



# 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 30, 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) Response to:  
*Response to NDEP September 18, 2008 Comments, Data Validation Summary Report (DVSR), Phase B Source Area Investigation, Soil Gas Survey, Tronox LLC Facility, Henderson, Nevada, Dated August 25, 2008*  
Dated September 29, 2008

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's above-identified Response-to-Comments (RTC) letter and provides additional comments in Attachment A. TRX should provide an annotated response-to-comments letter and revised DVSR **by October 14, 2008** addressing these comments. If TRX would find it helpful, a brief conference call with NDEP could be held to discuss these issues. 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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Brenda Pohlmann, City of Henderson, PO Box 95050, Henderson, NV 89009  
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WA 98110  
Dave Gratson, Neptune and Company, 1505 15<sup>th</sup> Street, Suite B, Los Alamos, NM 87544

**Attachment A**

1. RTC 1, NDEP has the following comments:
  - a. The NDEP finds TRX's description and method acceptable.
  - b. TRX should document the calibration and other QA/QC checks used during the helium analysis method and keep them for the record to document that helium results are based on quality procedures.
  - c. TRX should also cite the ITRC source that discusses using helium tracer and the New York State Department of Environmental Conservation document that allows tracer concentrations up to 10% before the sample is considered compromised.
  - d. TRX should note that all the sampling parameters and QC checks (e.g. dead volume) performed during the field work should be documented. This documentation does not have to be included in the DVSR but should be available if questions on the sampling arise.