

BRC Response to Comment (RTC) to NDEP's Comments Dated July 6, 2007 on the CAMU CSM

1. Response to comments (RTC) letter, the NDEP has the following comments:
 - a. RTC 14, the NDEP believes that it is appropriate and necessary to develop a groundwater monitoring plan, at this time. This groundwater monitoring plan should identify existing wells that will be utilized and should identify locations where new wells will be installed, as necessary. This should include the installation of 2nd and 3rd water-bearing zone wells, as appropriate. As noted previously, it is suggested that BRC review the variety of monitoring plans that are being implemented by the Pioneer-Stauffer-Syngenta-Montrose (PSSM) group and that BRC's plan might complement these plans. Please contact the NDEP regarding an expected submittal date for this document.

Response: BRC is in the process of developing the CAMU area groundwater monitoring work plan. It will include locations of existing and any proposed new wells. It will utilize existing wells and complement monitoring plans that are being implemented by others. BRC will contact the NDEP regarding the expected submittal date for this plan. It is targeting submittal for mid-late August, 2007.

- b. RTC 20, please provide copies of the referenced aerial photographs to the NDEP at this time.

Response: The requested aerial photograph figures are provided in Attachment A to this RTC.

- c. RTC 50, the NDEP had asked what data has been collected and BRC states that this is a data gap. If BRC has no data to support biodegradation how can they state that "The current data set indicates that chemical biodegradation may be occurring..."? If the argument depends solely on the occurrence of TCE; the argument is weak because TCE can exist both as a daughter product in reductive environments and as a primary chemical in any environment. Please clarify.

Response: Comment noted. As BRC has noted this is a data gap.

- d. RTC 62, the NDEP has the following comments:
 - i. Please note that the vicinity of location AA-BW-05 may be a good location for deep well installations due to the high concentrations of chlorobenzene.

Response: Comment noted. This will be evaluated as part of the CAMU area groundwater monitoring work plan discussed in Item 1 above.

- ii. Due to the unknown specifics regarding fate and transport in the sub-surface, perhaps it would be beneficial to complete tracer tests. This may afford BRC a line of evidence to discern upgradient versus on-Site sources for a number of contaminants.

Response: Comment noted.

2. Attachment A, the NDEP has the following comments:
 - a. Please note that the NDEP does not concur with BRC's statement that "No active public supply, commercial or domestic wells were located near the CAMU."

Response: BRC has conducted as thorough a job as practically possible with regards to locating all such wells identified in the DWR database. In addition to the information provided in the referenced Attachment A, BRC has subsequently investigated several of these wells as to status and location, as well as contacted or attempted to contact property owners where such wells may have been located. This was done in follow-up to NDEP questions on this matter. Based on all of these investigations, BRC could not locate any active wells (or wells that could be reasonably made active) near the CAMU area, which was broadly defined as extending approximately 5 miles or more from the CAMU. One well (#34097) was located on property owned by a BRC sister company. It has now been abandoned. It is BRC's understanding that NDEP is following up on the other identified wells, which are located on property not belonging to BRC or affiliated companies.

3. Attachment C, the NDEP has the following comments:
 - a. Figures, general comment, some Figures include a comparison to USEPA DAF 1 soil screening levels and others do not. The logic for the selection of the screening levels should be made clear in the next version of the CSM.

Response: Generally site concentrations were compared to USEPA industrial preliminary remediation goals (PRGs), and soil screening levels (SSLs) using a dilution attenuation factor of 1. In many cases, chemicals have an established industrial PRG, but do not have an established SSL. For these chemicals, only comparisons to the industrial PRG are shown. In all cases, non-detect values were compared to the industrial PRG only. For a few chemicals, neither an industrial PRG nor SSL has been established. In these cases, whether the chemical was detected or not is shown. For dioxins/furans, the TCDD TEQ concentration was compared to the ATSDR screening level of 50 ppt only.

A cross-check will be made to ensure that all available screening values are reflected in the figures in the future version of the CSM.

- b. Figure 5-374, Location BS-11-N10 is missing data from the 20' depth interval. This issue should be addressed in future iterations. A revised Figure is not requested at this time.

Response: Comment noted. These data will be added to the figure and provided in the next iteration.

