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July 15, 2015

Mr. J. Carton Parker  
Nevada Division of Environmental Protection (NDEP)  
Bureau of Corrective Actions (BCA)  
2030 E. Flamingo Road, Suite 230  
Las Vegas, NV 89119

**RE: Second Quarter 2015 Quarterly Progress Report  
Former Stauffer Chemical Company Facility  
NDEP Facility ID #H-000536 Pioneer/Stauffer  
Henderson, NV**

Dear Mr. Parker:

This Quarterly Progress Report (QPR), prepared on behalf of Stauffer Management Company LLC (SMC) and Pioneer Americas LLC [dba] Olin Chlor Alkali Products (Olin), summarizes notable activities performed as part of the Phase II Environmental Conditions Investigation (ECI), during the Second Quarter of 2015 at the former Stauffer Chemical Company facility (Site) in Henderson, Nevada. This QPR is submitted to the NDEP in accordance with the June 28, 1996 Phase II Consent Agreement entered into by the NDEP, Pioneer Chlor Alkali Company, Inc. and SMC. Notable activities performed during the reporting period included:

- Clark County Department of Air Quality (DAQ) approved a *Minor Source Permit* for the Site Groundwater Treatment System (GWTS). The permit was approved on March 27, 2015 and received in April 2015.
- On April 2, 2015, Olin, SMC/Syngenta Crop Protection, LLC (Syngenta), and Montrose Chemical Corporation of California (Montrose), collectively referred to as the "Companies", provided a tour of the Site areas of concern to NDEP new personnel.
- On April 2, 2015, representatives from SMC/Syngenta participated in a meeting with the NDEP to discuss the NDEP's February 27, 2015 Comments related to the Conceptual Site Model (CSM) and Data Usability Evaluation (DUE) for the former Stauffer ACD Drum Burial Waste Management Area (LOU No.5). The results of the meeting were formalized in the NDEP's April 2, 2015 Meeting Minutes. On behalf of SMC/Syngenta, the June 23, 2015 revised CSM and DUE reports (including Responses to the NDEP's February 27, 2015 Comments) prepared for the former Stauffer ACD Drum Burial Waste Management Area (LOU No.5), were submitted to the NDEP.
- On behalf of Olin and SMC, the *First Quarter 2015 QPR* was submitted to the NDEP on April 15, 2015.
- On April 15 2015, NDEP issued a *Draft Up-gradient Groundwater Quality Technical Memorandum for TDS, Arsenic, and Perchlorate*. Comment period for the memorandum ended on June 15, 2015.
- On May 20, 2015, the Companies participated in a quarterly status call with NDEP to discuss status and progress of several ongoing Site activities.

O L I N C O R P O R A T I O N

- On behalf of the Companies, following documents were submitted to NDEP:
  - On April 24, 2015, a letter documenting the *Completion of Extraction Well C Shutdown Program* was submitted. In a letter dated June 10, 2015, NDEP provided comments and the Companies submitted a *Response to Comments on the Well Shutdown Program Follow-up* on June 30, 2015. NDEP approved the submittal on July 8, 2015.
  - In response to NDEP's comments letter dated April 23, 2015, the Companies submitted a *Response to Comments on the 2014 Comprehensive Groundwater Data Evaluation Report* on May 29, 2015. NDEP approved the submittal on June 11, 2015.
  - Based on the outcome of a conference call between NDEP and Companies on May 19, 2015, the Companies submitted a revised *DVSR No. 46, Site Wide Groundwater Monitoring Program – Annual 2014*, on June 22, 2015.
- On behalf of SMC/Syngenta, the *Data Usability Evaluation Summary Report, Vadose Zone Soil Datasets*, prepared for the former Stauffer Leach Beds (LOU No. 9) and Phosphoric Acid Pond and Three Trenches (LOU No.4), was submitted to NDEP on June 23, 2015.

Should you have any questions related to the information contained herein, please contact me at (423) 336-4540, via email at [dms@olin.com](mailto:dms@olin.com), or an alternate Company representative.

Sincerely,



David M. Share  
Director, Environmental Remediation

Enclosures:  
Former Stauffer Chemical Company Facility Fact Sheet  
Selected Site Assessment Areas Status Update

cc: James (JD) Dotchin, Supervisor, BCA, NDEP, Las Vegas  
BMI Compliance Coordinator – NDEP Las Vegas, NV (paper & electronic)  
NDEP c/o Broadbent & Associates – (paper & electronic [2])  
Jeff Gibson – American Pacific Corporation  
Mark Paris – Basic Remediation Company  
Lee Farris – Basic Remediation Company  
Ranajit Sahu – Basic Remediation Company  
Joe Kelly – Montrose Chemical Corporation of California  
Paul Sundberg – Montrose Chemical Corporation of California  
Jay Steinberg – Nevada Environmental Response Trust  
Allan DeLorme – Environ  
John Pekala – Environ  
Curt Richards – Olin Corporation  
David Share – Olin Corporation  
Chinny Esakkiperumal – Olin Corporation  
Ed Modiano – de maximis, inc.  
Charles Elmendorf – Stauffer Management Company LLC  
Bill Carson – Terraphase Engineering, Inc.  
George Crouse – Syngenta Crop Protection, LLC  
Nicholas Pogoncheff – PES Environmental, Inc.  
Dick Pfarrer – TIMET  
Enoe Marcum – WAPA