

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 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
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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. **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.