



# STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

**December 7, 2007**

Mr. Mark Paris  
Basic Remediation Company  
875 West Warm Springs Road  
Henderson, NV 89011

Ms. Susan Crowley  
Tronox LLC  
PO Box 55  
Henderson, NV 89009

Mr. Curt Richards  
Olin Corporation  
PO Box 248, 1186 Lower River Road  
Charleston, TN 37310-0248

Mr. Joe Kelly  
Montrose Chemical Corp of CA  
600 Ericksen Ave NE, Suite 380  
Bainbridge Island, WA 98110

Mr. Brian Spiller  
Stauffer Management Co LLC  
1800 Concord Pike  
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**  
*Advisement Regarding Radionuclide Analyses for Uranium*

Dear Sirs and Madam:

As noted to the Companies via e-mail, it has been discovered that there are differences in the preparatory (prep) methods used for isotopic uranium analyses. Specifically, the use of hydrofluoric acid (HF) versus not using HF. This difference has significant impacts on the data and represents a comparability problem.

What has been discovered is as follows:

1. The BRC/TIMET background data set was analyzed by STL-Saint Louis (STL-SL) for isotopic uranium. STL-SL uses HF.
2. The TRX upgradient data set was analyzed by GEL for isotopic uranium. GEL uses HF.
3. The TRX Phase A data and several other BRC data sets were completed by STL-Richland. STL-Richland does not use HF. This results in significant low bias relative to the background data set for isotopic uranium.

All QAPPs shall be edited to specifically identify the prep method that uses HF for isotopic uranium analysis. Please address this issue **by January 11, 2008**.

There are several other issues as follows:

1. The Companies need to identify all data sets that are not comparable and report this to the NDEP. This will also be requested in the letter. Please address this issue **by January 11, 2008**.
2. All parties need to work to identify what other radionuclide data may be compromised. Each company should respond to this issue in the January 11, 2008 Deliverable. If additional radionuclide data is compromised additional changes to QAPPs will be required.

3. All parties need to contemplate how we might salvage the data from STL-Richland for isotopic uranium analysis for use in future background comparisons. Some ideas that have been mentioned thus far are as follows:
  - a. Complete a side by side study of the two methods and develop a correction factor that could be applied to data from STL-Richland. It should be noted that enough uranium (metal) data may exist to develop this correction factor currently. This is important if any of the data will be used for risk assessments. This item can be addressed by the NDEP for the Companies or the Companies can complete this exercise.
  - b. Discard the existing data that is affected by this difference and utilize the total uranium data for background comparisons. It is likely that this is a defensible procedure for addressing background comparisons.
  - c. Utilize gamma spectroscopy for future analyses of isotopic uranium (NDEP does not support this).
  - d. These ideas need to be contemplated for what will be defensible. NDEP is open to additional suggestions.
  - e. Each Company should respond to this issue in the January 11, 2008 Deliverable.

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

Sincerely,

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

BAR:s

CC: Jim Najima, NDEP, BCA, Carson City  
Marysia Skorska, NDEP, BCA, Las Vegas  
Shannon Harbour, NDEP, BCA, Las Vegas  
Todd Croft, NDEP, BCA, Las Vegas  
Greg Lovato, NDEP, BCA, Carson City  
Barry Conaty, Akin, Gump, Strauss, Hauer & Feld, L.L.P., 1333 New Hampshire Avenue, N.W.,  
Washington, D.C. 20036  
Brenda Pohlmann, City of Henderson, PO Box 95050, Henderson, NV 89009  
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9, mail code: WST-5,  
75 Hawthorne Street, San Francisco, CA 94105-3901  
Rob Mrowka, Clark County Comprehensive Planning, PO Box 551741, Las Vegas, NV, 89155-  
1741  
Ranjit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801  
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011  
Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015  
George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409  
Nicholas Pogoncheff, PES Environmental, Inc., 1682 Novato Blvd., Suite 100, Novato, CA  
94947-7021  
Lee Erickson, Stauffer Management Company LLC, P.O. Box 18890 Golden, CO 80402  
Keith Bailey, Environmental Answers, 3229 Persimmon Creek Drive, Edmond, OK 73013  
Jeff Gibson, AMPAC, 3770 Howard Hughes Parkway, Suite 300, Las Vegas, Nevada 89109  
Sally Bilodeau, ENSR, 1220 Avenida Acaso, Camarillo, CA 93012-8727  
Stan Smith, Olin Chlor Alkali, PO Box 86, Henderson, Nevada 89009  
Paul Sundberg, Montrose Chemical Corporation, 3846 Estate Drive, Stockton, California  
95209

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Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380,  
Bainbridge Island, WA 98110

Jon Erskine, Northgate Environmental Management, Inc., 300 Frank H. Ogawa Plaza, Suite 510,  
Oakland, CA 94612

Deni Chambers, Northgate Environmental Management, Inc., 300 Frank H. Ogawa Plaza, Suite  
510, Oakland, CA 94612

Robert Infelise, Cox Castle Nicholson, 555 California Street, 10<sup>th</sup> Floor, San Francisco, CA 94104-1513

Michael Ford, Bryan Cave, One Renaissance Square, Two North Central Avenue, Suite 2200,  
Phoenix, AZ 85004

Dave Gratson, Neptune and Company, 1505 15<sup>th</sup> Street, Suite B, Los Alamos, NM 87544

Paul Black, Neptune and Company, Inc., 8550 West 14<sup>th</sup> Street, Suite 100, Lakewood, CO 80215

Teri Copeland, 5737 Kanan Rd., #182, Agoura Hills, CA 91301

Paul Hackenberry, Hackenberry Associates, 550 West Plumb Lane, B425, Reno, NV, 89509