



November 18, 2009

Mr. Brian A. Rakvica, P.E.
Nevada Division of Environmental Protection
Bureau of Corrective Actions
2030 E. Flamingo Road, Suite 230
Las Vegas, Nevada 89119-0818

**Subject: Confirmation Sampling Plan for Soil, Western Hook Development Sub-Area,
Henderson, Nevada**

Dear Brian:

Basic Remediation Company (BRC) appreciates the opportunity to submit this Confirmation Sampling Plan to characterize remediation of impacted soil at the Western Hook Development sub-area. The Western Hook Development sub-area (hereinafter "the Site") is one of several sub-areas of the BMI Common Areas (Eastside) located in Clark County, Nevada. The Site encompasses an area of approximately 227 acres (Figure 2). The Site includes unexcavated ponds, previously excavated ponds, three ditches and areas that were not used for any known waste disposal.

This Confirmation Sampling Plan is based on the removal actions that were conducted at the Site, in August through October 2009. The conclusion that remediation of soil at the Site was needed is based on the findings of the field investigations carried out in accordance with the Sampling and Analysis Plan (SAP) for the Western Hook Development sub-area. The overall goal of this Confirmation Sampling Plan is carry out the confirmation sampling for the remediation that was performed at the Site.

Confirmation Sampling

Confirmation surface soil sampling will be collected at the original sample location for the ditch remediation areas, the surface soil remediation area polygons, and the deep excavation remediation areas (Figure 1). Confirmation surface soil sampling will be collected at the original sample location and from four samples in the corners of the small-scale square areas where remediation was triggered by dioxins/furans only. Proposed confirmation sample locations are shown on Figure 1. The remediation areas are also shown on Figure 1.

There were four locations identified for remediation that were not remediated during the August through October 2009 remediation. Two were deep sample locations, and two were surface sample locations. Re-sampling at these four locations, shown on Figure 1, are proposed as part of this Confirmation Sampling Plan.

All sampling will be completed under the direction of a State of Nevada Certified Environmental Manager. Field activities will be conducted in accordance with applicable standard operating procedures (SOPs; BRC, ERM and MWH 2008). The BRC Quality Assurance Project Plan

(QAPP; BRC and ERM 2009) and Health and Safety Plan (HASP; BRC and MWH 2005) prepared for the BMI Common Areas will be used for confirmation soil sampling. Table 1 presents the proposed analyte list for each of the confirmation sample locations.

It should be noted that the remediation conducted at the Site, and this Confirmation Sampling Plan, do not address the elevated arsenic levels found throughout the Site. This issue is being address separate from this Confirmation Sampling Plan.

Schedule

Once final approval of the Confirmation Sampling Plan is received from NDEP, field implementation activities can commence within two weeks. BRC will provide NDEP with at least two days notice prior to the initiation of field activities at the Site. It is anticipated that this work can be completed within one week, depending on field conditions. The confirmation soil samples will be submitted to the laboratories and placed on a standard turn around time.

Closing Remarks

See attached for appropriate certification language and signature. Please direct any remaining questions or comments you may have to me at 626-382-0001.

Sincerely,

Basic Remediation Company



Ranajit Sahu, CEM
Project Manager

cc: Jim Najima, NDEP, BCA, Carson City, NV 89701

Attachments: Attachment A – NDEP Comments and BRC's Response to Comments
Figure 1 – Southern RIBs Sub-Area Proposed Remediation Areas
Figure 2 – Southern RIBs Sub-Area Confirmation Sample Locations
Table 1 – Proposed Confirmation Sample Analyses

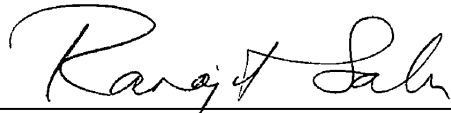
References

Basic Remediation Company (BRC) and MWH. 2005. BRC Health and Safety Plan, BMI Common Areas, Clark County, Nevada. October.

