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To: Shannon Harbour, PE
Nevada Division of Environmental Protection (NDEP)

RE: Remediation Zone E VOC and Asbestos
Tronox LLC, Henderson, Nevada

On behalf of Tronox LLC (Tronox), Northgate Environmental Management, Inc. (Northgate) submits the following information and proposed plan for dealing with volatile organics and asbestos found in Remediation Zone E (RZ-E) on the Tronox Henderson site (the Site). As discussed in our weekly conference call yesterday, Northgate has received results from air sampling at the west end of RZ-E. The sampling was prompted by odors encountered during excavation. A Summa canister sample analyzed for the TO-15 analytical suite showed detections of chloroform, chlorobenzene, and benzene (see attached Table 1).

Tronox proposes to collect additional samples in the volatile organic compound (VOC) impacted area of RZ-E for waste characterization purposes. We propose to advance two new borings to a depth of 19 feet (from original ground surface), as shown on the attached Figure 1. RZ-E-02 was already excavated to a depth of 11 feet below ground surface (bgs) when the odors were encountered. With NDEP approval, the two borings can be advanced and sampled early next week. Boring soil samples from depths of 15 and 19 feet below original ground surface (4 feet and 8 feet below existing grade) are proposed to be analyzed for VOCs. We expect that results will be available to guide the RZ-E excavation within two weeks of collecting the samples.

In addition to the organic vapors encountered in the western portion of RZ-E, Northgate has also identified asbestos-containing materials (ACM) in the top two feet of soil in several RZ-E polygons toward the middle of the Site (see attached Figure 2). With NDEP approval, Tronox proposes to remove the ACM following the same procedures utilized in excavating ACM from the Unit 1 and 2 basements.



While Las Vegas Paving continues to excavate RZ-E soils in areas not impacted by asbestos or odors, both the vapor and asbestos issues will likely delay completion of RZ-E excavation. At this time, Tronox cannot project the extent of the delay. As soon as results from the proposed borings become available and Las Vegas Paving estimates asbestos remediation timing, Tronox will update the RZ-E remediation schedule.

We would appreciate your comments on this matter as soon as possible to meet the project schedule. Please contact us if you have any questions.

Attachments

Table 1 – Air Sample Results

Figure 1 – Proposed Additional Borings – RZ-E-02

Figure 2 – Proposed Asbestos Removal Area

