



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: Second Removal Action Work Plan for Soil, Southern RIBs Sub-Area,
Henderson, Nevada**

Dear Brian:

Basic Remediation Company (BRC) appreciates the opportunity to submit this Removal Action Work Plan (RAWP) to address additional remediation of impacted soil at the Southern RIBs sub-area. The Southern RIBs 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 84.2 acres (Figure 1). The Site is located outside of any known areas used for any waste disposal associated with the BMI Common Areas; however, the eastern half of the Site comprises an area formerly used by the City of Henderson as Rapid Infiltration Basins (RIBs) associated with municipal wastewater treatment.

The conclusion that remediation of soil at each of the Sites is needed is based on the findings of the first round of confirmation sampling carried out in accordance with the Confirmation Sampling Plan for the Southern RIBs sub-area. The overall goal of this RAWP is to present a cleanup strategy for the Site that effectively reduces, to the extent feasible, the human health risks associated with the identified soil in the impacted areas of the Site. All work will be completed under the direction of a State of Nevada Certified Environmental Manager.

Proposed Additional Remediation Areas

The five additional remediation areas proposed for the Site and their rationale are presented below.

- Two rectangular polygons, 125 feet (one-half the distance from the eastern edge of the original remediation area to 50 feet beyond the westernmost confirmation sample location with exceedances) by 25 feet, around confirmation sample locations SRC2-J02E and SRC1-J03S, which had exceedances of metals, and metals and dioxins/furans, respectively. Rescrape confirmation surface soil samples are proposed at each of the original exceedance locations, and each of the four corners of the two rescrape polygons.
- Two rectangular polygons, 200 feet (the distance between confirmation sample locations along the northern boundary) by 25 feet, around confirmation sample locations SRC2-J21 and SRC2-J23, which had exceedances of metals and dioxins/furans, respectively. Rescrape confirmation surface soil samples are proposed at each of the original exceedance locations, and each of the four corners of the two rescrape polygons.

- A thessien polygon around confirmation sample location SRC2-J11C, which had exceedances of dioxins/furans. Rescrape confirmation surface soil samples are proposed at the original sample location and from four samples in the corners of the rescrape polygon.

These three additional remediation areas are shown on Figure 1. Table 1 presents the proposed analyte list for each of the rescrape confirmation surface soil sample locations.

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.

Following collection and analysis of confirmation soil samples, the data will be discussed with the NDEP. If results are considered acceptable, a risk assessment will be conducted to evaluate the potential risks to future on-site human receptors at each Site. The receptors identified to be evaluated in the risk assessment will be consistent with the proposed development of the Site.

Schedule

Once final approval of the RAWP 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 Remedation Company



Ranajit Sahu, CEM
Project Manager

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

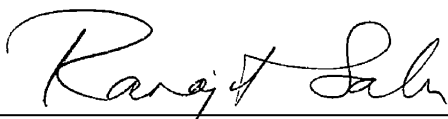
Attachments: Figure 1 – Southern RIBs Sub-Area Proposed Rescrape Areas and Confirmation Samples

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



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|--|--|---|
| Southern RIBs Sub-Area | ● Confirmation Sample Location | Initial Scrape Areas (8.1 Acres Total) |
| Site AOC3 Boundary | ● Confirmation Sample Location with Exceedances | Proposed Additional Scrape Areas (1.2 Acres) |
| Eastside Soil Sub-Areas | ◆ Re-Scrape Confirmation Sample Location | |

BMI Common Areas (Eastside)
Clark County, Nevada

FIGURE 1

**SOUTHERN RIBS SUB-AREA
PROPOSED RESCAPE AREAS
AND CONFIRMATION SAMPLES**



Prepared by
MKJ (ERM)



Date
11/18/09

JOB No. 0064276
FILE: GIS\RCSO\RIBS\FIGURE2.MXD

TABLE 1
PROPOSED CONFIRMATION SAMPLE ANALYSES
SOUTHERN RIBs SUB-AREA
(Page 1 of 1)

Sample Location	Northing	Easting	Latitude	Longitude	Location Notes	Analyses
SRC3-J02C2	26721320.19314	831968.28412	36.05264	-114.98858	--	Dioxins/furans; PCB congeners; Metals
SRC3-J02NE	26721355.51351	832031.68677	36.05274	-114.98836	--	Dioxins/furans; PCB congeners; Metals
SRC3-J02NW	26721302.79916	831918.43488	36.05259	-114.98875	--	Dioxins/furans; PCB congeners; Metals
SRC3-J02SE	26721332.96623	832042.17201	36.05268	-114.98833	--	Dioxins/furans; PCB congeners; Metals
SRC3-J02SW	26721280.27428	831928.97891	36.05253	-114.98871	--	Dioxins/furans; PCB congeners; Metals
SRC3-J03C2	26721350.04822	832141.52310	36.05272	-114.98799	--	Dioxins/furans; PCB congeners; Metals
SRC3-J03NE	26721377.22191	832159.48000	36.05280	-114.98793	--	Dioxins/furans; PCB congeners; Metals
SRC3-J03NW	26721327.75731	832044.70965	36.05266	-114.98832	--	Dioxins/furans; PCB congeners; Metals
SRC3-J03SE	26721354.28192	832169.37266	36.05273	-114.98790	--	Dioxins/furans; PCB congeners; Metals
SRC3-J03SW	26721304.81535	832054.59910	36.05260	-114.98829	--	Dioxins/furans; PCB congeners; Metals
SRC3-J11C2	26722003.85086	835049.37297	36.05447	-114.97814	--	Dioxins/furans; PCB congeners
SRC3-J11NE	26722040.63150	835121.35219	36.05457	-114.97790	--	Dioxins/furans; PCB congeners
SRC3-J11NW	26722092.92872	835023.42820	36.05471	-114.97823	--	Dioxins/furans; PCB congeners
SRC3-J11SE	26721906.62212	835060.32314	36.05420	-114.97811	--	Dioxins/furans; PCB congeners
SRC3-J11SW	26721922.92794	834979.90601	36.05425	-114.97838	--	Dioxins/furans; PCB congeners
SRC3-J21C2	26722467.89731	834928.06113	36.05574	-114.97854	--	Metals
SRC3-J21NE	26722523.21552	835011.93435	36.05590	-114.97826	--	Metals
SRC3-J21NW	26722438.84981	834830.59923	36.05567	-114.97887	--	Metals
SRC3-J21SE	26722500.54767	835022.48051	36.05583	-114.97822	--	Metals
SRC3-J21SW	26722416.18197	834841.14539	36.05560	-114.97884	--	Metals
SRC3-J23C2	26722214.28208	834380.37670	36.05506	-114.98040	--	Dioxins/furans; PCB congeners
SRC3-J23NE	26722269.47745	834465.23059	36.05521	-114.98011	--	Dioxins/furans; PCB congeners
SRC3-J23NW	26722185.11174	834283.89547	36.05498	-114.98073	--	Dioxins/furans; PCB congeners
SRC3-J23SE	26722246.80960	834475.77675	36.05514	-114.98008	--	Dioxins/furans; PCB congeners
SRC3-J23SW	26722162.44389	834294.44163	36.05492	-114.98069	--	Dioxins/furans; PCB congeners