- c. Figure 8-1, Migration to Groundwater – the box representing Exposure Route and Potential Receptors is not accurate for groundwater as it will migrate off-site; this was

highlighted in the NDEP's previous comment #44. Please revise and resubmit this Figure at this time.

Response: Figure 8-1 has been revised to reflect this comment. It is provided in Attachment B to this RTC.

- d. Figure 9-2, the NDEP has the following comments;
 - i. The runoff arrows should show chemical and water movement. In the belief of the NDEP it is reasonable to assume that some chemical load is contained in the runoff leaving the CAMU area.
 - ii. A revised figure is not required at this time.

Response: Comment noted.

- e. Figure 9-3, the NDEP has the following comments:
 - i. The ponds on the Plant Site appear to be missing from this Figure.
 - ii. A revised figure is not required at this time.

Response: Comment noted.

- f. Figure 9-4, the NDEP has the following comments:
 - i. It is noted that this Figure will likely change as the Remedial Alternative Study for the Slit Trenches is finalized.
 - ii. A revised figure is not required at this time.

Response: Comment noted.

Attachment A



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-1

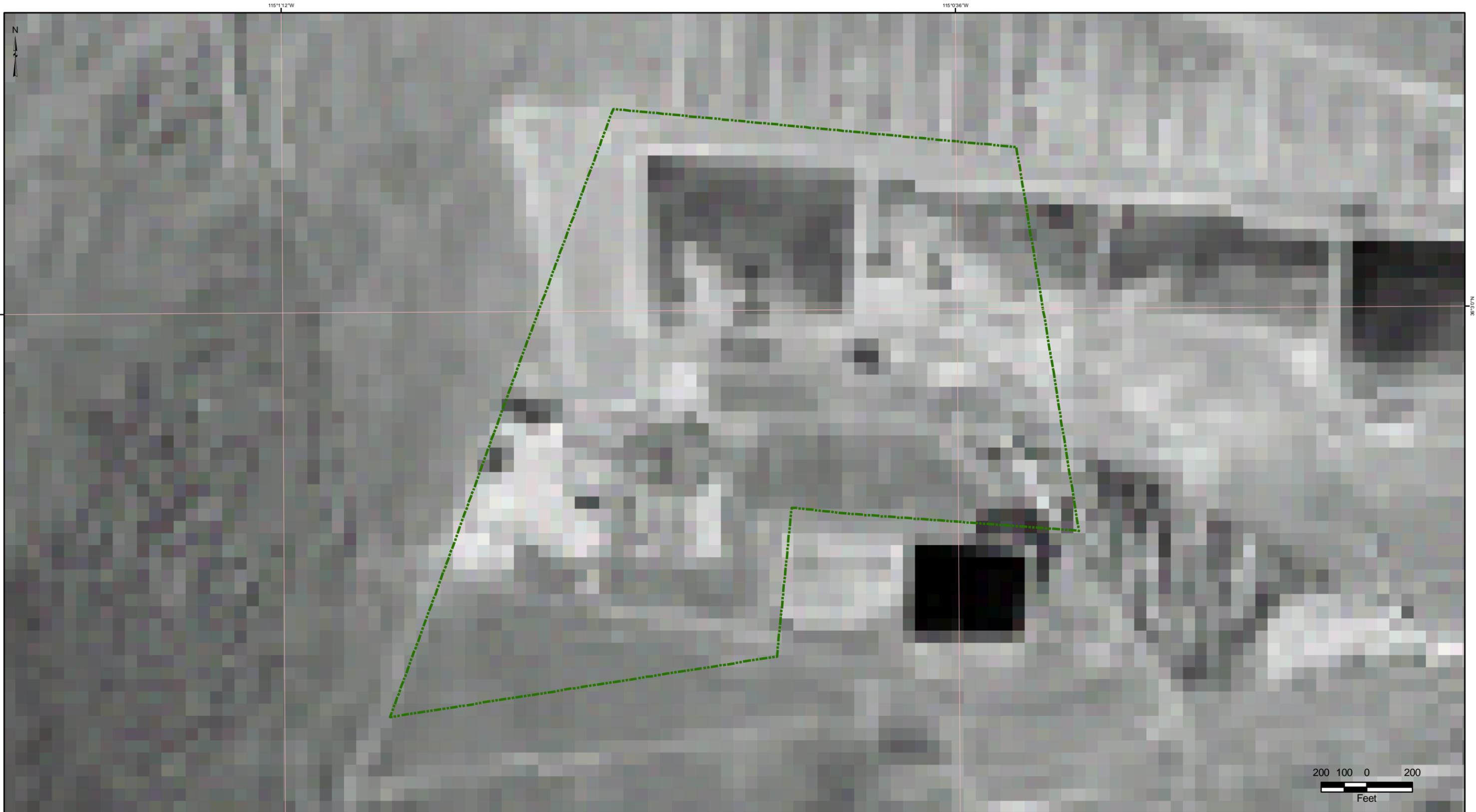
1943 AERIAL
PHOTOGRAPH



Prepared by: MKJ

Date: 07/26/07

JOB No. 0064276
FILE: GIS/BRC/CAMU/AERIAL_PHOTOS.MXD



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-2

1950 AERIAL
PHOTOGRAPH



Prepared by: MKJ

Date: 07/26/07

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FILE: GIS/BRC/CAMU/AERIAL_PHOTOS.MXD



