October 26, 2004

Ms. Susan Crowley Kerr-McGee Chemical LLC 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: Characterization of GW-11 Pond Contents in Response to September 20, 2004 NDEP letter dated October 18, 2004

Dear Ms. Crowley,

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

- 1. Please provide a schedule for the sampling, analyses, and reporting discussed in your response to comment #2.
- 2. Table B.2, please explain which water quality standards were used to develop the column labeled "Most Stringent Water Quality Standards".
- 3. Table B.2, the detection limits are not included for a number of the analyses. Please provide a revised table that includes the detection limits for all analyses.
- 4. Table B.2, the NDEP appreciates the submittal of this information, however, the NDEP would like to note that the detection limits that are presented are elevated (above the "Most Stringent Water Quality Standards") for a number of analytes. No response is needed to this issue as it was addressed in KM's response to Comment #3 from the previous NDEP letter.

The NDEP requests that KM respond to these issues by November 29, 2004. 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

BAR/bar

CC: Jim Najima, NDEP, BCA, Carson City Jon Palm, NDEP, BWPC, Carson City Todd Croft, NDEP, BCA, Las Vegas Jennifer Carr, NDEP, BCA, Carson City Jeff Johnson, NDEP, BCA, Carson City Valerie King, BWPC, Carson City Al Tinney, BWPC, Carson City

Barry Conaty, Akin, Gump, Strauss, Hauer & Feld, L.L.P., 1333 New Hampshire Avenue, N.W., Washington, D.C. 20036

Brenda Pohlmann, City of Henderson, 240 Water Street, Suite 210, Henderson, NV 89015 Mitch Kaplan, U.S. Environmental Protection Agency, Region 9, mail code: WST-5, 75 Hawthorne Street, San Francisco, CA 94105-3901

Carrie Stowers, Clark County Comprehensive Planning, PO Box 551741, Las Vegas, NV, 89155-1741

Ranajit Sahu, BEC, 875 West Warm Springs Road, Henderson, Nevada 89015 Craig Wilkinson, TIMET, PO Box 2128, Henderson, Nevada, 89009-7003 Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015