



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

May 23, 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:
*Revised Tech Memo: Screening Level Indoor Air Health Risk Assessment for the 2008
Tronox Parcels A/B Soil Gas Investigation, Tronox LLC, Henderson, Nevada*
Dated: November 12, 2010

Dear Mr. Steinberg,

The NDEP has received and reviewed the above-identified Deliverable prepared and submitted by TRX and provides comments in Attachment A. Please advise NDEP by **June 13, 2011** whether the Trust will be providing a revised Deliverable based on the comments found in Attachment A. Please contact the undersigned with any questions at sharbour@ndep.nv.gov or 775-687-9332.

Sincerely,

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

SH:wk:sh

EC: Jim Najima, Bureau of Corrective Actions, NDEP
Greg Lovato, Bureau of Corrective Actions, NDEP
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Carolyn Tanner, AG's Office
Brenda Pohlmann, City of Henderson
Stephen Tyahla, U.S. Environmental Protection Agency, Region 9
Charles K. Hauser, Esq., Southern Nevada Water Authority
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Marcia Scully, Metropolitan Water District of Southern California
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Kelly Black, Neptune and Company, Inc.
Mike Balshi, Neptune and Company, Inc.

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

Attachment A

1. General comment, NDEP has noted that this technical memorandum does not discuss the sampling design used for the data that were collected and presented. Please reference the appropriate document where this information can be found.
2. Response to Comment (RTC) 4.a.iv and Table 2, this RTC indicates that the appropriate reference for the enclosed space floor thickness parameter is EPA guidance. However, Table 2 indicates that the reference is "model default". Please revise for consistency.
3. RTC 3.d, NDEP comment 3.d requested that the data be displayed spatially as is noted in NDEP guidance for risk assessment. Spatial data plots have not been provided for any COPC other than chloroform and rationale for this has not been given. The RTC simply states that the requested spatial plots have not been submitted. NDEP understands that chloroform is one of the more pervasive compounds; however, other compounds have been shown to dominate the vapor intrusion pathway (e.g. naphthalene). The downgradient soil vapor intrusion study should be reviewed to assist in the selection of compounds other than chloroform for spatial data plots.
4. RTC 4.b, this RTC includes a table of chemicals and toxicological surrogates; however, this table could not be located within the main document. Please include this table in the main document as appropriate.
5. RTC 5, the last paragraph in the current Section 3.3.1 describes QSoil as an input to the J&E model. If it is an input, then please include it in Table 2. If not, then it should be labeled as an intermediate value. Please revise as necessary.
6. RTC 14, the redline additions to the document reference a groundwater well MW23, that seems to appear as M-23 on Figure 2. Please clarify that this is the same well as there are MW and M series wells associated with the Site. Additionally, please revise the document as necessary for consistency.
7. RTC 16, as requested in this RTC, NDEP is clarifying that cumulative risk be presented in this document.
8. Attachment E, NDEP provides the following comments:
 - a. NDEP issued guidance for blank contamination based on EPA's revision to the National Functional Guidelines in 2009. This guidance is referenced in the September 2010 revision that is included in the references in Appendix E. TRX did not follow the most recent NDEP guidance on blank contamination. Please revise the Deliverable accordingly.
 - b. Table E-2, please include footnotes that explain the reason codes and qualifiers.