Basic Environmental
COMPANY

September 19, 2007

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

Subject: Phase 2 Sampling and Analysis Plan to Conduct Soil Characterization, Tronox Parcel "F" Site, Henderson, Nevada, Revision 1E

Dear Shannon:

On behalf of Tronox, Basic Environmental Company (BEC) appreciates the opportunity to submit this letter Phase 2 Sampling and Analysis Plan (SAP) to conduct soil characterization of the Tronox Parcel "F" (portions of APN No. 178-12-401-009). Parcel F will be referred to as the Site for the purposes of this SAP. The Site is located within the Tronox facility, approximately 1/2 mile north of Lake Mead Parkway, in Henderson, Nevada. Figure 1 illustrates the location of the subject Site within the Tronox property. Figure 1 also shows the various Tronox source areas. Figure 2 shows details of Parcel F. Legal boundaries of Parcel F will be provided to the Nevada Division of Environmental Protection (NDEP) prior to issuance of the requested No Further Action Determination (NFAD). This revision of the SAP, Revision 1, incorporates comments received from the NDEP, dated September 12, 2007, on Revision 0 of the SAP, dated August 28, 2007. The NDEP comments and BRC's response to these comments are included in Attachment A. Also included in Attachment A is a redline/strikeout version of the text showing the revisions from the August, 28 2007 version of the SAP.

Background

The Site, which represents a portion of the Tronox property, is comprised primarily of vacant land, and includes portions of a building foundation. A remediation project was recently completed on the Parcel directly north of this Parcel (by TIMET). The parcel to the north was contaminated with PCBs from electrical equipment. There are also several aboveground storage tanks to the south of the Site. Although these tanks are at a higher elevation than the Site, they are within a bermed and synthetic lined containment area designed to hold 110 percent of the largest tank's contents. The tanks are empty now but historically stored sodium chlorate, and there has been no history of the tanks leaking. Even if the tanks did leak, it would be contained with the containment area. Therefore, there is minimal possibility of impacts to the Site from these tanks. In addition, the former Hardesty Chemical/AMECCO operation may have occurred directly south of the Site. Hardesty Chemical Company leased electrolysis building #2 and the adjacent chlorination building for operation of a chemical plant from 1946 to 1947. The company produced synthetic detergents, muriatic acid, chlorobenzene, p-dichlorobenzene, and o-dichlorobenzene. Hardesty Chemical sold or assigned its interest in the lease to Amecco Chemicals, Inc. in 1947. Amecco purchased chlorine piped in from Stauffer and produced four chemical products: chlorobenzene, p-dichlorobenzene, o-dichlorobenzene, and arsenite. The chemicals that may have been produced by these facilities are included in the proposed analytical list for this SAP.

BEC also recognizes that other historic uses/disposals on or near the Site may have occurred. A Phase 1 investigation has been performed on the Site. The Phase 1 investigation, Site visits and historical aerial photographs analysis indicate the presence of staining and debris. Electrical equipment (owned by BMI) is also located on the Site in a fenced area. None of this equipment contained PCBs. The equipment is de-energized and will be removed from the Site prior to its development. Given the Site is within the Tronox facility, and in the vicinity of the other BMI Industrial Companies, it is also possible that the Site or portions thereof could also have been indirectly impacted by such operations.

Several monitoring wells are located within the Site, which are used by several of the BMI plant operating companies. For example, Stauffer Management Company LLC (Stauffer), Montrose Chemical Corporation of California (Montrose), Syngenta Crop Protection, Inc., and Pioneer Americas, LLC (the Companies) conducted quarterly groundwater samples from one alluvial aquifer monitoring well within the property (TR-6). Chemicals concentrations were generally low or non-detect; however, chloroform was detected at 2,500 parts per billion (ppb). Tronox conducted groundwater sampling as part of their Phase A investigation in November-December 2006, as well as sampling conducted for their quarterly performance report in February 2007. Results of both the Montrose and Tronox groundwater sampling events are presented in Table 1.

This SAP will focus on the upper ten feet of soil in order to obtain a NFAD from the NDEP in order to support future industrial/commercial use on this Site. No residential use is planned. Tronox anticipates that, if needed, the site NFAD will contain a deed restriction precluding residential use of the property. The rationale for sampling for the upper ten feet (as opposed to the upper five feet) is that although imported fill of roughly five feet depth will be required in order to meet final site grading requirements on a site-wide average basis, the fill depth may not be exactly five feet at all locations. This fill will be clean. One possible source is material from the BRC Borrow Pit.

Objective

The objective of the field investigation is to identify and characterize the distribution of Site-related chemicals (SRCs) in the vicinity of the future land use features (e.g., warehouses, commercial office buildings) and historical site features (e.g., electrical equipment storage, debris piles, etc.). Surface and shallow subsurface samples that will be collected are depth-discrete soil matrix samples. Sample locations have been placed to both evaluate potential future land use exposures (although future plans are not fully defined at this time), and to characterize potential source areas on the Site. Source areas (defined during the Kerr-McGee Chemical Phase II work completed in the 1990's) within the Tronox property are shown on Figure 1. The sample locations proposed in this SAP provide spatial coverage of the Site (Figure 2). The rationale for location of the sampling points is to ensure that the entire Site is reasonably and completely covered for sampling purposes in order to obtain data that are representative of the Site, that specific locations within the Site that were potentially impacted are also sampled, and that the sampled concentrations can be meaningfully used in subsequent risk assessments, if needed. Ultimately, the purpose of this sampling is to support the NFAD for Parcel F.

Scope of Work

The following is the proposed scope of work for investigating the Site and meeting the SAP objectives. The scope of work has been divided into three main tasks: 1) Field Implementation; 2) Data Evaluation; and 3) Reporting.

Task 1: Field Implementation

The purpose of the intrusive investigation is to collect data sufficient to meet the objectives of the SAP. All sampling and sample handling procedures will be consistent with the NDEP-approved BRC Field Sampling and Standard Operating Procedures (FSSOP; BRC, ERM and MWH 2007a).

The proposed analyte list is composed of VOCs, semi-volatile organic compounds (SVOCs), total petroleum hydrocarbons (TPH), polyaromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), dioxins/furans, metals, organochlorine pesticides, perchlorate, ions (including chloride, nitrate, nitrite, and sulfate), radionuclides, and asbestos. This list includes all of the compounds (with a few additional modifications as discussed subsequently) on Tronox's "reduced list" as shown in Table 2. Tronox's reduced list was developed as a subset of the entire suite of Tronox SRCs based on the findings of the Tronox Phase A Source Area Investigation. The modifications are as follows: first, in general instead of analyzing for specific members of certain analyte categories like metals, VOCs and SVOCs, the entire suite will be analyzed and reported; second, the organophosphate pesticide and chlorinated herbicide suites were eliminated since only three detections were in these analytical suites (dimethoate and demeton-o) which were at least an order of magnitude below their respective U.S. Environmental Protection Agency (USEPA) Region 9 industrial preliminary remediation goals (PRGs); and lastly, not all SRCs are proposed to be analyzed at all depths in this SAP (for example, dioxins/furans and asbestos are proposed to be analyzed in surface soil samples only). Although only a single Aroclor was detected once in the Tronox Phase A Source Area Investigation, at 20 feet below ground surface (bgs) and below it's respective PRG, because PCBs may potentially be present on the Site (for example, in the electrical equipment area), they are retained for analysis in surface soil samples, given the proximity to the TIMET Parcel F portion which contained PCBs. Summary results of the Tronox Phase A investigation for PCBs, organophosphate pesticides, and chlorinated herbicides are provided in Table 3.

Given the absence of direct operations on this Site of a nature commensurate to that which took place on the Tronox plant site itself, the proposed SRC list and proposed sampling should characterize those sources that were located on the Site, as well as likely chemicals that may have been deposited on the Site via fugitive dust emissions from the Tronox operations and property and/or other neighboring BMI plants. The proposed analyte list for this SAP is presented in Table 2. Unless as otherwise noted above, all analytes will be analyzed at all locations. BEC notes that this analyte list may not be appropriate for any future planned investigations (such as the proposed Tronox Phase B investigation) at the Site (which will extend from 10 feet bgs to groundwater).

Pre-Field Activities

The pre-field activities will be conducted in accordance with applicable standard operating procedures (SOPs; BRC, ERM and MWH 2007a). The BRC Quality Assurance Project Plan (QAPP; BRC and MWH 2007b) and Health and Safety Plan (HASP; BRC and MWH 2005) prepared for the BMI Common Areas will be used for this proposed scope of work. All work will be completed under the direction of a State of Nevada Certified Environmental Manager.

Soil Borings

The SOPs referred to in the following discussion are documented in the FSSOP. BEC will implement field screening using photoionization detectors (PIDs) (using two lamps) in

accordance with SOP-39. SOP-1 will be followed for all drilling activities including Hollow Stem Auger drilling. The field geologist will prepare logs for each boring indicating the Unified Soil Classification System (USCS) soil classification (SOP-17), an estimate of field moisture content, sampling depths, progress of drilling (SOP-15), final completion depth, and the nature and resolution of any problems encountered.

Soil sample and auger boring locations will be surveyed using a handheld GPS to a horizontal accuracy of 3 meters (approximately 10 feet) or better. Soil cuttings generated during soil sampling and drilling activities will be collected on visqueen, analyzed, and appropriately disposed off. Due to the nature of the shallow sampling, it is not anticipated that a significant amount of excess soil will be generated as a result of the sampling, or that the soils will require special handling. Also, because the groundwater at the Site is generally 35 feet bgs, it is not anticipated that groundwater will be encountered during drilling of the shallow borings. The quality assurance/quality control (QA/QC) procedures that will be followed during the field investigation are detailed in Section B of the QAPP (BRC, ERM and MWH 2007b).

Soil matrix samples will be collected based on random sample locations placed within a 4-acre grid across the Site. The random sample locations were supplemented with judgmental sampling locations targeting specific site features (e.g., miscellaneous pile locations). The rationale for the various judgmental sampling locations is provided below:

- Parcel F, grid cell ‘F-A2’ – 55-gallon drum location;
- Parcel F, grid cell ‘F-B1’ – above ground vault location;
- Parcel F, grid cell ‘F-B2’ – electrical equipment location;
- Parcel F, grid cell ‘F-B1’ – debris pile location;
- Parcel F, grid cell ‘F-B1’ – debris pile location;
- Parcel F, grid cell ‘F-A1’ – debris pile location;
- Parcel F, grid cell ‘F-A1’ – debris pile location;
- Parcel F, grid cell ‘F-B2’ – debris pile location
- Parcel F, grid cell ‘F-B1’ – debris pile location; and
- Parcel F, grid cell ‘F-B2’ – mobile aboveground storage tank (AST) location.

Soil borings will be advanced with a hollow-stem auger to a total depth of ten feet bgs. Soil samples will be collected at approximately zero (i.e., surface) and ten feet bgs. Soil samples will be analyzed for the analyte list provided in Table 2, with limitations as noted in the footnotes to this table.

Task 2: Data Evaluation

Once the data are collected, BEC will subject the data to validation per procedures agreed to previously with the NDEP and consistent with the QAPP (BRC, ERM and MWH 2007b). Only those data determined by the QA/QC review to be suitable for use will be considered for the site data set. A separate Data Validation Summary Report will be prepared and submitted to NDEP.

Task 3: Reporting

Upon receipt of laboratory analytical results, an investigation report will be prepared. The report shall contain, but not be limited to, the following items:

- A summary of the sampling procedures conducted;
- Sampling location map;

- Soil boring logs;
- An evaluation and summary of the collected data;
- Tables(s) summarizing soil results; and
- If appropriate, plan view maps indicating the locations of detected constituents in soil.

Given the depth to groundwater at the Site (approximately 35 feet bgs, as measured at on-site monitoring wells), and the fact that future development will cover the Site with paved areas and buildings, migration of chemicals at the Site to groundwater is considered unlikely. However, once the data are collected this will be evaluated in the report. It should also be noted that development of the site will not preclude future groundwater investigation or remediation activities that may need to be conducted by Tronox.

