



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

March 21, 2011

Jay A. Steinberg
Nevada Environmental Response Trust
35 East Wacker Drive, Suite 1550
Chicago, IL 60601

Re: **Tronox LLC (TRX) Facility**
Nevada Environmental Response Trust (Trust) Property
NDEP Facility ID #H-000539
Nevada Division of Environmental Protection (NDEP) Response to:
December 2010 Indoor Air Quality Sampling and Analysis Report, Tronox LLC,
Henderson, Nevada
Dated: February 3, 2011

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and finds that the document is acceptable with the following comments noted for the Administrative Record:

1. General comment, although the report provides information on the outdoor weather conditions and the tables provide information on the status of the air conditioning use, the indoor temperatures are generally higher than the outdoor temperatures indicating that the heating systems were in use. This may be a terminology issue and rather than indicating use of the central AC system which most people interpret as 'cooling', the table could reflect use of the HVAC system. Please revise as necessary in any future submittals.
2. General comment, the discussion of the sample results where a 'J' qualifier has been provided by the laboratory is inconsistent throughout Section 3. In some instances a sample result with a J qualifier is described as "less than the RL" (i.e., Section 3.1.3). In other instances, the 'J' qualified values are reported as 'not detected above its RL' (i.e., Section 3.1.4), and in another instance the 'J' qualified value is reported as 'detected at concentration ranges of ...' (Section 3.1.8). This language is confusing to the reader and should be made consistent. Because 'J' qualified data are used in risk assessments as the valued that is reported by the laboratory, it is most appropriate to describe the 'J' qualified values as 'detected at.'
3. Section 2.1.8, in any future reporting, Unit 1 Building should be identified on the Site Map. Additionally, the two markers for the upwind ambient air samples collected at Gate 2 are not well indicated.
4. Section 3.1.1, Line 4, the concentration currently written as 1.427 $\mu\text{g}/\text{m}^3$ is incorrect. The lowest concentration was 1.124 $\mu\text{g}/\text{m}^3$.



5. Section 4.1, page 12, top paragraph, in future submittals, a reference that indicates a product containing TCE is used in the building. Otherwise, the hypothesis that chemical use activities in the Unit 3 building were a likely factor in the higher measured concentrations of TCE in the spring sampling lacks foundation.
6. Section 4.2, page 13, the conclusions regarding the higher indoor concentrations of chloroform should be discussed in context with the knowledge of the movement of the subsurface plume beneath the site, in particular the changes in chloroform concentrations that may be expected over time.

Please contact the undersigned with any questions at sharbour@ndep.nv.gov or 775-687-9332.

Sincerely,

A handwritten signature in blue ink that reads "Shannon Harbour".

Shannon Harbour, P.E.
Staff Engineer III
Bureau of Corrective Actions
Special Projects Branch
NDEP-Carson City Office
Fax: 775-687-8335

SH:sh

ec: Jim Najima, Bureau of Corrective Actions, NDEP
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Brenda Pohlmann, City of Henderson
Stephen Tyahla, U.S. Environmental Protection Agency, Region 9
Andrew Steinberg, Nevada Environmental Response Trust
Allan Delorme, ENVIRON
Mark Travers, ENVIRON
Mike Skromyda, Tronox LLC
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Deni Chambers, Northgate Environmental
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Julie Panko, ChemRisk, Inc.

cc: Lee Farris, BRC, 875 W. Warm Springs Road, Henderson, NV 89011
Lee Erickson, Stauffer Management Company