

**From:** Deni Chambers, Principal-in-Charge  
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**Date:** August 6, 2010

**To:** Shannon Harbour, PE  
Nevada Division of Environmental Protection

**RE:** Errata to Revised Work Plan for Additional Sampling of a Portion of a Former Trade Effluent Pond Bern in the Northwest Portion of Remediation Zone D, Tronox Facility, Henderson Nevada, dated July 28, 2010

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As proposed in the *Revised Work Plan for Additional Sampling of a Portion of a Former Trade Effluent Pond Bern in the Northwest Portion of Remediation Zone D, Tronox Facility, Henderson Nevada* dated July 28, 2010, proposed berm soil samples (purple dots shown on Figure 1) collected below the base of the berm will be analyzed for dioxins/furans and HCB. Soil samples collected within the berm and berm sidewalls will be analyzed for dioxins/furans, HCB, arsenic, perchlorate, and organochlorine pesticides (OCPs). In addition, surface samples will be collected on the berm for analysis of asbestos. Tronox proposes that the following suites of analytes not be analyzed: volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), organophosphorous pesticides (OPPs), hexavalent chromium, metals (except for arsenic), radionuclides, and organic acids.

Based on discussions between Northgate, Tronox, and the NDEP during a July 30, 2010 WebEx meeting, Northgate has prepared a set of EXCEL spreadsheets to support analyzing the TEP berm samples only for constituents that were detected above the BCLs in previously advanced borings in this area, and omitting analyses for those constituents that were either not detected, or were detected below BCLs. The attached spreadsheets (provided as electronic files due to size of the dataset) summarize analytical results for samples collected from borings previously advanced in the vicinity of the inactive TEP berm (in which concentrations were not detected above BCLs). The spreadsheets present a summary of boring identifications, sample depths, and analytical results. With the exception of dioxins/furans, HCB, arsenic, perchlorate, and OCPs, all other chemicals are detected below their respective BCLs. We therefore, plan to analyze the new soil samples for the five suites listed above. The previous samples were collected from areas that are representative of the bottom of former ponds TEP 4 and 5 and surrounding areas, and therefore are considered worst-case in terms of the concentrations and occurrence of chemicals from the TEP/berm complex.

The spreadsheets also contain a comparison of RZ-D radionuclide data to the TIMET background dataset. In accordance with NDEP's request, we are currently comparing



radionuclide data against the R-A background dataset, but we don't expect any changes in our conclusion that the additional analyses not include radionuclides.

The borings shown on Figure 1 of the *Revised Work Plan* evaluated for justification of the proposed TEP berm sampling program are: RSAH3, RSAI2, RSAI3, RSAJ2, RSAK3, SSAI2-02, SSAI3-05, SSAJ2-01, SSAJ2-02, SSAJ2-03, SSAJ3-03, SSAK3-01, SA134, SA201, SA202, SA206, SA88, and SSAI3-06.

We trust this additional information and the attached electronic file provides sufficient justification for the proposed suite of analyses for the TEP berm samples.

ATTACHMENTS:

FIGURE 1 – TRADE POND SAMPLING

DATA TABLES – PROVIDED ON CD