Following collection and analysis of soil samples, the data will be discussed with the NDEP. This will include a comparison to the recently approved BRC-TIMET background data set (BRC/TIMET 2007). If required upon this evaluation, a risk assessment will be conducted to evaluate the potential risks to future on-site human receptors. The receptors identified to be evaluated in the risk assessment will be consistent with the proposed development of the Site. These receptors will include construction workers, indoor commercial workers, and outdoor maintenance workers. Because the proposed development does not include residential units, on-site residents will not be evaluated. The risk assessment will be conducted using standard USEPA guidance, input parameters, and methods. A risk assessment work plan will be submitted to NDEP after sample results have been obtained and NDEP approval will be obtained prior to conducting the risk assessment.

Schedule

Once final approval of the SAP is received from NDEP, field implementation activities can commence within one to two weeks. BEC will provide NDEP with at least one week notice prior to the initiation of field activities at the Site. It is anticipated that this work can be completed within one week, depending on field conditions. The soil samples will be submitted to the laboratories and placed on a standard turn around time, which is 28 days for the complete analyte list. A report will be completed within three weeks after the final data are received from the laboratory and validated.

Closing Remarks

See attached for appropriate certification language and signature. Please direct any remaining questions or comments you may have to me at 626-382-0001.

Sincerely,

Basic Environmental Company

Ranajit Sahu, CEM
Project Manager

cc: Brian Rakvica, NDEP, BCA, Las Vegas, NV 89119
Jim Najima, NDEP, BCA, Carson City, NV 89701

Attachments: Table 1 – Recent Groundwater Results for Monitoring Wells within/near Parcel F
Table 2 – Project List of Analytes – Soil
Table 3 – Tronox Phase A Organophosphorous Pesticide and Chlorinated Herbicide Results Summary
Figure 1 – Tronox/BEC Parcel Map with Tronox Source Areas
Figure 2 – Proposed Sample Locations – Parcel "F"
Attachment A – NDEP Comments and BRC's Response to Comments

References

Basic Remediation Company (BRC) and MWH. 2005. BRC Health and Safety Plan, BMI Common Areas, Clark County, Nevada. October.

Basic Remediation Company (BRC), ERM, and MWH. 2007a. BRC Field Sampling and Standard Operating Procedures, BMI Common Areas, Clark County, Nevada. August.

Basic Remediation Company (BRC), ERM, and MWH. 2007b. BRC Quality Assurance Project Plan. BMI Common Areas, Clark County, Nevada. August.

Basic Remediation Company (BRC) and Titanium Metals Corporation (TIMET). 2007. Background Shallow Soil Summary Report, BMI Complex and Common Areas Vicinity. March 16.

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state and local statutes, regulations and ordinances. I hereby certify that all laboratory analytical data was generated by a laboratory certified by the NDEP for each constituent and media presented herein.

September 19, 2007

Dr. Ranajit Sahu, C.E.M. (No. EM-1699, Exp. 10/07/2009) Date
BRC Project Manager

FIGURES

LOU Number	Name of LOU
1	Trade Effluent Settling Ponds
2	Open Area Due South of "Trade Effluent Disposal Ponds"
3	Air Pollution Emissions Associated with Industrial Processes
4	Hardesty Chemical Company Site (prior to J. B. Kelley Operations)
5	On-Site Portion of Beta Ditch, Including "Small Diversion Ditch" Northwest of Pond C-1
6	Unnamed Drainage Ditch Segment (BMI Landfill)
7	Old P-2 Pond and Associated Conveyance Facilities
8	Old P-3 Pond and Associated Conveyance Facilities
9	New P-2 Pond and Associated Piping
10	On-Site Hazardous Waste Landfill (Closed)
11	Sodium Chlorate Filter Cake Holding Area
12	Hazardous Waste Storage Area
13	Pond S-1
14	Pond P-1, and Associated Conveyance Piping
15	Platinum Drying Unit
16	Ponds AP-1, AP-2, and AP-3 and Associated Transfer Lines
17	
18	Pond AP-4
19	Pond AP-5
20	Pond C-1 and Associated Piping
21	Mn-1 and Associated Piping
22	Pond WC-1 and Associated Piping
23	Pond WC-2 and Associated Piping
24	Leach Beds, Associated Conveyance Facilities, and Mn Tailings Area
25	Process Hardware Storage Area
26	Trash Storage Area
27	PCB Storage Area
28	Hazardous Waste Storage Area
29	Solid Waste Dumpster
30	AP Area-Pad 35
31	Drum Recycling Area
32	Ground Water Remediation Unit
33	Sodium Perchlorate Platinum By-Product Filter, Unit 5
34	Former Manganese Tailings Area
35	Truck Emptying/Dumping Site
36	Former Satellite Accumulation Point, Unit 3, Maintenance Shop
37	Former Satellite Accumulation Point, Unit 6, Maintenance Shop
38	Former Satellite Accumulation Point, AP-Laboratory
39	Satellite Accumulation Point-AP Maintenance Shop
40	PCB Transformer Spill
41	Unit 1 Tenant Stains
42	Unit 2 Salt Redler
43	Unit 4 and 5 Basements
44	Unit 6 Basement
45	Diesel Storage Tank
46	Former Old Main Cooling Tower and Recirculation Lines
47	Leach Plant Area Manganese Ore Piles
48	Leach Plant Analyte Tanks
49	Leach Plant Area Sulfuric Acid Storage Tanks
50	Leach Plant Area Leach Tanks
51	Leach Plant Area Transfer Lines
52	AP Plant Area Screening Building, Dryer Building and Associated Sump
53	AP Plant Area Tank Farm
54	AP Plant Area Change House/ Laboratory Sep
55	Area Affected by July 1990 Fire
56	AP Plant Area Old Building D-1- Washdown
57	AP Plant Area New Building D-1- Washdown and AP Plant
58	Transfer Lines to Sodium Chlorate Process, AP Plant SI's and Transfer Lines
59	Storm Sewer System
60	Acid Drain System
61	Old Sodium Chlorate Plant Decommissioning
62	State Industries, Inc. Site, Including Impoundments and Catch Basin
63	J. B. Kelley, Inc. Trucking Site
64	Koch Materials Company Site
65	Nevada Precast Concrete Products, Green Ventures International, Buckles Construction Company and Ebony Construction Sites
66	Above-Ground Diesel Storage Tank Leased by Flintkote Co.
67	Delbert Madsen and Estate of Delbert Madsen Site
68	Southern Nevada Auto Parts Site (Pick-a-Part)
69	Dillon Potter Site

Parcel "A"
Parcel "B"
Parcel "C"
Parcel "D"
Parcel "E"
Parcel "F"
Parcel "G"
Parcel "H"
Parcel "I"
Parcel "J"

600 300 0 600
Feet

Tronox Property
Monitoring Wells
Historical Ditches

Tronox/BEC Parcels
NFA to be obtained later
NFA to be obtained now
Parcels included in this SAP
TIMET NFA Area

Tronox Potential Source Area
Tronox Potential Source Area That is Less Defined

BEC / Tronox Sampling and Analysis Plan
BMI Common Areas, Henderson, Nevada

FIGURE 1

TRONOX/BEC PARCEL MAP

Basic Environmental COMPANY

Prepared by: MKJ
Date 09/17/07
JOB No. 0069073
FILE: GIS/BEC/TRONOX/FIGURE_1.MXD

- Proposed Sampling Location
- Monitoring Well
- Approximate Electrical Equipment Location
- Approximate Location 55 Gallon Drum
- Approximate Location of Above Ground Vault

- 4-Acre Random Sampling Grid (Grid ID = "F-X#")
- TIMET NFA Area

Sample ID Nomenclature:

TSB-FR(J)-01

- TSB-FR(J)-01: Sample Number
- TSB-FR: Parcel ID
- (J): Random Sample / Judgmental Sample

Spring 2007 Aerial from AirPhotoUSA.

BEC / Tronox Sampling and Analysis Plan
BMI Common Areas, Henderson, Nevada

FIGURE 2

PROPOSED SAMPLING LOCATIONS - PARCEL "F"

Basic Environmental COMPANY

Prepared by:	Date	JOB No. 0069073
MKJ	10/17/07	FILE: GIS/BEC/TRONOX/FIGURE_2.MXD

TABLES

TABLE 1
RECENT GROUNDWATER RESULTS FOR MONITORING WELLS WITHIN/NEAR PARCEL F
(Page 1 of 5)

Analytical Method	Parameter	MCL	Location / Date / Units	TR-06[a] 01/23/2007	M92[b] 11/29/2006	M92[c] 2/2007	M93[c] 2/2007	M97[b] 11/29/2006
Organic Acids	4-Chlorobenzenesulfonic acid	--	µg/L	<50	NA	NA	NA	NA
	Benzenesulfonic acid	--	µg/L	<50	NA	NA	NA	NA
	Diethyl phosphorodithioic acid	--	µg/L	<50	NA	NA	NA	NA
	Dimethyl phosphorodithioic acid	--	µg/L	<250	NA	NA	NA	NA
	Phthalic acid	--	µg/L	<50	NA	NA	NA	NA
EPA 160.1	Total Dissolved Solids	500	mg/L	**6300**	**1850**	**1990**	**2820**	**3750**
EPA 160.2	Total Suspended Solids	--	mg/L	NA	22 J	NA	NA	16 J
EPA 310.1	Alkalinity (as CaCO3)	--	mg/L	NA	< 5 U	NA	NA	< 5 U
	Bicarbonate Alkalinity	--	mg/L	NA	80	NA	NA	90
	Total Alkalinity	--	mg/L	NA	80	NA	NA	90
EPA 425.1	MBAS	--	mg/L	NA	0.2 U	NA	NA	0.24
EPA 9056	Bromide	--	mg/L	NA	0.21 J	NA	NA	< 25 U
	Chlorate	--	mg/L	NA	3.2 J	NA	NA	277
	Chloride	250	mg/L	NA	192	NA	NA	**1190**
	Nitrate	--	mg/L	NA	4	NA	NA	8.4
	Nitrite	1	mg/L	NA	< 0.02 U	NA	NA	< 2 U
	ortho-Phosphate	--	mg/L	NA	4.5	NA	NA	315
	Sulfate	250	mg/L	NA	992	NA	NA	**1150**
EPA 9060	Total organic carbon	--	mg/L	NA	< 50 U	NA	NA	< 50 U
EPA 9040B	pH (liquid)	6.5-9	none	NA	7.4 J	NA	NA	7.3 J
EPA 9050A	Specific conductance	--	umhos/cm	NA	1930	NA	NA	2410
EPA 314.0	Perchlorate	18 / 24.5	µg/L	NA	**610**	**670**	**7000**	**74500**
EPA 350.1	Ammonia (as N)	--	µg/L	NA	< 50 U	NA	NA	< 50 U
EPA 9012A	Cyanide	200	µg/L	NA	R	NA	NA	R
EPA 8081A	2,4'-DDD	--	µg/L	<0.094 L	NA	NA	NA	NA
	2,4'-DDE	--	µg/L	<0.094	NA	NA	NA	NA
	2,4'-DDT	--	µg/L	<0.094	NA	NA	NA	NA
	4,4-DDD	--	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	4,4-DDE	--	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	4,4-DDT	--	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	Aldrin	--	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	alpha-BHC	--	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	alpha-Chlordane	2	µg/L	NA	< 0.05 U	NA	NA	< 0.05 U
	beta-BHC	--	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	Chlordane (Tech)	2	µg/L	<0.94	< 0.5 U	NA	NA	< 0.5 U
	delta-BHC	--	µg/L	<0.19	< 0.05 U	NA	NA	< 0.05 U
	Dieldrin	--	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	Endosulfan I	--	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	Endosulfan II	--	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	Endosulfan Sulfate	--	µg/L	<0.19	< 0.05 U	NA	NA	< 0.05 U
	Endrin	2	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	Endrin aldehyde	--	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	Endrin ketone	--	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	gamma-BHC (Lindane)	0.2	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	gamma-Chlordane	2	µg/L	NA	< 0.05 U	NA	NA	< 0.05 U
	Heptachlor	0.2	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	Heptachlor epoxide	0.4	µg/L	<0.094	< 0.05 U	NA	NA	< 0.05 U
	Methoxychlor	40	µg/L	<0.094	< 0.1 U	NA	NA	< 0.1 U
	Toxaphene	3	µg/L	<4.7	< 2 U	NA	NA	< 2 U
EPA 6020	Aluminum	0.05	mg/L	NA	**1.59**	NA	NA	**0.51**
	Antimony	0.006	mg/L	NA	< 0.0005 U	NA	NA	< 0.01 U
	Arsenic	0.01	mg/L	**0.055**	**0.0914**	NA	NA	**0.188**
	Barium	2	mg/L	0.054	0.0383	NA	NA	0.0387 J
	Beryllium	0.004	mg/L	NA	< 0.000088 U	NA	NA	< 0.0018 U
	Boron	--	mg/L	NA	1.36	NA	NA	4.81
	Cadmium	0.005	mg/L	<0.010 RL1	0.000089 J	NA	NA	< 0.0012 U
	Calcium	--	mg/L	NA	138	NA	NA	309
	Chromium, Total	0.1	mg/L	0.012	0.0163	< 0.01	0.1	0.0772 J
	Cobalt	--	mg/L	NA	0.00084 J	NA	NA	< 0.0063 U
	Copper	1.3	mg/L	NA	0.0045	NA	NA	0.007
	Iron	0.3	mg/L	NA	1.01 J-	NA	NA	< 0.188 UJ
	Lead	0.015	mg/L	<0.010 RL1	0.00082 J	NA	NA	< 0.0098 U
	Magnesium	--	mg/L	NA	67	NA	NA	192
	Manganese	0.05	mg/L	NA	< 0.0353 U	NA	NA	< 0.0146 U
	Molybdenum	--	mg/L	NA	0.0173	NA	NA	0.0196 J

