



Fronapfel

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL PROTECTION

Capitol Complex
Carson City, Nevada 89710
(702) 885-4670

February 26, 1986

Kerr-McGee Chemical Corporation
P.O. Box 55
Henderson, Nevada 89015

Dear Mr. Chase:

This letter is in response to several issues that need our mutual attention. Specifically, the "Geohydrological Investigation" report which you submitted to Mr. Tom Fronapfel on July 29, 1985; the need for some type of groundwater cleanup or mitigation program; the monitoring schedule proposed in your letter of November 15, 1985; the problem of unauthorized cooling tower overflows and ways of eliminating them; and the NPDES permit revision which Kerr-McGee applied for on April 24, 1985.

The Geohydrologic Investigation report has been reviewed by our hydrogeologist and has been found to be a very good report with respect to its content. Like all good reports, it has raised further questions. We are particularly interested in questions related to plume chemistry such as:

- . What is the chemical makeup of the plume?
- . What other toxic constituents were present in the process waters that contained the chromium?
- . What reactions are likely to be occurring between the plume and sediments?
- . Is there uptake of chromium or other constituents by the sediments?

We feel that some type of recovery or mitigation measures are in order and, at this time, are leaning toward a well field intercept system. Groundwater flow and contaminant transport should be modeled prior to final design of any cleanup or mitigation program. We are aware that some voluntary pumping was done with the three wells located near unit #5 and possibly well M-3, and that this pumping has been terminated. Has the effectiveness of this test pumping been evaluated? Is there a feasible way to process the contaminated water pumped from these wells?

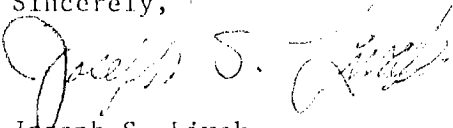
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We agree with proposed monitoring schedule for chromium presented in your letter of November 15, 1985. It is possible, however, that more or different monitoring wells may be needed as a cleanup program develops.

Regarding the cooling tower overflows, we know that Kerr-McGee has been evaluating alternative ways of dealing with this problem. You should know that the DEP considers these overflow incidents to be violations of Nevada Revised Statute (NRS) 445.221 and your NPDES permit, and that a Finding of Violation and Order is being developed. Civil penalties are a possibility. In spite of this ominous note, we do want to work with you on finding a mutually acceptable solution to the problem.

Finally, we need to discuss various alternative approaches to the new permit, including how stormwater is to be handled.

Because of the variety of issues to be resolved, we feel that a meeting would be very beneficial. I am, therefore, proposing a meeting in Carson City between you and/or appropriate Kerr-McGee staff and DEP staff to discuss the issues raised in this letter (and any others that you feel are pertinent). We would like to meet sometime before the end of March. Please contact me regarding an acceptable date. Any questions regarding the content of this letter or the purpose of the meeting are, of course, also welcome.

Sincerely,

Joseph S. Livak
Water Quality Enforcement Officer

JL/jh

cc: Steve Fuller, EPA