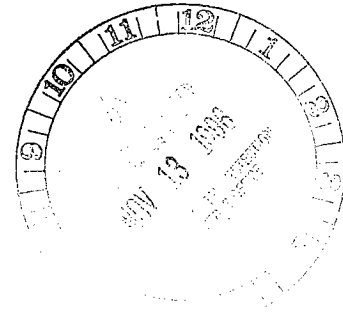




KERR-MCGEE CHEMICAL CORPORATION

POST OFFICE BOX 55 • HENDERSON, NEVADA 89009

November 7, 1996



Mr. Robert C. Kelso
Supervisor, Remediation Branch
NDEP - Bureau of Corrective Actions
333 West Nye Lane
Carson City, NV 89710

Dear Mr. Kelso:

Subject: KMCC Phase II Written Response to Letter of Understanding - Additions

Kerr-McGee Chemical Corporation (KMCC) signed a Consent Agreement with Nevada Division of Environmental Protection (NDEP) earlier in 1996, establishing the process for proceeding with Phase II of an Environmental Conditions Assessment. As required in this Agreement, a Phase II Work Plan was developed and submitted to NDEP which described field activities designed to fill in data gaps identified in the Phase I activities. Concurrent with submission of the Phase II Work Plan was submission of a Written Response which addressed those data gaps which did not require field work.

In July 1996, NDEP provided comments on both the Work Plan and Written Response for inclusion in the final version of the respective documents. Both the Written Response and the Work Plan were modified and resubmitted. The modified Written Response included references to a modified Plate 1 and an Attachment 25. These two portions of the modified Written Response were inadvertently missing from the resubmittal provided to NDEP in October. They are attached to this correspondence. Two copies have been sent to the Las Vegas NDEP location, to the attention of Brenda Pohlmann. We apologize for any inconvenience this has caused.

In addition, in the Written Response for LOU Item 62, KMCC explained that State Industries had been tasked with resolving inconsistencies in information originating from State Industries and provided to NDEP. Their response resolves past inconsistencies and is attached.

Feel free to call me at (702) 651-2234 if you have any questions. Thank you.

Sincerely,

Susan M. Crowley, CEM-1428
Staff Environmental Specialist

Attachments By Certified Mail

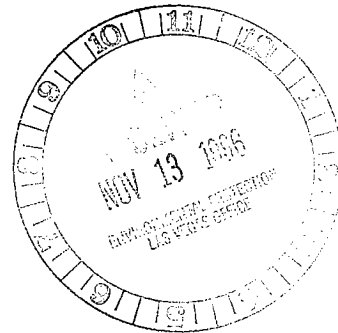
cc: PSCorbett
PRDemps
Lee Erickson (Stauffer) - w/o attachment
RHJones
Joel Mack (Montrose)
RANapier
Verrill Norwood (Pioneer)
Brenda Pohlmann (NDEP)
TWReed

Mike Reilly (Zeneca) - w/o attachment
Barry Sandles (Morrison & Foerster - TIMET) - w/o attachment
Greg Schlink (BMI)
RSimon (ENSR)
JTSmith (Covington & Burling)
Kent Stevenson (Pioneer) - w/o attachment
Susan Stewart (TIMET)
David Tundermann (Parsons, Behle & Latimer - BMI) - w/o attachment

Oct 21 1996



State Industries, Inc. • 500 By-Pass Road • Ashland City, Tennessee 37015-1299 • 615/792-4371



October 15, 1996

Susan M. Crowley
Kerr-McGee Chemical Corporation
P. O. Box 55
Henderson, NV 89009

Re: Henderson Ponds

Dear Susan:

I have received your letter dated September 23, 1996 regarding the "Henderson Ponds".

I have reviewed the documents you enclosed as well as our own files, and discussed the matter with Lee Spann, our former Plant Engineer at Henderson. Based on this information, we offer the following points of clarification:

- Pond Size - The western, circular pond was 130 feet in diameter. The eastern, rectangular pond was 150 feet by 250 feet. This is consistent with the Kleinfelder document.
- Liners - Both ponds were lined with single liners consisting of PVC bottoms and reinforced butyl rubber sides. This is also consistent with the Kleinfelder document.

The data presented in the Kleinfelder document appears to be accurate except for the statement at the bottom of page 7-13 regarding the closure of the eastern pond. To clarify, after testing sludge samples and finding nothing hazardous, the sludge was left to dry. When dry, the walls were pushed back into the pond restoring the original plane and elevation of the site. During the course of this work, there was some mixing of the dried sludge with the original, native soil of the berm being replaced into the pond recess. Due to the nature of earthmoving work, some mixing of the materials was inevitable. But, the sludge was mostly dry at this point and not dried by mixing with soil as indicated in the

Kerr McGee Chemical Corporation

Re: Henderson Ponds

October 15, 1996

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Kleinfelder report. The western pond was closed in a similar manner except the dried contents were mixed with fill being placed within the building foundation walls prior to pouring the concrete floor.

I hope this answers the questions raised. If you need further information, please do not hesitate to contact me.

Sincerely,

STATE INDUSTRIES, INC.

A handwritten signature in cursive script, appearing to read "Michael R. Garrison", written over the typed name.

Michael R. Garrison

Manufacturing Engineering Manager

cc: Evie Sommers, State Industries, Inc.



ATTACHMENT 25

LOU ITEM 24

**GROUNDWATER INFORMATION
RELATING TO Mn TAILINGS AREA**

MN TAILINGS PILE MONITOR WELLS
KMCC HENDERSON, NEVADA FACILITY