TABLE 1
RECENT GROUNDWATER RESULTS FOR MONITORING WELLS WITHIN/NEAR PARCEL F
(Page 2 of 5)

Analytical Method	Parameter	MCL	Location / Date / Units	TR-06[a] 01/23/2007	M92[b] 11/29/2006	M92[c] 2/2007	M93[c] 2/2007	M97[b] 11/29/2006
EPA 6020	Nickel	--	mg/L	NA	0.0058	NA	NA	0.0114 J
	Platinum	--	mg/L	NA	< 0.0001 U	NA	NA	< 0.002 U
	Potassium	--	mg/L	NA	11.4	NA	NA	17.3
	Selenium	0.05	mg/L	<0.020 RL1	0.003 J	NA	NA	< 0.02 U
	Silver	0.1	mg/L	<0.010 RL1	< 0.0002 U	NA	NA	< 0.0041 U
	Sodium	--	mg/L	NA	306	NA	NA	623
	Strontium	--	mg/L	NA	3.09	NA	NA	7.62
	Thallium	0.002	mg/L	NA	< 0.00032 U	NA	NA	< 0.0064 U
	Tin	--	mg/L	NA	< 0.0002 U	NA	NA	< 0.004 U
	Titanium	--	mg/L	NA	0.0718	NA	NA	0.0223 J
	Tungsten	--	mg/L	NA	0.00063 J	NA	NA	< 0.01 U
	Uranium	--	mg/L	NA	0.0056	NA	NA	0.0346
	Vanadium	--	mg/L	NA	0.0367 J	NA	NA	0.043 J
	Zinc	0.5	mg/L	NA	< 0.0172 UJ	NA	NA	< 0.0452 UJ
EPA 7470A	Mercury	0.002	mg/L	<0.0002	< 0.000093 U	NA	NA	< 0.000093 U
EPA 7199	Hexavalent chromium	--	mg/L	NA	0.0143 J	NA	NA	0.0646
EPA 903.1	Radium-226 - soluble	5	pCi/L	NA	0.209 J	NA	NA	0.522 J
EPA 904.0	Radium-228 - soluble	5	pCi/L	NA	0.204 U	NA	NA	0.718 J
EPA 8015B	Ethanol	--	mg/L	NA	5 U	NA	NA	NA
	Ethylene glycol	--	mg/L	NA	10 UJ	NA	NA	NA
	Methanol	--	mg/L	NA	5 U	NA	NA	NA
EPA 8082	Aroclor 1016	0.5	µg/L	NA	0.1 U	NA	NA	0.1 U
	Aroclor 1221	0.5	µg/L	NA	0.1 U	NA	NA	0.1 U
	Aroclor 1232	0.5	µg/L	NA	0.1 U	NA	NA	0.1 U
	Aroclor 1242	0.5	µg/L	NA	0.1 U	NA	NA	0.1 U
	Aroclor 1248	0.5	µg/L	NA	0.1 U	NA	NA	0.1 U
	Aroclor 1254	0.5	µg/L	NA	0.1 U	NA	NA	0.1 U
	Aroclor 1260	0.5	µg/L	NA	0.1 U	NA	NA	0.1 U
EPA 8141A	Azinphos-methyl	--	µg/L	NA	< 2.5 UJ	NA	NA	< 2.5 UJ
	Bolstar	--	µg/L	NA	< 1 U	NA	NA	< 1 U
	Chlorpyrifos	--	µg/L	NA	< 1 U	NA	NA	< 1 U
	Coumaphos	--	µg/L	NA	< 1 U	NA	NA	< 1 U
	Demeton-O	--	µg/L	NA	< 1 U	NA	NA	< 1 U
	Demeton-S	--	µg/L	NA	< 1 U	NA	NA	< 1 U
	Diazinon	--	µg/L	NA	< 1 U	NA	NA	< 1 U
	Dichlorvos	--	µg/L	NA	< 1 U	NA	NA	< 1 U
	Dimethoate	--	µg/L	NA	< 1 U	NA	NA	< 1 U
	Disulfoton	--	µg/L	NA	< 0.5 U	NA	NA	< 0.5 U
	EPN	--	µg/L	NA	< 1.2 U	NA	NA	< 1.2 U
	Ethoprop	--	µg/L	NA	< 0.5 U	NA	NA	< 0.5 U
	Ethyl parathion	--	µg/L	NA	< 1 U	NA	NA	< 1 U
	Famphur	--	µg/L	NA	< 1 U	NA	NA	< 1 U
	Fensulfothion	--	µg/L	NA	< 2.5 U	NA	NA	< 2.5 U
	Fenthion	--	µg/L	NA	< 2.5 U	NA	NA	< 2.5 U
	Malathion	--	µg/L	NA	< 1.2 U	NA	NA	< 1.2 U
	Merphos	--	µg/L	NA	< 5 U	NA	NA	< 5 U
	Methyl parathion	--	µg/L	NA	< 4 U	NA	NA	< 4 U
	Mevinphos	--	µg/L	NA	< 6.2 U	NA	NA	< 6.2 U
	Naled	--	µg/L	NA	< 1 UJ	NA	NA	< 1 UJ
	Phorate	--	µg/L	NA	< 1.2 U	NA	NA	< 1.2 U
	Ronnel	--	µg/L	NA	< 10 U	NA	NA	< 10 U
	Stirphos	--	µg/L	NA	< 3.5 U	NA	NA	< 3.5 U
	Sulfotep	--	µg/L	NA	< 1.5 U	NA	NA	< 1.5 U
	Thionazin	--	µg/L	NA	< 1 U	NA	NA	< 1 U
	Tokuthion	--	µg/L	NA	< 1.6 U	NA	NA	< 1.6 U
	Trichloronate	--	µg/L	NA	< 0.5 U	NA	NA	< 0.5 U
EPA 8260B	1,1,1,2-Tetrachloroethane	--	µg/L	<250	< 5 U	NA	NA	< 5 U
	1,1,1-Trichloroethane	200	µg/L	<100	< 5 U	NA	NA	< 5 U
	1,1,2,2-Tetrachloroethane	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	1,1,2-Trichloroethane	5	µg/L	<100	< 5 U	NA	NA	< 5 U
	1,1-Dichloroethane	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	1,1-Dichloroethene	7	µg/L	<250	**14**	NA	NA	5.4
	1,1-Dichloropropene	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	1,2,3-Trichlorobenzene	--	µg/L	<250 C	< 5 U	NA	NA	< 5 U
	1,2,3-Trichloropropane	--	µg/L	<500	< 5 U	NA	NA	< 5 U

TABLE 1
RECENT GROUNDWATER RESULTS FOR MONITORING WELLS WITHIN/NEAR PARCEL F
(Page 3 of 5)

Analytical Method	Parameter	MCL	Location / Date / Units	TR-06[a] 01/23/2007	M92[b] 11/29/2006	M92[c] 2/2007	M93[c] 2/2007	M97[b] 11/29/2006
EPA 8260B	1,2,4-Trichlorobenzene	70	µg/L	<250	< 5 U	NA	NA	< 5 U
	1,2,4-Trimethylbenzene	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	1,2-Dibromo-3-chloropropane	0.2	µg/L	<250	< 5 U	NA	NA	< 5 U
	1,2-Dibromoethane	--	µg/L	<100	NA	NA	NA	NA
	1,2-Dichlorobenzene	600	µg/L	<100	< 5 U	NA	NA	< 5 U
	1,2-Dichloroethane	5	µg/L	<100	< 5 U	NA	NA	< 5 U
	1,2-Dichloropropane	5	µg/L	<100	< 5 U	NA	NA	< 5 U
	1,3,5-Trimethylbenzene	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	1,3-Dichlorobenzene	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	1,3-Dichloropropane	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	1,4-Dichlorobenzene	75	µg/L	<100	0.76 J	NA	NA	< 5 U
	2,2-Dichloropropane	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	2-Butanone	--	µg/L	NA	< 10 U	NA	NA	< 10 U
	2-Chlorotoluene	--	µg/L	<250	< 5 U	NA	NA	< 5 U
	2-Hexanone	--	µg/L	NA	< 10 UJ	NA	NA	< 10 UJ
	2-Methoxy-2-methyl-butane	--	µg/L	NA	< 5 U	NA	NA	< 5 U
	4-Chlorotoluene	--	µg/L	<250	< 5 U	NA	NA	< 5 U
	4-Isopropyltoluene	--	µg/L	NA	< 5 U	NA	NA	< 5 U
	4-Methyl-2-pentanone	--	µg/L	NA	< 10 U	NA	NA	< 10 U
	Acetone	--	µg/L	NA	< 10 U	NA	NA	< 10 U
	Benzene	5	µg/L	<100	< 5 U	NA	NA	< 5 U
	Bromobenzene	--	µg/L	<250	< 5 U	NA	NA	< 5 U
	Bromochloromethane	--	µg/L	<250	< 5 U	NA	NA	< 5 U
	Bromodichloromethane	80	µg/L	<100	< 5 U	NA	NA	< 5 U
	Bromoform		µg/L	<250	< 5 U	NA	NA	< 5 U
	Chloroform		µg/L	**2500**	30	NA	NA	12
	Dibromochloromethane		µg/L	<100	< 5 U	NA	NA	< 5 U
	Bromomethane	--	µg/L	<250	< 10 UJ	NA	NA	< 10 UJ
	Carbon tetrachloride	5	µg/L	<250	< 5 U	NA	NA	< 5 U
	Chlorobenzene	100	µg/L	<100	< 5 U	NA	NA	< 5 U
	Chloroethane	--	µg/L	<250	< 5 UJ	NA	NA	< 5 UJ
	Chloromethane	--	µg/L	<250	< 5 UJ	NA	NA	< 5 UJ
	cis-1,2-Dichloroethene	70	µg/L	<100	< 5 U	NA	NA	< 5 U
	cis-1,3-Dichloropropene	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	Dibromomethane	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	Dichlorodifluoromethane	--	µg/L	<250	< 5 UJ	NA	NA	< 5 UJ
	Dimethyl Disulfide	--	µg/L	<100	NA	NA	NA	NA
	Ethyl t-butyl ether	--	µg/L	NA	< 5 U	NA	NA	< 5 U
	Ethylbenzene	700	µg/L	<100	< 5 U	NA	NA	< 5 U
	Ethylene dibromide	--	µg/L	NA	< 5 U	NA	NA	< 5 U
	Hexachlorobutadiene	--	µg/L	<250	< 5 U	NA	NA	< 5 U
	isopropyl ether	--	µg/L	NA	< 5 U	NA	NA	< 5 U
	Isopropylbenzene	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	p-Isopropyl toluene	--	µg/L	<100	NA	NA	NA	NA
	Methyl tert butyl ether	--	µg/L	NA	< 5 U	NA	NA	< 5 U
	Methylene chloride	5	µg/L	<250	< 5 U	NA	NA	< 5 U
	Naphthalene	--	µg/L	<250	< 5 U	NA	NA	< 5 U
	n-Butylbenzene	--	µg/L	<250	< 5 U	NA	NA	< 5 U
	n-Propylbenzene	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	sec-Butylbenzene	--	µg/L	<250	< 5 U	NA	NA	< 5 U
	Styrene	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	t-Butyl alcohol	--	µg/L	NA	< 10 UJ	NA	NA	< 10 UJ
	tert-Butylbenzene	--	µg/L	<250	< 5 U	NA	NA	< 5 U
	Tetrachloroethene	5	µg/L	<100	< 5 U	NA	NA	< 5 U
	Toluene	1,000	µg/L	<100	< 5 U	NA	NA	< 5 U
	trans-1,2-Dichloroethylene	100	µg/L	<100	< 5 U	NA	NA	< 5 U
	trans-1,3-Dichloropropene	--	µg/L	<100	< 5 U	NA	NA	< 5 U
	Trichloroethene	5	µg/L	<100	3.8 J	NA	NA	< 5 U
	Trichlorofluoromethane	--	µg/L	<250	< 5 UJ	NA	NA	< 5 UJ
	Vinyl chloride	2	µg/L	<250	< 5 UJ	NA	NA	< 5 UJ
	m,p-Xylene	10,000	µg/L	<100	NA	NA	NA	NA
	o-Xylene	10,000	µg/L	<100	NA	NA	NA	NA
	Xylene (Total)	10,000	µg/L	NA	< 10 U	NA	NA	< 10 U

