

STATE OF NEVADA

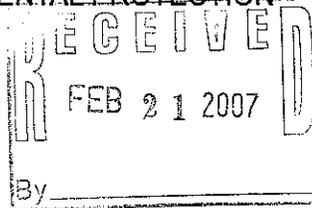
Department of Conservation & Natural Resources

Jim Gibbons, Governor

Allen Biaggi, Director

DIVISION OF ENVIRONMENTAL PROTECTION

Leo M. Drozdoff, P.E., Administrator



February 16, 2007

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

Re.: Nevada Division of Environmental Protection Response to:
Revised Aquifer Testing Work Plan
dated January 9, 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. Please note that it is not necessary to respond to any of these comments and the NDEP encourages BRC to implement this work plan as soon as possible.

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
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
Ranajit 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
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Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380,
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Jon Erskine, Northgate Environmental Management, Inc., 300 Frank H. Ogawa Plaza, Suite 510, Oakland, CA
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Deni Chambers, Northgate Environmental Management, Inc., 300 Frank H. Ogawa Plaza, Suite 510, Oakland, CA
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Robert Infelise, Cox Castle Nicholson, 555 Montgomery Street, Suite 1500, San Francisco, CA 94111
Michael Ford, Bryan Cave, One Renaissance Square, Two North Central Avenue, Suite 2200, Phoenix, AZ 85004
Paul Hackenberry, Hackenberry Associates, 550 West Plumb Lane, B425, Reno, NV, 89509

Attachment A

1. Appendix A1, Response-to-Comments (RTC) 3, please note that the NDEP does not concur with BRC's response. NDEP believes that it is not productive to discuss this issue any further. Please note that in NDEP reviews of any future BRC document, we will not accept this Work Plan as a reference for conclusions drawn in regard to these hypotheses. In future submittals, all hypotheses must be supported by data. No response is required.
2. Appendix A1, RTC 7, please note that the text and the tables still do not coincide. For the purposes of this workplan the NDEP will assume that slug tests will be conducted on all ten wells listed on Table 1. Please advise if this is not correct, otherwise, no response is necessary.
3. Appendix A1, RTC 10, BRC's response does not adequately address the NDEP's concern that all of the selected locations are located within the same sub-area. BRC will need to demonstrate that the data collected from this sub-area is representative of the remaining areas of the Site where BRC may wish to apply this data. It would seem to the NDEP that there are other sub-areas of the Site where the selection criteria could be met. For example, the TIMET Ponds sub-area or the Spray Wheel sub-area. No response is required unless BRC chooses to add additional areas for hydraulic testing of the cores.
4. Appendix A1, RTC 19, the NDEP cannot concur with BRC's response, however, the NDEP believes that it is not productive to discuss this issue further.