



# STATE OF NEVADA

Department of Conservation & Natural Resources  
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

September 18, 2008

Susan Crowley  
Tronox LLC  
PO Box 55  
Henderson, Nevada 89009

Re: **Tronox LLC (TRX)**  
**NDEP Facility ID #H-000539**  
Nevada Division of Environmental Protection (NDEP) Revised Response to:  
*Data Validation Summary Report (DVSR), Phase B Source Area Investigation Soil Gas Survey, Tronox LLC Facility, Henderson, Nevada*  
Dated August 25, 2008

Dear Ms. Crowley,

Please accept this revised response letter that replaces NDEP's September 17, 2008 letter regarding the above-identified DVSR.

The NDEP has received and reviewed TRX's above-identified DVSR and provides comments in Attachment A. TRX should provide an annotated response-to-comments letter **by September 30, 2008** addressing these comments.

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

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  
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Dave Gratson, Neptune and Company, 1505 15<sup>th</sup> Street, Suite B, Los Alamos, NM 87544

**Attachment A**

1. **Helium Analysis:** Review of the laboratory reports from Columbia Analytical Services shows that helium analysis, using a modified method 3C, was performed on the Summa canister samples. It is unclear why helium analysis was required and why the soil gas samples would be exposed to helium. The DVSR should provide details on why helium analysis was performed along with a discussion of what impact helium detection in a sample has on the TO-15 results. For example, does helium indicate a soil gas sample was influenced from a purge gas? If helium detection in a sample does impact the VOC results the DVSR should also provide a validation of the helium analysis along with a discussion of the impact of helium results on the VOC data. Please respond **by September 30, 2008** with the rationale for the helium analysis and the potential effects the presence of helium would have on the analytical results.
2. **Recommendation for Future Reports:** It would benefit the readability of the report if future reports included the following information in the Introduction section of the DVSR:
  - a. The number of SDGs included in this DVSR
  - b. The SDG IDs
  - c. The total number of samples taken
  - d. The number of samples taken within each SDG
  - e. An analyte list for each SDG.