



# STATE OF NEVADA

NEVADA DIVISION OF  
ENVIRONMENTAL PROTECTION  
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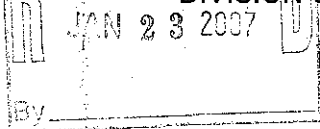
Department of Conservation & Natural Resources

Jim Gibbons, Governor

Allen Biaggi, Director

DIVISION OF ENVIRONMENTAL PROTECTION

Leo M. Drozdoff, P.E., Administrator



January 20, 2007

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

Re.: Nevada Division of Environmental Protection Response to:  
*Workplan for Parcels 4A and 4B Investigation*  
dated January 2007  
NDEP Facility ID# H-000688

Dear Mr. Paris:

The NDEP has received and reviewed BRC's correspondence identified above and provides comments in Attachment A. The NDEP does not require a resubmittal of this document if the changes requested in Attachment A are included as part of the implementation of the work plan. Please contact the NDEP to confirm BRC's intentions. If there are issues that require discussion it is suggested that these issues be rectified in a meeting.

Should you have any questions or concerns, please do not hesitate to contact me at (702) 486-2850x247.

Sincerely,

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

BAR:s

cc: Jim Najima, NDEP, BCA, Carson City  
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Brenda Pohlmann, City of Henderson, PO Box 95050, Henderson, NV 89009  
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9, mail code: WST-5,  
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Rob Mrowka, Clark County Comprehensive Planning, PO Box 551741, Las Vegas, NV, 89155-  
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Girard Page, Clark County Fire Department, 575 East Flamingo Road, Las Vegas, Nevada 89119  
Ranajit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801  
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011  
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### Attachment A

1. General comment, the NDEP does not necessarily concur with all portions of the work plan but instead has focused its comments on Table 2 and Figure 2 of the work plan. Once the data from this work plan has been collected the need for additional investigations can be evaluated.
2. Section 1.0, page 1-1 and Appendix A response-to-comment 4, it is probable that contamination may exist at depth within these parcels due to several mechanisms. BRC lists at least two of these in this Section of the report. These include: historic groundwater mounding and the influence of contaminated groundwater (both of which would likely results in concentrations increasing with depth). The NDEP expects that this data gap will be addressed by BRC prior to any affirmation of the No Further Action (NFA) status of this property. This comment is included for completeness and no additional work is required, at this time.
3. Section 2.2, page 2-2, BRC states that the 1980 USEPA report does not identify any specific impacts at the Site. Figure 24 of that report appears to identify "open trash dumps". These should be addressed via this sampling event. Based upon the NDEP's review it appears that these areas are adequately addressed, however, this comment is included for completeness of the record.
4. Table 2, the NDEP has the following comments:
  - a. The note "NS" is not defined. The NDEP has assumed that "NS" is ascribed the same meaning as "NA". This comment is included for completeness and no additional work is required, at this time.
  - b. The NDEP believes that it is appropriate to include TPH analyses in all locations of the Site. The NDEP believes that this is appropriate due to historic/current dumping activities on these Parcels and the proximity of these Parcels to vehicular traffic. This change is requested as part of the implementation of the work plan.
  - c. The transformer area should include analysis for dioxins/furans as well. Dioxins and furans are a known component of PCBs.
  - d. The fine grained soil area samples should be collected from the same depth intervals and should include the same analyses as the remainder of the samples. It is the belief of the NDEP that inadequate justification has been submitted to support the limited analyses proposed in this work plan. In addition, please add a 10' sample in these locations and expand the analytical suites.
  - e. The NDEP would like to note that it may be necessary to complete radionuclide analyses in the future, based on the results of this round of sampling. This comment is included for completeness and no additional work is required, at this time.
5. Table 3, the NDEP has the following comments:
  - a. This table relates to the NDEP's previous comment 11.b in the letter in Appendix A.
  - b. This table must be reviewed by the reader in concert with the justification in the text, as well as Table 2 because some analytes are only proposed for analyses in limited areas of the Site (e.g.: PCBs and radionuclides) or at limited depths (e.g.: dioxins and furans).
  - c. Asbestos, BRC notes that asbestos should not be analyzed for because there is "No historical basis for the chemicals to be present at the site in soils." The NDEP does not agree and requests that BRC include asbestos analysis in all surface soil samples. The justification for this is as follows:
    - i. Asbestos is a Class A carcinogen.
    - ii. Asbestos has been found in investigations throughout the BMI Complex and Common Areas. Asbestos was also detected as part of BRC's off-site dust

sampling work; investigations in the CAMU-area; 44 of the 56 surface samples in the First Eight Rows Sub-Area (per BRC's August 2006 Closure Plan); 9 of the 27 surface soil samples in the Southern RIBs Sub-Area (per BRC's August 2006 Closure Plan); and 2 of the 30 surface soil samples in the Mohawk Sub-Area (per BRC's August 2006 Closure Plan). These are merely examples and are not meant to be a comprehensive discussion of asbestos occurrence at the BMI Complex and Common Areas.

- iii. In Section 2.2, page 2-2, BRC references a report entitled "Asbestos-Containing Materials Removal from Vacant Desert Area". BRC does not specifically discuss the findings of this report in the body of the text but it is assumed that an asbestos clean up must have occurred in the vicinity of the Site in the past.
  - iv. BRC has not provided adequate justification to support eliminating this chemical from the suite of analytes.
  - d. Metals, BRC has selectively eliminated some metals for reason "(2)" which states "Chemical has low toxicity and/or no toxicity criteria." The NDEP concurs that this reason is valid for some of the compounds listed but not all (e.g.: uranium). In addition, some compounds may have low toxicity, however, they may be a good indicator of Site impacts. NDEP requests that BRC include all metals that can routinely be analyzed as part of the 6020/6010B analysis. In addition, it is critical that compounds that are prevalent on the Site and these Parcels (e.g.: iron, manganese and titanium) or have ecological concerns (e.g.: boron). In addition, tungsten must be included. NDEP requires BRC to clarify this analytical suite prior to implementing the work plan.
  - e. Total petroleum hydrocarbons (TPH), it is not clear to the NDEP why gasoline is being analyzed for and the remaining ranges of TPH compounds are not being analyzed for. The NDEP requests that the remainder of the analyses be included. This change is requested as part of the implementation of the work plan.
6. Figure 1, the locations with the identifiers "T" and "F" could not be located on this Figure, however, the proposed sample locations were found on Figure 2. It is the NDEP's expectation that the sample locations correspond to the areas described in the text for the fine grained soils and the transformers.