

Shannon and Brian,

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As we have discussed on our weekly telephone updates for the Tronox Phase B ECA project, we are finding that several locations proposed for asbestos sampling in Areas II, III and IV are not compatible with the 50'x50' random sampling grid specified in the BMI SOP. All Area I samples were collected, but in Areas II, III, and IV, several boring areas are paved, making sampling meaningless. In our call two weeks ago, Tronox verbally proposed a modified staged sampling approach as follows:

1. Where the normal 50' x 50' random sample grid is not usable due to paved surfaces, we propose that any exposed soil locations within the grid could be used for sampling. This would eliminate the random component of sampling, but would collect samples from within the grid. Of the total 164 proposed asbestos sample locations in Areas II, III and IV, 54 are not compatible with the random grid. By sampling non-random exposed soil locations within the grid, 17 locations can be sampled using this approach (see Table 1 below for a breakdown by Area). This leaves 37 boring locations where no exposed soil is available within the grid.
2. Where no exposed soil is present within the 50' x 50' sample grid, we propose to collect the asbestos sample from any exposed soil location within 75' of the boring location. This would allow sampling of an additional 22 samples outside the regular sample grid. For comparison, the Table below shows three columns with various distances from the borings. The 75 foot distance was selected for this proposed sample plan.
3. Where no exposed soil can be located within 75 feet of the boring, no asbestos sample would be collected for that boring. A total of 15 sample locations would be impacted by this approach (see the last two columns in the Table below for breakdown by area).

All asbestos samples collected using these three exceptions to the regular BMI SOP sampling approach will be documented in the final Phase B Area sample reports. We would like to discuss these options with you in our weekly call tomorrow. If NDEP is satisfied by the discussion, an e-mail approval would then be appreciated.

Thanks.

Keith Bailey and Susan Crowley

Table 1. Proposed Adjustments to Phase B Asbestos Sampling Plans

Area	Sample Locations	Normal Sample Location	Exposed soil at a non-random single location within 50x50 grid	Exposed soil within 50' radius of boring	Exposed soil within 75' radius of boring	Exposed soil within 100' radius of boring	No exposed soil within 100' radius of boring
II	85	62	6	8	5	2	2
IV	57	36	7	4	1	0	9
III	22	12	4	4	0	0	2

Note that three locations in Area II were not accessible for evaluation due to demolition activities. These locations have been assumed to Be normal sample locations, but may change later.