential releases (see LOU 62 summary for details).	
U-4	62		RSAU4-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X					
U-4	62		RSAU4-10	10	X	X	X	X	X	X	X	Hold	X	X						
U-4	62		RSAU4-20	20	X	X	X	X	X	X	X	Hold	X	X				X		
U-4	62		RSAU4-30	30	X	X	X	X	X	X	X	Hold	X	X						
U-4	62		RSAU4-40	40	X	X	X	X	X	X	X	Hold	X	X						
U-4	62		RSAU4-50	50	X	X	X	X	X	X	X	Hold	X	X				X		
U-4	62		RSAU4-60	60	X	X	X	X	X	X	X	X	X	X						
U-4	62	SA146	SA146-0.0	0.0													X		Boring located to evaluate former eastern pond in LOU 62 (State Industries, Inc. Site). Located within footprint of former pond to provide general coverage of pond area for potential releases (see LOU 62 summary for details).	
U-4	62		SA146-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X					
U-4	62		SA146-10	10	X	X	X	X	X	X	X	Hold	X	X						
U-4	62		SA146-20	20	X	X	X	X	X	X	X	Hold	X	X						
U-4	62		SA146-30	30	X	X	X	X	X	X	X	Hold	X	X						
U-4	62		SA146-40	40	X	X	X	X	X	X	X	Hold	X	X						
U-4	62		SA146-50	50	X	X	X	X	X	X	X	Hold	X	X						
U-4	62		SA146-60	60	X	X	X	X	X	X	X	X	X	X						
U-4	62	SA147	SA147-0.0	0.0													X		Boring located to evaluate former eastern pond in LOU 62 (State Industries, Inc. Site). Located within footprint of former pond to provide general coverage of pond area for potential releases (see LOU 62 summary for details).	
U-4	62		SA147-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X					
U-4	62		SA147-10	10	X	X	X	X	X	X	X	Hold	X	X						
U-4	62		SA147-20	20	X	X	X	X	X	X	X	Hold	X	X						
U-4	62		SA147-30	30	X	X	X	X	X	X	X	Hold	X	X						
U-4	62		SA147-40	40	X	X	X	X	X	X	X	Hold	X	X						
U-4	62		SA147-50	50	X	X	X	X	X	X	X	Hold	X	X						
U-4	62		SA147-60	60	X	X	X	X	X	X	X	X	X	X						
U-5	62	RSAU5	RSAU5-0.0	0.0													X		Boring located to evaluate former eastern pond in LOU 62 (State Industries, Inc. Site). Located within footprint of former pond to provide general coverage of pond area for potential releases (see LOU 62 summary for details).	
U-5	62		RSAU5-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X					
U-5	62		RSAU5-10	10	X	X	X	X	X	X	X	Hold	X	X						
U-5	62		RSAU5-20	20	X	X	X	X	X	X	X	Hold	X	X				X		
U-5	62		RSAU5-30	30	X	X	X	X	X	X	X	Hold	X	X						
U-5	62		RSAU5-40	40	X	X	X	X	X	X	X	Hold	X	X						
U-5	62		RSAU5-50	50	X	X	X	X	X	X	X	Hold	X	X				X		
U-5	62		RSAU5-60	60	X	X	X	X	X	X	X	X	X	X						
U-5	62	SA28	SA28-0.0	0.0													X		Boring located to evaluate former eastern pond in LOU 62 (State Industries, Inc. Site). Located within footprint and in the center of the former pond to provide general coverage of pond area for potential releases (see LOU 62 summary for details).	
U-5	62		SA28-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X					
U-5	62		SA28-10	10	X	X	X	X	X	X	X	Hold	X	X						
U-5	62		SA28-20	20	X	X	X	X	X	X	X	Hold	X	X						
U-5	62		SA28-30	30	X	X	X	X	X	X	X	Hold	X	X						
U-5	62		SA28-40	40	X	X	X	X	X	X	X	Hold	X	X						
U-5	62		SA28-50	50	X	X	X	X	X	X	X	Hold	X	X						
U-5	62		SA28-60	60	X	X	X	X	X	X	X	X	X	X						
U-6	n/a	RSAU6	RSAU6-0.0	0.0													X		Boring located to evaluate soil for area-wide coverage and not associated with a specific LOU.	
U-6	n/a		RSAU6-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X					
U-6	n/a		RSAU6-10	10	X	X	X	X	X	X	X	Hold	X	X						
U-6	n/a		RSAU6-20	20	X	X	X	X	X	X	X	Hold	X	X						
U-6	n/a		RSAU6-30	30	X	X	X	X	X	X	X	Hold	X	X						
U-6	n/a		RSAU6-40	40	X	X	X	X	X	X	X	Hold	X	X						
U-6	n/a		RSAU6-50	50	X	X	X	X	X	X	X	Hold	X	X						
U-6	n/a		RSAU6-60	60	X	X	X	X	X	X	X	X	X	X						
U-7	n/a	RSAU7	RSAU7-0.0	0.0													X		Boring located to evaluate soil for area-wide coverage and not associated with a specific LOU.	
U-7	n/a		RSAU7-0.5	0.5	X	X	X	X	X	X	X	X	X	X	X					
U-7	n/a		RSAU7-10	10	X	X	X	X	X	X	X	Hold	X	X						
U-7	n/a		RSAU7-20	20	X	X	X	X	X	X	X	Hold	X	X						
U-7	n/a		RSAU7-30	30	X	X	X	X	X	X	X	Hold	X	X						
U-7	n/a		RSAU7-40	40	X	X	X	X	X	X	X	Hold	X	X						
U-7	n/a		RSAU7-50	50	X	X	X	X	X	X	X	Hold	X	X						
U-7	n/a		RSAU7-60	60	X	X	X	X	X	X	X	X	X	X						
Number of Borings:		53																		

