



KERR-McGEE CHEMICAL CORPORATION

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August 16, 1996

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PROTECTION
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Mr. Paul Lohman
Nevada Department of Environmental Protection
333 West Nye Lane
Carson City, NV 89710

Subject: Modification of Permit NV0000078 - Well Sampling Elimination

Dear Mr. Lohman:

Kerr-McGee Chemical Corporation (KMCC) maintains ponds on site for management of process solutions. These ponds all contain aqueous non-hazardous solutions and are regulated in the NPDES program under the authority of the Nevada Department of Environmental Protection.

While we recognize the efficiency ponds provide for managing and concentrating process solutions, we also recognize the risk ponds may pose to the environment in the event of a breach of the lining system. Towards minimizing this risk, it has been KMCC's goal to eliminate all single-lined ponds from service. Single-lined ponds were either decommissioned with flows redirected to alternative equipment for handling the process solutions, or ponds were decommissioned with flows redirected to a double-lined pond.

Ponds AP-2 and C-1 were the last of these single-lined ponds to be decommissioned. C-1 pond was decommissioned in late 1995, and the flow (steam plant blow down) was expected to be redirected to a newly built, double-lined C-1. Until the new C-1 was built, the flow was temporarily redirected to WC-2, a double-lined pond. Because our NPDES Permit was in the renewal process, changes were made to the Permit to reflect the new C-1 existence as a double-lined pond even though the pond had not yet been built. This was done because pond construction was imminent. NDEP and KMCC believed the pond would be complete and in service by the end of the Permit's comment period. However, after a construction delay due to the difficulty in C-1 solids evaporation, and after considerable engineering effort to reduce the steam plant effluent volume, KMCC was able to accommodate the old C-1 flows in WC-2 on a permanent basis. A decision was made to not build the new C-1, and the construction materials were returned to the manufacturer. Decommissioning of old C-1 was discussed in the first, second, and third quarter 1995 DMR's submitted to Shannon Bell, NDEP. The final disposition of the solids and liner was discussed in the third quarter 1995 DMR. Yet to be completed for the decommissioned C-1 pond is a Sampling Plan which will provide information for a clean closure of the non-hazardous C-1 pond area.

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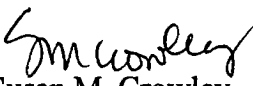
Single-lined pond AP-2 was decommissioned in the fourth quarter 1995. Flow which had gone to this pond was redirected to double-lined AP-1 pond. AP-2 pond's accumulated solids were transferred to double-lined AP-6 for later product value recovery. The liner was washed and allowed to dry. It was tested and subsequently disposed of at the non-hazardous Apex Industrial landfill. A description of these activities was provided in the fourth quarter 1995 DMR submitted to Shannon Bell, NDEP. A Sampling Plan will be prepared for AP-2 which will provide information for clean closure of the non-hazardous AP-2 pond area.

In March 1996, KMCC submitted a request to Leo Drozdof, NDEP, for modification of KMCC Henderson's NPDES Permit #0000078. KMCC requested that the Permit be modified: 1) to eliminate double lined C-1 pond from the pond list, because new C-1 was not built, and 2) to eliminate the sampling requirement for wells which historically monitored the single lined AP-2, because AP-2 was no longer in existence. Subsequent information was sent to Mr. Drozdof in April 1996, which included plots of the constituents monitored in the AP-2 wells. Attached to this correspondence are the AP-2 well descriptions as well as a map to indicate where these wells are located.

KMCC appreciates your attention in this matter. We are interested in our Permit reflecting conditions within the plant as accurately as possible. Please feel free to call me at (702) 651-2234 if you have any questions or need additional information.

Sincerely,

Kerr-McGee Chemical Corporation


Susan M. Crowley
Staff Environmental Specialist

Attachments

cc: PSCorbett
MJPorterfield
RANapier
TWReed
Shannon Bell, NDEP

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