TABLE 1
RECENT GROUNDWATER RESULTS FOR MONITORING WELLS WITHIN/NEAR PARCEL F
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Analytical Method	Parameter	MCL	Location / Date / Units	TR-06[a] 01/23/2007	M92[b] 11/29/2006	M92[c] 2/2007	M93[c] 2/2007	M97[b] 11/29/2006
EPA 8270C	1,2,4-Trichlorobenzene	70	µg/L	<9.4	NA	NA	NA	NA
	1,2-Dichlorobenzene	600	µg/L	<9.4	NA	NA	NA	NA
	1,3-Dichlorobenzene	--	µg/L	<9.4	NA	NA	NA	NA
	1,4-Dichlorobenzene	75	µg/L	<9.4	NA	NA	NA	NA
	1,4-Dioxane	--	µg/L	NA	< 10 U	NA	NA	< 10 U
	2,4,5-Trichlorophenol	--	µg/L	<19 L	NA	NA	NA	NA
	2,4,6-Trichlorophenol	--	µg/L	<19 L	NA	NA	NA	NA
	2,4-Dichlorophenol	--	µg/L	<9.4	NA	NA	NA	NA
	2,4-Dimethylphenol	--	µg/L	<19	NA	NA	NA	NA
	2,4-Dinitrophenol	--	µg/L	<19	NA	NA	NA	NA
	2,4-Dinitrotoluene	--	µg/L	<9.4 L	NA	NA	NA	NA
	2,6-Dinitrotoluene	--	µg/L	<9.4	NA	NA	NA	NA
	2-Chloronaphthalene	--	µg/L	<9.4	NA	NA	NA	NA
	2-Chlorophenol	--	µg/L	<9.4	NA	NA	NA	NA
	2-Methylnaphthalene	--	µg/L	<9.4	< 10 U	NA	NA	< 10 U
	2-Methylphenol	--	µg/L	<9.4	NA	NA	NA	NA
	2-Nitroaniline	--	µg/L	<19	NA	NA	NA	NA
	2-Nitrophenol	--	µg/L	<9.4	NA	NA	NA	NA
	3,3'-Dichlorobenzidine	--	µg/L	<19	NA	NA	NA	NA
	3-Nitroaniline	--	µg/L	<19	NA	NA	NA	NA
	4,6-Dinitro-2-methylphenol	--	µg/L	<19	NA	NA	NA	NA
	4-Bromophenyl phenyl ether	--	µg/L	<9.4 L	NA	NA	NA	NA
	4-Chloro-3-methylphenol	--	µg/L	<19	NA	NA	NA	NA
	4-Chloroaniline	--	µg/L	<9.4	NA	NA	NA	NA
	4-Chlorophenyl phenyl ether	--	µg/L	<9.4	NA	NA	NA	NA
	4-Methylphenol	--	µg/L	<9.4	NA	NA	NA	NA
	4-Nitroaniline	--	µg/L	<19	NA	NA	NA	NA
	4-Nitrophenol	--	µg/L	<19 L	NA	NA	NA	NA
	Acenaphthene	--	µg/L	<9.4	< 10 U	NA	NA	< 10 U
	Acenaphthylene	--	µg/L	<9.4	< 10 U	NA	NA	< 10 U
	Aniline	--	µg/L	<9.4	NA	NA	NA	NA
	Anthracene	--	µg/L	<9.4	< 10 U	NA	NA	< 10 U
	Azobenzene	--	µg/L	<19	NA	NA	NA	NA
	Benzidine	--	µg/L	<19 L	NA	NA	NA	NA
	Benz(a)anthracene	--	µg/L	<9.4	< 10 U	NA	NA	< 10 U
	Benzo(a)pyrene	0.2	µg/L	<9.4 L	< 10 U	NA	NA	< 10 U
	Benzo(b)fluoranthene	--	µg/L	<9.4 L	< 10 U	NA	NA	< 10 U
	Benzo(g,h,i)perylene	--	µg/L	<9.4 L	< 10 U	NA	NA	< 10 U
	Benzo(k)fluoranthene	--	µg/L	<9.4 L	< 10 U	NA	NA	< 10 U
	Benzoic acid	--	µg/L	<19	NA	NA	NA	NA
	Benzyl alcohol	--	µg/L	<19	NA	NA	NA	NA
	bis(2-Chloroethoxy)methane	--	µg/L	<9.4	NA	NA	NA	NA
	Bis(2-Chloroethyl)ether	--	µg/L	<9.4	NA	NA	NA	NA
	Bis(2-Chloroisopropyl)ether	--	µg/L	<9.4	NA	NA	NA	NA
	bis(2-Ethylhexyl)phthalate	--	µg/L	<47	3.2 J	NA	NA	1.5 J
	Butyl benzyl phthalate	--	µg/L	<19	< 10 U	NA	NA	< 10 U
	Chrysene	--	µg/L	<9.4	< 10 U	NA	NA	< 10 U
	Di-n-butyl phthalate	--	µg/L	<19	< 10 U	NA	NA	< 10 U
	Di-n-octyl phthalate	--	µg/L	<19	< 10 U	NA	NA	< 10 U
	Dibenz(a,h)anthracene	--	µg/L	<19 L	< 10 U	NA	NA	< 10 U
	Dibenzofuran	--	µg/L	<9.4	NA	NA	NA	NA
	Diethyl phthalate	--	µg/L	<9.4 CL	< 10 U	NA	NA	< 10 U
	Dimethyl phthalate	--	µg/L	<9.4	< 10 U	NA	NA	< 10 U
	Fluoranthene	--	µg/L	<9.4	< 10 U	NA	NA	< 10 U
	Fluorene	--	µg/L	<9.4	< 10 U	NA	NA	< 10 U
	Hexachlorobenzene	1	µg/L	<9.4	< 10 U	NA	NA	< 10 U
	Hexachlorobutadiene	--	µg/L	<9.4	NA	NA	NA	NA
	Hexachlorocyclopentadiene	50	µg/L	<19	NA	NA	NA	NA
	Hexachloroethane	--	µg/L	<9.4	NA	NA	NA	NA
	Indeno(1,2,3-cd)pyrene	--	µg/L	<19 L	< 10 U	NA	NA	< 10 U
	Isophorone	--	µg/L	<9.4	NA	NA	NA	NA
	n-Nitroso-di-n-propylamine	--	µg/L	<9.4	NA	NA	NA	NA
	n-Nitrosodiphenylamine	--	µg/L	<9.4	NA	NA	NA	NA
	Naphthalene	--	µg/L	<9.4	< 10 U	NA	NA	< 10 U
	Nitrobenzene	--	µg/L	<19	< 10 U	NA	NA	< 10 U

TABLE 1
RECENT GROUNDWATER RESULTS FOR MONITORING WELLS WITHIN/NEAR PARCEL F
(Page 5 of 5)

Analytical Method	Parameter	MCL	Location / Date / Units	TR-06[a] 01/23/2007	M92[b] 11/29/2006	M92[c] 2/2007	M93[c] 2/2007	M97[b] 11/29/2006
EPA 8270C	Octachlorostyrene	--	µg/L	NA	< 10 U	NA	NA	< 10 U
	Pentachlorophenol	1	µg/L	<19	NA	NA	NA	NA
	Phenanthrene	--	µg/L	<9.4	< 10 U	NA	NA	< 10 U
	Phenol	--	µg/L	<9.4	NA	NA	NA	NA
	Pyrene	--	µg/L	<9.4	< 10 U	NA	NA	< 10 U
	Pyridine	--	µg/L	NA	< 20 U	NA	NA	< 20 U

a = From Montrose, Syngenta, And Pioneer Groundwater Monitoring Data Submittal, First Quarter 2007, Quarterly Groundwater Monitoring Program, March 30, 2007.
b = From Tronox Source Area Investigation, Phase A, May 2007.
c = From Tronox Quarterly Performance Report, Perchlorate Recovery System, January-March 2007, May 2007.
NA = Not analyzed.
C = Calibration Verification recovery was above the method control limit for this analyte. Analyte not detected, data not impacted.
J = The result is an estimated quantity. The associated numerical value is the approximate concentration of the analyte in the sample.
L = Laboratory Control Sample and/or Laboratory Control Sample Duplicate recovery was above the acceptance limits. Analyte not detected, data not impacted.
R = The sample result is rejected and unusable.
RL1 = Reporting limit raised due to sample matrix effects.
U = The analyte was analyzed for, but was not detected above the sample reporting limit
UJ = The analyte was not detected above the sample reporting limit and the reporting limit is approximate.

