



STATE OF NEVADA
Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

September 1, 2010

Mr. Mark Paris
Basic Remediation Company (BRC)
875 West Warm Springs
Henderson, NV 89011

RE: Nevada Division of Environmental Protection Response to:
*Indicator Parameter Selection, BMI Common Areas (Eastside-Main and Eastside-Hook Area),
Clark County, Nevada*
Dated: August 18, 2010
NDEP Facility ID#: H-000688

Dear Mr. Paris:

The NDEP has received and reviewed BRC's above-identified Deliverable and provides comments in Attachment A. A revised Deliverable should be submitted **by September 24, 2010** based on the comments found in Attachment A. BRC should additionally provide an annotated response-to-comments letter as part of the revised Deliverable.

Should you have any questions or concerns, please do not hesitate to contact me at (775) 687-9373 or glovato@ndep.nv.gov.

Sincerely,

Greg Lovato, P.E.
Supervisor, Remediation Branch
Bureau of Corrective Actions
Fax: (775) 687-8335

GL:s



cc: Jim Najima, Bureau of Corrective Actions, NDEP
Joe McGinley, McGinley & Associates
Brian Rakvica, McGinley and Associates
Brian Giroux, McGinley and Associates
Paul Hackenberry, Hackenberry Associates
Brenda Pohlmann, City of Henderson
Barry Conaty, Holland & Hart LLP
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9
Ebrahim Juma, Clark County Water Reclamation District, Clean Water Team
Kathryn Hoffmann, Clark County Water Reclamation District, Clean Water Team
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Susan Crowley, Tronox LLC (Contractor)
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George Crouse, Syngenta Crop Protection, Inc.
Nick Pogoncheff, PES Environmental
Lee Erickson, Stauffer Management Company
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cc: Robert Williams, Clark County Fire Department, 575 East Flamingo Road, Las Vegas, Nevada 89119
David Sadoff, AIG Consultants, Inc., 121 Spear Street, 3rd Floor, San Francisco, CA 94105
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Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden, CO 80402

Attachment A

1. General comments, NDEP provides the following general comments:
 - a. In many instances BRC references USEPA, 1988 when in fact the reference should be to USEPA, 1986. NDEP requests that BRC review and correct each of the citations, as necessary. This comment will not be repeated for each instance.
 - b. This Deliverable and the review of this Deliverable would be greatly aided by concentration contour maps for each compound in each water-bearing zone. Due to the voluminous nature of these maps it is suggested that these only be provided in an electronic format. The number of maps can be reduced through some form of screening criteria. Please consult with NDEP for discussion on this item.
 - c. Specific uses need to be proposed for indicator parameter selection as none were listed in the Introduction and Objectives section. For example, the objectives (discussed in the Conclusions section) could provide focus on the analyte list for one or more of the following:
 - i. Future groundwater monitoring analyte list
 - ii. Future groundwater monitoring reporting;
 - iii. Eastside conceptual site model (CSM); and
 - iv. Groundwater remedial alternative study (RAS) including:
 1. Remedial Action Objectives
 2. Remedial Technology Selection
 3. Remedial Technology Design
 - d. It appears that BRC used the data from all wells sampled regardless of their location. The NDEP notes that given the potential intended use of the indicator parameters not all wells provide relevant comparison. There should be a figure showing: 1) all wells sampled and 2) those wells within the Eastside Area (former Upper and lower Ponds Areas). Wells not included within the latter should not be included in the indicator parameter selection. Also, the upgradient wells should be removed from the data set as they are to be used for the "background" comparison discussed below.
 - e. In Step 1 (USEPA, 1986) chemicals with maximum concentrations below either its NDEP BCL or USEPA MCL should be listed in a separate Table. Chemicals that do not have either a BCL or MCL should be listed in a separate Table.
 - f. If a chemical or class of chemicals is considered important in terms of developing the CSM and/or evaluating remedial alternatives, then that chemical or class of chemicals should be included as an indicator parameter.
 - g. BRC should keep in mind that the overall objective for developing indicator parameters is to develop a list of parameters sufficient to meet the stated objectives. For example, a chemical below its BCL or MCL but frequently detected could have impact on the CSM or remedial alternative evaluation.
2. Page 2, Methods, item 3, NDEP notes that this item was not completed in the subject Deliverable and requests that BRC discuss why this was not completed.

3. Page 2, Methods, NDEP provides the following comments:
 - a. NDEP notes that BRC references a frequency of detection (FOD) of less than 5% as a screening tool. NDEP did not find any reference to this specific screening step in USEPA, 1988 USEPA, 1986. Please explain the basis for this.
 - b. Please note that NDEP is not opposed to utilizing FOD as a screening tool however, the geographic area must be in proportion to the distribution of contamination. As the Deliverable is written, NDEP is concerned that compounds are being screened out inappropriately. For example, PCE and TCE in the Shallow Zone; and the fact that all compounds were screened out of the Middle and Deep Zone. As noted above, concentration contours maps would be helpful in determining the appropriateness of the screening.
4. USEPA, 1986 specifically notes that a comparison to background concentrations be completed and any compound failing this comparison be carried forward. BRC has not done this. Please justify the elimination of this step.
5. Page 3, Methods, 2nd paragraph, BRC states "Compounds with detected concentrations below MCLs or BCLs, or those without an MCL or BCL, dropped out of the screening." The NDEP does not concur with this process. A compound with detected concentrations, say marginally below either its BCL or MCL; but, with a high frequency of detection could be important to the CSM and/or groundwater RAS.
6. Page 3, Indicator Parameter Lists, 2nd paragraph, BRC states "Compounds with only one or a few isolated detections nominally greater than MCLs/BCLs were dropped out of the screening." The NDEP does not concur with this process. Also, please identify these chemicals.
7. Page 3, Indicator Parameter Lists, BRC discusses that the screening process is detailed in Tables 1-3. These Tables detail why compounds were retained or screened out, however, not all compounds are included. NDEP requests that these tables address all compounds.
8. Page 4, Discussion, 2nd paragraph, the fact that concentrations for certain chemicals are higher in groundwater in off-site areas is not relevant if these chemicals also occur on-site and are above a BCL or MCL; and/or if these chemicals could migrate on-site at concentrations above a BCL or MCL. Some of these compounds may be screened out via the "background" or "upgradient" comparison, however, that has not been completed yet.
9. References, please indicate the approval status of each reference if the reference is a Deliverable that was submitted to NDEP.

References

U.S. Environmental Protection Agency (USEPA). 1986. Superfund Public Health Evaluation Manual, Office of Emergency and Remedial Response, Washington, D.C., October.

U.S. Environmental Protection Agency (USEPA). 1988. Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, Interim Final, Office of Emergency and Remedial Response, Washington, D.C. EPA/540/G-89/004OSWER Directive 9355.3-01 October.