

November 30, 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:  
*Kerr-McGee Response to NDEP's 10-26-04 Comments*

Dear Ms. Crowley,

The NDEP has received and reviewed KM's correspondence identified above and provides comments in Attachment A. The NDEP requests that KM respond to these issues in the next semi-annual report.

If there is anything further or if there are any questions please do not hesitate to contact me.

Sincerely,

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

Ms. Susan Crowley

5/17/2013

Page 2

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  
Alan 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  
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. Comment #1
  - a. In a November 8, 2004 telephone conference with KM, it was noted that there may have been some errors in the concentrations that were reported. This issue was not addressed in KM's response, however, the data presented in Table 1 appears to be revised. This issue should be documented and explained in KM's response. The revised data presented in Table 1 shows that the concentrations of total chromium in the discharge for the months of May and June 2004 are within the range of historic concentrations. The data presented for September 2004, however, shows a sharp increase in total chromium concentration (approximate three fold increase) over recent discharge concentrations. In general, the data presented in Table 1 shows a decrease in hexavalent chromium concentration and an increase in total chromium concentration versus previously reported values. The increase in total chromium concentration in September 2004 (and any other unexpected data) as well as the revisions made to the data should be discussed in the forthcoming semi-annual report.
  - b. The NDEP understands and appreciates the purpose of pond GW-11 and agrees that the contents of the pond should not be expected to meet MCLs. The MCLs were being used by the NDEP as a metric for comparison of discharge concentrations of chromium from the groundwater treatment plant (GWTP).
2. Comment #2, Over the next several reports, it is anticipated that the monitoring network will be refined (expanded) to determine the breadth of the chromium plume and to provide better definition to the iso-concentration contours. Until the chromium plume is defined adequately, it is again requested that KM provide a regional chromium iso-concentration map and potentiometric surface map with each semi-annual report.
3. Comment #5
  - a. The NDEP does not fully concur with KM's explanation for the decrease in chromium concentrations in the plume. The NDEP does concur with KM's statement that dispersion and dilution are likely playing a role in the decrease of chromium concentrations in the northern portions of the plume. The NDEP does not have any information to substantiate KM's statement that natural chemical reduction or bio-degradation are taking place. As requested previously, if KM has information to substantiate this statement it is requested that this information be provided to the NDEP. It is requested that statements without a technical basis be omitted from future submittals.
  - b. The NDEP concurs with KM's approach to capture and remediate chromium at the Athens Road well field and the on-site well field. The NDEP appreciates that KM is evaluating the capture system to achieve maximum capture of the plume. As characterization progresses it may be necessary to revise the approach to chromium remediation.