PETER C. MORROS, Director
L.H. DODGION, *Administrator*
(702) 687-4670
TDD 687-4678
Administration
Mining Regulation and Reclamation
Water Pollution Control
Facsimile 687-5856
Address Reply to:
Capitol Complex
Carson City, NV 89710

STATE OF NEVADA
BOB MILLER
Governor

Waste Management
Corrective Actions
Federal Facilities
Air Quality
Water Quality Planning
Facsimile 687-6396
Located at:
333 W. Nye Lane
Carson City, NV 89710

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL PROTECTION

Capitol Complex

Carson City, Nevada 89710

February 4, 1997

Ms. Susan Crowley
Kerr-McGee Chemical Corporation
P O Box 55
Henderson NV 89009-7000

Subject: Phase II Work Plan/LOU - Approval with Comments

Dear Ms. Crowley:

The Division has received and reviewed the revised Phase II Work Plan and LOU Response (dated October 14, 1996 and September 30, 1996, respectively) prepared for the KMCC Facility in Henderson, Nevada. It should be noted, the Division considers the combined Phase II Work Plan and LOU Response to be the "workplan" required by the Phase II Consent Agreement. Therefore, this Workplan is approved upon the conditions specified in the attached NDEP Comments.

Please do not hesitate to contact me or Doug Zimmerman at (702) 687-4670, extension 3020 and 3127 respectively, if you have any questions or comments regarding this matter.

Sincerely,

Robert C. Kelso, P.E.
Supervisor, Remediation Branch
Bureau of Corrective Actions

RCK:kmf

Attachment: KMCC Revised Phase II Work Plan - NDEP Comments

cc w/attach:
D. Zimmerman, NDEP
W. Frey, DAG
Ms. Terre Maize, IT Corporation, 4330 South Valley View, Suite 114, Las Vegas, NV 89103-4047
Barry Conaty, Esq., Cutler & Stanfield, 700 Fourteenth Street, N.W., Washington, D.C. 20005

KMCC Revised Phase II Work Plan

NDEP Comments

LOU Responses

1. LOU Item #3, page 4 - KMCC's response states that "...no information on historical deposition...." is available for comparison. Provide any current/recent data submitted to Clark County regarding air emissions from the facility and the submittal schedule.

2. LOU Items #16 and #17 - Page 14: Provide analytical results verifying all contaminated soil was removed and properly disposed of during the 1995 decommissioning of AP2.
- page 16: Provide the rationale for not sampling MW-17, -25, and -89 for chromium. Provide the schedule for installation and implementation of the "new system" designed to eliminate the need for the AP Ponds (Ref. page 15, paragraph 2).

3. LOU Item # 20, page 18 - Discharges to Pond C-1 were stopped in October 1994 to allow the pond contents to dry. Per the LOU response, the liner and dried pond sludge were characterized and sent to the Silver State Landfill, but confirmatory sampling was not completed. Provide the liner and sludge characterization data and the date characterization was completed. Provide a schedule for completion of the confirmatory sampling plan forwarding to the Division for approval? Provide the Bureau of Corrective Actions with a copy of the transmittal letter and the plan when it is submitted.

4. LOU Item # 47, page 30 - KMCC's response regarding the health effects of manganese exposure is unclear. Is KMCC unaware of exposure studies because these studies have not been performed by KMCC, have not been performed by anyone or have not been searched for in the literature? Is any data available to interpret the average exposure levels recorded in 1995? Are these levels good, bad, acceptable, harmful,...? Provide clarification.

5. LOU Item #56, page 34 - Based on the information provided in Attachment 19, the Division agrees with KMCC's conclusion that the perchlorate ion is inert and generally does not react with other compounds in the soil or groundwater. Keep the Division apprised of your attempts to obtain additional references and provide copies when they are received. It should also be noted that the first paper in Attachment 19 consists of even number pages only.

6. LOU Item #62, page 38 - Provide a copy of the letter to State Industries and their response when received.

7. LOU Item #67, page 41 - Provide further information on the investigation, sampling, and/or analysis performed during or after removal of the trash and debris from the Delbert Madsen Site to assess and characterize any contamination, specifically hydrocarbons. The Phase I Report refers to the site as a "storage and salvage yard...for old vehicles and wrecked vehicles."