Grid Location	LOU Number	Phase B Boring No.	Sample ID Number	Sample Depths ¹ (ft, bgs)	Perchlorate (EPA 314.0)	Metals (EPA 6020)	Hex Cr (EPA 7199)	TPH-DRO/ORO (EPA 8015B)	VOCs ² (EPA 8260B)	Wet Chemistry ³	Total Cyanide (EPA 9012A)	OCPs ⁴ (8081A)	SVOCs ⁵ (EPA 8270C)	Radio-nuclides ⁶	Dioxins/Furans ⁷	PCBs ⁸ (EPA 8082 and 1668A)	Asbestos ⁹ (EPA/540/R-97/028)	Geo-technical Tests ¹⁰	Location Description and Characterized Area Rationale
Borings are organized by grid location as shown on Plate A - Starting point is on the northwestern most grid in Area IV (P-5) and ending with the southeastern most grid in Area IV (U-7).																			
Synthetic Precipitate Leaching Procedure (SPLP) Samples¹¹:																			
Grid Location	LOU Number	Phase B Boring No.	Sample ID Number	Sample Depths (ft, bgs)	Perchlorate (EPA 314.0)	Metals (EPA 6020)	Hex Cr (EPA 7199)	TPH-DRO/ORO (EPA 8015B)	VOCs (EPA 8260B)	Wet Chemistry	Cyanide	OCPs (8081A)	SVOCs (EPA 8270C)	Radio-nuclides	Dioxins/Furans	PCBs (EPA 8082)	Asbestos (EPA/540/R-97/028)	Geo-technical Testing	Location Description and Characterized Area Rationale
Q-4	4	RSAQ4	RSAQ4-10	10	X	X	X	X	X	X			X	X				X	Soil sample collected below bottom of former AST in the northern part of LOU 4 (former Hardesty Chemical Co. Site) to evaluate leaching potential of Site-related analytes from Alluvium (Qal) soils. Expected soil type: Sand.
Q-4	4	RSAQ4	RSAQ4-DD	DD* = depth (ft)	X	X	X	X	X	X			X	X				X	Optional sample - only to be collected if soil type is different than at 10 ft bgs.; no sample will be collected within the capillary fringe. Contact between Qal & MCfg1 is approximately 29 feet bgs. Groundwater is expected to occur at approximately 34 feet bgs. Expected soil type: Silt.
Q-4	4	SA148	SA148-20	20	X	X	X	X	X	X			X	X				X	Soil sample collected below bottom of former UST in the southern part of LOU 4 (former Hardesty Chemical Co. Site) to evaluate leaching potential of Site-related analytes from Alluvium (Qal) soils. Expected soil type: Gravelly Sand.
Q-4	4	SA148	SA148-33	33	X	X	X	X	X	X			X	X				X	Soil sample collected from below bottom of former UST in the southern part of LOU 4 (former Hardesty Chemical Co. Site) to evaluate leaching potential of Site-related analytes from Muddy Creek Formation - First Fine-Grained Facies (MCfg1) soils. Contact between Qal and MCfg1 is approximately 31 feet bgs. Groundwater anticipated to be at approximately 42 feet bgs. No soil sample will be collected within capillary fringe. Expected soil type: Silt.
R-3	60	RSAR3	RSAR3-20	20	X	X	X	X	X	X			X	X				X	Soil sample collected from below LOU 60 (Acid Drain System pipeline) to evaluate leaching potential of Site-related analytes from Alluvium (Qal) soils. Expected soil type: Sand.
R-3	60	RSAR3	RSAR3-DD	DD* = depth (ft)	X	X	X	X	X	X			X	X				X	Optional sample - only to be collected if soil type is different than at 10 ft bgs.; no sample will be collected within the capillary fringe. Contact between Qal & MCfg1 is approximately 29 feet bgs. Groundwater is expected to occur at approximately 34 feet bgs. Expected soil type: Silt.
U-4	62	RSAU4	RSAU4-20	20	X	X	X	X	X	X			X	X				X	Soil sample collected from beneath bottom of former western pond in LOU 62 (State Industries, Inc. Site) to evaluate leaching potential of Site-related analytes. Expected soil type: Gravelly Sand.
U-4	62	RSAU4	RSAU4-50	50	X	X	X	X	X	X			X	X				X	Optional sample - only to be collected if Silt/Clay of the Muddy Creek Formation - first fine-grained facies (MCfg1) is encountered at this boring location. If soil type is similar to soils at 20 feet, then no sample will be collected for SPLP analyses. Expected soil type: Silt.
