

July 25, 2005

Ms. Susan Crowley
Staff Environmental Specialist
Kerr-McGee Chemical LLC
P.O. Box 55
Henderson, NV 89009

Subject: Perchlorate Reduction Technology – Use of Ion Exchange
(dated June 13, 2005)

Reference: Kerr-McGee Chemical LLC Facility
8000 W. Lake Mead Parkway
Henderson, NV 89015
Facility I.D. # H-000539

Dear Ms. Crowley:

The Nevada Division of Environmental Protection (NDEP) has received and reviewed a *Perchlorate Reduction Technology – Use of Ion Exchange* letter report prepared by Kerr-McGee Chemical LLC (KMCLLC) for the above referenced site. The submittal was received in the NDEP-Las Vegas office on June 15, 2005 and follows earlier discussion between KMCLLC and NDEP regarding plans to discontinue use of the Ion Exchange (IX) System. The IX System has been used as a back up since June 2004 when all intercepted perchlorate-impacted groundwater and surface water flows were diverted to the new Fluidized Bed Reactor (FBR) Biological Treatment System.

Kerr-McGee has demonstrated successful operation of the FBR Biological Treatment System since reaching full capacity in October 2004. Perchlorate concentrations and mass flux in the FBR effluent are greatly reduced compared to measured perchlorate concentrations and mass flux applicable to the IX System. Sufficient reserve capacity now exists within the GW-11 pond to allow flexibility in managing the various water collection systems and the FBR Biological Treatment System.

The NDEP Bureau of Corrective Actions concurs with the resin reduction and IX system decommissioning approach detailed in the June 13, 2005 letter report. Please proceed with resin removal and IX System decommissioning at your earliest possible opportunity. Please keep the undersigned NDEP case officer apprised of the project schedule and any potential changes to this schedule.

Note: Water discharges, withdrawals and re-injections, and air emissions will require different state and local government permits. Coordination should be initiated immediately to determine which permits and approvals are required; or may require revision as a consequence of changes to remedial design. This information is best obtained from each agency of government, including state and local fire, health, public works, sanitation, transportation, building/construction, NDEP, and Nevada Division of Water Resources. Your case officer may provide assistance in this regard.

Please contact the undersigned at (702) 486-2871 if you have any questions regarding this letter.

Sincerely,

Todd J. Croft, Supervisor
Remediation & LUST Branch
Bureau of Corrective Actions
NDEP - Las Vegas Office

TJC:tjc

cc: Mr. Jim Najima, Chief, Bureau of Corrective Actions, NDEP, Carson City, NV
Mr. Brian Rakvica, Remediation Branch, Bureau of Corrective Actions, NDEP, Las Vegas, NV
Mr. Al Tinney, Supervisor, Bureau of Water Pollution Control, NDEP, Carson City, NV
Mr. Jim Hogan, Bureau of Water Pollution Control, NDEP, Carson City, NV
Mr. Larry Bowerman, U.S. Environmental Protection Agency, Region 9, RCRA Corrective Action Office,
75 Hawthorne Street, San Francisco, CA 94105-3901
Mr. Mitch Kaplan, U.S. Environmental Protection Agency, Region 9, RCRA Corrective Action Office,
75 Hawthorne Street, San Francisco, CA 94105-3901
Ms. Pat Mulroy, General Manager, Southern Nevada Water Authority, 1001 S. Valley View Blvd.,
Las Vegas, NV 89107
Ms. Leslie Palencia, Engineer, Water Quality Section, Water System Operations,
Metropolitan Water District of Southern California, 700 Moreno Ave., La Verne, CA 91750-3399
Ms. Brenda Pohlmann, City of Henderson, PO Box 95050, Henderson, NV 89009
Mr. Barry Conaty; Akin, Gump, Strauss, Hauer & Feld, L.L.P., 1333 New Hampshire Avenue,
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Mr. Rob Mrowka, Planning Manager, Clark County Division of Environmental Planning, 500 Grand Central Parkway,
1st Floor, P.O. Box 551741, Las Vegas, NV 89155-1741
Mr. Craig Erskin, Clark County Health District, PO Box 3902, Las Vegas, NV 89127
Mr. Keith Bailey, Director, Safety, Quality & Engineering/Technology, Safety & Environmental Affairs
Division, Kerr-McGee Corporation, Kerr-McGee Center, P.O. Box 25861, Oklahoma City, OK 73125
Mr. Jeff Gibson, Director, Support Operations, American Pacific Corporation, 3770 Howard Hughes Parkway,
Suite 300, Las Vegas, NV 89109
Mr. Rick Kellogg, Basic Environmental Company, 875 W. Warm Springs Road, Henderson NV 89015
Mr. George Crouse, Syngenta Crop Protection, Inc. 410 Swing Road, Greensboro, NC 27409
Mr. Christopher Sylvia, Pioneer Americas LLC, 8000 Lake Mead Drive, Henderson, Nevada 89015
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Mr. Joe Kelly, Montrose Chemical Corp of CA, 600 Ericksen Ave NE, Suite 380, Bainbridge Island, WA 98110
Mr. Paul Sundberg, 3846 Estate Drive, Stockton, California 95209
Mr. Craig Wilkinson, Titanium Metals Corporation, PO Box 2128, Henderson, NV 89009
Mr. Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015
Mr. Joe McGinley, McGinley & Associates, 5690 Riggins Court, Suite C, Reno, NV 89502