



de maximis, inc.

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VIA E-MAIL

October 16, 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: Quarterly Progress Report - Third Quarter 2015
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 Third Quarter of 2015. This Quarterly Progress Report has been prepared in accordance with the Montrose Phase II Consent Decree Agreement, dated June 18, 1996.

- On July 6, 2015, Montrose submitted for NDEP's review the 2015 Annual Closed Ponds Post-Closure Monitoring Report. The report summarized the findings of the annual groundwater monitoring conducted at the Montrose closed ponds area per the post-closure monitoring plan.
- On July, 7, 2015, Montrose submitted for NDEP's review the Revised Data Usability Evaluation (DUE) for the CPA-FTF site assessment area.
- On July 13, 2015, NDEP submitted a 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.
- On July 15, 2015, Montrose submitted to NDEP the 2nd quarter ECI program progress report and updated Montrose Program Fact Sheet.
- On August 5, 2015, the OSSM Companies participated in a quarterly status call with NDEP to discuss ongoing administrative and technical project activities. During the status call, the OSSM Companies requested that NDEP provide electronic versions of the data contained in the NERT report titled "Preliminary Evaluation of Chloroform Sampling Data"

- On August 6, 2015, NDEP submitted to the OSSM Companies four excel spreadsheet files representing the electronic chloroform data from the Technical Memorandum titled Preliminary Evaluation of Chloroform Sampling Data.
- On August 11, 2015, the OSSM Companies followed up with NDEP by requesting the complete VOC data set along with a couple of additional items associated with the NERT Technical Memorandum Preliminary Evaluation of Chloroform Sampling Data.
- On August 13, 2015, NDEP submitted a letter to Montrose indicating that the 2015 Annual Closed Ponds Post-Closure Monitoring Report dated July 6, 2015 was acceptable with two comments being noted for the administrative record.
- On August 14, 2015, Montrose and NDEP corresponded in regards to the DCB Warehouse No Further Action (NFA) package that was previously submitted on April 23, 2015. In brief, NDEP had requested the tax parcel ID number for the DCB Warehouse in which Montrose provided on August 17, 2015.
- On August 20, 2015, Montrose representatives (Paul Sundberg and Edward Modiano) conducted a meeting with NDEP (James Dotchin and Carlton Parker) to discuss the transition of Montrose project activities. In brief, Paul Sundberg is retiring and Edward Modiano will be the consultant on behalf of Montrose.
- On August 27, 2015, NDEP submitted a letter to Montrose indicating that the revised DUE for the CPA-FTF was acceptable.
- On September 9 and 10, 2015, Montrose and NDEP further corresponded in regards to the DCB Warehouse NFA package. In brief, it has been determined that NDEP requires a legal description for the DCB Warehouse area in order to complete the NFA. Montrose is in the process of preparing the legal description.
- On September 18, 2015, Montrose submitted to NDEP for review the DNAPL Investigation Data Summary Report. The report summarized the findings of a DNAPL Mobility Test conducted at Well MC-MW-18 and provided an update of the DNAPL Monitoring and Purge program consisting of quarterly surveillance of 15 Middle Zone wells. The update includes new data generated through June of 2015.

The following provides a brief description of the Montrose ECI Program activities planned for the 4th Quarter 2015:

- The next NDEP and OSSM Companies quarterly status call to discuss ongoing administrative and technical project activities is scheduled for November 18, 2015.
- Complete the DUE and CSM documents for the Former Plant Site and submittal planned for the fourth quarter 2015.
- A CSM revision and a response to NDEP comments on the previous submitted Screening Risk Assessment for the Former Benzene Storage Tank Area intended for submittal to NDEP in the fourth quarter 2015.

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- Submit NFA package for the Former Underground Benzene Storage Tank Area to NDEP in November 2015.
 - Submit updated Montrose ECI program status table to NDEP.
 - 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 is ongoing.

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 3rd quarter of 2015. Notable among the 3rd quarter GWTS operations conducted by the Companies was the following:

- On July 8, 2015, NDEP submitted a letter to the OSSM Companies indicating that the April 24 letter documenting the completion of the extraction well C shutdown program and subsequent submittal of a letter report on June 30 responding to NDEP's comments were acceptable.
- On August 7, 2015, the Semi-annual Underground Injection Control (UIC) Report was submitted by *de maximis* on behalf of the OSSM Companies to NDEP.
- On August 14, 2015, *de maximis* on behalf of the OSSM Companies submitted to NDEP the 2015 Semi-Annual Operations Report for the Henderson Groundwater Treatment System.
- On August 21, 2015, NDEP submitted a letter to the OSSM Companies indicating that 2015 Semi-Annual Operations Report for the Henderson Groundwater Treatment System was acceptable with comments being noted for the administrative record

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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