U-5	62	RSAU5	RSAU5-10	10	X	X	X	X	X	X			X	X				X	Soil sample collected from beneath bottom of former eastern pond in LOU 62 (State Industries) to evaluate leaching potential of Site-related analytes from Alluvium (Qal). Expected soil type: Gravelly Sand.
U-5	62	RSAU5	RSAU5-50	50	X	X	X	X	X	X			X	X				X	Optional sample - only to be collected if Silt/Clay of the Muddy Creek Formation - first fine-grained facies (MCfg1) is encountered at this boring location. If soil type is similar to soils at 20 feet, then no sample will be collected for SPLP analyses. Expected soil type: Silt.
Number of Samples:					286	286	286	281	281	286	115	105	281	286	57	1	53	18	
QA/QC Samples:																			
Field Duplicates (10%)					29	29	29	29	29	29	12	11	29	29	6	1	6		
Field Blanks					1	1	1	1	1	1	1	1	1	1	1	1	0	0	0
Equipment Rinsate Blanks					15	15	15	11	11	15	5	5	10	14	15	0	0	0	0
Trip Blank Samples					0	0	0	0	18	0	0	0	0	0	0	0	0	0	0
Matrix Spike (5%)					15	15	15	15	15	15	6	6	15	15	3	1	0	0	0
Matrix Spike Duplicate (5%)					15	15	15	15	15	15	6	6	15	15	3	1	0	0	0
Total Sample Count:					361	361	361	352	370	361	145	134	351	360	85	5	59	18	
Notes:																			
n/a Not applicable - boring is not associated with a specific LOU but is located to evaluate soil for general area-wide coverage.																			
X Sample will be collected and analyzed.																			
No sample collected under Phase B sampling program.																			
DD* Sample depth to be determined in the field where DD = sample depth (ft).																			
TPH-DRO/ORO Total petroleum hydrocarbons - Diesel-Range Organics/Oil-Range Organics.																			
1. The 0.5 ft bgs sample will be collected from the 0.0 to 0.5 ft bgs interval, unless the area is paved. If area is paved, samples will be collected at 0.5 feet below or from a representative depth beneath the pavement. Alternately, if an unpaved area is within a reasonable distance, the sample will be moved to the unpaved area.																			
2. Samples for VOC analysis will be preserved in the field using sodium bisulfate (or DI water) and methanol preservatives per EPA Method 5035.																			
3. Consists of wet chemistry parameters (including pH) listed on Table 1 of the Phase B Source Area Work Plan.																			
4. Organochlorine Pesticides (includes analysis for hexachlorobenzene).																			
5. Semi-volatile Organic Compounds																			
6. Radionuclides consists of alpha spec reporting for isotopic thorium and isotopic uranium, and Radium-226, plus Radium-228 by beta counting (per NDEP).																			
7. Dioxins/furans will be analyzed by EPA Method 8290 for all samples. Screening reports will be provided for 90% of the samples and full data packages for 10% of the samples.																			
8. Polychlorinated biphenyls - Sample locations will be analyzed by USEPA methods 8082 and 1668A. Concrete surfaces at these locations will also include chip and/or wipe samples per EPA Region 1 SOP for Sampling Concrete in the Field (1997).																			
9. Soil samples for asbestos analyses will be collected from a depth of 0 to 2-inches bgs.																			
10. Geotechnical Tests consist of: moisture content (ASTM D-2216), grain size analysis (ASTM D-422 and C117-04), Soil Dry Bulk Density (ASTM D-2937), Grain Density (ASTM D-854, Soil-Water Filled Porosity (ASTM D-2216); Vertical Hydraulic Conductivity (ASTM D-5084/USEPA 9100).																			
11. SPLP samples will be analyzed by EPA method 1312 using two preparation methods: 1) with extraction fluid #2 (reagent water at pH 5.00 ±0.05), and 2) with extraction method #3 (reagent water); per NDEP.																			