TABLE 2
PROJECT LIST OF ANALYTES – SOIL
(Page 1 of 11)

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC	Soil Sample Analysis	
					Surface (0 ft bgs)	Subsurface (10 ft bgs)
Ions	**EPA 300.0**	Bromide	24959-67-9		X	X
		Bromine	7726-95-6		X	X
		Chlorate	14866-68-3	X	X	X
		Chloride	16887-00-6	X	X	X
		Chlorine (soluble)	7782-50-5	X	X	X
		Chlorite	14998-27-7		X	X
		Fluoride	16984-48-8		X	X
		Nitrate (as N)	14797-55-8	X	X	X
		Nitrite (as N)	14797-65-0		X	X
		Orthophosphate	14265-44-2	X	X	X
		Sulfate	14808-79-8	X	X	X
	EPA 314.0	Perchlorate	14797-73-0	X	X	X
Polychlorinated Dibenzodioxins/ Dibenzofurans	**EPA 8290**	1,2,3,4,6,7,8,9-Octachlorodibenzofuran	39001-02-0	X	X	
		1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	3268-87-9	X	X	
		1,2,3,4,6,7,8-Heptachlorodibenzofuran	67562-39-4	X	X	
		1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	35822-46-9	X	X	
		1,2,3,4,7,8,9-Heptachlorodibenzofuran	55673-89-7	X	X	
		1,2,3,4,7,8-Hexachlorodibenzofuran	70648-26-9	X	X	
		1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	39227-28-6	X	X	
		1,2,3,6,7,8-Hexachlorodibenzofuran	57117-44-9	X	X	
		1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	57653-85-7	X	X	
		1,2,3,7,8,9-Hexachlorodibenzofuran	72918-21-9	X	X	
		1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	19408-74-3	X	X	
		1,2,3,7,8-Pentachlorodibenzofuran	57117-41-6	X	X	
		1,2,3,7,8-Pentachlorodibenzo-p-dioxin	40321-76-4	X	X	
		2,3,4,6,7,8-Hexachlorodibenzofuran	60851-34-5	X	X	
		2,3,4,7,8-Pentachlorodibenzofuran	57117-31-4	X	X	
		2,3,7,8-Tetrachlorodibenzofuran	51207-31-9	X	X	
		2,3,7,8-Tetrachlororodibenzo-p-dioxin	1746-01-6	X	X	
Asbestos	**Elutriator/TEM**	Asbestos	1332-21-4	X	X	

TABLE 2
PROJECT LIST OF ANALYTES – SOIL
(Page 2 of 11)

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC	Soil Sample Analysis	
					Surface (0 ft bgs)	Subsurface (10 ft bgs)
Metals	**EPA 6020/6010B**	Aluminum	7429-90-5	X	X	X
		Antimony	7440-36-0	X	X	X
		Arsenic	7440-38-2	X	X	X
		Barium	7440-39-3	X	X	X
		Beryllium	7440-41-7	X	X	X
		Boron	7440-42-8	X	X	X
		Cadmium	7440-43-9	X	X	X
		Calcium	7440-70-2	X	X	X
		Chromium	7440-47-3	X	X	X
		Cobalt	7440-48-4	X	X	X
		Copper	7440-50-8	X	X	X
		Iron	7439-89-6	X	X	X
		Lead	7439-92-1	X	X	X
		Lithium	1313-13-9		X	X
		Magnesium	7439-95-4	X	X	X
		Manganese	7439-96-5	X	X	X
		Molybdenum	7439-98-7	X	X	X
		Nickel	7440-02-0	X	X	X
		Niobium	7440-03-1		X	X
		Palladium	7440-05-3		X	X
		Phosphorus	7723-14-0	X	X	X
		Platinum	7440-06-4	X	X	X
		Potassium	7440-09-7	X	X	X
		Selenium	7782-49-2	X	X	X
		Silicon	7440-21-3	X	X	X
		Silver	7440-22-4	X	X	X
		Sodium	7440-23-5	X	X	X
		Strontium	7440-24-6	X	X	X
		Sulfur	7704-34-9		X	X
		Thallium	7440-28-0	X	X	X
		Tin	7440-31-5	X	X	X
		Titanium	7440-32-6	X	X	X

TABLE 2
PROJECT LIST OF ANALYTES – SOIL
(Page 3 of 11)

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC	Soil Sample Analysis	
					Surface (0 ft bgs)	Subsurface (10 ft bgs)
Metals (continued)	**EPA 6020/6010B**	Tungsten	7440-33-7	X	X	X
		Uranium	7440-61-1	X	X	X
		Vanadium	7440-62-2	X	X	X
		Zinc	7440-66-6	X	X	X
		Zirconium	7440-67-7		X	X
	EPA 7196A	Chromium (VI)	18540-29-9	X	X	X
Polychlorinated Biphenyls (PCBs)[1]	**EPA 8141A**	Aroclor 1016	12674-11-2	X	X	
		Aroclor 1221	11104-28-2	X	X	
		Aroclor 1232	11141-16-5	X	X	
		Aroclor 1242	53469-21-9	X	X	
		Aroclor 1248	12672-29-6	X	X	
		Aroclor 1254	11097-69-1	X	X	
		Aroclor 1260	11096-82-5	X	X	
Organophosphorous Pesticides[1]	**EPA 8141A**	Azinphos-Methyl	86-50-0	X		
		Bolstar	35400-43-2	X		
		Chlorpyrifos	2921-88-2	X		
		Coumaphos	56-72-4	X		
		Demeton-O	298-03-3	X		
		Demeton-S	126-75-0	X		
		Diazinon	333-41-5	X		
		Dichlorvos	62-73-7	X		
		Dimethoate	60-51-5	X		
		Disulfoton	298-04-4	X		
		Epn	2104-64-5	X		
		Ethoprop	13194-48-4	X		
		Ethyl Parathion	56-38-2	X		
		Famphur	52-85-7	X		
		Fensulfothion	115-90-2	X		
		Fenthion	55-38-9	X		
		Malathion	121-75-5	X		
		Merphos	150-50-5	X		
		Methyl Parathion	298-00-0	X		

TABLE 2
PROJECT LIST OF ANALYTES – SOIL
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Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC	Soil Sample Analysis	
					Surface (0 ft bgs)	Subsurface (10 ft bgs)
Organophosphorous Pesticides[1] (continued)	**EPA 8141A**	Mevinphos	7786-34-7	X		
		Naled	300-76-5	X		
		Phorate	298-02-2	X		
		Ronnel	299-84-3	X		
		Stirphos	22248-79-9	X		
		Sulfotep	3689-24-5	X		
		Thionazin	297-97-2	X		
		Tokuthion	34643-46-4	X		
		Trichloronate	327-98-0	X		
Organochlorine Pesticides	**EPA 8081A**	2,4-DDD	53-19-0	X	X	X
		2,4-DDE	3424-82-6	X	X	X
		4,4-DDD	72-54-8	X	X	X
		4,4-DDE	72-55-9	X	X	X
		4,4-DDT	50-29-3	X	X	X
		Aldrin	309-00-2	X	X	X
		alpha-BHC	319-84-6	X	X	X
		alpha-Chlordane	5103-71-9	X	X	X
		beta-BHC	319-85-7	X	X	X
		Chlordane	57-74-9	X	X	X
		delta-BHC	319-86-8	X	X	X
		Dieldrin	60-57-1	X	X	X
		Endosulfan I	959-98-8	X	X	X
		Endosulfan II	33213-65-9	X	X	X
		Endosulfan sulfate	1031-07-8	X	X	X
		Endrin	72-20-8	X	X	X
		Endrin aldehyde	7421-93-4	X	X	X
		Endrin ketone	53494-70-5	X	X	X
		gamma-BHC (Lindane)	58-89-9	X	X	X
		gamma-Chlordane	5103-74-2	X	X	X

TABLE 2
PROJECT LIST OF ANALYTES – SOIL
(Page 5 of 11)

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC	Soil Sample Analysis	
					Surface (0 ft bgs)	Subsurface (10 ft bgs)
Organochlorine Pesticides (continued)	**EPA 8081A**	Heptachlor	76-44-8	X	X	X
		Heptachlor epoxide	1024-57-3	X	X	X
		Methoxychlor	72-43-5	X	X	X
		Toxaphene	8001-35-2	X	X	X
Chlorinated Herbicides[1]	**EPA 8151A**	2,4,5-TP (Silvex)	93-72-1	X		
Polynuclear Aromatic Hydrocarbons	**EPA 8310[2]**	Acenaphthene	83-32-9	X	X	X
		Acenaphthylene	208-96-8	X	X	X
		Anthracene	120-12-7	X	X	X
		Benzo(a)anthracene	56-55-3	X	X	X
		Benzo(a)pyrene	50-32-8	X	X	X
		Benzo(b)fluoranthene	205-99-2	X	X	X
		Benzo(g,h,i)perylene	191-24-2	X	X	X
		Benzo(k)fluoranthene	207-08-9	X	X	X
	EPA 8310[2]	Chrysene	218-01-9	X	X	X
		Dibenzo(a,h)anthracene	53-70-3	X	X	X
		Indeno(1,2,3-cd)pyrene	193-39-5	X	X	X
		Phenanthrene	85-01-8	X	X	X
		Pyrene	129-00-0	X	X	X
Radionuclides	**HASL A-01-R**	Thorium-228	14274-82-9	X	X	X
		Thorium-230	14269-63-7	X	X	X
		Thorium-232	7440-29-1	X	X	X
		Uranium-233/234	13966-29-5	X	X	X
		Uranium 235/236	15117-96-1	X	X	X
		Uranium-238	7440-61-1	X	X	X
	EPA 903.0 / 903.1	Radium-226	13982-63-3	X	X	X
	EPA 904.0	Radium-228	15262-20-1	X	X	X
Semivolatile Organic Compounds	**EPA 8270C [3]**	1,2,4,5-Tetrachlorobenzene	95-94-3		X	X
		1,2-Diphenylhydrazine	122-66-7		X	X
		1,4-Dioxane	123-91-1		X	X
		2,2'/4,4'-Dichlorobenzil	3457-46-3		X	X
		2,4,5-Trichlorophenol	95-95-4		X	X
		2,4,6-Trichlorophenol	88-06-2		X	X

TABLE 2
PROJECT LIST OF ANALYTES – SOIL
(Page 6 of 11)

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC	Soil Sample Analysis	
					Surface (0 ft bgs)	Subsurface (10 ft bgs)
Semivolatile Organic Compounds (continued)	**EPA 8270C [3]**	2,4-Dichlorophenol	120-83-2		X	X
		2,4-Dimethylphenol	105-67-9		X	X
		2,4-Dinitrophenol	51-28-5		X	X
		2,4-Dinitrotoluene	121-14-2		X	X
		2,6-Dinitrotoluene	606-20-2		X	X
		2-Chloronaphthalene	91-58-7		X	X
		2-Chlorophenol	95-57-8		X	X
		2-Methylnaphthalene	91-57-6		X	X
		2-Nitroaniline	88-74-4		X	X
		2-Nitrophenol	88-75-5		X	X
		3,3-Dichlorobenzidine	91-94-1		X	X
		3-Nitroaniline	99-09-2		X	X
		4,4'-Dichlorobenzil	3457-46-3		X	X
		4-Bromophenyl phenyl ether	101-55-3		X	X
		4-Chloro-3-methylphenol	59-50-7		X	X
		4-Chlorophenyl phenyl ether	7005-72-3		X	X
		4-Chlorothioanisole	123-09-1		X	X
		4-Chlorothiophenol	106-54-7		X	X
		4-Nitroaniline	100-01-6		X	X
		4-Nitrophenol	100-02-7		X	X
		Acenaphthene	83-32-9	X	X	X
		Acenaphthylene	208-96-8	X	X	X
		Acetophenone	98-86-2		X	X
		Aniline	62-53-3		X	X
		Anthracene	120-12-7	X	X	X
		Azobenzene	103-33-3		X	X
		Benzo(a)anthracene	56-55-3	X	X	X
		Benzo(a)pyrene	50-32-8	X	X	X
		Benzo(b)fluoranthene	205-99-2	X	X	X
		Benzo(g,h,i)perylene	191-24-2	X	X	X
		Benzo(k)fluoranthene	207-08-9	X	X	X
		Benzoic acid	65-85-0		X	X

TABLE 2
PROJECT LIST OF ANALYTES – SOIL
(Page 7 of 11)

