



3855 NORTH OCOEE STREET, SUITE 200, CLEVELAND, TN 37312
OFFICE: (423) 336-4000 FAX: (423) 336-4166

October 15, 2015

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: Third Quarter 2015 Quarterly Progress Report
Former Stauffer Chemical Company Facility ("Site")
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 activities performed as part of the Phase II Environmental Conditions Investigation (ECI), during the Third Quarter of 2015 at the Site. 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:

- On July 13, 2015, NDEP circulated a (unapproved) Technical Memorandum, prepared by NERT dated June 30, 2015 and titled, *Preliminary Evaluation of Chloroform Sampling Data, Nevada Environmental Response Trust (NERT) Site, Henderson Nevada*. The NERT report is under NDEP's review/comment/approval process. Olin, SMC/Syngenta Crop Protection, LLC (Syngenta), and Montrose Chemical Corporation of California (Montrose), collectively referred to as the "Companies", are awaiting receipt of all data collected in support of the NERT report. After receiving the data, Companies will be able to evaluate the NERT report and continue communications with NDEP.
- On behalf of Olin and SMC, the *Second Quarter 2015 QPR* was submitted to NDEP on July 15, 2015.
- On August 5, 2015, the Companies participated in a quarterly status call with NDEP to discuss status and progress of several ongoing Site activities. As discussed during the call, the Companies are preparing a draft process outline table to keep track of status to obtain administrative closure for Site Letter of Understanding (LOU) areas.
- The *Semi-annual Underground Injection Control (UIC) Report* and the *Semi-annual Operations Report* for the GWTS were submitted to NDEP on August 7 and August 14, 2015, respectively. NDEP approved the GWTS report on August 21, 2015.

- In response to NDEP's comment letter dated August 14, 2015, SMC/Syngenta submitted, on September 25, 2015 a *Data Usability Evaluation Summary Report (Revised), Vadose Zone Soil Datasets*, prepared for the former Stauffer Leach Beds (LOU No. 9) and Phosphoric Acid Pond and Three Trenches (LOU No.4).
- In a letter dated August 27, 2015, NDEP approved SMC/Syngenta's *Conceptual Site Model, Leach Beds (LOU No. 9) and Phosphoric Acid Pond and Three Trenches (LOU No.4)*, dated February 3, 2015.
- On September 23, 2015, a NDEP representative observed the quarterly sampling of the UIC system at the Site.
- In a letter dated October 9, 2015, NDEP approved SMC/Syngenta's *Conceptual Site Model (Revised) for Vadose Zone and Data Usability Evaluation Summary Report, ACD Drum Burial Waste Management Area (LOU No. 5)*, dated February 3, 2015.

In addition, the Companies are continuing their efforts to characterize/investigate Site LOU areas to achieve administrative closure.

Should you have any questions related to the information contained herein, please contact me at (423) 336-4540, via email at 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, Chief, BISC, 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
Ed Modiano – Montrose Chemical Corporation of California
Jay Steinberg – Nevada Environmental Response Trust
Allan DeLorme – Environ
John Pekala – Environ
Curt Richards – Olin Corporation
Chinny Esakkiperumal – Olin Corporation
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