

February 9 2005

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 Semi-Annual Performance Report – Chromium Mitigation Program*  
*July – December, 2004*

Dear Ms. Crowley,

The NDEP has received and reviewed KM's correspondence identified above and provides comments below. The NDEP requests that KM respond to these issues in the next semi-annual report (except where specified otherwise in this letter).

1. Page 1, Introduction, it is requested that future reports clarify the revised manner in which treated water is managed. A portion of the treated water is taken from the on-site impoundment and re-run through the chromium treatment system prior to delivery to the perchlorate remedial system. Discussion in the form of text, a table or a figure with the flow rates and other applicable information would be helpful.
2. Page 3, KM states "These data are shown in table 1 and are presented...in Figures 7 and 8." Table 1 does not present all of the data presented on Figures 7 and 8. It is requested that this table be modified to reflect all data shown on the referenced figures. Also, in this same paragraph there is an erroneous reference to Figure 6.
3. Page 4, KM states "The rapid decline in chromium concentrations in wells M-72 and M-86...is due to the presence of the groundwater barrier wall upgradient from the wells." This statement needs further qualification. The concentrations of chromium in well M-72 are actually higher than most pre-October 1995 concentrations.

4. Page 4, please provide discussion on the steady increase in concentrations in well M-36 as shown on Figure 10 and Table 3.
5. Page 5, KM states that Figure 11 “portrays total chromium concentration...” Figure 11 as contained in this report portrays extraction well temperatures. Please provide a copy of the Figure 11 that is referenced in the text. This Figure can be submitted as a supplement to this report in the form of an errata sheet.
6. Page 6, KM states “The particulates, however, ultimately drop out of the process prior to introduction into the FBRs by either settling out in the equalization tanks or by entrapment on top of the GAC beds as the water passes through the carbon.” If KM has analytical data to support these assertions it is recommended that this information be summarized in the report. If this is a hypothesis that KM cannot support with analytical data it is suggested that this statement be clarified in the report. Supporting documentation may require a presentation of the data in terms of a mass balance as it is understood that dilution contributes to the reduction of chromium concentrations in the FBR influent.
7. Plate 2, this figure contains a mixture of chromium concentrations and potentiometric surface elevations. This presents a confusing picture. Please re-submit this figure with the errata sheet.
8. Plate 3, the presentation of the 1590 iso-elevation contour line in the vicinity of the Athens Road well field (ARW) is somewhat confusing. There are two 1590 contour lines with no data between the lines to support such a depiction. The same issue is apparent in the Seep Area with respect to the 1545 iso-elevation contour line.
9. Plate 4, the NDEP understands that the delineation of the chromium plume is still ongoing and notes the following:
  - a. The eastern extent of the plume in the vicinity of wells MW-K8, PC4, PC24, PC58, PC122, and PC123 is not completely identified.
  - b. It seems likely that there would be laterally continuous contaminant distributions of chromium-impacted water in the vicinity of 0.1 ppm and 0.05 ppm contours from the ARW to the Seep Area. For example, the data from wells PC93/PC94 could be contoured with well PC58 and further south (even if presented as inferred). The NDEP anticipates that sampling from additional wells and re-contouring the chromium iso-concentration data will resolve this issue.
  - c. The 0.05 ppm contour drawn around wells PC1 and PC4 is somewhat arbitrary on the north, south and eastern sides as there is no data in the vicinity to support its development.
  - d. The northern extent of the 0.05 ppm contour near well PC62 may require additional delineation.

Please provide the revised documentation **by February 28, 2005**. If there is anything further or if there are any questions please do not hesitate to contact me.

Ms. Susan Crowley  
5/17/2013  
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Sincerely,

Brian A. Rakvica, P.E.  
Staff Engineer III  
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NDEP-Las Vegas Office

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