

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 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
Sally Bilodeau, ENSR, 1220 Avenida Acaso, Camarillo, CA 93012-8727
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, DAQEM, PO Box 551741, Las Vegas, NV, 89155-1741
Ranjit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011
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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, 3846 Estate Drive, Stockton, California 95209
Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380, Bainbridge Island,
WA 98110
Dave Gratson, Neptune and Company, 1505 15th 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.