Basic Remediation Company (BRC), ERM, and MWH. 2008. BRC Field Sampling and Standard Operating Procedures, BMI Common Areas, Clark County, Nevada. December.

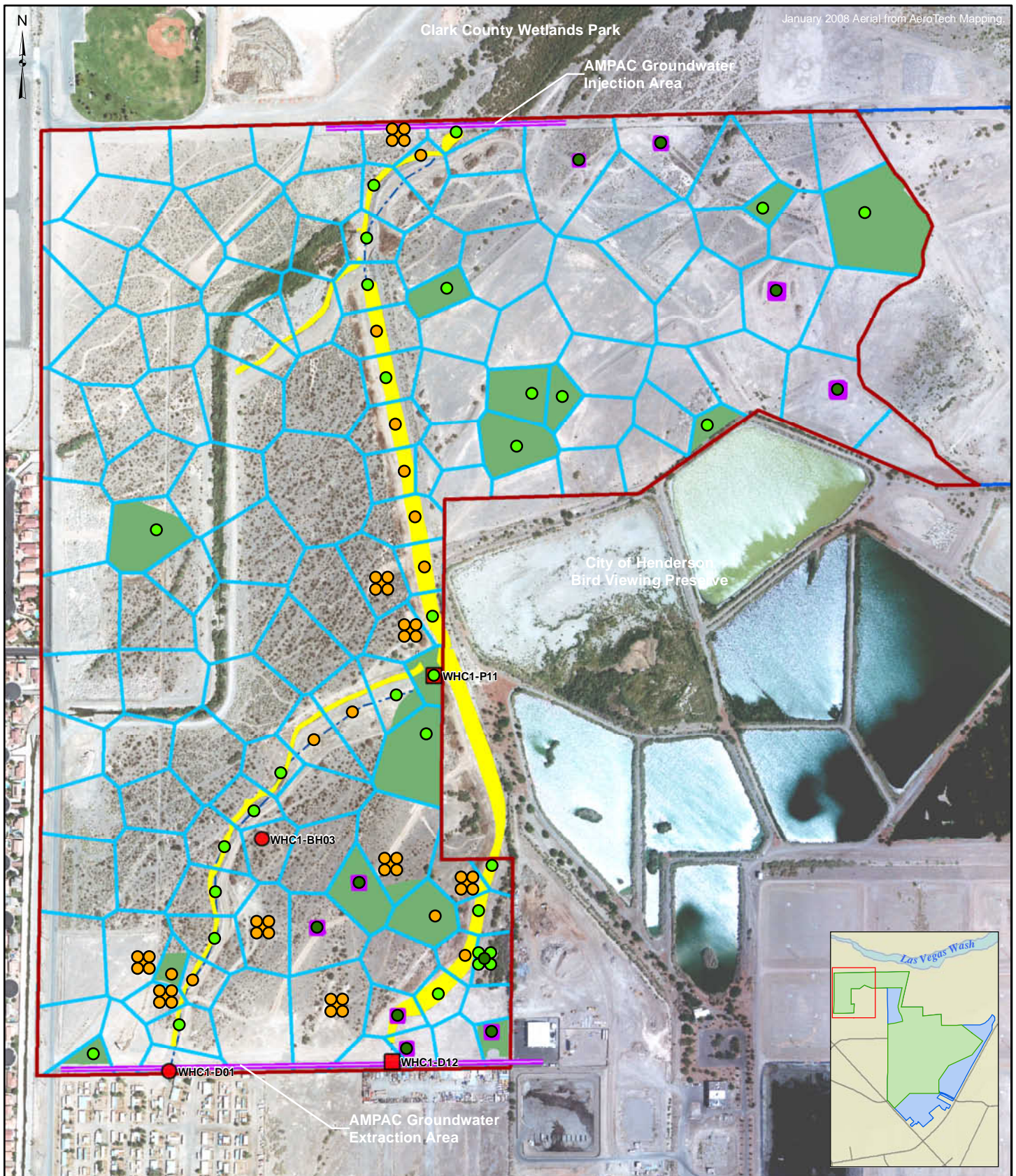
Basic Remediation Company (BRC) and ERM. 2009. BRC Quality Assurance Project Plan. BMI Common Areas, Clark County, Nevada. May.

