



environmental management, inc.

From: Deni Chambers, Northgate
Ted Splitter, Northgate

Date: September 8, 2010

To: Shannon Harbour, NDEP

RE: Response to NDEP's August 20th, 2010 Comments:
Excavation Details in the Vicinity of the Infiltration Trenches, dated August 12, 2010

1. *Comment: General comment, TRX should review the RZ-D Excavation Plan and NDEP's response to this plan and determine what the final depths of excavation are for the polygons that overlap this area. The name of the excavation polygons, depth of excavation, and length of pipe that will need to be exposed should be included in the revised Deliverable.*

Response: Table 1 has been prepared detailing the requested information and is now part of the memorandum.

2. *Comment: Page 2, last bullet, TRX should note that native Site soil backfill should have sufficient data to support risk assessment.*

Response: The reference to using Site soils as backfill has been removed from the memorandum. Only tested and approved imported materials will be used as trench backfill.

3. *Comment: Page 2, 1st paragraph, TRX does not provide any explanation as to why excavation is limited to 10 feet below ground surface (fbgs). Based on the reported layers and thicknesses on Page 1, the depth to the infiltration pipe is approximately 6-7 fbgs. An excavation to 10 fbgs would only be 3-4 feet below the pipe. Please provide justification for this 10 fbgs limit, if the review of the excavation depths (see above-comment #1) indicates that excavation deeper than 10 fbgs is warranted.*

Response: The memorandum has been revised to remove reference to 10 feet. Northgate understands that the infiltration trenches may be only about 11 feet in depth. If in the process of excavating for the remediation the trench is completely removed, the proposed alternative backfill method, presented on Page 2 of the memorandum, will be preferred by Tronox.