October 6, 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:
Upgradient Investigation Work Plan
dated September 29, 2005

Dear Ms. Crowley,

The NDEP has received and reviewed KM's letter identified above and provides comments in Attachment A. The remaining issues outlined below should be addressed through a conference call and/or errata sheet prior to the initiation of field work.

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
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. Section 3.2, page 3-2, after the completion of field activties, in the investigation report, and please include a discussion regarding the relationship between the various lithologies. For example, how does the groundwater encountered in the alluvial aquifer in the central portions of site relate to the MCfg1 and MCcg1 formations on the southern portion of the site? Also, are any chemical differences in groundwater attributable to the difference in lithology?
2. Section 3.3, pages 3-3 and 3-4, please consider including the following chemicals in the soil and groundwater analyses: cyanide – reportedly was historically associated with State Industries operations; chlorate – historically associated with Site operations; platinum – historically associated with Site operations and potentially useful for delineating upgradient versus Site-related. The presence of platinum is unclear at this time based on the limited amount of historic data on platinum.
3. Section 3.3, page 3-3, it is suggested that perchlorate analysis be completed in the same intervals as the remaining metals and ions. Also, this section does not address the NDEP comment 9 in the July 28, 2005 letter to KM regarding VOCs. Please provide a discussion or table that addresses this issue.
4. Section 4.2.6.2, page 4-6, in the errata submitted on September 5, 2005 KM changed the variance to 3% for electrical conductivity, turbidity and dissolved oxygen. The NDEP's requested change was for electrical conductivity only. Please note the appropriate correction in the field sampling protocol.
5. Table 2, the NDEP has the following comments:
    a. The proposed sampling frequency for metals does not coincide with the text on page 3-3. The text on page 3-3 indicates that samples will be collected every 10' to the bottom of the boring. Table 2 skips the collection of samples in select intervals. Please correct the text or table.
    b. The proposed sampling frequency for location M-121 for hexavalent chromium does not appear to be consistent with the remainder of the locations or with the text. Please delete the 5' depth interval for consistency.
    c. The proposed sampling frequency for location M-121 for radionuclides is not consistent with the remainder of the locations. Please include a sample at the 5' depth interval and hold the samples in the 10' depth interval for consistency.
6. Figure 2, KM should consider soil sampling in the storm water ditch (and vicinity) to delineate the depth and extents of contamination associated with this ditch
7. Please note that the NDEP's review of this document does not include a comprehensive review of detection limits in Appendix D; appropriateness of containers or holding times for laboratory analyses; or QA/QC procedures relating to field procedures or laboratory analyses. These issues are the responsibility of KM to insure that data collected is of sufficient quality to support future decision making. The NDEP will review these issues in an exhaustive manner as part of future data validation; risk assessments; and risk-based decisions. The NDEP has performed "spot checks" of this information and has included comments as necessary. Also, the

NDEP does not have the regulatory authority to review or approve Health and Safety plans but appreciates the inclusion of these documents as part of the work plan.