

STATE OF NEVADA

Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor
Leo M. Drozdoff, P.E., Director
Colleen Cripps, Ph.D., Administrator

July 9, 2013

Richard A. Pfarrer
Director, ESH TIMET.
PO Box 2128
Henderson, Nevada 89009

Re.: **NDEP Facility ID# H-000537 (TIMET)**

Nevada Division of Environmental Protection Response To:
Removal Action Work Plan-Rev2

*BMI Beta/Northwest Ditch Ditches Located on the Titanium Metals Corporation
Plant Site*

Dated and Received: June 28, 2013

Dear Mr. Pfarrer:

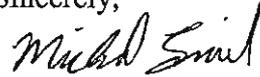
The Nevada Division of Environmental Protection (NDEP) has completed a review of the excavation design in Appendices B and C in the aforementioned Deliverables. We find the excavation design acceptable with the condition that TIMET does not disagree and will address the comments below:

1. Introduction, page 1, TIMET states radioisotopes (radium 226 and 228, thorium 228) are believed to be present more ubiquitously in the area and better managed via future Site wide risk assessment and decision making. NDEP understands the investigation of these radioisotopes will be included in future site wide investigations, however until those investigations are complete, TIMET will need to address the worker and dust exposure at the sample locations for BD-3, BD-10, BD-11, BD-12, and BD-14 that are not being covered by clean fill and are well above the outdoor industrial BCL levels. Please submit a work plan/mitigation measures to address this comment **no later than August 9, 2013.**
2. Appendix B, Table 2 – Excavation Analysis by Location, page 5 of 5, at a depth a 0.5 feet at location NW-17, the sample for total PCBs was recorded at 1.43 mg/kg. Please excavate to a clean sample depth of 5 feet to remove the total PCBs above 1 mg/kg or TIMET may excavate to a depth below 0.5 feet and above 5 feet and provide confirmation sampling. Please provide an updated Table 2 – Excavation Analysis by Location and Design Plans **no later than July 19, 2013.**
3. Please note NDEP will require TIMET to further incorporate all contamination left in place in their human health risk assessment and to address source control measures for leaching concerns through remedial alternatives appropriate for the COPCs.



The remaining Appendices are currently under review and comments will be provided separately. Should you have any questions or concerns, please do not hesitate to contact me at (702) 486-2850 x247 or mpfriend@ndep.nv.gov.

Sincerely,



Michael P Friend, P.E.
Staff Engineer III, Special Projects Branch
Bureau of Corrective Actions
NDEP-Las Vegas Office
Fax: (702) 486-2863

MF/jd

ec: Greg Lovato, NDEP, BCA, Carson City
James Dotchin, NDEP, BCA LV
Adam Baas, Edgcomb Law Group
Allan DeLorme, ENVIRON International Corporation
Andrew Barnes, Geosyntec
Ashley Katri, McGinley and Associates
Brenda Pohlmann, City of Henderson
Brian Giroux, McGinley & Associates
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Brian Waggle, Hargis +Associates
Chuck Elmendorf, Stauffer Management Company, LLC
Curt Richards, Olin Corporation
Ebrahim Juma, Clark County Clean Water Team
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Emi Donis, Precision Castparts Corp
George Crouse, Syngenta Crop Protection, Inc.
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