

March 2, 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 LLC Response to NDEP February 9, 2005 Comments: KMCLLC*  
*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. It is expected that the issues discussed below will be addressed in the next performance report (as needed).

1. Response #6, KM states "Regardless of the method Kerr-McGee has found effective for removal of chromium from the water treated to remove perchlorate, the primary goal of discharging water which is within the strict limits set for the NPDES discharge permit". The NDEP encourages KM to develop an understanding of the specific method by which chromium is removed from the water used as influent to the perchlorate remedial system. The influent concentrations of chromium to the chromium treatment system are variable and will likely increase over time. It is important for KM to be prepared to address these variable influent concentrations.
2. Response #8, it is requested that the text of future reports discuss the issues outlined in this response. Any data points or depictions that are abnormal should be discussed in the text or as a note on the applicable figure or table.

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5/17/2013  
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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

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