Grid Location	Location Area	Monitoring Well No.	Sample ID Number	Screen Interval (ft bgs)	Soil Type Expected Across Screen Interval ¹	Well Sampled for Phase A? (y/n)	Perchlorate (EPA 314.0)	Hex Cr (EPA 7199)	Metals	VOCs ² (EPA 8260)	Wet Chemistry (a)	Total Cyanide (EPA 9012A)	OCPs ³ (EPA 8081A)	SVOCs ⁴ (EPA 8270C)	Radio-nuclides ⁵	Rationale	
Wells are organized by grid location as shown on Plate A - Starting point is on the northwestern-most grid in Area 4 (P-2) and ending with the southeastern-most grid covering Area 4 (W-7).																	
P-4	Parcel F	M-93	M-93	35.4 - 45.4	MCfg1	no	X	X	X	X	X		X	X	X	Located to serve as a downgradient stepout for LOUs 41 and 65; as an upgradient stepout for LOU 63; and for general Site coverage.	
P-5	IV	M-97	M-97	35 - 45	MCfg1	yes	X	X	X	X	X		X	X	X	Located to serve as a downgradient stepout for LOUs 4, 26, 27, 28, 42, and 59; and for general Site coverage.	
Q-4	Parcel F	M-92	M-92	34.9 - 44.9	MCfg1	yes	X	X	X	X	X		X	X	X	Located to serve as a downgradient stepout for LOUs 25, 41, 59, 60, and 65; as an upgradient stepout for LOU 63; and for general Site coverage.	
Q-5	II	M-13	M-13	40-50	Qal/MCf1	yes	X	X	X	X	X	X	X	X	X	Located to serve as a downgradient stepout for LOUs 42, 59, and 60 and for general site coverage.	
Q-6	II	M-12A	M-12A	28-48	MCfg1	yes	X	X	X	X	X	X	X	X	X	Located to serve as a downgradient stepout for LOU 59 and for general site coverage.	
R-4	IV	M-143	M-143	TBD	TBD	new well	X	X	X	X	X		X	X	X	New well to be installed; located to evaluate LOUs 4, 25, 26, 27, 28, 42, and 60 for general Site coverage	
R-5	IV	M-144	M-144	TBD	TBD	new well	X	X	X	X	X		X	X	X	New well to be installed; located to evaluate LOU 42 and for general site coverage.	
S-2	IV	TR-8	TR-8	63 - 93	MCcg1/MCf2	no	X	X	X	X	X	X	X	X	X	Located to serve as an upgradient stepout for LOUs 41 and 65; to evaluate possible offsite sources to the west (particularly for VOCs); and for general Site coverage.	
T-7	IV	M-10	M-10	43 - 63	MCcg1	no	X	X	X	X	X		X	X	X	Located as downgradient stepout for LOU 59; and for general Site coverage.	
U-4	IV	TR-10	TR-10	80-100	MCcg1	no	X	X	X	X	X		X	X	X	Located to evaluate LOU 62 and for general Site coverage.	
U-4	IV	M-137	M-137	TBD	TBD	new well	X	X	X	X	X	X	X	X	X	New well to be installed; located to serve as a downgradient stepout for LOU 62 (former State Industries western pond), and for general Site coverage.	
U-5	IV	M-138	M-138	TBD	TBD	new well	X	X	X	X	X	X	X	X	X	New well to be installed; Located to serve as a downgradient stepout for LOU 62 (former State Industries eastern pond) and LOU 59 (Storm Sewer System), and for general Site coverage.	
V-7	Parcel H	M-103	M-103	69.5 - 89.5	MCcg1	no	X	X	X	X	X		X	X	X	Located to evaluate potential onsite sources in the southeastern portion of the Site and possible upgradient sources.	
W-1	Olin Chemical	H-11	H-11	95 - 105	MCcg1	no	X	X	X	X	X		X	X	X	To provide general area-wide upgradient information.	
W-4	Parcel H	M-121	M-121	77 - 97	MCcg1	no	X	X	X	X	X		X	X	X	Located to evaluate upgradient (southwest) groundwater conditions on the Site.	
W-5	Parcel H	M-118	M-118	138 - 158	MCfg2	no	X	X	X	X	X		X	X	X	Located to evaluate upgradient (south) groundwater conditions on the Site.	
W-6	Parcel H	M-120	M-120	80 - 100	MCcg1	yes	X	X	X		X		X	X	X	Located to evaluate upgradient (south) groundwater conditions on the Site.	
W-7	Parcel H	M-117	M-117	130 - 150	MCfg2	no	X	X	X		X		X	X	X	Located to evaluate upgradient groundwater conditions on the southeast corner of the Site.	
Number of Field Samples:							18	18	18	16	18	5	18	18	18		
QA/QC Samples:																	
Field Duplicates (10%)							2	2	2	2	2	1	2	2	2	2	
Field Blanks							1	1	1	1	1	1	1	1	1	1	
Equipment Rinsate Blanks							18	18	18	18	18	18	18	18	18	18	
Trip Blank Samples							0	0	0	9	0	0	0	0	0	0	
Matrix Spike (5%)							1	1	1	1	1	1	1	1	1	1	
Matrix Spike Duplicate (5%)							1	1	1	1	1	1	1	1	1	1	
Total Samples:							41	41	41	48	41	27	41	41	41	41	