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state and local statutes, regulations and ordinances. I hereby certify that all laboratory analytical data was generated by a laboratory certified by the NDEP for each constituent and media presented herein.



November 18, 2009

Dr. Ranajit Sahu, C.E.M. (No. EM-1699, Exp. 10/07/2011) Date
BRC Project Manager



Western Hook-Development Sub-Area

Site AOC3 Boundary

Surface Sample

Deep (Bottom of Excavation)

Surface Sample (Dioxins/Furans/PCBs Only)

Actual Remediation Limits

Remediation Limit - 1 Foot Scrape

Remediation Limit - Channel

Remediation Limit - Deep Cut

Missing Surface Remediation (2)

Missing Deep Remediation (2)

BMI Common Areas (Eastside)
Clark County, Nevada

FIGURE 1

WESTERN HOOK DEVELOPMENT CONFIRMATION SAMPLES



Prepared by
MKJ (ERM)



Date
11/18/09

JOB No. 0064276
FILE: GIS\BRC\WH-DEVELOP\FIGURE.MXD

TABLE 1
PROPOSED CONFIRMATION SAMPLE ANALYSES
WESTERN HOOK DEVELOPMENT SUB-AREA
(Page 1 of 5)

Sample Location	Northing	Easting	Latitude	Longitude	Location Notes	Analyses
WHC2-A09C	26732120.25537	827177.74918	36.08239	-115.00457		Asbestos
WHC2-BF01C	26729332.03653	825327.30453	36.07476	-115.01089		Asbestos
WHC2-BF02C	26729574.75078	825632.04952	36.07542	-115.00985		Dioxins/furans; PCB congeners
WHC2-BF02NE	26729599.75078	825657.04952	36.07549	-115.00977		Dioxins/furans; PCB congeners
WHC2-BF02NW	26729599.75078	825607.04952	36.07549	-115.00993		Dioxins/furans; PCB congeners
WHC2-BF02SE	26729549.75078	825657.04952	36.07535	-115.00977		Dioxins/furans; PCB congeners
WHC2-BF02SW	26729549.75078	825607.04952	36.07535	-115.00994		Dioxins/furans; PCB congeners
WHC2-BF04C	26729537.33267	826355.07915	36.07531	-115.00740		Dioxins/furans; PCB congeners
WHC2-BF04NE	26729562.33267	826380.07915	36.07538	-115.00732		Dioxins/furans; PCB congeners
WHC2-BF04NW	26729562.33267	826330.07915	36.07538	-115.00749		Dioxins/furans; PCB congeners
WHC2-BF04SE	26729512.33267	826380.07915	36.07524	-115.00732		Dioxins/furans; PCB congeners
WHC2-BF04SW	26729512.33267	826330.07915	36.07524	-115.00749		Dioxins/furans; PCB congeners
WHC2-BF05C	26729356.24476	826649.75575	36.07481	-115.00641	Sample at bottom center of excavation	Metals, Radionuclides
WHC2-BF06C	26729426.87908	827007.97062	36.07499	-115.00520	Sample at bottom center of excavation	Asbestos; Radionuclides
WHC2-BG02C	26729718.17073	825538.86413	36.07582	-115.01016		Dioxins/furans; PCB congeners
WHC2-BG02NE	26729743.17073	825563.86413	36.07589	-115.01008		Dioxins/furans; PCB congeners
WHC2-BG02NW	26729743.17073	825513.86413	36.07589	-115.01025		Dioxins/furans; PCB congeners
WHC2-BG02SE	26729693.17073	825563.86413	36.07575	-115.01008		Dioxins/furans; PCB congeners
WHC2-BG02SW	26729693.17073	825513.86413	36.07575	-115.01025		Dioxins/furans; PCB congeners
WHC2-BG03C	26729867.05725	826042.50372	36.07622	-115.00846		Dioxins/furans; PCB congeners
WHC2-BG03NE	26729892.05725	826067.50372	36.07629	-115.00837		Dioxins/furans; PCB congeners
WHC2-BG03NW	26729892.05725	826017.50372	36.07629	-115.00854		Dioxins/furans; PCB congeners
WHC2-BG03SE	26729842.05725	826067.50372	36.07615	-115.00837		Dioxins/furans; PCB congeners
WHC2-BG03SW	26729842.05725	826017.50372	36.07615	-115.00854		Dioxins/furans; PCB congeners

