



de maximis, inc.

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VIA E-MAIL

April 15, 2016

Mr. J. Carton Parker, P.G.
Nevada Division of Environmental Protection (NDEP)
Supervisor, Bureau of Industrial Site Cleanup (BISC)
2030 E. Flamingo Road, Suite 230
Las Vegas, NV 89119

**Re: Quarterly Progress Report - First Quarter 2016
Environmental Conditions Investigation Program
Former Montrose Facility - Henderson, Nevada**

Dear Mr. Parker,

On behalf of Montrose Chemical Corporation of California (Montrose), please find summarized below a list of work performed or significant activities completed for the environmental program at the former Montrose facility in Henderson, Nevada during the First Quarter of 2016. This Quarterly Progress Report has been prepared in accordance with the Montrose Phase II Consent Decree Agreement, dated June 18, 1996.

- On January 12, 2016, Montrose submitted an update to the All-Wells Database as requested by NDEP.
- On January 13, 2016, Montrose submitted to NDEP the legal description to complete the No Further Action (NFA) Package for the DCB Warehouse.
- On January 15, 2016, Montrose submitted to NDEP the 4th quarter 2015 Environmental Conditions Investigation (ECI) program progress report and the updated Montrose Program Fact Sheet.
- On January 22, 2016, NDEP submitted Pay Request #80 to Montrose. Subsequently, Montrose reviewed and approved prior to the payment date of March 14, 2016.
- On January 26, 2016, Montrose (Ed Modiano) and NDEP (Carlton Parker) conducted a teleconference call to discuss the DNAPL Program path forward. The results of the DNAPL program teleconference call were summarized in an e-mail from Ed Modiano to Carlton Parker on February 2, 2016.
- On February 18, 2016, representatives for Montrose conducted a meeting with Attorney General in Carson City, Nevada to review the current status of the Beta Ditches.

- On March 2, 2016, NDEP and Montrose conducted a meeting at the NDEP office in Las Vegas, Nevada to discuss the risk assessment process path forward for the Closed Pond Area-Former Tank Farm Area (CPA-FTF).
- On March 21, 2016, Montrose submitted to NDEP the NFA Package for the Former Underground Benzene Storage Tank (FUBST) Area
- On March 23, 2016, Kurt Fehling on behalf of NDEP submitted the background compound data set to be used in the Montrose Risk Assessment Process.
- On March 30, 2016, Kurt Fehling on behalf of NDEP submitted a couple of template risk assessment documents to be used by Montrose for developing the annotated outline for the CPA-FTF risk assessment.

The following provides a brief description of the Montrose ECI Program activities planned for the 2nd Quarter 2016:

- Montrose and NDEP representatives to conduct a risk assessment scoping teleconference call in late April 2016. Also, it is anticipated that a follow-up teleconference call regarding the Montrose asbestos data will be conducted in May 2016.
- As discussed with NDEP, Montrose is in the process of repackaging the DNAPL MC-MW-18 Mobility Test Report and Monitoring and Purge Program Update for submittal as a Data Summary Report. It is anticipated that the repackaged report will be submitted to NDEP in June 2016.
- Complete the DUE and CSM documents for the Former Plant Site and submittal planned for the second quarter 2016.
- A CSM revision and a response to NDEP comments on the previously submitted Screening Risk Assessment for the Former Benzene Storage Tank Area intended for submittal to NDEP in the second quarter 2016.
- Montrose is in the process of evaluating and developing the path forward regarding the NDEP comments to the DNAPL MC-MW-18 Mobility Test Report and Monitoring and Purge Program Update
- Development of a long-term access agreement is ongoing to assure continued access to Montrose ECI areas on the Olin property.
- Development of a deed restriction agreement with Olin to assist closure of the Montrose site assessment areas by future NDEP NFA determinations.

Additionally, while also not directly part of the Phase II ECI program, Montrose continued its participation in the operation and management of the site-wide groundwater treatment system (GWTS) during the 1st quarter of 2016. Notable among the 1st quarter GWTS operations conducted by the Companies was the following:

- The Semi-Annual Underground Injection Control Report was submitted to NDEP on February 4, 2016.
- The Semi-Annual GWTS Report was submitted to NDEP on February 15, 2016.
- On March 1, 2016, the annual NDEP/OSSM meeting was conducted at Southern Nevada Water Authority office in Las Vegas, Nevada. The purpose for the meeting was for NDEP/OSSM to provide status update regarding the OSSM project activities.
- The OSSM Companies reviewed the NERT Chloroform Report during the 1st Quarter 2016 and is in the process of preparing a response document for submittal to NDEP.

If you should have any questions or require additional information regarding the above contents, please contact me at 619-991-9074.

Sincerely,



Edward Modiano
de maximis, inc,
Consultant for Montrose Chemical Corporation of California
Nevada Certified Environmental Manager
EM No. 2107; Expires October 18, 2017

Enclosure:
Fact Sheet-Former Montrose Facility, Henderson, Nevada

Distribution Via email:

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