

November 12, 2013

Geotechnical
Environmental
Water Resources
Ecological

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

Re: Titanium Metals Corporation
Henderson, Nevada Facility
NDEP Facility ID # 000537
*Response to NDEP Comments Dated October 31, 2013 Regarding the Document Titled:
"Proposed Design Changes for First Water-Bearing Zone Groundwater Remediation
Program and Response to NDEP Comments Dated September 18, 201"*

Dear Mr. Friend:

Titanium Metals Corporation (TIMET) is in receipt of the Department's letter dated October 31, 2013 presenting comments on the above-captioned submittal. On behalf of TIMET, GEI Consultants is pleased to submit the following responses:

NDEP Comment 1: Response to Comment (RTC) 3, the uranium and tetrachloroethene plumes from the 2012 Annual Groundwater Monitoring Report (2012) appear to extend approximately 600 to 800 feet past the south eastern boundary of the proposed slurry wall. NDEP is not confident that EWQal-16 well will have enough radius of influence to capture and contain these plumes and the other corresponding plumes in the same area. Please reincorporate wells EWQal-17, EWQal-18 and EWQal-19 into the design at a minimum or provide a capture zone analysis using a model to demonstrate that the currently proposed design can provide proper containment of these plumes. (Also note for future maps and discussions, including the contaminate plumes of concern and all the wells being discussed on the same map will be extremely helpful for review.)

TIMET Response: TIMET will include these wells in the design and they will be equipped with the necessary pumps, piping and instrumentation. The wells will be operated to improve capture to the east if needed. Drawing 1, revised accordingly, is attached.

NDEP Comment 2: RTC 7b, NDEP appreciates TIMET's commitment to have the evaporation system operational in 2015, however in the unlikely event the evaporation system is not operational then, NDEP will still require the discontinuation of the use of the recharge trenches by the end of 2015. It will be TIMET's responsibility to properly store/dispose of the treated groundwater. No response is necessary.

TIMET Response: No response.

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Page 2

If you have any questions regarding this submittal, please do not hesitate to contact the undersigned at (716) 204-7158 (email: kmcintosh@geiconsultants.com) or Mr. Richard Pfarrer of TIMET at (702) 566-4453 (email: Richard.Pfarrer@Timet.com).

Sincerely,

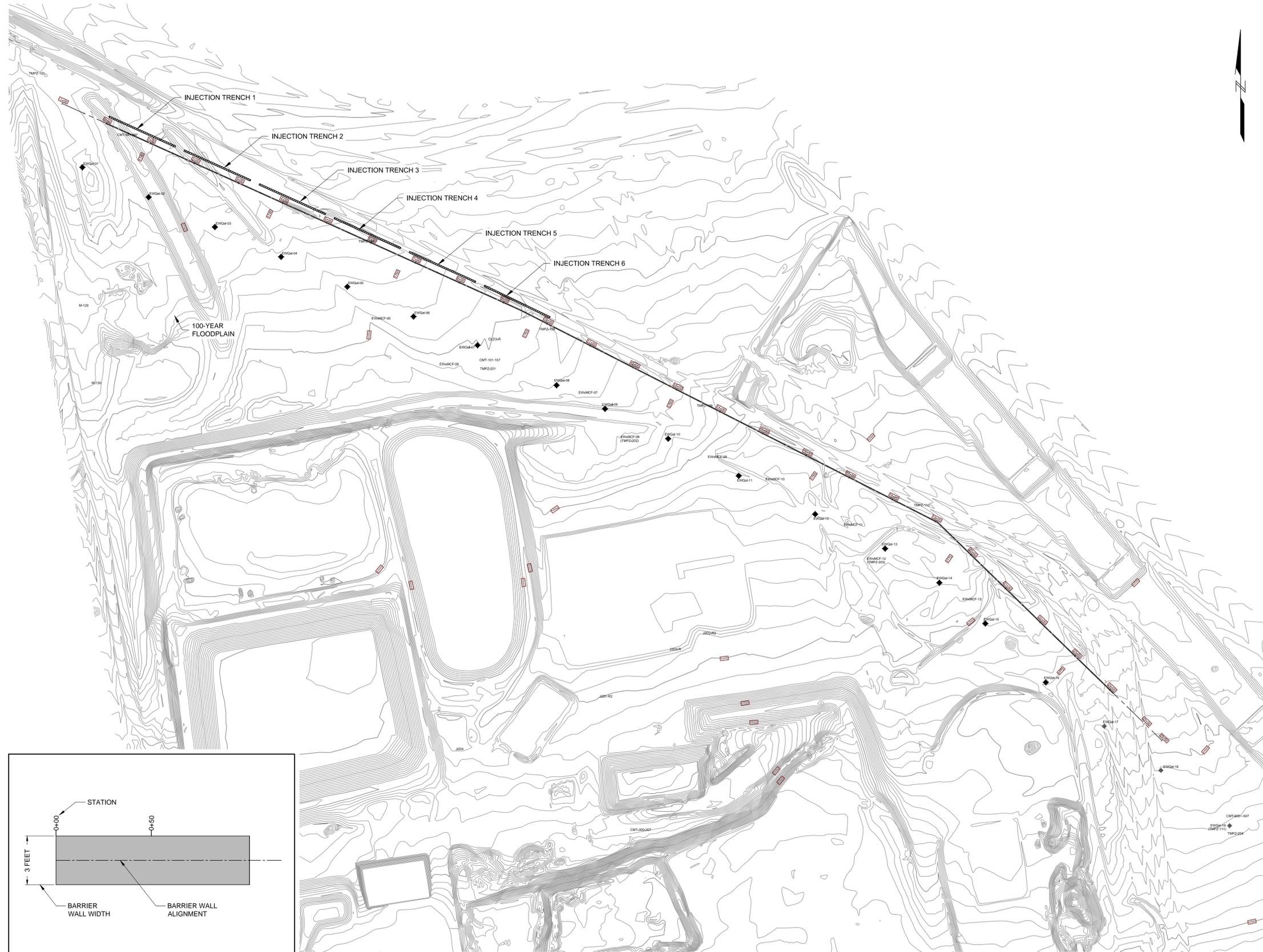
GEI Consultants, Inc.



