



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

June 1, 2009

Susan Crowley (Contractor)
C/O Tronox LLC
PO Box 55
Henderson, NV 89009

Re: **Tronox LLC (TRX)**
NDEP Facility ID #H-000539
Nevada Division of Environmental Protection (NDEP) Response to:
Quality Assurance Project Plan, Tronox LLC Facility, Henderson, Nevada
Dated: May 26, 2009

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's above-identified Quality Assurance Project Plan (QAPP) and provides comments in Attachment A. A revised QAPP or errata should be submitted based on the comments found in Attachment A. Please advise the NDEP by **June 8, 2009** regarding the schedule for this resubmittal. TRX should additionally provide an annotated response-to-comments letter as part of the revised submittal.

Please contact the undersigned with any questions at sharbour@ndep.nv.gov or (702) 486-2850 extension 240.

Sincerely,

Shannon Harbour, P.E.
Staff Engineer III
Bureau of Corrective Actions
Special Projects Branch
NDEP-Las Vegas Office
Fax: 702-486-5733



SH:bar:sh

CC: Jim Najima, NDEP, BCA, Carson City
Brian Rakvica, NDEP, BCA, Las Vegas
Keith Bailey, Environmental Answers LLC, 3229 Persimmon Creek Drive, Edmond, OK 73013
Susan Crowley, Crowley Environmental LLC, 366 Esquina Dr, Henderson NV 89014
Mike Skromyda, Tronox LLC, PO Box 55, Henderson, NV 89009
Barry Conaty, Holland & Hart LLP, 975 F Street, N.W. Suite 900, Washington, D.C. 20004
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
Ebrahim Juma, DAQEM, PO Box 551741, Las Vegas, NV, 89155-1741
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Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380, Bainbridge Island,
WA 98110
Dave Gratson, Neptune and Company, Inc., 1505 15th Street, Suite B, Los Alamos, NM 87544

Attachment A

1. Section A.1, page 1 of 14, 2nd paragraph, the reference to the Field Sampling and Analysis Plan (FSAP) should be updated. The Basic Remediation Company (BRC) Standard Operating Procedures (SOPs) have been periodically updated since then. TRX should also include a reference to the most current SOPs in Section E.
2. Section A.7.a, page 11 of 14, 5th paragraph, TRX should consider using collision cell ICP/MS (or another suitable method) for the metal analyses that are subject to interferences.
3. Section B.2.2, page 1 of 9, TRX states that field filtration may be required if the turbidity exceeds 10 NTU. TRX should review the BRC SOP-5: Water Sampling and Field Measurements and revise this section for consistency with this SOP.
4. Section B.4, table, page 5 or 9, PTS Laboratories are listed in this table; however, no Quality Assurance (QA) manual from this laboratory was provided in Appendix B. Please forward their QA Manual for review and inclusion in this QAPP or revise this Section accordingly.
5. Section E, reference NDEP 2009(e), TRX should note that this guidance has been updated with *Unification of Electronic Data Deliverables (EDD), NDEP-Required EDD Format* (NDEP guidance letter, May 20, 2009).
6. Figure A-1, TRX should provide an update to this organization chart Figure as follows:
 - a. Northgate Environmental Management, Inc. is providing project oversight for the environmental investigative activities and AECOM is no longer providing any services at the Site.
 - b. Susan Crowley is no longer directly employed by TRX.
7. Table A-1, Distribution List, NDEP has the following comments:
 - a. Todd Croft, NDEP, should be removed from the distribution list.
 - b. Joanna Otani-Fehling is incorrectly listed as associated with Neptune and Company.
8. Table B-1, pages 19-22 of 37, NDEP has the following comments:
 - a. General comment, this table appears to have two sections: soil sampling requirements and groundwater sampling requirements. Please revise this table to clarify this.
 - b. Page 19 of 37, the number "1" is used in two separate instances to reference a footnote. The first is for the "Container" heading (this footnote reference is on all four pages on the Table) and the second is for the preservative for hexavalent chromium. There are two number 1 footnotes listed on this Table: on page 20 and on page 22. Please revise this Table for clarity.
9. Table B-3, page 28 of 37, the Control Limits for Organic Acids - Method Blanks uses the term MRL. It is likely this should be replaced with the term is PQL. If not, please justify why MRL is being used.