July 28, 2005

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:
Semi-annual Performance Report – Chromium Mitigation Program – January – June 2005 dated July 27, 2005

Dear Ms. Crowley,

The NDEP has received and reviewed KM's report identified above and provides comments in Attachment A. Please address these comments in the next semi-annual report, if there are questions it is suggested that these issue be discussed in our next monthly meeting.

If there is anything further or if there are any questions please do not hesitate to contact me.

Sincerely,

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

CC: Jim Najima, NDEP, BCA, Carson City
Jeff Johnson, NDEP, BCA, 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, 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
Rob Mrowka, 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
Mr. George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409
Mr. Lee Erickson, Stauffer Management Company, 1800 Concord Pike, Hanby 1, Wilmington, DE 19850-5437
Mr. Chris Sylvia, Pioneer Americas LLC, PO Box 86, Henderson, Nevada 89009
Mr. 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

Attachment A

1. Page 3, the NDEP requests that KM review the remedial alternatives for treating the chromium-impacted groundwater in the "dead zone". There may be several in-situ treatment options that could readily be employed to treat this water. The NDEP understands and appreciates that the hydraulic mound is minimizing the potential for this groundwater to migrate. The NDEP also appreciates and understands that the Athens Road Well Field is downgradient and provides a means of capturing impacted groundwater. It should be noted that the chromium concentrations in some of the wells downgradient of the slurry wall exceeds the concentrations of chromium in the interceptor well field. This issue should be reviewed and discussed on a mass basis. If KM does not agree with the concept of remediation of this impacted groundwater it is suggested that this issue be discussed in an upcoming monthly meeting or on a tele-conference. The NDEP needs to understand KM's long-term plans for the remediation of this groundwater.
2. Page 6, KM states that "Overall, chromium concentrations are slightly lower at the interceptor well line in 2005 as compared to 2004. This may indicate that the main portion of the chromium plume has now reached the interceptor well line and chromium concentrations will further decline with time." Based on the plume contours shown on Plate 2, the highest concentrations of chromium on-site are located upgradient from the interceptor well line. The basis for KM's statement is not clear and there are alternate reasons for the "slightly lower" concentrations.
3. Plate 4, please note that the western extent of the plume does not appear to be delineated in the vicinity of well PC73. In addition, the eastern extent of the plume does not appear to be delineated in the vicinity of wells PC-67, PC-122 or PC-124.
4. In the future, it may be helpful to include data from the Las Vegas Wash and a discussion of this data. It is suggested that the following data points from the Las Vegas Wash be utilized: upgradient of the KM Seep, the KM Seep data, KM NPDES discharge data, downgradient of the KM Seep, and a data point near the end of the KM mixing zone. This data should be readily available from KM's NPDES permit monitoring or from the Southern Nevada Water Authority. It is suggested that total and hexavalent chromium data be presented (if available). Limitations regarding the interpretation of this data should be included in the body of the text. This issue can be discussed further in an upcoming monthly meeting or on a tele-conference.