

MEMORANDUM TO FILE

TO: Kerr McGee (KM) File

FROM: Brian Rakvica

DATE: November 8, 2004

CC:

RE: KM Meeting on November 8, 2004 at 8:30 AM via telephone

1. Attendance:
 - a. NDEP: Brian Rakvica, Todd Croft
 - b. KM: Keith Bailey, Susan Crowley, Tom Reed
2. Discussed the Chromium GWTS
 - a. KM investigated the increase in concentration in the effluent from the GWTS in May/June 2004.
 - b. It was noted that the data that was reported in Table 4 included data from the KM lab and the confirmatory lab. If the data was all adjusted to the confirmatory samples the data would be consistent. KM to address this issue in future reporting. It was noted that the data from July and August were similar (0.21 and 0.15 ppm respectively).
 - c. KM noted that the operation of the system has been consistent.
 - d. KM noted that the GWTS must be operated to maintain the discharge limitations in the Consent Agreement (1.7 ppm total chromium); the concentration in pond GW-11 must be below the RCRA limits and they are contractually obligated to provide feed water to the FBR system that is near the NPDES limits.
 - e. NDEP asked for clarification of how the ferrous sulfate is monitored. KM explained that excess ferrous sulfate is added and then the discharge is monitored.
 - f. KM will memorialize these operational issues in the response to Brian's letter.
 - g. It was noted that a majority of the total chromium in the discharge is suspended solids.
 - h. KM noted that the Seep area would likely have to be operated (in some fashion) due to TDS Issues.
 - i. NDEP requested that KM describe the methodologies to address chromium at the Seep area and the Athens Road well field in their response.
 - j. KM also noted that some of the total chromium is removed in the GAC columns and the guard filter to the FBR plant.
3. Discussed pond GW-11 analytical.
 - a. KM noted that it would be very difficult to find the analytical data that supports Table B.2 as submitted to the NDEP.

- b. KM will discuss with NDEP BWPC the requirements for the permit renewal as this may or may not include sampling of the various well fields.
- c. Brian noted that he had found the backup documentation for Table B.2 and that KM did not need to provide the response for the “most stringent water quality standards”.