8. LOU Item #68, page 42 - KMCC's original response to this item stated Nevada recycling has been notified of lease termination effective December 1996. The September 30, 1996, response indicates the lease will likely be renewed on a yearly basis for some time to come. The existence of a lease is insufficient, in itself, to delay remediation of any contamination until the property is vacated. If the lease has been renewed and the property will be occupied beyond December 1996, it is strongly suggested that KMCC inspect the property for possible releases and acceptable housekeeping activities, and take appropriate actions as may be required.

Workplan

9. Section 2.2.1, page 2-1 - "EPA Method 8015" should read "EPA Method 8015 Modified (8015M)" for consistency with requirements and Table 1d. Correct the remainder of the document as necessary.

10. Section 2.2.2, page 2-2 - It should be noted, when analytical results are received they may be statistically evaluated (i.e. SW-846, Equation 8) to determine if the appropriate number of samples were collected and the assumption of homogeneity is correct.

11. Section 2.2.2, last paragraph (page 2-3) - Provide the criteria that will be used to determine the need for TCLP analyses?

12. Section 2.3, page 2-3 - The last two paragraphs contain apparent typographical errors - "wereconstructed" and "???impoundments." Correct as appropriate.

13. Section 2.3.2, page 2-4 - Provide the rationale for the 24-36 inches sampling depth in Old P-2 and P-3. How much underlying soil was removed and disposed at U.S. Ecology? Was any fill placed in the excavations? If so, how much?

14. Section 2.3.3, page 2-5 - The rationale for nitrate sampling in wells MW-17, -25, and -89 appears to be limited to the fact it is specifically required by the LOU. Is this correct? Provide a discussion of additional analyses that might provide more useful information?

15. Section 2.3.4, page 2-6 - Again, provide the rationale for sample depths of 24-36 inches. Provide construction details of the east, west, and south side berms and the origin of the berm material? What does "inorganic type materials" mean? Provide the information from "a previous terminal manager" that resulted in metal and Ph testing only. Was this manager a KMCC employee? The Phase I Report states this area was outside of the fenced and guarded KMCC facility, and accessible to Pioneer, BMI, Koch, Saguaro, NuBulk Transportation, J.B. Kelly and Chemstar among others. If access was uncontrolled, why are metal and pH analyses deemed sufficient to define the extent of possible contamination?

16. Section 2.3.7, page 2-7 - Specifically address the use of the J.B.Kelly Site as a truck washing and maintenance facility as described in the Phase I Report, and the potential for cleaning and degreasing solvent contamination as a result of these operations. Justify limiting samples to metals and pH only.

17. Section 2.3.8, page 2.8 - Was any sampling performed to verify that no 1,1,1-TCA contamination was present around the AP maintenance shop? If not, should sampling be considered?

18. Section 2.3.10, page 2-9 - Provide additional information regarding soil sampling to verify that no residual contamination remains from the kerosene and benzene USTs. The monitoring well should also be sampled for TPH to verify/refute the presence of kerosene. Provide the location of this proposed monitoring well (MW-97). Why does KMCC only propose lithologic sampling of the soil boring? Per KMCC's response to LOU Item #4, projected products from the site include monochlorobenzene, paradichlorobenzene, soda arsenite solution, synthetic detergent, and chlorinated paraffin. Provide the proposed sampling/analysis plan for these compounds.

19. Section 3 - There is no reference to collection of duplicates, blanks, spikes or other quality control samples, with the exception of four samples for field pH, temperature and conductivity, and only rinsate and trip blanks are specified for groundwater samples. For aqueous samples, it is standard practice to collect duplicate samples, and volatile samples usually require a field blank. Commonly, one quality control sample is collected per 20 samples of each matrix or sample group. Please explain. Also, provide the planned disposition of purge water and excess soils.

20. Sections 3.2.2.1 and 3.3.2.1 - It should be noted that samples collected for volatile organic compound analysis may not be composited.

21. Section 3.5, page 3-16 - Well installation/abandonment procedures should be in accordance with NRS 534.010 through 534.340 and NAC 534.010 through 534.470, Regulation for Water Well and Related Drilling.