

LEO DROZDOFF, *Administrator*

(775) 687-4670

Administration
Facsimile 687-5856

Water Quality Planning
Water Pollution Control
Facsimile 687-4684

Mining Regulations and Reclamation
Facsimile 684-5259

Las Vegas Office
Facsimile (702) 486-2863

STATE OF NEVADA
KENNY C. GUINN
Governor



ALLEN BIAGGI, *Director*

Air Pollution Control
Air Quality Planning
Facsimile 687-6396

Waste Management
Facsimile 687-6396

Corrective Actions
Facsimile 687-8335

Federal Facilities
Facsimile (702) 486-2863

Webpage <http://ndep.nv.gov>

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

Las Vegas Office

1771 East Flamingo Road, Suite 121-A

Las Vegas, Nevada 89119-0837

(702) 486-2850

October 3, 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:
Source Area Evaluation Work Plan Conceptual Approach
dated September 30, 2005

Dear Ms. Crowley,

The NDEP has received and reviewed KM's letter identified above and provides comments below.

1. The NDEP agrees with KM's approach, in concept. Please note that the NDEP may have comments on the individual work plans as they are submitted.
2. Phase A, please note that the NDEP may request that additional borings be completed as part of this round of investigation. KM proposes to screen some chemicals from future analysis between Phases A and B. The NDEP agrees with this approach (in concept), however, KM should note that the NDEP reserves the right to request additional analysis in the future. These requests may be due to the discovery of new or additional information; refinement of the site-wide conceptual site model; findings on an adjacent property or for other reasons not contemplated herein.
3. Phase B, KM should also consider developing cross-sections upgradient of the Unit Buildings and at the northern property boundary.

The NDEP requests that these issues be considered in the development of the future work plans. Please provide a schedule for the submittals of the Phase A Investigation Work Plan

Ms. Susan Crowley

10/3/2005

Page 2

by October 21, 2005. 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
Bureau of Corrective Actions
NDEP-Las Vegas Office

CC: Jim Najima, NDEP, BCA, Carson City
Jeff Johnson, NDEP, BCA, 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, PO Box 95050, Henderson, NV 89009
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9, mail code: WST-5,
75 Hawthorne Street, San Francisco, CA 94105-3901
Rob Mrowka, 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
Mr. George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409
Mr. Lee Erickson, Stauffer Management Company, 1800 Concord Pike, Hanby 1, Wilmington,
DE 19850-5437
Mr. Chris Sylvia, Pioneer Americas LLC, PO Box 86, Henderson, Nevada 89009
Mr. Paul Sundberg, Montrose Chemical Corporation, 3846 Estate Drive, Stockton, California
95209
Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380,
Bainbridge Island, WA 98110



KERR-McGEE CHEMICAL LLC

Susan Crowley
Staff Environmental Specialist

RECEIVED
ENVIRONMENTAL PROTECTION
LAS VEGAS OFFICE (702) 651-2234
Fax (405) 228-6882
scrowley@kmg.com

October 3, 2005

2005 OCT -6 P 1:05

Mr. Todd Croft
Supervisor
Nevada Division of Environmental Protection
1771 East Flamingo – Suite 121A
Las Vegas, NV 89119

Subject: 2005 AOC Monthly Progress Report for September 2005

Dear Mr. Croft,

This monthly progress report fulfills requirements laid out in the April 12, 2005 Administrative Order On Consent (2005 AOC) between the State of Nevada, Department of Conservation and Natural Resources, Division of Environmental Protection (NDEP), Bureau of Corrective Actions and Kerr-McGee Chemical LLC (Kerr-McGee).

Activities this month:

1. Bids on construction of the Effluent Clarity / AP-5 treatment system have been received. Clarifications to several of the bids have been requested. A project construction schedule will be developed once the final bids are evaluated.
2. The Fournier rotary press pilot test did not produce results better than those with the existing plate and frame filter presses. Accordingly, the technology will not be applied to the biological treatment plant.

If you have questions or comments on this report, please call me at (702) 651-2234 or call Keith Bailey at (405) 270-3651.

Sincerely,

Susan M. Crowley
Staff Environmental Specialist

Overnight Mail

cc: Keith Bailey, Kerr-McGee
Sally Bilodeau, ENSR