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC	Soil Sample Analysis	
					Surface (0 ft bgs)	Subsurface (10 ft bgs)
Semivolatile Organic Compounds (continued)	**EPA 8270C** [3]	Benzyl alcohol	100-51-6		X	X
		bis(2-Chloroethoxy)methane	111-91-1		X	X
		bis(2-Chloroethyl) ether	111-44-4		X	X
		bis(2-Chloroisopropyl) ether	108-60-1		X	X
		bis(2-Ethylhexyl) phthalate	117-81-7		X	X
		bis(Chloromethyl) ether	542-88-1		X	X
		bis(p-Chlorophenyl) sulfone	80-07-9		X	X
		bis(p-Chlorophenyl)disulfide	1142-19-4		X	X
		Butylbenzyl phthalate	85-68-7		X	X
		Carbazole	86-74-8		X	X
		Chrysene	218-01-9	X	X	X
		Dibenzo(a,h)anthracene	53-70-3	X	X	X
		Dibenzofuran	132-64-9		X	X
		Dichloromethyl ether	542-88-1		X	X
		Diethyl phthalate	84-66-2		X	X
		Dimethyl phthalate	131-11-3		X	X
		Di-n-butyl phthalate	84-74-2		X	X
		Di-n-octyl phthalate	117-84-0		X	X
		Diphenyl disulfide	882-33-7		X	X
		Diphenyl sulfide	139-66-2		X	X
		Diphenyl sulfone	127-63-9		X	X
		Fluoranthene	206-44-0	X	X	X
		Fluorene	86-73-7	X	X	X
		Hexachlorobenzene	118-74-1	X	X	X
		Hexachlorobutadiene	87-68-3		X	X
		Hexachlorocyclopentadiene	77-47-4		X	X
		Hexachloroethane	67-72-1		X	X
		Hydroxymethyl phthalimide	118-29-6		X	X
		Indeno(1,2,3-cd)pyrene	193-39-5	X	X	X
		Isophorone	78-59-1		X	X
		m,p-Cresol	106-44-5		X	X
		Naphthalene	91-20-3	X	X	X

TABLE 2
PROJECT LIST OF ANALYTES – SOIL
(Page 8 of 11)

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC	Soil Sample Analysis	
					Surface (0 ft bgs)	Subsurface (10 ft bgs)
Semivolatile Organic Compounds (continued)	**EPA 8270C [3]**	Nitrobenzene	98-95-3	X	X	X
		N-nitrosodi-n-propylamine	621-64-7		X	X
		N-nitrosodiphenylamine	86-30-6		X	X
		o-Cresol	95-48-7		X	X
		Octachlorostyrene	29082-74-4	X	X	X
		p-Chloroaniline (4-Chloroaniline)	106-47-8		X	X
		p-Chlorobenzenethiol	106-54-7		X	X
		Pentachlorobenzene	608-93-5		X	X
		Pentachlorophenol	87-86-5		X	X
		Phenanthrene	85-01-8	X	X	X
		Phenol	108-95-2		X	X
		Phthalic acid	88-99-3		X	X
		Pyrene	129-00-0	X	X	X
		Pyridine	110-86-1	X	X	X
		Thiophenol	108-98-5		X	X
		Tentatively Identified Compounds (TICs)			X	X
Volatile Organic Compounds	**EPA 8260B**	1,1,1,2-Tetrachloroethane	630-20-6		X	X
		1,1,1-Trichloroethane	71-55-6	X	X	X
		1,1,2,2-Tetrachloroethane	79-34-5		X	X
		1,1,2-Trichloroethane	79-00-5		X	X
		1,1-Dichloroethane	75-34-3		X	X
		1,1-Dichloroethene	75-35-4		X	X
		1,1-Dichloropropene	563-58-6		X	X
		1,2,3-Trichlorobenzene	87-61-6		X	X
		1,2,3-Trichloropropane	96-18-4		X	X
		1,2,4-Trichlorobenzene	120-82-1		X	X
		1,2,4-Trimethylbenzene	95-63-6		X	X
		1,2-Dichlorobenzene	95-50-1	X	X	X
		1,2-Dichloroethane	107-06-2		X	X
		1,2-Dichloroethene	540-59-0		X	X
		1,2-Dichloropropane	78-87-5		X	X
		1,3,5-Trichlorobenzene	108-70-3		X	X

TABLE 2
PROJECT LIST OF ANALYTES – SOIL
(Page 9 of 11)

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC	Soil Sample Analysis	
					Surface (0 ft bgs)	Subsurface (10 ft bgs)
Volatile Organic Compounds (continued)	**EPA 8260B**	1,3,5-Trimethylbenzene	108-67-8		X	X
		1,3-Dichlorobenzene	541-73-1	X	X	X
		1,3-Dichloropropene	542-75-6		X	X
		1,3-Dichloropropane	142-28-9		X	X
		1,4-Dichlorobenzene	106-46-7	X	X	X
		2,2-Dichloropropane	594-20-7		X	X
		2,2-Dimethylpentane	590-35-2		X	X
		2,2,3-Trimethylbutane	464-06-2		X	X
		2,3-Dimethylpentane	565-59-3		X	X
		2,4-Dimethylpentane	108-08-7		X	X
		2-Chlorotoluene	95-49-8		X	X
		2-Hexanone	591-78-6	X	X	X
		2-Methylhexane	591-76-4		X	X
		2-Nitropropane	79-46-9		X	X
		3,3-Dimethylpentane	562-49-2		X	X
		3-Ethylpentane	617-78-7		X	X
		3-Methylhexane	589-34-4		X	X
		4-Chlorobenzene	108-90-7		X	X
		4-Chlorotoluene	106-43-4		X	X
		4-Methyl-2-pentanone (MIBK)	108-10-1	X	X	X
		Acetone	67-64-1	X	X	X
		Acetonitrile	75-05-8		X	X
		Benzene	71-43-2	X	X	X
		Bromobenzene	108-86-1		X	X
		Bromodichloromethane	75-27-4		X	X
		Bromoform	75-25-2		X	X
		Bromomethane	74-83-9		X	X
		Carbon disulfide	75-15-0		X	X
		Carbon tetrachloride	56-23-5		X	X
		Chlorobenzene	108-90-7	X	X	X
		Chlorobromomethane	74-97-5		X	X
		Chlorodibromomethane	124-48-1		X	X

TABLE 2
PROJECT LIST OF ANALYTES – SOIL
(Page 10 of 11)

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC	Soil Sample Analysis	
					Surface (0 ft bgs)	Subsurface (10 ft bgs)
Volatile Organic Compounds (continued)	**EPA 8260B**	Chloroethane	75-00-3		X	X
		Chloroform	67-66-3	X	X	X
		Chloromethane	74-87-3		X	X
		cis-1,2-Dichloroethene	156-59-2		X	X
		cis-1,3-Dichloropropene	10061-01-5		X	X
		Cymene (Isopropyltoluene)	99-87-6		X	X
		Dibromochloroethane	73506-94-2		X	X
		Dibromochloromethane	124-48-1		X	X
		Dibromochloropropane	96-12-8		X	X
		Dibromomethane	74-95-3		X	X
		Dichloromethane (Methylene chloride)	75-09-2		X	X
		Dimethyldisulfide	624-92-0		X	X
		Ethanol	64-17-5		X	X
		Ethylbenzene	100-41-4	X	X	X
		Freon-11 (Trichlorofluoromethane)	75-69-4		X	X
		Freon-113 (1,1,2-Trifluoro-1,2,2-trichloroethane)	76-13-1		X	X
		Freon-12 (Dichlorodifluoromethane)	75-71-8		X	X
		Heptane	142-82-5		X	X
		Isoheptane	31394-54-4		X	X
		Isopropylbenzene	98-82-8		X	X
		m,p-Xylene	mp-XYL	X	X	X
		Methyl ethyl ketone (2-Butanone)	78-93-3	X	X	X
		Methyl iodide	74-88-4		X	X
		MTBE (Methyl tert-butyl ether)	1634-04-4	X	X	X
		n-Butyl benzene	104-51-8		X	X
		n-Propylbenzene	103-65-1		X	X
		Nonanal	124-19-6		X	X
		o-Xylene	95-47-6	X	X	X
		sec-Butylbenzene	135-98-8		X	X
		Styrene	100-42-5		X	X
		tert-Butyl benzene	98-06-6		X	X
		Tetrachloroethene	127-18-4	X	X	X

TABLE 2
PROJECT LIST OF ANALYTES – SOIL
(Page 11 of 11)

Parameter of Interest	Analytical Method	Compound List	CAS Number	Tronox SRC	Soil Sample Analysis	
					Surface (0 ft bgs)	Subsurface (10 ft bgs)
Volatile Organic Compounds (continued)	**EPA 8260B**	Toluene	108-88-3	X	X	X
		trans-1,2-Dichloroethene	156-60-5		X	X
		trans-1,3-Dichloropropene	10061-02-6		X	X
		Trichloroethene	79-01-6	X	X	X
		Vinyl acetate	108-05-4		X	X
		Vinyl chloride	75-01-4		X	X
		Xylenes (total)	1330-20-7	X	X	X
		Tentatively Identified Compounds (TICs)			X	X
Total Petroleum Hydrocarbons	**EPA 8015**	Diesel	64742-46-7	X	X	X
		Gasoline	8006-61-9	X	X	X
		Grease	68153-81-1	X	X	X

Notes:
The laboratory will be instructed to report the top 25 Tentatively Identified Compounds (TICs) under method 8260B and 8270C.
[1]PCBs, organophosphorous pesticides and chlorinated herbicides are not included in the analyte list. See text for rationale.
[2]For polynuclear aromatic hydrocarbons, Method 8270C is the primary analytical method, but Method 8310 may be used if necessary.
[3]Method 3540 for extraction and Method 3640 for cleanup are to be used as appropriate.

TABLE 3
TRONOX PHASE A ORGANOPHOSPHOROUS PESTICIDE AND CHLORINATED HERBICIDE RESULTS SUMMARY

Method	Matrix	Chemical	Count	Hits	Minimum Detect	Maximum Detect	Minimum DL	Maximum DL	PRG/MCL
Organophosphorous Pesticides	Soil (mg/kg)	Azinphos-Methyl	36	0	--	--	0.014	0.017	--
		Bolstar	36	0	--	--	0.014	0.017	--
		Chlorpyrifos	36	0	--	--	0.021	0.026	1,847
		Coumaphos	36	0	--	--	0.014	0.017	--
		Demeton-O	36	1	0.092	0.092	0.041	0.05	24.6
		Demeton-S	36	0	--	--	0.016	0.019	24.6
		Diazinon	36	0	--	--	0.023	0.028	554
		Dichlorvos	36	0	--	--	0.024	0.03	5.9
		Dimethoate	36	3	0.011	0.013	0.023	0.028	123
		Disulfoton	36	0	--	--	0.05	0.062	24.6
		Epn	36	0	--	--	0.014	0.017	6.16
		Ethoprop	36	0	--	--	0.016	0.019	--
		Ethyl Parathion	36	0	--	--	0.019	0.023	3,694
		Famphur	36	0	--	--	0.014	0.017	--
		Fensulfothion	36	0	--	--	0.014	0.017	--
		Fenthion	36	0	--	--	0.034	0.043	--
		Malathion	36	0	--	--	0.016	0.019	12,312
		Merphos	36	0	--	--	0.031	0.039	--
		Methyl Parathion	36	0	--	--	0.021	0.026	154
		Mevinphos	36	0	--	--	0.016	0.019	--
		Naled	36	0	--	--	0.034	0.043	1,231
		Phorate	36	0	--	--	0.021	0.026	123
		Ronnel	36	0	--	--	0.019	0.023	30,780
		Stirphos	36	0	--	--	0.016	0.019	72
		Sulfotep	36	0	--	--	0.021	0.026	308
		Thionazin	36	0	--	--	0.019	0.023	--
		Tokuthion	36	0	--	--	0.021	0.026	--
		Trichloronate	36	0	--	--	0.021	0.026	--
	Groundwater (ug/L)	Azinphos-Methyl	30	0	--	--	2.5	2.5	--
		Bolstar	30	0	--	--	1	1	--
		Chlorpyrifos	30	0	--	--	1	1	--
		Coumaphos	30	0	--	--	1	1	--
		Demeton-O	30	0	--	--	1	1	--
		Demeton-S	30	0	--	--	1	1	--
		Diazinon	30	0	--	--	1	1	--
		Dichlorvos	30	0	--	--	1	1	--
		Dimethoate	30	0	--	--	1	1	--
		Disulfoton	30	0	--	--	0.5	0.5	--

