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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

December 17, 1998

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

RE: Phase II Response and Supplemental Work Plan

We have received and reviewed the "Response to Phase II Report Comments" and the "Supplemental Work Plan" submitted by Kerr-McGee on November 9, 1998. We approve your responses including the response to Item 4.9 (AP-1, AP-2 and AP-3 Ponds) that the impacts to groundwater should be addressed in the perchlorate remediation effort. The Work Plan is approved subject to including the development of a conceptual site model for the plant site and the comparing the soil sample results that are obtained to Nevada cleanup standards and actual background values.

A conceptual site model is a three-dimensional representation that conveys what is known or suspected about contamination sources, release mechanisms, and the transport and fate of those contaminants. ("Conceptual site model" is not synonymous with "computer model.") The conceptual site model should initially be based on existing geological, geochemical, hydrological, climatological and analytical data and the sampling described in the Supplemental Work Plan. Additional sampling and analysis may be necessary to refine and complete the models. Guidance on the development of a site conceptual model is contained in ASTM Standard E1689 and US EPA's Draft Policy (OSWER Directive 9200.4-17, November 18, 1997).

This review is for administrative purposes only and does not relieve Kerr-McGee Chemical Corporation of its responsibility to utilize the appropriate means and methods to investigate the site as required under Nevada Statutes and Administrative Codes, the Consent Agreement, ASTM Guide D5730 and good management practices. The conceptual site models developed under this Supplemental Work Plan must be complete enough to provide the basis for Remedial Alternative Studies.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas A. Whalen".

Thomas A. Whalen, P.E.
Remediation Branch

TAW:kmf