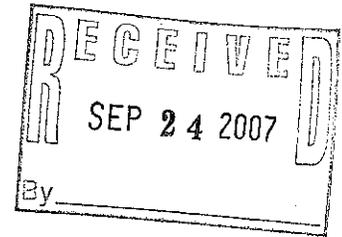


STATE OF NEVADA
Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor
Allen Biaggi, Director
Leo M. Drozdoff, P.E., Administrator

September 20, 2007

Mr. Mark Paris
Basic Remediation Company (BRC)
875 West Warm Springs
Henderson, NV 89011



Re.: Nevada Division of Environmental Protection Response to:
Response to NDEP Comments Dated August 23, 2007 on the BRC Corrective Action Management Unit (CAMU) Groundwater Monitoring Plan dated August 20, 2007
dated September 19, 2007
NDEP Facility ID# H-000688

Dear Mr. Paris:

The NDEP has received and reviewed BRC's document identified above and provides comments below:

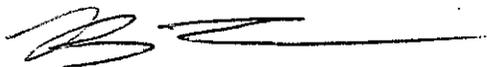
1. Response-to-Comment (RTC) 1, NDEP will track these long term issues as part of the NDEP and BRC's bi-weekly status calls. Once resolved, the CAMU-Area Groundwater Monitoring Plan (GMP) can be updated.
2. RTC 2, it appears that lithologic data is not available for each of the wells proposed for inclusion in the GMP. Please develop cross sections which show each of the wells and their relation to the following: the Quaternary alluvium, the Muddy Creek Formation (MCF), static water levels, and aquifer thickness. If information is not available, please make this obvious. These cross-section can be provided at any time and should not delay the imminent, next round of sampling (schedule for mid-October 2007).
3. RTC 3b, for this next round of sampling, please include Aroclor analysis as well. PCB Aroclors have been detected within the CAMU area. Long term monitoring for PCBs can be discussed at a later date. If BRC disagrees and this item requires additional discussion, please contact the NDEP as soon as possible so as not to delay the next round of sampling.
4. RTC 3c, for this next round of sampling it is acceptable to analyze for PAHs as part of the SVOC analysis. Based on the usability of this data, refinements may be needed in the future.
5. Attachment A, the NDEP has the following comments in addition to the comment listed for RTC 2 above:
 - a. Casing material, screened interval, and lithologic information are not known for some wells. This information needs to be gathered if the wells are to be included in the long term monitoring program.



- b. NDEP understands that BRC will not have information regarding aquifer thickness for the historic wells, however, please provide some discussion regarding the wells constructed by BRC. Please explain if these wells fully penetrate and screen the water table aquifer.
- c. Development of the cross-sections listed above will address many of the NDEP's remaining concerns.

It is expected that the issues raised above can be discussed and resolved between BRC and the NDEP. Please proceed with the next round of sampling (currently scheduled for mid-October 2007). Should you have any questions or concerns, please do not hesitate to contact me at (702) 486-2850x247 or brakvica@ndep.nv.gov.

Sincerely,



Brian A. Rakvica, P.E.
Supervisor, Special Projects Branch
Bureau of Corrective Actions

BAR:s

cc: Jim Najima, 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
Girard Page, Clark County Fire Department, 575 East Flamingo Road, Las Vegas, Nevada 89119
Ranjit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011
Sherry Bursey, Davis, Graham & Stubbs, LLP, 1550 17th Street, Suite 500, Denver, CO 80202
Tara Bahn, U.S. Department of Justice, PO Box 23896, Washington, DC 20026-3986
Craig Wilkinson, TIMET, PO Box 2128, Henderson, Nevada, 89009-7003
Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015
George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409
Nicholas Pogoncheff, PES Environmental, Inc., 1682 Novato Blvd., Suite 100, Novato, CA 94947-7021
Susan Crowley, Tronox, PO Box 55, Henderson, Nevada 89009
Keith Bailey, Tronox, Inc, PO Box 268859, Oklahoma City, Oklahoma 73126-8859
Sally Bilodeau, ENSR, 1220 Avenida Acaso, Camarillo, CA 93012-8727
Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden, Co 80402
Chris Sylvia, Pioneer Americas LLC, PO Box 86, Henderson, Nevada 89009
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
Jon Erskine, Northgate Environmental Management, Inc., 300 Frank H. Ogawa Plaza, Suite 510, Oakland, CA
94612
Deni Chambers, Northgate Environmental Management, Inc., 300 Frank H. Ogawa Plaza, Suite 510, Oakland, CA
94612
Robert Infelise, Cox Castle Nicholson, 555 California Street, 10th Floor, San Francisco, CA 94104-1513
Michael Ford, Bryan Cave, One Renaissance Square, Two North Central Avenue, Suite 2200, Phoenix, AZ 85004