



# STATE OF NEVADA

Department of Conservation & Natural Resources  
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

April 12, 2010

Matt Paque  
Tronox LLC  
3301 NW 150th  
Oklahoma City, OK 73134

Re: **Tronox LLC (TRX)**  
**NDEP Facility ID #H-000539**  
Nevada Division of Environmental Protection (NDEP) Response to:  
*Indoor Air Quality Investigation Work Plan, Tronox LLC, Henderson, Nevada*  
Dated: March 29, 2010

Dear Mr. Paque,

The NDEP has received and reviewed TRX's above-identified Deliverable and provides comments in Attachment A. A revised Deliverable or errata should be submitted **by April 23, 2010** based on the comments found in Attachment A. TRX should additionally provide an annotated response-to-comments letter as part of the revised Deliverable.

Please contact the undersigned with any questions at [sharbour@ndep.nv.gov](mailto: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:sh

EC: Jim Najima, NDEP, BCA, Carson City  
Greg Lovato, Bureau of Corrective Actions, NDEP, Carson City, NV  
Carolyn Tanner, AG's Office, Carson City, NV

CC: Keith Bailey, Environmental Answers LLC, 3229 Persimmon Creek Drive, Edmond, OK 73013  
Susan Crowley, C/O Tronox LLC, PO Box 55, Henderson, NV 89009  
Mike Skromyda, Tronox LLC, PO Box 55, Henderson, NV 89009  
Michael J. Foster, Tronox LLC, P.O. Box 268859, Oklahoma City, OK 73126-8859



Deni Chambers, Northgate Environmental, 300 Frank H. Ogawa Plaza, Suite 510, Oakland, CA 94612  
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, Planning Manager, Air Quality and Environmental Management, 500 S. Grand Central Pkwy, 1st floor, P.O. Box 555210, Las Vegas, NV 89155-5210  
Joe McGinley, McGinley & Associates, 815 Maestro Dr, Reno, NV 89511  
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Ranjit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801  
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Craig Wilkinson, TIMET, PO Box 2128, Henderson, Nevada, 89009-7003  
Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015  
George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409  
Nick Pogoncheff, PES Environmental, 1682 Novato Blvd., Suite 100, Novato, CA 94947  
Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden, CO 80402  
Michael Bellotti, Olin Corporation, 3855 North Ocoee Street, Suite 200, Cleveland, TN 37312  
Curt Richards, Olin Corporation, 3855 North Ocoee Street, Suite 200, Cleveland, TN 37312  
Paul Sundberg, Montrose Chemical Corporation, 10733 Wave Crest Court, Stockton, CA 95209  
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Jeff Gibson, AMPAC, 3883 Howard Hughes Pkwy, Ste 700, Henderson, NV 89169  
Larry Cummings, AMPAC, 3883 Howard Hughes Pkwy, Ste 700, Henderson, NV 89169

**Attachment A**

1. Section 2.2, page 3, TRX should clarify the number of rounds of indoor air sampling that will be performed. TRX should note that subsurface vapor intrusion into existing buildings can be affected by a number of different factors including outdoor meteorological conditions and building systems operations. Therefore, several rounds of indoor air sampling should be considered to capture the potential variability. Additionally, TRX should discuss the factors which may affect the indoor air concentrations and how the number of rounds of sampling will yield representative results
2. Section 2.3, page 4, first paragraph, TRX discusses the flow rate for the indoor air sampling. TRX should specify whether the outdoor sampling will be set differently and if so, should indicate how the outdoor air sample controllers will be set.
3. Section 2.4.2, page 5, please provide information regarding how air flow rates, fresh air-makeup and recirculated air within the building will be measured.