



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

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December 9, 2008

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Mr. Brian Spiller
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Wilmington, DE 19850-6438

Mr. Craig Wilkinson
Titanium Metals Corporation
PO Box 2128
Henderson, NV 89009

Re. **BMI Plant Sites and Common Areas Projects, Henderson, Nevada**
Lead in Health Risk Assessments

Dear Sirs and Madam:

During the development of health risk assessments (HRA), in the chemical of potential concern (COPC) selection step, some special consideration needs to be given to lead. COPC selection for lead should follow a two step process. The first step is a background comparison to gain insight into the potential for lead contamination in support of the conceptual site model (CSM) for the sub-area (or operable unit or management unit or any other analogous term) of interest and for the site as a whole. The second step is comparison to a risk-based threshold (e.g.: 400 mg/kg for the residential scenario and 800 mg/kg for the commercial/industrial scenario). This second step is the COPC selection step.

Please contact me with any questions (tel: 702-486-2850 x247; e-mail: brakvica@ndep.nv.gov).

Sincerely,

Brian A Rakvica, P.E.
Supervisor, Special Projects Branch
Bureau of Corrective Actions

BAR:s

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