

STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

DECEUVE JUL **26** 2007

Leo M. Drozdoff, P.E., Administrator

July 24, 2007

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

Re.: Nevada Division of Environmental Protection Response to: *Upwind Downwind Baseline Dust Monitoring* dated July 20, 2007 NDEP Facility ID# H-000688

Dear Mr. Paris:

The NDEP has received and reviewed BRC's correspondence identified above and provides comments below.

- The proposed monitoring approach deviates from the approved *Perimeter Air Monitoring Plan* (PAMP) which is Appendix B of the September 2006 *Corrective Action Plan*. Specifically, the proposed approach does not include the collection of PUF samples. These PUF samples are collected for analysis of dioxins/furans; SVOCs/PAHs; PCBs; and pesticides. NDEP requests that the approved PAMP methodology be implemented for this round of sampling.
- If there are additional deviations which have not been noted they should also be resolved. It is the expectation of the NDEP that the methodology in the PAMP will be explicitly followed.
- If this is acceptable to BRC please confirm this in writing to the NDEP and proceed with implementation of the scope of work.

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

Sincerely,

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

BAR:s





Mr. Mark Paris 7/24/2007 Page 2

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 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, 10<sup>th</sup> Floor, San Francisco, CA 94104-1513 Michael Ford, Bryan Cave, One Renaissance Square, Two North Central Avenue, Suite 2200, Phoenix, AZ 85004 Teri Copeland, 5737 Kanan Rd., #182, Agoura Hills, CA 91301