



# KERR-McGEE CHEMICAL LLC

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ENVIRONMENTAL PROTECTION  
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July 18, 2005

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Mr. Brian Rakvica, P.E.  
Nevada Division of Environmental Protection  
1771 East Flamingo Road, Suite 121-A  
Las Vegas, Nevada 89119

Dear Mr. Rakvica:

Subject: Kerr-McGee ECA Quarterly Report – 2<sup>nd</sup> Quarter 2005

Pursuant to Section XIII of the Consent Agreement, signed September 5, 1996, between Nevada Division of Environmental Protection (NDEP) and Kerr-McGee Chemical LLC (Kerr-McGee), formerly Kerr-McGee Chemical Corporation (KMCC), Kerr-McGee submits the following quarterly status report for the Henderson facility's Environmental Conditions Assessment (ECA).

## Activities Conducted 4-1-05 to 6-30-05

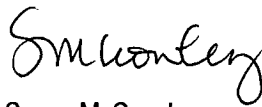
- April 6<sup>th</sup> – Kerr-McGee requests that NDEP provide final approval for use of ferrous sulfate as a mechanism for hexa-valent chromium reduction.
- April 11<sup>th</sup> – Kerr-McGee submits to NDEP reimbursement payment for the "non-specific" common area changes.
- May 5<sup>th</sup> – Kerr-McGee transmits the February 2005 *Conceptual Site Model* and the March 2005 *Background Study Work Plan* to Titanium Metals, Craig Wilkinson.
- May 6<sup>th</sup> – NDEP provides Kerr-McGee with comments on the February 2005 *Conceptual Site Model*, requesting a response.
- May 6<sup>th</sup> – NDEP provides Kerr-McGee with comments on the March 2005 *Background Study Work Plan*, requesting a response.
- May 6<sup>th</sup> – NDEP BCA provides Kerr-McGee with comments on the document *Use of Ferrous Sulfate for Reduction of Hexa-Valent Chromium* dated April 6, 2005.
- May 10<sup>th</sup> – Kerr-McGee received approval from NDEP BWPC for use of ferrous sulfate as a mechanism for hexa-valent chromium reduction.
- May 24<sup>th</sup> – Kerr-McGee meets with all BMI companies and NDEP to discuss each companies investigative project status.
- May 27<sup>th</sup> – Kerr-McGee requests that NDEP extend the date for Kerr-McGee responses to NDEP comments on the February 2005 *Conceptual Site Model* until August 31<sup>st</sup>. NDEP approved Kerr-McGee's request.
- May 27<sup>th</sup> – Kerr-McGee request that NDEP extend the date for Kerr-McGee responses to NDEP comments on the March 2005 *Background Study Work Plan* until July 22<sup>nd</sup>. NDEP approved Kerr-McGee's request.
- May 27<sup>th</sup> – Kerr-McGee requests that the deliverable date for the *Data Usability Assessment* be re-set to June 17<sup>th</sup>.
- June 3<sup>rd</sup> – Kerr-McGee submits to NDEP reimbursement payment for billings #27 and #28.
- June 7<sup>th</sup> – NDEP and Kerr-McGee (with ENSR) meet to discuss the ECA activities' status.
- June 7<sup>th</sup> – Kerr-McGee submits response to NDEP BCA's May 6<sup>th</sup> comments regarding the *Use of Ferrous Sulfate for Reduction of Hexa-Valent Chromium* dated April 6, 2005.
- June 10<sup>th</sup> – NDEP finds Kerr-McGee response to NDEP's May 6<sup>th</sup> comments regarding *Use of Ferrous Sulfate for Reduction of Hexa-Valent Chromium* date April 2005 acceptable.

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- June 16<sup>th</sup> – Kerr-McGee submits the *Data Usability Assessment* to NDEP.
- June 22<sup>nd</sup> – NDEP and Kerr-McGee (with ENSR) meet to discuss the ECA activities' status.
- June 30<sup>th</sup> – NDEP and Kerr-McGee teleconference with NDEP's consultant to discuss data needs for the consultant to continue her review the June 2005 *Data Usability Assessment*. Kerr-McGee provides NDEP with an extra copy of the Data Usability Assessment.