TABLE 3
TRONOX PHASE A ORGANOPHOSPHOROUS PESTICIDE AND CHLORINATED HERBICIDE RESULTS SUMMARY

Method	Matrix	Chemical	Count	Hits	Minimum Detect	Maximum Detect	Minimum DL	Maximum DL	PRG/MCL
Organophosphorous Pesticides	Groundwater (ug/L)	Epn	30	0	--	--	1.2	1.2	--
		Ethoprop	30	0	--	--	0.5	0.5	--
		Ethyl Parathion	30	0	--	--	1	1	--
		Famphur	30	0	--	--	1	1	--
		Fensulfothion	30	0	--	--	2.5	2.5	--
		Fenthion	30	0	--	--	2.5	2.5	--
		Malathion	30	0	--	--	1.2	1.2	--
		Merphos	30	0	--	--	5	5	--
		Methyl Parathion	30	0	--	--	4	4	--
		Mevinphos	30	0	--	--	6.2	6.2	--
		Naled	30	0	--	--	1	1	--
		Phorate	30	0	--	--	1.2	1.2	--
		Ronnel	30	0	--	--	10	10	--
		Stirphos	30	0	--	--	3.5	3.5	--
		Sulfotep	30	0	--	--	1.5	1.5	--
		Thionazin	30	0	--	--	1	1	--
		Tokuthion	30	0	--	--	1.6	1.6	--
		Trichloronate	30	0	--	--	0.5	0.5	--
Chlorinated Herbicides	Soil (mg/kg)	2,4,5-TP (Silvex)	3	0	--	--	0.021	0.025	4,925
	Groundwater (ug/L)	2,4,5-TP (Silvex)	4	0	--	--	1	1	50

-- = None detected/none established.
DL = detection limit
PRG = U.S. Environmental Protection Agency (USEPA) Region 9 preliminary remediation goal
MCL = USEPA Maximum Contaminant Level

ATTACHMENT A

Attachment A

Response to NDEP Comments Dated September 12, 2007 on the Phase 2 Sampling and Analysis Plan to Conduct Soil Characterization, Tronox Parcel "F" Site, Henderson, Nevada Dated August 28, 2007

1. General comment, the Figures do not show the relationship of Parcel "F" to surrounding source areas. TRX has identified most of these source areas in their CSM: however, transparency is lacking in this document. Please provide a map showing Parcel "F" in comparison to these source areas.

Response: *Tronox source areas have been added to Figure 1. Figure 1 shows Parcel F.*

2. Background, the NDEP provides the following comments:
   a. TRX indicates that the aboveground storage tanks (ASTs) located south of the Site "…are at a different elevation – and therefore there is limited possibility that spills from the tanks would have affected the surface to 10 foot elevation of the Site." The text does not specify whether the tanks are higher or lower that the Site. The NDEP notes that these tanks are higher than Parcel F. It is unclear how this difference in elevation would prevent a release from these ASTs to the Site. Please revise and clarify this statement.

Response: *The following text has been added to the sampling and analysis plan (SAP): Although the aboveground storage tanks are at a higher elevation than the Site, they are within a bermed and synthetic lined containment area, designed to hold 110% of the largest tank's contents. The tanks are empty now but historically stored sodium chlorate, and there has been no history of the tanks leaking. Even if the tanks did leak, it would be contained with the containment area. Therefore, there is no possibility of impacts to the Site from these tanks.*

   b. TRX states that this Site is in "the vicinity of BMI Industrial Companies". The Site is located on TRX property and in the vicinity of other BMI Industrial Companies. Please revise the text accordingly.

Response: *The sentence has been reworded to read: Given the Site is within the Tronox facility, and in the vicinity of the other BMI Industrial Companies….*

   c. TRX states that several monitoring wells are located within the Site. TRX additionally states that monitoring well data from TR-6 indicated that concentrations of monitored chemicals are "generally low to non-detect". Please provide a table listing the concentration data available from all of the monitoring wells located on and in the immediate vicinity of the Site.

Response: *A table (Table 1) with recent groundwater data from wells on the Site; shallow monitoring wells M92, M93, and TR-6, as well as monitoring well M95 which is approximately 75 feet east of the Site, has been added to the SAP.*

d. TRX states that the concentration of chloroform in TR-6 was 2,500 ppb. Please provide a discussion on the vapor intrusion pathway in relation to future land use including development and construction activities.

Response: *Depth to groundwater at the Site is approximately 40 feet below ground surface (bgs). In addition, the other on-site wells had only low levels of chloroform (and other VOCs), and Tronox is planning soil vapor sampling as part of its Phase B investigation. Therefore, given the depth to groundwater, and that subsequent soil vapor sampling will be collected, no further evaluation of this pathway is recommended as part of this SAP.*

e. TRX proposes to focus sampling on the upper five feet of soil since five feet of fill will be imported to bring the Site to grade for construction. Please note that deed restrictions may need to be placed on the Site to facilitate a No Further Action Determination (NFAD).

Response: *Comment noted. Text has been added to reflect the likely placement of a deed restriction down to the sampling depth of 10 feet below current ground surface.*

3. Scope of Work, Task 1: Field Implementation, see the following comments:
   a. The reference for the BRC Field Sampling and Standard Operating Procedures (FSSOP) should be updated.

Response: *The first revision of the SAP was submitted prior to the updated BRC FSSOP and QAPP documents. These references have been updated in this revision of the SAP.*

b. Please note and revise text accordingly that dioxins/furans are listed on the TRX SRC list dated March 2006.

Response: *The text has been revised accordingly.*

c. The reference for the quality assurance project procedure (QAPP) should be updated.

Response: *The first revision of the SAP was submitted prior to the updated BRC FSSOP and QAPP documents. These references have been updated in this revision of the SAP.*

4. Scope of Work, Task 2: Data Evaluation, add SOP 40 to QAPP reference.

Response: *The text has been revised to reference the updated FSSOP, which includes SOP-40.*

5. Schedule, 1st paragraph, please verify that the 28-day turn around time is applicable to all analytes (i.e.: asbestos, radionuclides).

Response: *Although in practice BRC has experienced longer turn around times from the laboratories, the specified project turn around time for all laboratory analysis is 28 days.*

6. Figure 2, the NDEP observed that judgmental samples are not located on all seemingly disturbed areas on the provided aerial photograph (e.g. disturbed area in grid F-B2 between TSB-FR-05 and TSB-FJ-03, disturbed area in grid F-B1 between TSB-FR-02 and TSB-FJ-04, etc.). Please add samples to these areas or discuss rationale for not sampling these areas in the text.

Response: *Judgmental samples have been added between TSB-FR-05 and TSB-FJ-03, and TSB-FR-02 and TSB-FJ-04.*

7. The following comments are based on a May 11, 2007 letter from the NDEP, Re: Nevada Division of Environmental Protection Response to: Phase I Environmental Site Assessment – Approximately 182 Acres of land (Phase I), dated March 5, 2007. These comments were generated for portions of APN 178-12-401-009 and 178-13-101-002 as shown in Figure 3 of the Phase I (currently labeled as Parcel "F" in the Phase 2 SAP)
   a. Figure 3 in the Phase I, the NDEP has the following comments:
      i. There appears to be large piles of debris that are not labeled on Figure 3. These had been removed by the time the NDEP had completed a site visit. It is necessary to correlate these piles to aerial photographs and investigate these areas, as necessary. Please discuss and illustrate on Figure 2 of the Phase II SAP.

Response: *Six judgmental samples, as shown on the revised Figure 2, have been placed on these debris piles.*

      ii. As noted above it is imperative that TRX identify and discuss the features displayed on Figure 3.

Response: *BRC has identified these features and has placed judgmental samples throughout the site in order to address these locations.*

   b. There is a building foundation on Parcel "F", which appears similar to the peat building that was destroyed on the TIMET parcel. Please discuss what the use of this building was.

Response: *Tronox believes that this was also for a similar peat building.*

   c. TRX states that there is electrical equipment on Parcel "F" in a fenced area. The ownership and condition of this equipment needs to be assessed and reported in the Phase II SAP.

Response: *The electrical equipment was operated by BMI. It has been de-energized and is no longer in operation. To the best of BMI's knowledge, none of the equipment contained any PCBs.*

d. It is the understanding of the NDEP that the former Hardesty Chemical/ AMECCO operation may have occurred directly south of Parcel "F". Please discuss this.

Response: *Additional text regarding these operations has been added to the text.*

e. A mobile aboveground storage tank is located on Parcel "F". Please discuss this.

Response: *According to Tronox the mobile aboveground storage tank was on the Timet NFA property south of the canteen, near its west end. The tank was small, approximately 300 to 400 gallons, and mounted on axels for transporting. On visual inspection, it appeared to be empty, except for some solid residue in the bottom, and did not give off any odors.*

REDLINE/STRIKEOUT

Basic Environmental
COMPANY

September 19, 2007

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

Subject: Phase 2 Sampling and Analysis Plan to Conduct Soil Characterization, Tronox Parcel "F" Site, Henderson, Nevada, Revision 1

Dear Shannon:

On behalf of Tronox, Basic Environmental Company (BEC) appreciates the opportunity to submit this letter Phase 2 Sampling and Analysis Plan (SAP) to conduct soil characterization of the Tronox Parcel "F" (portions of APN No. 178-12-401-009). Parcel F will be referred to as the Site for the purposes of this SAP. The Site is located within the Tronox facility, approximately 1/2 mile north of Lake Mead Parkway, in Henderson, Nevada. Figure 1 illustrates the location of the subject Site within~~relative to~~ the Tronox property. Figure 1 also shows the various Tronox source areas. Figure 2 shows details of Parcel F. Legal boundaries of Parcel F will be provided to the Nevada Division of Environmental Protection (NDEP) prior to issuance of the requested No Further Action Determination (NFAD). This revision of the SAP, Revision 1, incorporates comments received from the NDEP, dated September 12, 2007, on Revision 0 of the SAP, dated August 28, 2007. The NDEP comments and BRC's response to these comments are included in Attachment A. Also included in Attachment A is a redline/strikeout version of the text showing the revisions from the August, 28 2007 version of the SAP.

Background

The Site, which represents a portion of the Tronox property, is comprised primarily of vacant land, and includes portions of a building foundation. A remediation project was recently completed on the Parcel directly north of this Parcel (by TIMET). The parcel to the north was contaminated with PCBs from electrical equipment. There are also several aboveground storage tanks to the south of the Site. Although these tanks are at a higher elevation than the Site, they are within a bermed and synthetic lined containment area designed to hold 110 percent of the largest tank's contents. The tanks are empty now but historically stored sodium chlorate, and there has been no history of the tanks leaking. Even if the tanks did leak, it would be contained with the containment area. Therefore, there is minimal possibility of impacts to the Site from these tanks.~~Tronox indicates that these are at a different elevation – and therefore there is limited possibility that spills from the tanks would have affected the surface to 10 foot elevation of the Site.~~ In addition, the former Hardesty Chemical/–AMECCO operation may have occurred directly south of the Site. Hardesty Chemical Company leased electrolysis building #2 and the adjacent chlorination building for operation of a chemical plant from 1946 to 1947. The company produced synthetic detergents, muriatic acid, chlorobenzene, p-dichlorobenzene, and

o-dichlorobenzene. Hardesty Chemical sold or assigned its interest in the lease to Amecco Chemicals, Inc. in 1947. Amecco purchased chlorine piped in from Stauffer and produced four chemical products: chlorobenzene, p-dichlorobenzene, o-dichlorobenzene, and arsenite. The chemicals that may have been produced by these facilities are included in the proposed analytical list for this SAP.

BEC also recognizes that other historic uses/disposals on or near the Site may have occurred. A Phase 1 investigation has been performed on the Site. The Phase 1 investigation, Site visits and historical aerial photographs analysis indicate the presence of staining and debris. Electrical equipment (owned by BMI) is also located on the Site in a fenced area. None of this equipment contained PCBs. The equipment is de-energized and will be removed from the Site prior to its development. Given the Site is within the Tronox facility, and in the vicinity of the other BMI Industrial Companies, it is also possible that the Site or portions thereof could also have been indirectly impacted by such operations.

