



KERR-McGEE CORPORATION

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DNMS

January 10, 2000

Mr. Darrell Shults
ODEQ Waste Management Division
707 N. Robinson
Oklahoma City, Ok 73101

Re: Cushing Refinery Site
Monthly Progress Report

Dear Mr. Shults:

Kerr-McGee Corporation (KM) submits herein a progress report for the month of December, 1999 for the Cushing, Oklahoma remediation site.

RADIOLOGICAL WORK

NRC Inspection - NRC conducted an inspection focusing on preparations for the decommissioning of Pit 4. KMC has not yet received the inspection report.

Health Physics Laboratory Modifications - Software validation must be complete before soil counters can be used for decommissioning. This is scheduled for January. KM is still evaluating the possibility of replacing the Minaxi automated soil counter. A decision should be made in January.

Sediment Pond Final Status Survey - The sediment pond has been sampled for final status survey. After HP laboratory analytical software has been validated, the data will be utilized to prepare and submit a Final Status Survey report to NRC for release of this area.

RMA-6 and North Tank Farm - Samples were collected and measurements were recorded in this area. It was determined that decommissioning of RMA-6 will be required. This will be done as personnel and equipment are available.

"Triangle" Property - The "triangle" area north of Deep Rock Road, west of Linwood Avenue, and south of the MK&T right of way contains numerous structures (tanks, foundations, tank stands, buildings, etc.) that must be radiologically surveyed prior to release. This work will be done as personnel and equipment are available.

NON-RADIOLOGICAL WORK COMPLETED

OPDES Permit - KM submitted modifications to the permit application to DEQ. The OPDES permit will provide for discharge of water to surface water from several locations. Treatment of water prior to discharge may be required in some locations.

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Pit 5 Disposal Cell Construction - KM continued construction of the Pit 5 Disposal Cell. Construction will continue in January, and VFL has scheduled completion of the liner in February.

Pits 1, 2, and 3 Remediation - The pug mill was moved to Pit 5 in December. The Pits 1, 2, and 3 area was regraded and is being prepared for topsoil and vegetation. Hay bale dikes were placed across the area to minimize sediment erosion. Topsoil placement and vegetation will be installed when the weather permits germination.

Pit 5 Remediation - VFL has resumed neutralization and stabilization of waste in Pit 5. Odor control dictates the rate of treatment while VFL maintains the odor control system and develops a method for applying additional odor control chemicals directly to the waste as it is being worked. During December, VFL neutralized approximately 3,500 cubic yards of Pit 5 waste, and stabilized and placed approximately 1,500 cubic yards in the existing disposal cell. Neutralization and stabilization will continue in January.

Pit 4 Remediation - VFL began to place reagent on Pit 4 in preparation for remediation activities. Property line air monitors were moved from the Pits 1, 2, and 3 area to Pit 4, and odor control systems were installed around the pit. Neutralization will begin in January.

Waste Water Discharges - KM discharged Pond 5 four times during the month of December. On December 10, KM began a discharge of treated water from Pond 5, but after discharging part of the impoundment, the pH dropped below permit limits. KM immediately shut off the discharge. Upon investigation, it was discovered that the connecting pipe between the holding pond and the treatment pond was leaking, allowing acidic water to enter the treatment pond by gravity flow as it was discharging. KM notified the DEQ Water Quality Service verbally and in writing and corrected the problem.

Sampling and Analysis Plan - KM submitted a final "Sampling and Analysis Plan" for DEQ approval. Additional revisions were made to several procedures based on DEQ response.

If you have any questions or comments, please contact me at (405) 270-2694 (OKC) or (918) 225-7753 (Cushing).

Sincerely,



Jeff Lux
Project Manager

cc: Cushing Public Repository
Dennis Whitfield, ODEQ