

environmental management, inc.

From: Deni Chambers, CEM, Principal-in-Charge Date: September 8, 2010

To: Shannon Harbour, PE

Nevada Division of Environmental Protection (NDEP)

RE: September 2010 Phase B ECA and Leaching/Groundwater Programs

Please find attached the draft schedule, which combines the soil and groundwater programs. Several tasks, some of which are marked with an asterisk and highlighted, have been identified for potential delay due to overall project schedule and cost impacts. Tasks requiring delay will be discussed during our conference call on Monday, September 13, 2010. A revised schedule will be submitted to NDEP following this meeting.

The following preliminary revisions were made to update the schedule for the month of September:

PHASE B ECA PROGRAM SCHEDULE

- 1. Lines associated with the following completed tasks have been rolled up:
 - a. Phase B Site Investigation (lines 2-58)
 - b. Phase B Remediation Supplemental Sampling (lines 60 through 69)
 - c. DVSR for Area I/II Supplemental Sampling (lines 84-92)
 - d. Dioxin TEQ Bioaccessibility Study (lines 93-116)
 - e. Pre-Confirmation Sampling (lines 117-167)
 - f. Remediation Zone (RZ) Data Validation and DVSR reports (lines 168-197)
 - g. RAW and Excavation Plans (lines 217-242)
 - h. Contractor Plans and Specs (lines 263-300)
 - i. DVSR Reports (lines 420-430)
 - j. Human Health Risk Evaluation (lines 471-499)
 - k. Soil Vapor Intrusion Evaluation and Mitigation (lines 535-558)
- 2. Internal project management tasks have been removed from the schedule (formerly lines 3-105).
- 3. The length of the LOU 10 Haz Waste Landfill subtask entitled "Acceptance" has revised.
- 4. The completion date for 2nd phase additional step-out sampling (line 149) has been revised to September 16, 2010.
- 5. Submittal and NDEP review dates for RZ-B Revised Data Validation Summary Report (DVSR; line 185) were revised to reflect the actual deliverable submittal date of August 12, 2010.
- 6. Submittal and NDEP review dates for RZ-D Revised DVSR (lines 203 and 204) were revised to reflect the new submittal date of September 8, 2010.

- 7. The summary task "RAW Document" was added (line 218) to allow RAW documents that are completed to be rolled up.
- 8. The RZ-C Excavation Plan Response to Comments/EP Finalization task was moved to September 1 to reflect NDEPs request/actual submittal date (line 247).
- 9. The summary task "Tailings Removal" was added (line 358) to allow the Mn Tailings removal tasks to be rolled up.
- 10. The Manganese Tailings field sampling and analysis start date (line 372) has been revised to September 7, 2010.
- 11. The task start date for RZ-B excavation and transport, dust monitoring and perimeter air monitoring (lines 389-391) has been revised to September 13, 2010.
- 12. The task start date for RZ-D excavation and transport, dust monitoring, and perimeter air monitoring (lines 404-406) has been revised to September 13, 2010.
- 13. LOU 10 task and subtasks has been added to the schedule (lines 407-410).
- 14. The IAQ Evaluation Report submittal date (line 561) was revised.
- 15. Dates associated with Parcels C, D, F, G, and H Closure Report have been revised (lines 581-589).

LEACHING/GROUNDWATER SCHEDULE

- Leaching/Groundwater Program tasks were incorporated into the schedule from the previous CCC Schedule (lines 614-807), including subtasks for Vadose Zone, Groundwater Phase B Report, In-Situ Bioremediation of Groundwater, and Groundwater System OMM.
- 2. The projected start date for subtask "Install UMCf well cluster near Mn-tails excavation" has been revised (line 835) from the previous CCC Schedule.
- 3. Lines associated with the following completed tasks have been rolled-up:
 - a. Soil Flushing/In-Situ Bioremediation (lines 623-667)
 - b. Capture Zone Evaluation and Reporting (lines 711-754)
 - c. Compliance Reporting (lines 776-807)