Please note that attached is Kerr-McGee's ECA "*Deliverable Schedule*" which tracks recent activities as well as lists expectations for future activities. Feel free to call me at (702) 651-2234, if you have any questions. Thank you.

Sincerely,



Susan M. Crowley  
Staff Environmental Specialist

Hand Carried

Cc: Public Repository  
Jeff Johnson, NDEP  
Jennifer Carr, NDEP  
Todd Croft, NDEP  
Mitch Kaplan, EPA Region IX  
Val King, NDEP  
Jim Najima, NDEP  
Jon Palm, NDEP  
Brenda Pohlmann, COH  
Barry Conaty, COH  
Ron Sahu, BMI  
Carrie Stowers, CCCP  
Paul Sunberg, Montrose  
Al Tinney, NDEP  
Craig Wilkinson, TIMET  
Keith Bailey, Kerr-McGee  
Sally Bilodeau, ENSR  
Pat Corbett, Kerr-McGee  
John Dixon, Kerr-McGee  
Dave Gerry, ENSR  
Ed Krish, ENSR  
Tom Reed, Kerr-McGee  
Don Shandy, Kerr-McGee  
Rick Stater, Kerr-McGee

Attachment

## ENVIRONMENTAL CONDITIONS ASSESSMENT - DELIVERABLE SCHEDULE

### KERR-McGEE CHEMICAL LLC - Henderson, Nevada

Revised: July 18, 2005

Deliverable	Date
Project Organizational Chart / Resumes * Revision 1: Response to NDEP Comments of June 11, 2004 * Revision 2: Inclusion of Keith Bailey, Kerr-McGee, on project team.	May 15, 2004 – Submitted July 6, 2004 – Approved July 9-, 2004 August 15, 2005 – Pending
KM Response to NDEP Comments (2-11-04 Letter) * Revision 1: Response to NDEP Comments of June 11, 2004	June 1, 2004 – Submitted July 12, 2004 – Approved July 13, 2004
Deliverable Schedule * KM Response to NDEP Schedule Comments of 6-29-04 * KM Submits Revised Schedule in each Quarterly Report	April 8, 2004 – Submitted July 14, 2004 – Submitted
Site-Related Chemical List (Report) * Revision 1: Response to NDEP Comments of June 21, 2004 * Revision 2: Response to NDEP Comments of August 5, 2004 * Revision 3: Response to NDEP Comments of September 29, 2004	June 15, 2004 – Submitted July 22, 2004 – Submitted September 27, 2004 – Submitted October 26, 2004 – Approved October 27, 2004
Summary of Groundwater Monitoring * Revision 1: Response to NDEP Comments of August 11, 2004	August 15, 2004 – Submitted September 13, 2004 – Approved September 6, 2004
Characterization of GW-11 Pond Contents * KM Response to NDEP Comments of September 20, 2004 * KM Response to NDEP Comments of October 26, 2004 * Additional Characterization	August 30, 2004 – Submitted October 18, 2004 – Submitted November 29, 2004 – Submitted Pending
Conceptual Site Model * KM Response to NDEP May 6, 2005 Comments	February 28, 2005 – Submitted August 31, 2005 – Pending
Data Quality Objectives	March 30, 2005 – Delayed until CSM comments and responses are finalized.
Data Usability Evaluation (including review of <i>Supplemental Phase II Report</i> )	June 17, 2005 – Submitted
Source Area Evaluation Work Plan	August 31, 2005 – Expected to be delayed until CSM comments and responses are finalized.
<b>BACKGROUND STUDY</b>	
Background Study Work Plan * KM Response to NDEP May 6, 2005 Comments	March 30, 2005 – Submitted July 22, 2005 – Pending
Background Study Field Sampling	120 days following NDEP approval of Work Plan
Background Study Report	120 days following field sampling completion
<b>PERIODIC MONITORING AND REPORTING</b>	
ECA Phase II Status Report (Quarterly)	January 15 ; April 15; July 15 and October 15
Perchlorate Remediation Performance Report (Quarterly)	January 28; April 15; July 28 and October 28
Chromium Remediation Performance Report (Semi-Annually)	January 28; July 28