TABLE 1
PROPOSED CONFIRMATION SAMPLE ANALYSES
WESTERN HOOK DEVELOPMENT SUB-AREA
(Page 2 of 5)

Sample Location	Northing	Easting	Latitude	Longitude	Location Notes	Analyses
WHC2-BG04C	26729866.83578	826271.47145	36.07621	-115.00768	Sample at bottom center of excavation	Metals, Radionuclides
WHC2-BG06C	26729734.80706	826978.96792	36.07584	-115.00529	Sample at bottom center of excavation	Dioxins/furans; PCB congeners; Metals; Radionuclides
WHC2-BG06NE	26729759.80706	827003.96792	36.07591	-115.00520		Dioxins/furans; PCB congeners; Metals; Radionuclides
WHC2-BG06NW	26729759.80706	826953.96792	36.07591	-115.00537		Dioxins/furans; PCB congeners; Metals; Radionuclides
WHC2-BG06SE	26729709.80706	827003.96792	36.07577	-115.00521		Dioxins/furans; PCB congeners; Metals; Radionuclides
WHC2-BG06SW	26729709.80706	826953.96792	36.07577	-115.00537		Dioxins/furans; PCB congeners; Metals; Radionuclides
WHC2-BH03C	26730241.49341	826039.01569	36.07725	-115.00846		Dioxins/furans; PCB congeners
WHC2-BH05C	26730133.90593	826582.33834	36.07694	-115.00662		Dioxins/furans; PCB congeners
WHC2-BH05NE	26730158.90593	826607.33834	36.07701	-115.00654		Dioxins/furans; PCB congeners
WHC2-BH05NW	26730158.90593	826557.33834	36.07701	-115.00671		Dioxins/furans; PCB congeners
WHC2-BH05SE	26730108.90593	826607.33834	36.07687	-115.00654		Dioxins/furans; PCB congeners
WHC2-BH05SW	26730108.90593	826557.33834	36.07687	-115.00671		Dioxins/furans; PCB congeners
WHC2-BH06C	26730053.81536	826904.29813	36.07672	-115.00554		Dioxins/furans; PCB congeners
WHC2-BH06NE	26730078.81536	826929.29813	36.07679	-115.00545		Dioxins/furans; PCB congeners
WHC2-BH06NW	26730078.81536	826879.29813	36.07679	-115.00562		Dioxins/furans; PCB congeners
WHC2-BH06SE	26730028.81536	826929.29813	36.07665	-115.00545		Dioxins/furans; PCB congeners
WHC2-BH06SW	26730028.81536	826879.29813	36.07665	-115.00562		Dioxins/furans; PCB congeners
WHC2-BI05C	26730684.24218	826731.82395	36.07845	-115.00611		Dioxins/furans; PCB congeners; Metals
WHC2-BJ05C	26731119.45619	826664.86285	36.07965	-115.00632		Dioxins/furans; PCB congeners
WHC2-BJ05NE	26731144.45619	826689.86285	36.07972	-115.00624		Dioxins/furans; PCB congeners
WHC2-BJ05NW	26731144.45619	826639.86285	36.07972	-115.00641		Dioxins/furans; PCB congeners
WHC2-BJ05SE	26731094.45619	826689.86285	36.07958	-115.00624		Dioxins/furans; PCB congeners
WHC2-BJ05SW	26731094.45619	826639.86285	36.07958	-115.00641		Dioxins/furans; PCB congeners
WHC2-BK05C	26731319.28530	826544.90247	36.08020	-115.00673		Dioxins/furans; PCB congeners