Kelly R. McIntosh, Ph.D., EM-2199 (exp. 9/24/15)
Senior Consultant

cc: Richard Pfarrer – TIMET, hard copy and electronic copy
Richard Truax – GEI, electronic copy
JD Dotchin, Nevada Division of Environmental Protection, Las Vegas, Nevada,
electronic copy
BMI Compliance Coordinator, Nevada Division of Environmental Protection, Las Vegas,
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Nevada Division of Environmental Protection, c/o McGinley and Associates, Inc.,
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Jeff Gibson – AMPAC, by electronic mail
Mark Paris – BMI, by electronic mail
Lee Farris – BMI, by electronic mail
Ranjit Sahu – BMI, by electronic mail
Joe Kelly – Montrose, by electronic mail
Paul Sundberg – representing Montrose, by electronic mail
Jay Steinberg – NERT, by electronic mail
Allan DeLorme – NERT, by electronic mail
John Pekala – NERT, by electronic mail
Curt Richards – Olin, by electronic mail
Jay Gear – Olin, by electronic mail
Ed Modiano – OSSM GWTS, by electronic mail
Chuck Elmendorf –Stauffer, by electronic mail
Nick Pogoncheff –Stauffer, by electronic mail
George Crouse –Syngenta, by electronic mail
Enoe Marcum – WAPA, by electronic mail

X:\2013\1323080 - TITANIUM METALS CORPORATION\11-06-2013\DRAWINGS\C1_BARRIER WALL OVERVIEW AND EXTRACTION WELL LOCATION PLAN.DWG

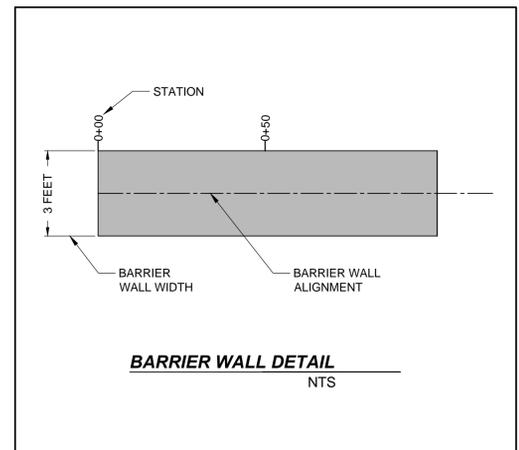


LEGEND:

- PROPERTY LINE
- WALL ALIGNMENT
- ⊕ EWQal-07 EXTRACTION WELL
- TMSB-139 EXPLORATION - BY OTHERS
- PDI-04 EXPLORATION - BY GEI
- △ 1 CONSTRUCTION CONTROL POINT

CONSTRUCTION CONTROL POINTS			
POINT #	NORTHING	EASTING	ELEVATION
1	26721012.74	826778.78	1737
2	26720627.39	827637.66	1750
3	26720633.37	828668.24	1765
4	26720432.79	829117.09	1775

EXTRACTION WELLS			
WELL ID	NORTHING	EASTING	ELEVATION
EWQal-01	26720412	828845	1737
EWQal-02	26720308	828953	1737
EWQal-03	26720247	829090	1744
EWQal-04	26720185	829227	1743
EWQal-05	26720124	829363	1748
EWQal-06	2672031	829535	1748
EWQal-07	26719986	826666	1749
EWQal-08	26719921	829796	1752
EWQal-09	26719857	829925	1755
EWQal-10	26719857	830051	1759
EWQal-11	26719719	830204	1761
EWQal-12	26719656	830330	1764
EWQal-13	26719585	830475	1766
EWQal-14	26719504	830577	1767
EWQal-15	26719420	830673	1771
EWQal-16	26719310	830807	1775
EWQal-17	26719220	830928	1778
EWQal-18	26719129	831045	1781
EWQal-19	26719015	831187	1784



NOTE:
ALL UTILITY LOCATIONS ARE APPROXIMATE.

NO.	DATE	ISSUE/REVISION	APP
0	11/04/13	FOR BIDDING	GOA
-	07/16/13	NOT FOR CONSTRUCTION	GOA

Designed: G. Onorato
 Checked: G. Onorato
 Drawn: S. Mrozinski
 Submittal Date: 11/12/2013



TITANIUM METALS CORPORATION
 181 NORTH WATER STREET
 BLACK MOUNTAIN
 INDUSTRIAL CENTER
 HENDERSON, NEVADA 89015
 GEI Project 1323080

REMEDIAL DESIGN PLAN	DWG. NO. 1
BARRIER WALL OVERVIEW AND EXTRACTION WELL LOCATION PLAN	SHEET NO. 5 of 15