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-3

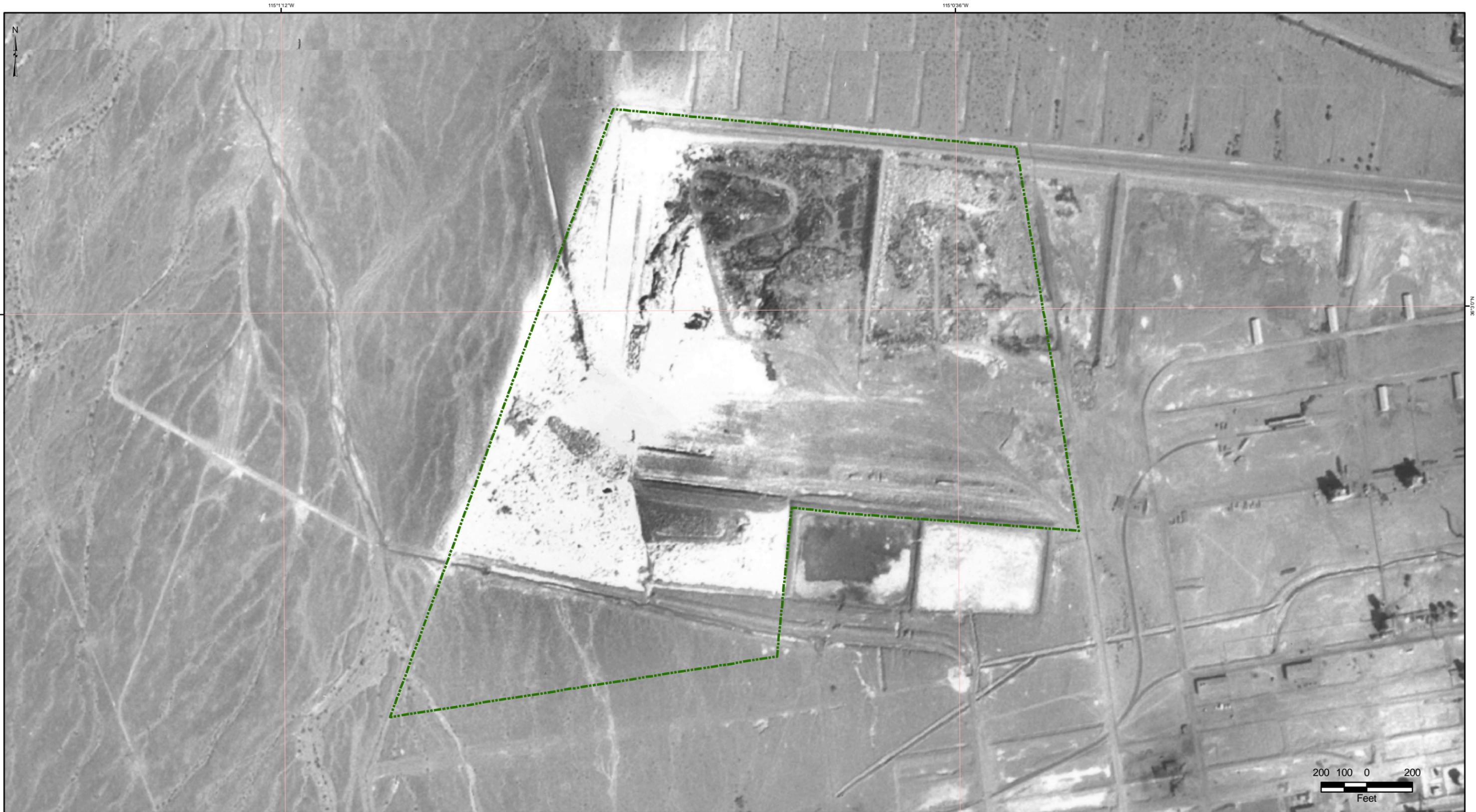
1967 AERIAL
PHOTOGRAPH



Prepared by: MKJ

Date: 07/26/07

JOB No. 0064276
FILE: GIS/BRC/CAMU/AERIAL_PHOTOS.MXD



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-4

1969 AERIAL
PHOTOGRAPH



Prepared by:
MKJ

Date:
07/26/07

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FILE: GIS\BRC\CAMU\AERIAL_PHOTOS.MXD