TABLE 1
PROPOSED CONFIRMATION SAMPLE ANALYSES
WESTERN HOOK DEVELOPMENT SUB-AREA
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Sample Location	Northing	Easting	Latitude	Longitude	Location Notes	Analyses
WHC2-BK05NE	26731344.28530	826569.90247	36.08027	-115.00664		Dioxins/furans; PCB congeners
WHC2-BK05NW	26731344.28530	826519.90247	36.08027	-115.00681		Dioxins/furans; PCB congeners
WHC2-BK05SE	26731294.28530	826569.90247	36.08013	-115.00664		Dioxins/furans; PCB congeners
WHC2-BK05SW	26731294.28530	826519.90247	36.08013	-115.00681		Dioxins/furans; PCB congeners
WHC2-BM06C	26731898.52995	827113.74398	36.08178	-115.00479		Dioxins/furans; PCB congeners; Metals
WHC2-BM07C	26732108.21678	827307.89585	36.08235	-115.00413		Dioxins/furans; PCB congeners; Asbestos
WHC2-BM08C	26731986.41387	827919.68494	36.08201	-115.00206		Dioxins/furans; PCB congeners; Asbestos; Radionuclides
WHC2-BM10C	26732138.34800	828468.29865	36.08242	-115.00020	Sample at bottom center of excavation	Metals, Radionuclides
WHC2-BN05C	26732564.77936	826819.13582	36.08362	-115.00577		Dioxins/furans; PCB congeners; Asbestos
WHC2-BN09C	26732555.69382	828210.71414	36.08357	-115.00106	Sample at bottom center of excavation	Metals, Radionuclides
WHC2-BO09C	26732903.40705	828152.50473	36.08453	-115.00125		Asbestos
WHC2-BO10C	26732884.41490	828584.26423	36.08447	-114.99979		Metals, Radionuclides
WHC2-BP05C	26733212.81253	826615.05161	36.08540	-115.00645		Dioxins/furans; PCB congeners
WHC2-BP05NE	26733237.81253	826640.05161	36.08547	-115.00637		Dioxins/furans; PCB congeners
WHC2-BP05NW	26733237.81253	826590.05161	36.08547	-115.00654		Dioxins/furans; PCB congeners
WHC2-BP05SE	26733187.81253	826640.05161	36.08533	-115.00637		Dioxins/furans; PCB congeners
WHC2-BP05SW	26733187.81253	826590.05161	36.08533	-115.00654		Dioxins/furans; PCB congeners
WHC2-BP07C	26733106.86904	827376.61370	36.08510	-115.00388	Sample at bottom center of excavation	Metals
WHC2-BP08C	26733178.54806	827721.88007	36.08529	-115.00271	Sample at bottom center of excavation	Metals
WHC2-D01C	26729260.77386	825648.92740	36.07456	-115.00980		Dioxins/furans; PCB congeners; Asbestos; OCPs
WHC2-D02C	26729455.77006	825690.70886	36.07509	-115.00965		Dioxins/furans; PCB congeners; SVOCs
WHC2-D03C	26729644.14926	825745.97663	36.07561	-115.00946		Dioxins/furans; PCB congeners
WHC2-D04C	26729819.74155	825839.02194	36.07609	-115.00915		Dioxins/furans; PCB congeners; SVOCs; OCPs
WHC2-D05C	26730016.62671	825842.51527	36.07663	-115.00913		Dioxins/furans; PCB congeners; SVOCs; OCPs