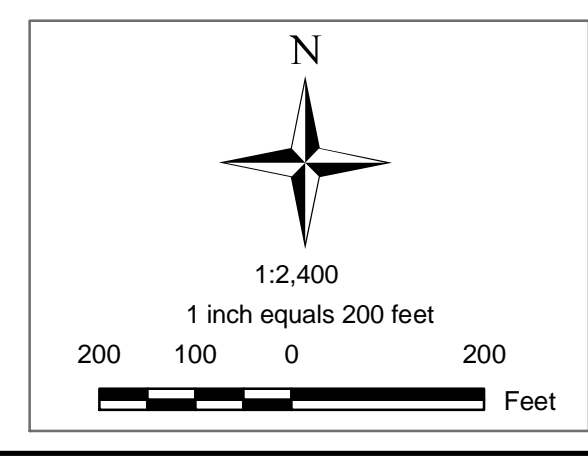
Grid Location	Location Area	Monitoring Well No.	Sample ID Number	Screen Interval (ft bgs)	Soil Type Expected Across Screen Interval ¹	Well Sampled for Phase A? (y/n)	Perchlorate (EPA 314.0)	Hex Cr (EPA 7199)	Metals	VOCs ² (EPA 8260)	Wet Chemistry (a)	Total Cyanide (EPA 9012A)	OCPs ³ (EPA 8081A)	SVOCs ⁴ (EPA 8270C)	Radio-nuclides ⁵	Rationale
Wells are organized by grid location as shown on Plate A - Starting point is on the northwestern-most grid in Area 4 (P-2) and ending with the southeastern-most grid covering Area 4 (W-7).																
Notes:																
X Sample will be collected and analyzed. 1 It is anticipated that the large majority of the flow to the well will be from the coarse-grained sediments. As such, in the cases where there are two lithologies present across the screen interval, the water sampled will represent conditions in the coarse-grained interval. 2 VOCs = Volatile organic compounds (to include analysis for naphthalene). 3 OCPs = Organochlorine pesticides (to include analysis for hexachlorobenzene). 4 SVOCs = Semi volatile organic compounds. 5 Radionuclides consists of alpha spec reporting for isotopic Thorium and isotopic Uranium, and Radium-226, plus Radium-228 by beta counting (per NDEP). (a) Complete list of wet chemistry parameters are shown on Table 1. All groundwater samples will have pH measured in the field. TBD To be determined when well is constructed. Qal Qaternary Alluvium MCfg1 Muddy Creek Formation - first fine-grained facies MCCg1 Muddy Creek Formation - first coarse-grained facies MCfg2 Muddy Creek Formation - second fine-grained facies																



