

September 29, 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:
Revised Site Related Chemicals List
dated September 27, 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 29, 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
Al Tinney, BWPC, Carson City
Barry Conaty, Akin, Gump, Strauss, Hauer & Feld, L.L.P., 1333 New Hampshire Avenue, N.W.,
Washington, D.C. 20036
Brenda Pohlmann, City of Henderson, 240 Water Street, Suite 210, Henderson, NV 89015
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9, mail code: WST-5,
75 Hawthorne Street, San Francisco, CA 94105-3901
Carrie Stowers, Clark County Comprehensive Planning, PO Box 551741, Las Vegas, NV, 89155-
1741
Ranajit 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. Cover page, in response to KM's statement on hexachlorobenzene, please note that hexachlorobenzene (HCB), octachlorostyrene, dioxins, furans and other dioxin-like compounds can all form in a similar manner. Benzene does not need to be present. HCB forms in the presence of high-temperature thermal processes where both carbon, chlorine and a catalyst are present. Specifically, the former magnesium process at BMI represent a possible source of HCB formation.
2. General, in several places in this document KM states that "KM does not propose to develop new analytical methods". The NDEP understands and appreciates the costs associated with method development and would like to note that this response is adequate for the site-related chemicals (SRC) list, however, as the project progresses towards eventual risk assessment these unknowns will need to be discussed.
3. Page 13 and Table 1, for phosphorous KM states that "EPA method 200.7 have been added to the table", however, the table lists EPA Method 365.3. Please verify and correct the method number or the text.
4. Page 13 and Table 1, KM states that "the table has been modified to include only EPA 350.1 for urea, ammonia and ammonium perchlorate." The table lists method 350.2 for each of these compounds. Please correct the table or the text.
5. Table 1, please note that TCE is not a synonym for tetrachloroethylene.
6. Table 1, please note that the degradation product DDD is missing from the organochlorine pesticides category.
7. Please be advised that the NDEP has not verified the applicability of all of the analytical methods listed in the SRC list. The NDEP anticipates that discussions on analytical methods will be covered in more detail as a sampling and analysis plan is developed for the site.