

Memorandum

To: Mr. Michael Friend, PE
Staff Engineer III
Special Project Branch
Bureau of Corrective Actions
Nevada Division of Environmental Protection
2030 E. Flamingo Road, Suite 230
Las Vegas, NV 89119-0818

From: Rich Truax, PE

Cc: Dick Pfarrer, TIMET; George Onorato, GEI

Date: October 8, 2013

Re: Work Plan for Soil Sampling of TIMET Beta Ditch Excavation Wheel Wash at the TIMET Facility, Henderson, Nevada

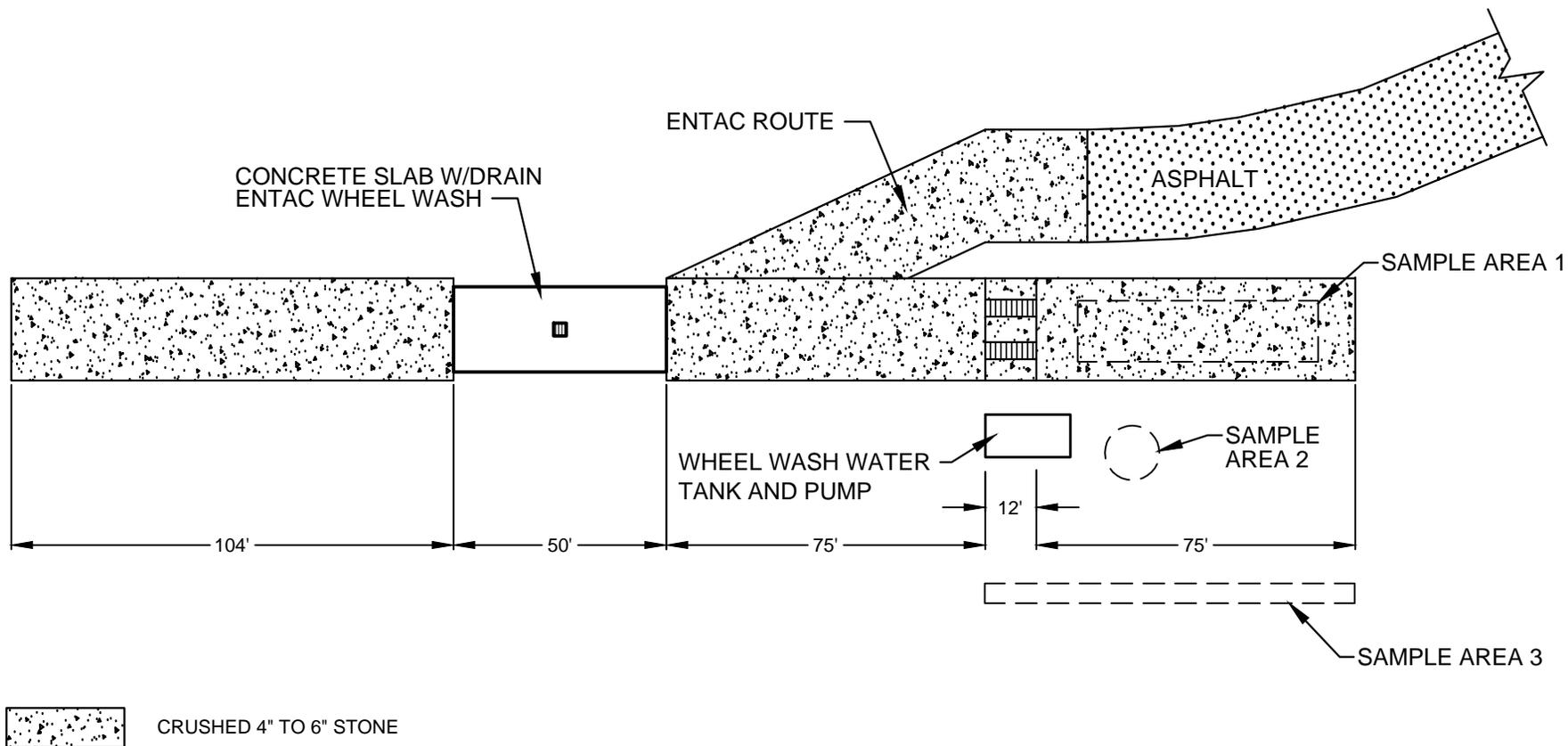
GEI has developed this soil sampling work plan on behalf of TIMET in response to NDEP's 9/11/13 email request. NDEP's email (Michael Friend to Richard Pfarrer, NDEP Requests for Track Out and Potential Contamination Issues) indicates concern regarding potential drippage of wheel wash water from bottom dump / clam shell trucks in the area following the wheel wash. NDEP indicates the potential that wash water may have splashed upward into bottom-dump / clam shell, contacted soils, and then dripped back out after the wheel wash. In addition, NDEP indicates localized areas of green / yellow coloring in ponding / puddles in the wheel wash area. This work plan provides for soil sampling of these areas at the conclusion of the Beta Ditch excavation work.

Upon completion of the Beta Ditch excavation activities, the wheel wash area will be removed as part of site demobilization. The wheel wash area is comprised of approximately 4- to 6-inch thickness of rock ballast over previously existing soils. The rock and a thin layer (approximate one-inch) of the soils will be removed as part of the demobilization activities. Following removal of this material, the remaining soils will then be sampled in accordance with this work plan.

The attached sketch provides the layout of the wheel wash area. Sample areas 1, 2, and 3 represent the areas of interest. Area 1 is the area of observed drippage following the wheel wash. Areas 2 and 3 are the areas of observed puddling / ponding with yellow / green color.

One soil sample will be collected from the middle of each of these areas at 0- to 2-inch depth using a decontaminated shovel. Each sample will be placed in individual laboratory supplied sample jars, and be shipped with proper chain of custody and cooling to the laboratory. Laboratory analysis will be ordered for constituents that exceeded the remedial action objective (RAO) for the Beta Ditch excavation: (hexachlorobenzene [8270], lead [6010B], dioxins/furan [8290], total PCBs [8082], manganese [6020A], and niobium [6020A]). These constituents were identified in Beta Ditch samples at concentrations exceeding the RAO as detailed in the NDEP approved Removal Action Work Plan – Rev 2.

The laboratory data results will be evaluated and reported in a follow-up document along with recommendations for appropriate further actions if any. It is anticipated that this sampling will be conducted at similar time as the site demobilization (approximately late in the week of October 14th). Allowing four weeks for laboratory analysis, a follow-up report is then expected by approximately November 29th.



Titanium Metals Corporation
 181 North Water Street
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BETA DITCH
 WHEEL WASH SKETCH

Project 1323080

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Fig. 1