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-5

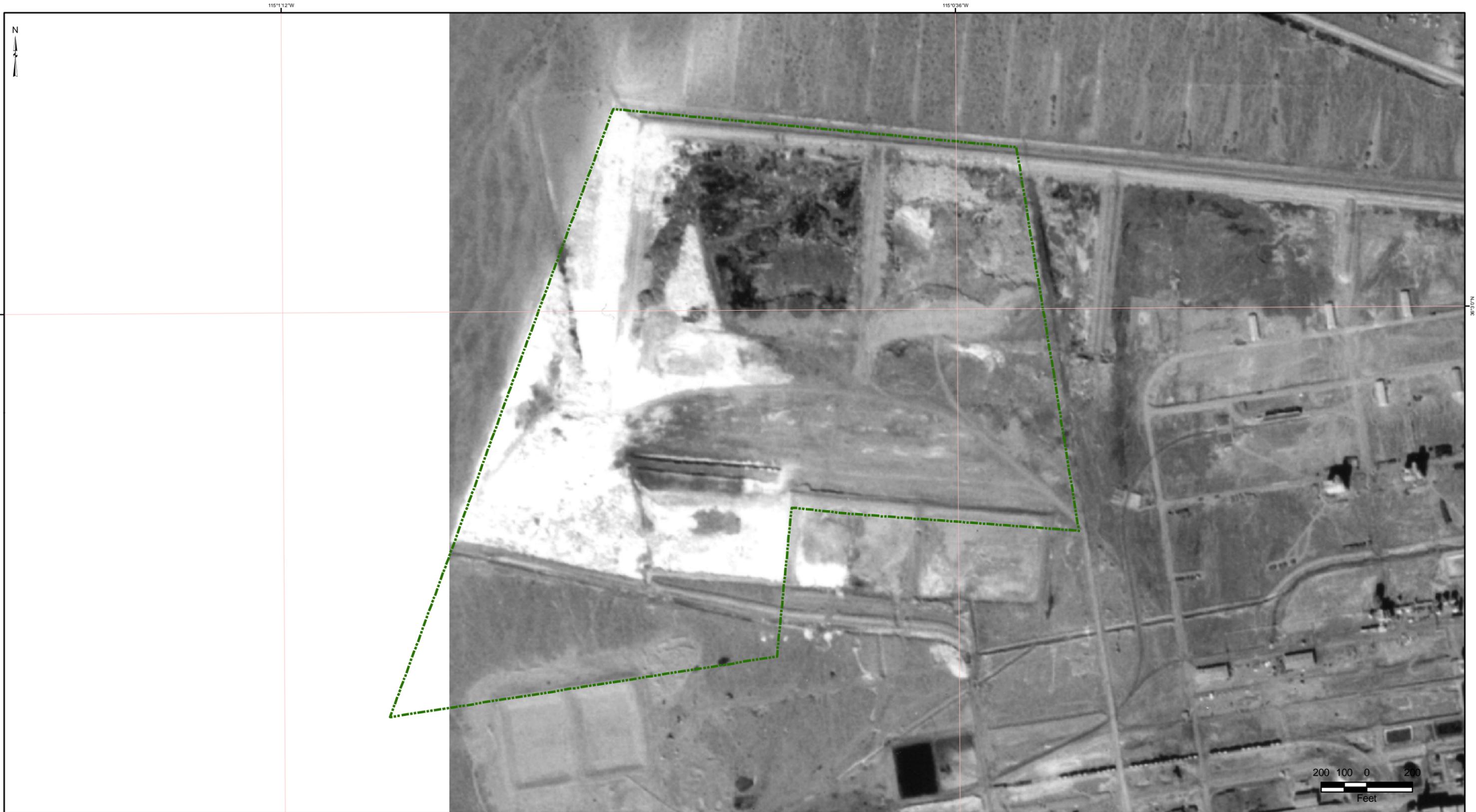
1972 AERIAL
PHOTOGRAPH



Prepared by:
MKJ

Date:
07/26/07

JOB No. 0064276
FILE: GIS/BRC/CAMU/AERIAL_PHOTOS.MXD



 Site Boundary

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FIGURE A-6

1974 AERIAL
PHOTOGRAPH



Prepared by:
MKJ

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FILE: GIS/BRC/CAMU/AERIAL_PHOTOS.MXD