LOU Number	Name of LOU	Grid
1	Trade Effluent Settling Ponds	Rows I-K
2	Open Area Due South of "Trade Effluent Disposal Ponds"	L-3
3	Air Pollution Emissions Associated with Industrial Processes	-
4	Former Hardesty Chemical Company Site (prior to J. B. Kelley Operations)	Q-4
5	On-Site Portion of Beta Ditch, Including "Small Diversion Ditch" Northwest of Pond C-1	M-2, M-8
6	Unnamed Drainage Ditch Segment (Silt Landfill)	Offsite
7	Old P-2 Pond and Associated Conveyance Facilities	O-5
8	Old P-3 Pond and Associated Conveyance Facilities	O-5
9	New P-2 Pond and Associated Piping	O-6
10	On-Site Hazardous Waste Landfill (Closed)	L-2
11	Sodium Chlorate Filter Cake Holding Area	Q-6
12	Hazardous Waste Storage Area	R-6
13	Pond S-1	Q-6
14	Pond P-1 and Associated Conveyance Piping	O-6
15	Platinum Drying Unit	Q-6
16 & 17	Ponds AP-1, AP-2, and AP-3 and Associated Transfer Lines	M-6
18	Pond AP-4	M-7
19	Pond AP-5	M-5, M-6
20	Pond C-1 and Associated Piping	M-8
21	Pond Mh-1 and Associated Piping	N-8
22	Pond WC-1 (WC-West) and Associated Piping	J-6
23	Pond WC-2 (WC-East) and Associated Piping	J-7
24	Leach Beds, Associated Conveyance Facilities, and Mn Tailings Area	O-7, O-8
25	Process Hardware Storage Area	R-4
26	Trash Storage Area	Q-3
27	PCB Storage Area	R-4
28	Hazardous Waste Storage Area	R-3
29	Solid Waste Dumpsters	S-6
30	AP Area-Pad 35	L-5
31	Drum Recycling Area	L-5
32	Groundwater Remediation Unit	Rows I-L
33	Sodium Perchlorate Platinum By-Product Filter, Unit 5	R-7
34	Former Manganese Tailings Area	Q-8
35	Truck Emptying/Dumping Site	O-2, O-3
36	Former Satellite Accumulation Point, Unit 3, Maintenance Shop	R-6
37	Former Satellite Accumulation Point, Unit 6, Maintenance Shop	R-8
38	Former Satellite Accumulation Point, AP Laboratory	N-3
39	Satellite Accumulation Point-AP Maintenance Shop	N-4
40	PCB Transformer Spill	R-7
41	Unit 1 Tenant Stains	Q-3
42	Unit 2 Salt Conveyor	R-5
43	Unit 4 Basement and Old Sodium Chlorate Plant Decommissioning	R-6
44	Unit 5 Basement	R-8
45	Diesel Storage Tank	Q-8
46	Former Old Main Cooling Tower and Recirculation Lines	O-7, O-8
47	Leach Plant Area Manganese Ore Piles	P-8
48	Leach Plant Area Leach Tanks	P-7
49	Leach Plant Area Sulfuric Acid Storage Tanks	P-7
50	Leach Plant Area Leach Tanks	P-7
51	Leach Plant Area Transfer Lines	P-8
52	AP Plant Area Screening Building, Dryer Building and Associated Sump	M-5
53	AP Plant Area Tank Farm	N-6
54	AP Plant Area Change House/Laboratory Septic Tank	N-3
55	Area Affected by July 1990 Fire	L-6
56	AP Plant Area Old Building D-1, Washdown	L-6
57	AP Plant Transfer Lines to Sodium Chlorate Process, AP Plant SI's and Transfer Lines	M-5
58	AP Plant Area New Building D-1 Washdown	M-5
59	Storm Sewer System	Rows N-T
60	Acid Drain System	Rows K-R
61	Unit 5 Basement	R-6
62	State Industries, Inc. Site, Including Impoundments and Catch Basin	U-4, U-5
63	J. B. Kelley, Inc. Trucking Site	P-3
64	Koch Materials Company Site	Q-3, Q-4
65	Nevada Precast Concrete Products, Green Ventures International, Buckles Construction Company and Ebony Construction Sites	P-4, Q-3, R-3, S-3
66	Aboveground Diesel Storage Tank Leased by Filinkote Co. Located on Chemstar Property	Q-5
67	Delbert Madsen and Estate of Delbert Madsen Site	B-4
68	Southern Nevada Auto Parts Site (Pick A Part)	F-6
69	Dillon Potter Site	H-7
70	Former U.S. Vanadium Site	P-8, Q-8

