

NDEP Comments on Phase A Work Plan Concept from 6/15/06 Meeting

1. General – please note that the NDEP has not verified method numbers and does not warrant the applicability of method detection limits.
2. General – please note that the specific list of analytes will be verified in the final submittal.
3. General – updates and additional detail to be provided as discussed in meeting on 6/15/06.
4. General – there should be discussion in the text that explains how Trx got from Table 1 to Table 3. This should specifically note that due to “unknowns” the broad suite analyses provided in Table 3 is proposed.
5. Radionuclides -please note that the data should be compared versus the BRC/TIMET background data set as well to confirm correlations.
6. SVOCs – please note that Trx will need to verify that the non-SIM method can provide sufficient detection limits for all future uses.
7. Dioxins/furans – typically, there is a need to split approximately 10% and analyze by both methods. There is also some calibrating the 4025 method after an initial GC/MS set of analyses. Also, if there are different sources of dioxin/furans you need to first characterize the dioxin/furan species with GC/MS for each source. The best approach is first GC/MS characterization, then using that data to develop a site-specific (and single source specific) immunoassay calibration, followed by using 4025 with some additional GC/MS analyses. This can be accomplished with roughly a 10% 8290 mix but a detailed plan should be included in the final work plan.
8. Silicon – Trx was to review the development of the SRC list and provide a discussion why silicon was de minimus.
9. It was previously discussed that analyses may be conducted on the ore materials and tailings. These do not appear to be addressed by the work plan.
10. Pesticides – please include samples at depth per our discussion in the 6/15/06 meeting.
11. Metals – is there truly a cost benefit to eliminating aluminum? This metal may be useful for geochemical correlations.
12. Location SA-9 – please add ethylene glycol to this location.
13. Sample depths – please discuss the 0.5’ interval. How will this sample be collected to acquire enough sample volume? Will the 0-0.5’ depth over a larger area be used?
14. Table 1 – the NDEP has the following comments:
 - a. A footnote should be included that discusses how historic unknowns are addressed.
 - b. Please note that the NDEP’s comments on this table are not comprehensive as the NDEP is more concerned with the end result, e.g.: Table 3.
 - c. General chemistry should likely be associated with all LOU areas.
 - d. It appears that “Process Hardware Storage Area” is mis-labeled as LOU #0 or is mis-located on the table.
 - e. The historic US Vanadium site appears to be omitted. This site was reportedly used to process tungsten ores.

- f. LOU #2 – since the history is “poorly defined” all analytical suites should be considered.
 - g. LOU #21 – would this pond be likely to contain other metals as well as impurities in the ore?
 - h. LOU #27 – please note that this LOU area and any other that may have been impacted by PCBs should include dioxins/furans by default.
 - i. LOU #35 mentions unknown wastes – it is the opinion of the NDEP that unknown wastes should result in all analytical suites being considered.
 - j. LOU #38 were any of the flammable liquids SVOCs?
 - k. LOU #55 should include dioxins and furans as a result of the fire.
 - l. LOU #59 and LOU #60 may have conveyed all manner of contaminants and should likely include all analytical suites.
 - m. LOU #64 should also include dioxins/furans.
 - n. LOU #68 – asbestos should be considered as it is used for various auto parts.
15. Table 2 – there is a listing for “organics” which seems to imply that field screening will be conducted in lieu of analysis. This is not clear on Table 3. This item requires additional clarification.
16. Please *consider* adding borings in the following locations:
- a. In the Beta Ditch south of well M89.
 - b. North of LOU #21.
 - c. Between wells M77 and MW6R and LOUs # 34 and 47.