

September 20, 2004

Ms. Susan Crowley  
Kerr-McGee Chemical LLC  
PO Box 55  
Henderson, Nevada 89009

Re: **Kerr-McGee Chemical Corporation LLC (KM)**  
**NDEP Facility ID #H-000539**  
Nevada Division of Environmental Protection Response to:  
*Characterization of GW-11 Pond Contents*  
dated September 16, 2004

Dear Ms. Crowley,

The Nevada Division of Environmental Protection (NDEP) has reviewed the  
aforementioned document and provides comments in Attachment A. The NDEP requests  
that KM respond to these issues **by October 18, 2004**.

Should you have any questions or concerns, please do not hesitate to contact me at (702)  
486-2870.

Sincerely,

Brian A. Rakvica, P.E.  
Staff Engineer III  
Remediation and LUST Branch  
Bureau of Corrective Actions  
NDEP – Las Vegas Office

BAR/bar

CC: Jim Najima, NDEP, BCA, Carson City  
Jon Palm, NDEP, BWPC, Carson City  
Todd Croft, NDEP, BCA, Las Vegas  
Jennifer Carr, NDEP, BCA, Carson City  
Jeff Johnson, NDEP, BCA, Carson City  
Valerie King, BWPC, Carson City  
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Carrie Stowers, Clark County Comprehensive Planning, PO Box 551741, Las Vegas, NV, 89155-  
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Ranjit Sahu, BEC, 875 West Warm Springs Road, Henderson, Nevada 89015  
Craig Wilkinson, TIMET, PO Box 2128, Henderson, Nevada, 89009-7003  
Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015

## ATTACHMENT A

1. A revised "Sample Collection Procedures" section was provided to the NDEP via electronic mail due to a number of spelling errors in the original version. It should be noted that the corrected version contains four errors (grammatical, spelling and formatting). Quality appears to be a lingering problem on this project and the NDEP requests that KM discuss this issue with their consultants. Please note that Table 1 and the "detailed narrative discussing quality control issues..." have similar errors.
2. In the revised "Sample Collection Procedures" it is stated that uranium, thorium, cyanide, TPH, organophosphorous pesticides, and octachlorostyrene were not included among the analyses. These parameters were all included in Table 1 that was presented to the NDEP at our July 23, 2004 meeting. It is not clear why these parameters were eliminated and why the NDEP was not notified. The NDEP requests that a sample be taken and analyzed for the parameters that were not included.
3. In the narrative from the lab discussing quality control issues it is stated that "the pahs in general may be either biased low or subject to degradation in this sample matrix." Regardless of the grammatical and formatting errors of this sentence, this concerns the NDEP because the detection limits for some of the PAHs are above ARARs or guidance levels; including (but not limited to): benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo(a,h)anthracene, and indeno(1,2,3-c,d)pyrene. There are a number of other chemicals that have detection limits above corresponding ARARs or guidance levels. For example, PCBs (except Aroclor 1016), alpha-BHC, aldrin, beta-BHC, chlordane, etc. were reported with elevated detection limits. KM should be advised that this is an issue that will need to be addressed in the future.
4. The NDEP has comments regarding the analytical data as listed below.
  - a. Gross Alpha concentrations must be presented in a summary as Adjusted Gross Alpha for comparison to USEPA MCLs. Also, Radium 226 and 228 concentrations should be presented as combined Radium 226, 228 for comparison to USEPA MCLs.
  - b. Given the concentrations of a number of chemicals in the GW-11 pond (gross alpha radionuclides, arsenic, boron, hexavalent chromium, nitrate, and TDS), the NDEP requests that KM sample and analyze a minimum of one representative sample from each of the well fields. This includes the on-site well field, the Athens Road well field, and the Seep Area well field. These samples should be collected in a manner that is representative of the composite flow of each of the well fields. The NDEP requests that these samples be analyzed using the complete analyte list presented in Table 1.