TABLE 1
PROPOSED CONFIRMATION SAMPLE ANALYSES
WESTERN HOOK DEVELOPMENT SUB-AREA
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Sample Location	Northing	Easting	Latitude	Longitude	Location Notes	Analyses
WHC2-D06C	26730207.03273	825881.14218	36.07716	-115.00899		
WHC2-D07C	26730359.32331	826006.34145	36.07757	-115.00857		
WHC2-D08C	26730519.75569	826119.75556	36.07801	-115.00818		Asbestos
WHC2-D09C	26730659.65688	826259.38854	36.07839	-115.00771		Dioxins/furans; PCB congeners
WHC2-D10C	26730776.48579	826421.65143	36.07871	-115.00715		Dioxins/furans; PCB congeners
WHC2-D11C	26730848.36548	826606.15999	36.07891	-115.00653		Dioxins/furans; PCB congeners; Asbestos; Metals; SVOCs; OCPs
WHC2-D12C	26729301.15160	826589.65151	36.07466	-115.00662	Sample at 10' bgs	Radionuclides
WHC2-D13C	26729495.62795	826611.28295	36.07519	-115.00654	Sample at bottom center of excavation	Dioxins/furans; PCB congeners; Metals; Radionuclides; SVOCs
WHC2-D14C	26729585.99659	826784.29103	36.07543	-115.00595		
WHC2-D15C	26729748.14892	826896.99603	36.07588	-115.00557		Dioxins/furans; PCB congeners
WHC2-D16C	26729938.12002	826952.90014	36.07640	-115.00537		Dioxins/furans; PCB congeners; Metals
WHC2-D17C	26730127.96389	827010.62938	36.07692	-115.00517		Dioxins/furans; PCB congeners; Metals; SVOCs
WHC2-D18C	26731180.84448	826759.36468	36.07982	-115.00600		Dioxins/furans; PCB congeners; Asbestos; SVOCs
WHC2-D19C	26731387.96632	826725.94130	36.08039	-115.00611		Dioxins/furans; PCB congeners
WHC2-D20C	26731598.75614	826686.24666	36.08097	-115.00624		Dioxins/furans; PCB congeners
WHC2-D21C	26731792.73007	826640.39038	36.08150	-115.00639		Dioxins/furans; PCB congeners
WHC2-D22C	26731990.64553	826601.92375	36.08204	-115.00652		Dioxins/furans; PCB congeners
WHC2-D23C	26732186.80107	826562.89803	36.08258	-115.00665		
WHC2-D24C	26732382.95660	826523.87232	36.08312	-115.00678		Dioxins/furans; PCB congeners
WHC2-D25C	26732579.11213	826484.84660	36.08366	-115.00690		Dioxins/furans; PCB congeners; SVOCs
WHC2-D26C	26732777.01565	826480.66192	36.08421	-115.00691		
WHC2-D27C	26732998.44492	826512.06560	36.08481	-115.00680		Dioxins/furans; PCB congeners; Radionuclides
WHC2-D28C	26733125.51436	826709.49579	36.08516	-115.00613		Dioxins/furans; PCB congeners
WHC2-D29C	26733224.07642	826859.13306	36.08543	-115.00562		Dioxins/furans; PCB congeners

TABLE 1
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WESTERN HOOK DEVELOPMENT SUB-AREA
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Sample Location	Northing	Easting	Latitude	Longitude	Location Notes	Analyses
WHC2-P07C	26731544.31540	825593.29361	36.08083	-115.00994		Metals, Radionuclides
WHC2-P10C	26729913.99384	826769.99953	36.07634	-115.00599		Dioxins/furans; PCB congeners
WHC2-P11C	26730931.26059	826765.50828	36.07913	-115.00599	Surface Sample	Dioxins/furans; PCB congeners; Metals; SVOCs; Perchlorate; OCPs
WHC2-P11C	26730931.26059	826765.50828	36.07913	-115.00599	Sample at 10' bgs	Dioxins/furans; PCB congeners; Metals
WHC2-P12C	26729669.22104	825658.41665	36.07568	-115.00976		Dioxins/furans; PCB congeners
WHC2-P13C	26730055.46802	826448.87558	36.07673	-115.00708	Sample at bottom center of excavation	Dioxins/furans; PCB congeners; Metals; Radionuclides