Area 70: Former U.S. Vanadium Site
LOU = Site identified in Letter of Understanding dated August 15, 1994.

Sample locations in Areas I, II and III are not finalized and subject to change.



LEGEND

- Tronox Facility Boundary
- Area IV Boundary
- Other Area Boundary
- LOU Boundary in Area IV
- LOU Boundary in other areas
- Aboveground Pipeline
- Groundwater Monitoring Well Location
- Proposed Phase B Borehole Location
- Phase A Borehole Location (Sept. 2007)
- Phase II Borehole Location (Oct. 2007)
- Historic Sample Location (pre 2006)
- LOU #59 Storm Drain System with manholes and sumps with flow direction in Area IV
- LOU #59 Storm Drain System with manholes and sumps with flow direction in other areas
- LOU #60 Acid Drain System with manholes and sumps with flow direction in Area IV
- LOU #60 Acid Drain System with manholes and sumps with flow direction in other areas
- Four Arms Grid Line (Cell reference displayed row-column)
- Parcel Boundary
- Location moved per NDEP (June 18, 2008)
- Location deleted per NDEP (June 18, 2008)
- Location added per NDEP (June 18, 2008)

Grid: Stateplane, Nevada East, NAD83, Feet
Base Aerial Photo from RS&A, October 2006

PHASE B SAMPLE LOCATIONS AND LOUs FOR AREA IV
PHASE B AREA IV SOURCE AREA INVESTIGATION
TRONOX FACILITY
HENDERSON, NEVADA

SCALE: AS SHOWN DATE: 7/9/2008 PROJECT NUMBER: 04020-023-430

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REVISIONS			
NO.	DESCRIPTION	DATE	BY
1	Changes per NDEP Comments (June 18, 2008)	7/7/2008	MS

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