

June 29, 2004

Ms. Susan Crowley
Kerr-McGee Chemical LLC (KM)
PO Box 55
Henderson, Nevada 89009

Re: **Kerr-McGee Chemical Corporation LLC (KM)**
NDEP Facility ID #H-000539
Nevada Division of Environmental Protection Response to:
Revised Deliverable Schedule dated June 28, 2004

Dear Ms. Crowley,

The Nevada Division of Environmental Protection (NDEP) has reviewed the
aforementioned document and provides the following comments:

1. As noted in comment #7 of the NDEP's June 11, 2004 letter to KM regarding KM's response to the NDEP's February 11, 2004 letter, the NDEP does not believe that the delivery date for the characterization of pond GW-11 is appropriate and requests an accelerated delivery date.
2. As noted in comment #8 of the NDEP's June 11, 2004 letter to KM regarding KM's response to the NDEP's February 11, 2004 letter, the NDEP does not feel that the "*Evaluation of Detection Limits in the Supplemental Phase II Report*" will be sufficient to address the NDEP's comments. Please refer to the NDEP's June 11, 2004 letter for further details.
3. As noted in comment #9 of the NDEP's June 11, 2004 letter to KM regarding KM's response to the NDEP's February 11, 2004 letter, it appears that an evaluation of screening levels needs to be completed. Please explain where this will be addressed in the current schedule.

4. Responses to the NDEP's June 11, 2004 and June 21, 2004 letters are due on July 6, July 12, and July 22, 2004. These responses should be included in the schedule.
5. The NDEP believes that the Conceptual Site Model (CSM) and Data Quality Objectives (DQOs) reports should be completed prior to the "*Evaluation of Detection Limits in the Supplemental Phase II Report*". Please revise the schedule accordingly.
6. Under the heading of "*Periodic Monitoring and Reporting*" KM needs to add the quarterly progress reporting required under the Phase II Consent Agreement.
7. Please revise the item titled "*Chemical List*" to "*Site-Related Chemical report*".
8. It should be noted that this document is a request for a change in schedule.
9. It is suggested that KM provided an updated schedule quarterly with the submission of the quarterly progress reporting as required by the Phase II Consent Agreement.

By **July 14, 2004** KM shall address the issues outlined herein. If possible, it would be helpful if KM provided a revised schedule at our July 6, 2004 meeting. Should you have any questions or concerns, please do not hesitate to contact me at (702) 486-2870.

Sincerely,

Brian A. Rakvica, P.E.
Staff Engineer III
Remediation and LUST Branch
Bureau of Corrective Actions
NDEP – Las Vegas Office

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CC: Jim Najima, NDEP, BCA, Carson City
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