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DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

333 W. Nye Lane, Room 138
Carson City, Nevada 89706-0851

June 10, 1998

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

RE: Review of Phase II Environmental Conditions Assessment

Dear Ms Crowley:

In accordance with Section VI of the Consent Agreement, we have reviewed the Phase II Environmental Conditions Assessment, dated August 1997, for the Kerr-McGee Chemical Corporation Facility located at Henderson, Nevada. The Report is approved subject to the conditions noted in this letter. Where specified, information requested and workplans for additional environmental conditions investigations activities or remedial alternatives studies shall be submitted (postmarked) to NDEP within 60 days of your receipt of this letter. Of significance is our recommendation to develop a site conceptual model. The conceptual model is a three-dimensional representation of the source areas, groundwater flow, and solute transport system based on available geological, biological, geochemical, hydrological, climatological and analytical data for the site.

2.3.2 Hydrogeology

A reference is given for the Nevada Department of Water Resources. Please provide the citation for this information.

3.1 Trade Effluent Settling Ponds

Is LOU item Number 2 the area described as "S-8" in the July 1980 US EPA photo analysis?

3.1.1 Background

Please provide an analysis of the data from the post-closure monitoring program for the closed landfill.

Please explain the conditions of the NDEP permit and provide an analysis of any monitoring program.

3.5.1 Background

Please provide the location of the leachfield and any groundwater evaluations conducted in the vicinity. Also, please be more specific about "appropriate disposal facility" for hazardous solutions.

3.8 Unit 1 Tenant Stains

Please provide results of the resampling of the area.

4.1 Trade Effluent Settling Ponds

We agree that project objectives for this area have been met.

In this and some of the following sections in the report, reference is made to the American Society of Testing Materials publication "Cleanup Criteria for Contaminated Soil and Groundwater." [Please correct the citation for this publication in the list of references.] The publication contains average concentration and natural range of metals in the United States. The ranges in the publication are very broad and represent a large variety of geologic and soil conditions.

The report makes the implied assumption that because RCRA metals values fall "within the range of the average concentration of these constituents in soils," there is not an impact from KMCC or predecessor operations at the site. The ASTM ranges are very broad (for example, chromium ranges from 2 to 3,000 milligrams per kilogram, or three orders of magnitude). To determine impacts to the environment from facility operations, the Nevada cleanup standards or actual background soil metals concentrations should be used.

NDEP's soil and Ground Water Remediation Policy of 1992 was superseded on October 3, 1996 by NAC 445A.226-445A.22755. NDEP no longer requires Subpart S calculations. However, Subpart S may be appropriate in some cases. Also, background values must be determined prior to establishing cleanup levels!

4.2 Old P-2, Old P-3 Ponds

We agree that further work is required. More areal and subsurface definition is required. Please provide a workplan for the proposed work.

4.3 Truck Unloading Area

Based on the data presented in the report, no further investigative work needs to be conducted at the site at this time.

4.4 Diesel Fuel Storage Tank

We agree that further work is required to determine the affected volume of soil. Please submit a workplan for this work.

We agree that groundwater from M-21 does not appear to be impacted by diesel; consequently no further monitoring well installation is required. However, TPH should be routinely sampled from M-21 in the future.

4.6 J.B. Kelly, Inc. Trucking Site

Although concentration of total chromium is below action levels, where did it come from and what is the migration through soil?

Susan Crowley
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4.7 A.P. Satellite Accumulation Point - AP Maintenance Shop

We agree that the removal action was effective in removing soil affected by diesel fuel compounds. However, please explain any motor oil concentrations. Based on the data presented in the report, no further investigative work needs to be conducted at the site at this time.

4.8 Unit 1 Tenant Site

We agree with the report regarding the effectiveness of the removal action. Based on the data presented, no further investigative work needs to be conducted at the site at this time.

4.9 AP-1, AP-2, and AP-3 Ponds

We agree that additional investigative work is required to determine the source of elevated levels of elemental nitrogen in the existing monitor wells M-17, M-89 and M-25. Please submit a workplan for this additional investigative work.

Considering that monitoring well M-25 is located about 280 feet to the Northwest (ostensibly downgradient) of monitoring well M-89, the volume of affected groundwater could be extensive. Additional work should address the potential lateral extent of affected groundwater. Analysis of groundwater samples for ammonium perchlorate should be included in any sampling scheme.

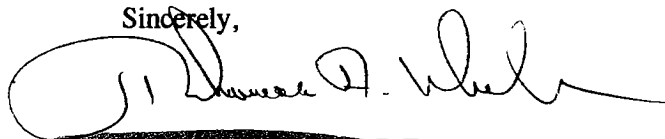
4.10 Hardesty Chemical Site

We agree that the removed underground storage tanks did not affect groundwater.

5.0 Data Validation and Review

Please explain the impact of numerous sample qualifications on future remedial decisions.

Sincerely,



Enforcement Branch
Bureau of Corrective Actions

TAW:kmf

cc: Barry Conaty, Cutler & Stanfield, 700 Fourteenth St., NW, Washington, DC 20005
David L. Gerry, ENSR, 1220 Avenida Acaso, Camarillo, CA 93012