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 5/17/2013 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

Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380, Bainbridge Island, WA 98110