



January 10, 2013

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2013 JAN 17 P 2: 23

Ms. Shannon Harbour, P.E.  
Nevada Division of Environmental Protection  
Bureau of Corrective Actions  
901 South Stewart Street, Suite 3005  
Carson City, NV 89701

**Re: Proposed Modification to Revised Work Plan:  
Depth of Soil Samples to be Analyzed for Asbestos  
Former Wastewater Ponds 1 and 2  
Former Stauffer Chemical Company Facility,  
Current Olin Chlor Alkali Facility  
Henderson, Nevada**

Dear Ms. Harbour:

This letter is submitted on behalf of Stauffer Management Company LLC/Syngenta Crop Protection, Inc., Montrose Chemical Corporation of California and Olin Corporation (“the Companies” for the purpose of this letter) to propose a modification to the above-captioned November 20, 2012 *Revised Work Plan* that was accepted by the Nevada Division of Environmental Protection (NDEP) in your letter dated December 11, 2012. The proposed modification would eliminate the analysis of asbestos for deeper subsurface soil samples included in the laboratory analytical program (e.g., 19.5 to 20 feet below ground surface [bgs]), 29.5 to 30 ft bgs and a sample between ~40 to 50 ft bgs), if based upon field observations, it is possible to differentiate that the soil sample(s) from such depth(s) appear to represent undisturbed native sediments in contrast to waste materials and/or materials that have been altered due to former waste management operations. The Companies note that the proposed modification would be sufficient to address the NDEP’s concern regarding “restricting the depth of the asbestos sampling given the unknown depth of the former land surface and the amount of recontouring that has occurred in this area over the decades.” Conversely, if based upon field observations, it is not possible to differentiate between undisturbed native sediments in contrast to waste materials and/or materials that have been altered due to former waste management operations, the samples would be analyzed for asbestos as implied in the *Revised Work Plan*.

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To facilitate the differentiation between undisturbed native sediments and waste materials and/or materials that have been altered, the continuous soil core (Section 4.1 of the *Revised Work Plan*) will be inspected with depth to note potential indicators of waste material/alteration based on direct visual examination (disturbances in lithology and/or composition, color, texture, sorting, presence of anthropogenic debris or liquid), odor and other properties which may serve as suitable field indicators for documenting such conditions.

The Companies appreciate the NDEP's consideration of the proposed modification and ask for your prompt response to this request as drilling and soil sample collection for the subject scope of work is scheduled to commence January 21, 2013.

Should you have any questions regarding this information, please call me or one of the Companies' representatives.

Yours very truly,

**PES ENVIRONMENTAL, INC.**

A handwritten signature in black ink, appearing to read "N C Pogoncheff". The signature is fluid and cursive, with a large, stylized flourish at the end.

Nicholas C. Pogoncheff, P.G., Nevada C.E.M. No. 2067  
Principal Hydrogeologist

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cc: Christa Smaling, BMI Compliance Coordinator – NDEP Las Vegas, NV (paper)  
NDEP c/o McGinley and Associates – Reno, NV (paper)  
Brain Rakvica, NDEP c/o McGinley and Associates – Las Vegas, NV (paper & electronic)  
George Crouse – Syngenta Crop Protection, LLC  
Charles Elmendorf - Stauffer Management Company LLC  
Curt Richards – Olin Corporation  
Jay Gear – Olin Corporation  
Paul Sundberg – Montrose Chemical Corporation of California  
Joe Kelly – Montrose Chemical Corporation of California  
Ed Modiano – de maximis, inc.  
Lynne Preslo – Geosyntec Consultants  
Brian Waggle – Hargis+ Associates, Inc.  
Mark Paris – Basic Remediation Company  
Ranajit Sahu – Basic Remediation Company  
Jay Steinberg – Nevada Environmental Response Trust  
Allan DeLorme – Nevada Environmental Response Trust  
Mark Travers – Nevada Environmental Response Trust  
Craig Wilkinson – Titanium Metals Corporation  
Kirk Stowers – Broadbent & Associates  
Victoria Tyson – Titanium Metals Corporation  
Jeff Gibson – American Pacific Corporation  
Brenda Pohlmann – City of Henderson