Several monitoring wells are located within the Site, which are used by several of the BMI plant operating companies. For example, Stauffer Management Company LLC (Stauffer), Montrose Chemical Corporation of California (Montrose), Syngenta Crop Protection, Inc., and Pioneer Americas, LLC (the Companies) conducted quarterly groundwater samples from one alluvial aquifer monitoring well within the property (TR-6). Chemicals concentrations were generally low or non-detect; however, chloroform was detected at 2,500 parts per billion (ppb). Tronox conducted groundwater sampling as part of their Phase A investigation in November-December 2006, as well as sampling conducted for their quarterly performance report in February 2007. Results of both the Montrose and Tronox groundwater sampling events are presented in Table 1.

This SAP will focus on the upper tenfive feet of soil in order to obtain a NFAD from the NDEP in order to support future industrial/commercial use on this Site. No residential use is planned. Tronox anticipates that, if needed, the site NFAD will contain a deed restriction precluding residential use of the property. The rationale for sampling for the upper tenfive feet (as opposed to the upper five10 feet) is that although imported fill of roughly five feet depth will be required in order to meet final site grading requirements on a site-wide average basis, the fill depth may not be exactly five feet at all locations. This fill will be clean. One possible source is material from the BRC Borrow Pit.

Objective

The objective of the field investigation is to identify and characterize the distribution of Site-related chemicals (SRCs) in the vicinity of the future land use features (e.g., warehouses, commercial office buildings) and historical site features (e.g., electrical equipment storage, debris piles, etc.). Surface and shallow subsurface samples that will be collected are depth-discrete soil matrix samples. Sample locations have been placed to both evaluate potential future land use exposures (although future plans are not fully defined at this time), and to characterize potential source areas on the Site. Source areas (defined during the Kerr-McGee Chemical Phase II work completed in the 1990's) within the Tronox property are shown on Figure 1. The sample locations proposed in this SAP provide spatial coverage of the Site (Figure 2). The rationale for location of the sampling points is to ensure that the entire Site is reasonably and completely covered for sampling purposes in order to obtain data that are representative of the Site, that specific locations within the Site that were potentially impacted are also sampled, and that the

sampled concentrations can be meaningfully used in subsequent risk assessments, if needed. Ultimately, the purpose of this sampling is to support the NFAD for Parcel F.

Scope of Work

The following is the proposed scope of work for investigating the Site and meeting the SAP objectives. The scope of work has been divided into three main tasks: 1) Field Implementation; 2) Data Evaluation; and 32) Reporting.

Task 1: Field Implementation

The purpose of the intrusive investigation is to collect data sufficient to meet the objectives of the SAP. All sampling and sample handling procedures will be consistent with the NDEP-approved BRC Field Sampling and Standard Operating Procedures (FSSOP;) (BRC, ERM and MWH 2007a2006a).

The proposed analyte list is composed of VOCs, semi-volatile organic compounds (SVOCs), total petroleum hydrocarbons (TPH), polyaromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), dioxins/furans, metals, organochlorine pesticides, perchlorate, ions (including chloride, nitrate, nitrite, and sulfate), radionuclides, and asbestos. This list includes all of the compounds (with a few additional modifications as discussed subsequently) on Tronox's "reduced list" as shown in Table 2.1. Tronox's reduced list was developed as a subset of the entire suite of Tronox SRCs based on the findings of the Tronox Phase A Source Area Investigation. The modifications are as follows: first, in general instead of analyzing for specific members of certain analyte categories like metals, VOCs and SVOCs, the entire suite will be analyzed and reported; second, the organophosphate pesticide and chlorinated herbicide suites were eliminated since only three detections were in these analytical suites (dimethoate and demeton-o) which were at least an order of magnitude below their respective U.S. Environmental Protection Agency (USEPA) Region 9 industrial preliminary remediation goals (PRGs); and lastlythird, not all SRCs are proposed to be analyzed at all depths in this SAP (for example, dioxins/furans and asbestos are is proposed to be analyzed in surface soil samples only).); and lastly, although dioxins/furans are not on the Tronox SRC list, because they may potentially be present on the Site, they are also proposed for analysis in surface soil samples. Although only a single Aroclor was detected once in the Tronox Phase A Source Area Investigation, at 20 feet below ground surface (bgs) and below it's respective PRG, because PCBs may potentially be present on the Site (for example, in the electrical equipment area), they are retained for analysis in surface soil samples, given the proximity to the TIMET Parcel F portion which contained PCBs. Summary results of the Tronox Phase A investigation for PCBs, organophosphate pesticides, and chlorinated herbicides are provided in Table 32.

Given the absence of direct operations on this Site of a nature commensurate to that which took place on the Tronox plant site itself, the proposed SRC list and proposed sampling should characterize those sources that were located on the Site, as well as likely chemicals that may have been deposited on the Site via fugitive dust emissions from the Tronox operations and property and/or other neighboring BMI plants. The proposed analyte list for this SAP is presented in Table 2.1. Unless as otherwise noted above, all analytes will be analyzed at all locations. BEC notes that this analyte list may not be appropriate for any future planned investigations (such as the proposed Tronox Phase B investigation) at the Site (which will extend from 10 feet bgs to groundwater).

Pre-Field Activities

The pre-field activities will be conducted in accordance with applicable standard operating procedures (SOPs; BRC, ERM and MWH 2007a2006a). The BRC Quality Assurance Project Plan (QAPP; BRC and MWH 2007b2006b) and Health and Safety Plan (HASP; BRC and MWH 2005) prepared for the BMI Common Areas will be used for this proposed scope of work. All work will be completed under the direction of a State of Nevada Certified Environmental Manager.

Soil Borings

The SOPs referred to in the following discussion are documented in the FSSOP. BEC will implement field screening using photoionization detectors (PIDs) (using two lamps) in accordance with SOP-39. SOP-1 will be followed for all drilling activities including Hollow Stem Auger drilling. The field geologist will prepare logs for each boring indicating the Unified Soil Classification System (USCS) soil classification (SOP-17), an estimate of field moisture content, sampling depths, progress of drilling (SOP-15), final completion depth, and the nature and resolution of any problems encountered.

Soil sample and auger boring locations will be surveyed using a handheld GPS to a horizontal accuracy of 3 meters (approximately 10 feet) or better. Soil cuttings generated during soil sampling and drilling activities will be collected on visqueen, analyzed, and appropriately disposed off. Due to the nature of the shallow sampling, it is not anticipated that a significant amount of excess soil will be generated as a result of the sampling, or that the soils will require special handling. Also, because the groundwater at the Site is generally 35 feet bgs, it is not anticipated that groundwater will be encountered during drilling of the shallow borings. The quality assurance/quality control (QA/QC) procedures that will be followed during the field investigation are detailed in Section B of the QAPP (BRC, ERM and MWH 2007b2006b).

Soil matrix samples will be collected based on random sample locations placed within a 4-acre grid across the Site. The random sample locations were supplemented with judgmental sampling locations targeting specific site features (e.g., miscellaneous pile locations). The rationale for the various judgmental sampling locations is provided below:

- Parcel F, grid cell ‘F-A2’ – 55-gallon drum location;
- Parcel F, grid cell ‘F-B1’ – above ground vault location;
- Parcel F, grid cell ‘F-B2’ – electrical equipment location;
- Parcel F, grid cell ‘F-B1’ – debris pile location;
- Parcel F, grid cell ‘F-B1’ – debris pile location;
- Parcel F, grid cell ‘F-A1’ – debris pile location; and
- Parcel F, grid cell ‘F-A1’ – debris pile location; .
- Parcel F, grid cell ‘F-B2’ – debris pile location; and
- Parcel F, grid cell ‘F-B1’ – debris pile location.

Soil borings will be advanced with a hollow-stem auger to a total depth of tenfive feet bgs. Soil samples will be collected at approximately zero (i.e., surface) and tenfive feet bgs. Soil samples will be analyzed for the analyte list provided in Table 21, with limitations as noted in the footnotes to this table.

Task 2: Data Evaluation

Once the data are collected, BEC will subject the data to validation per procedures agreed to previously with the NDEP and consistent with the QAPP (BRC, ERM and MWH 2007b2006b). Only those data determined by the QA/QC review to be suitable for use will be considered for the site data set. A separate Data Validation Summary Report will be prepared and submitted to NDEP.

Task 32: Reporting

Upon receipt of laboratory analytical results, an investigation report will be prepared. The report shall contain, but not be limited to, the following items:

- A summary of the sampling procedures conducted;
- Sampling location map;
- Soil boring logs;
- An evaluation and summary of the collected data;
- Tables(s) summarizing soil results; and
- If appropriate, plan view maps indicating the locations of detected constituents in soil.

Given the depth to groundwater at the Site (approximately 35 feet bgs, as measured at on-site monitoring wells), and the fact that future development will cover the Site with paved areas and buildings, migration of chemicals at the Site to groundwater is considered unlikely. However, once the data are collected this will be evaluated in the report. It should also be noted that development of the site will not preclude future groundwater investigation or remediation activities that may need to be conducted by Tronox.

Following collection and analysis of soil samples, the data will be discussed with the NDEP. This will include a comparison to the recently approved BRC-TIMET background data set (BRC/TIMETTetraTech 2007). If required upon this evaluation, a risk assessment will be conducted to evaluate the potential risks to future on-site human receptors. The receptors identified to be evaluated in the risk assessment will be consistent with the proposed development of the Site. These receptors will include construction workers, indoor commercial workers, and outdoor maintenance workers. Because the proposed development does not include residential units, on-site residents will not be evaluated. The risk assessment will be conducted using standard USEPA guidance, input parameters, and methods. A risk assessment work plan will be submitted to NDEP after sample results have been obtained and NDEP approval will be obtained prior to conducting the risk assessment.

Schedule

Once final approval of the SAP is received from NDEP, field implementation activities can commence within one to two weeks. BEC will provide NDEP with at least one week notice prior to the initiation of field activities at the Site. It is anticipated that this work can be completed within one week, depending on field conditions. The soil samples will be submitted to the laboratories and placed on a standard turn around time, which is 28 days for the complete analyte list. A report will be completed within three weeks after the final data are received from the laboratory and validated.

Closing Remarks

See attached for appropriate certification language and signature. Please direct any remaining questions or comments you may have to me at 626-382-0001.

Sincerely,

Basic Environmental Company

Ranajit Sahu, CEM
Project Manager

cc: Brian Rakvica, NDEP, BCA, Las Vegas, NV 89119
Jim Najima, NDEP, BCA, Carson City, NV 89701

Attachments:
Table 1 – Recent Groundwater Results for Monitoring Wells within/near Parcel F
Table 2 – Project List of Analytes – Soil
Table 32 – Tronox Phase A Organophosphorous Pesticide and Chlorinated Herbicide Results Summary
Figure 1 – Tronox/BEC Parcel Map with Tronox Source Areas
Figure 2 – Proposed Sample Locations – Parcel "F"
Attachment A – NDEP Comments and BRC's Response to Comments

References

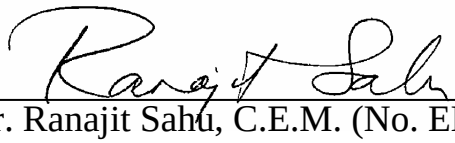
Basic Remediation Company (BRC) and MWH. 2005. BRC Health and Safety Plan, BMI Common Areas, Clark County, Nevada. October.

Basic Remediation Company (BRC), ERM, and MWH. 2007a.2006a. BRC Field Sampling and Standard Operating Procedures, BMI Common Areas, Clark County, Nevada. AugustMay.

Basic Remediation Company (BRC), ERM, and MWH. 2007b.2006b. BRC Quality Assurance Project Plan. BMI Common Areas, Clark County, Nevada. AugustApril.

Basic Remediation Company (BRC) and Titanium Metals Corporation (TIMET). 2007. Background Shallow Soil Summary Report, BMI Complex and Common Areas Vicinity. March 16.

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state and local statutes, regulations and ordinances. I hereby certify that all laboratory analytical data was generated by a laboratory certified by the NDEP for each constituent and media presented herein.



September 19~~August 28~~, 2007

Dr. Ranajit Sahu, C.E.M. (No. EM-1699, Exp. 10/07/2009) Date
BRC Project Manager