115°12'W

115°03'6"W



36°30'N

36°30'N



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-7

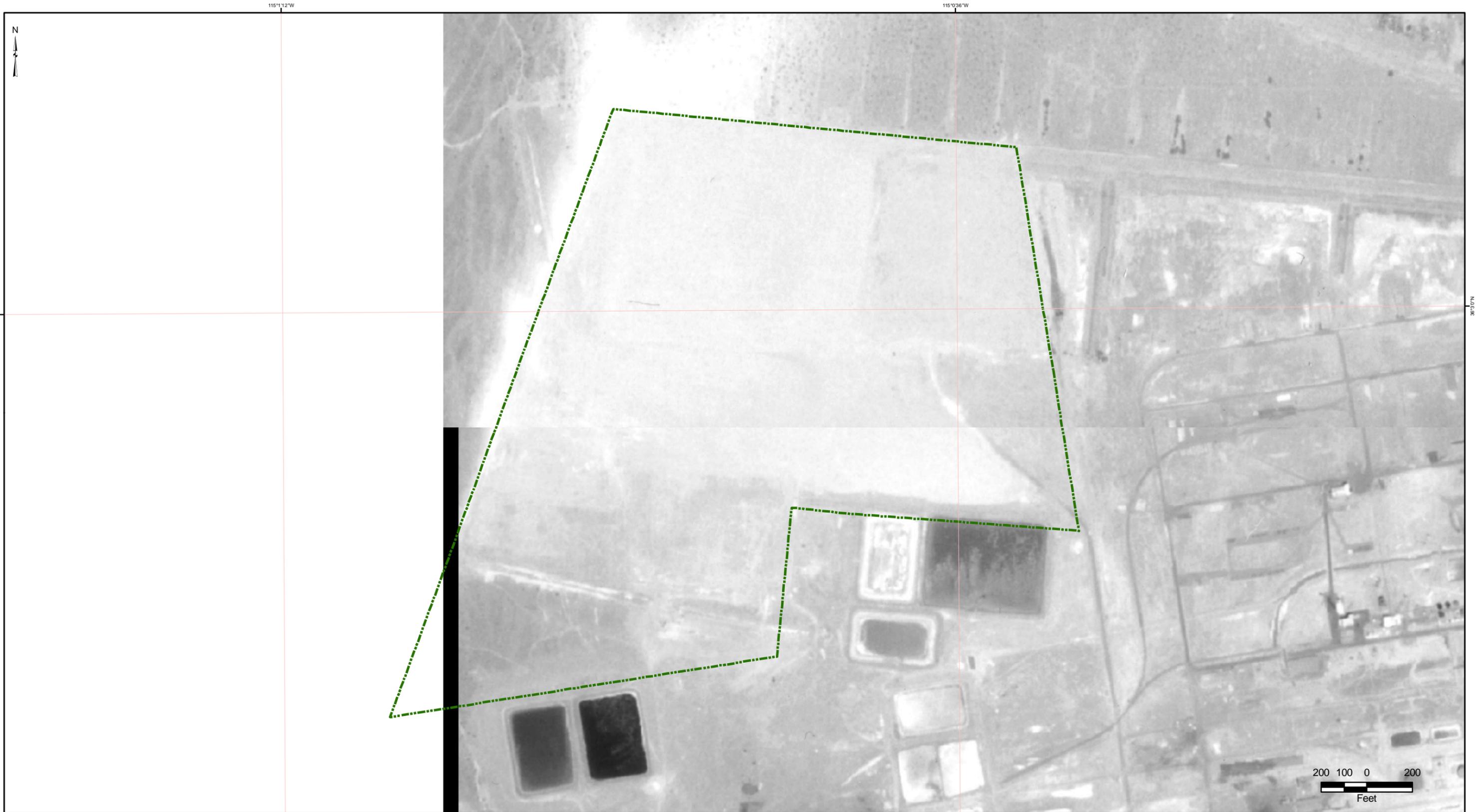
1976 AERIAL
PHOTOGRAPH



Prepared by:
MKJ

Date:
07/26/07

JOB No. 0064276
FILE: GIS\BRC\CAMU\AERIAL_PHOTOS.MXD



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-8

1980 AERIAL
PHOTOGRAPH



Prepared by:
MKJ

Date:
07/26/07

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FILE: GIS/BRC/CAMU/AERIAL_PHOTOS.MXD



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-9

1987 AERIAL
PHOTOGRAPH



Prepared by:
MKJ

Date:
07/26/07

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FILE: GIS/BRC/CAMU/AERIAL_PHOTOS.MXD



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-10

1990 AERIAL
PHOTOGRAPH



Prepared by:
MKJ

Date:
07/26/07

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FILE: GIS/BRC/CAMU/AERIAL_PHOTOS.MXD



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-11

1994 AERIAL
PHOTOGRAPH



Prepared by:
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07/26/07

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FILE: GIS/BRC/CAMU/AERIAL_PHOTOS.MXD



