

From: Deni Chambers
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To: Shannon Harbour, P.E.
Nevada Division of Environmental Protection (NDEP)

RE: RTC to NDEP's March 22, 2010 Comments on *Technical Memorandum Regarding General Comment #1 of NDEP's March 17, 2010 Comments on Pre-Confirmation Sampling Work Plan*

Response to Comments

1. *Page 1, 4th bullet, TRX should clarify if the soil at the bottom of the excavation will represent the surface concentration in all cases or only in cases where no backfill is used.*

Response: The 4th bullet has been clarified to indicate the following: Excavations may or may not be filled with clean soil. Regardless, for purposes of this approach, it is assumed that soil at the bottom of the excavation, prior to fill, will represent surface soil.

2. *Page 2, 1st bullet, TRX states that "existing data for soil that will be excavated will be replaced with clean data from pre-confirmation samples." TRX should also specify how this will be calculated if there are multiple pre-confirmation samples. Please note that this applies to the examples provided in the remainder of the document. For example,*

- a. *Page 2, Example #1, there are often several samples which represent the 0-3' soil interval in this example. NDEP needs to understand how TRX plans to handle this data for use in the risk assessment.*

Response: A second bullet has been added that provides the general approach that will be applied in instances where there are multiple-pre confirmation samples within a soil depth interval. Specific examples have also been provided to address how data will be used to determine representative soil concentrations within the depths of interest.

3. *NDEP would like to clarify that for the remaining chemicals, if a deeper soil sample (e.g., at 20 feet below ground surface (bgs) does not currently exist, then the existing soil data from samples collected at 10 feet bgs would represent the entire 0-10 feet bgs interval*

Response: Additional explanation has provided in Example #3 to clarify that if no data were collected at 20 feet bgs, the existing data from samples collected 10 feet bgs will be used to represent the entire 0 to 10-foot bgs.