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-12

1999 AERIAL
PHOTOGRAPH



Prepared by:
MKJ

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07/26/07

JOB No. 0064276
FILE: GIS/BRC/CAMU/AERIAL_PHOTOS.MXD



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-13

2002 AERIAL
PHOTOGRAPH



Prepared by:
MKJ

Date:
07/26/07

JOB No. 0064276
FILE: GIS/BRC/CAMU/AERIAL_PHOTOS.MXD



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-14

2004 AERIAL
PHOTOGRAPH



Prepared by:
MKJ

Date:
07/26/07

JOB No. 0064276
FILE: GIS\BRC\CAMU\AERIAL_PHOTOS.MXD



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-15

2005 AERIAL
PHOTOGRAPH



Prepared by:
MKJ

Date:
07/26/07

JOB No. 0064276
FILE: GIS/BRC/CAMU/AERIAL_PHOTOS.MXD



 Site Boundary

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE A-16

2006 AERIAL
PHOTOGRAPH

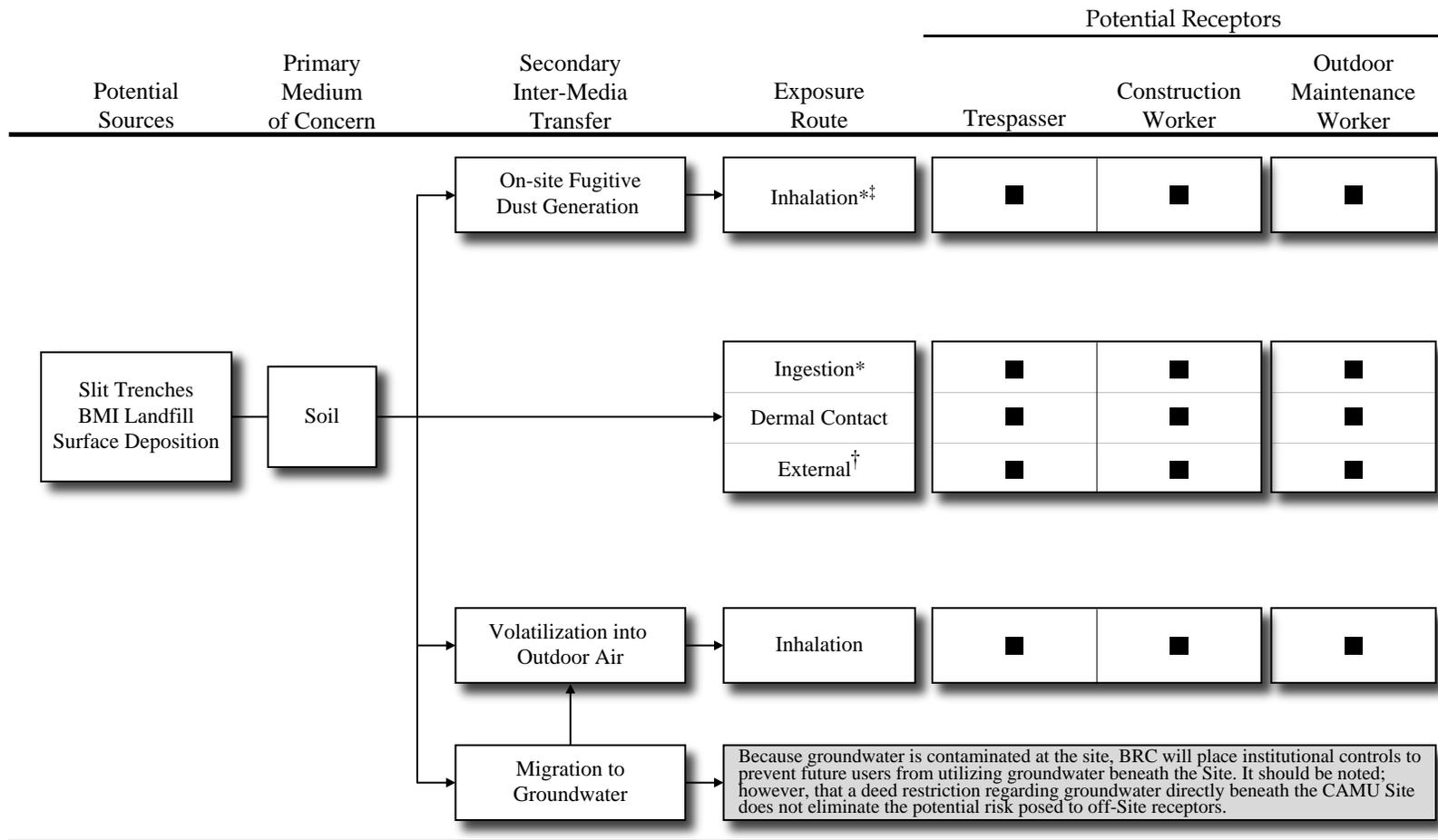


Prepared by:
MKJ

Date:
07/26/07

JOB No. 0064276
FILE: GIS/BRC/CAMU/AERIAL_PHOTOS.MXD

Attachment B



- - Incomplete or insignificant exposure pathway.
- - Complete exposure pathway to CAMU site soil.
- *Includes radionuclide exposures.
- †Only radionuclide exposures.
- ‡Includes asbestos exposures.

Notes:

- Current receptors that may access the property include construction workers and trespassers. Outdoor maintenance workers are assumed to only access the soil following CAMU construction.
- Because the future anticipated use of the CAMU site precludes use for residential, future residential exposures are not considered.
- Because of the nature of the CAMU site, no ecological receptors of concern have been identified (see Section 8.2).
- Exposures to potential nearby, off-site receptors that may be impacted during construction activities will be less than those for on-site receptors.

Corrective Action Management Unit (CAMU)
BMI Complex, Henderson, Nevada

FIGURE 8-1

**CONCEPTUAL SITE
MODEL DIAGRAM FOR
POTENTIAL EXPOSURES**



Prepared by: ERM MKJ	Date: 07/06/07	JOB No. 0064276 FILE: GIS/BRC/CAMU/CSM_DIAGRAM.AI
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