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April 15, 2016

Mr. J. Carlton 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: First Quarter 2016 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 First Quarter of 2016 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:

- In January 2016, Pioneer implemented the NDEP-approved Vadose Zone Characterization Work Plan for Letter of Understanding (LOU) Areas 17 and 20. The investigation activities were observed by NDEP on January 19, 2016. As discussed with and agreed by NDEP, investigation of one of the LOU 17 ponds (i.e., former CAPD Pond 1) has been temporarily deferred due to the presence of several underground utility lines and process pipelines.
- On January 7, 2016, Pioneer provided details and clarifications to NDEP on several requested information for Pioneer-owned monitoring wells at the Site.
- On behalf of Olin and SMC, the *Fourth Quarter 2015 QPR* was submitted to NDEP on January 15, 2016.
- In a letter dated January 7, 2016, NDEP approved SMC/Syngenta Crop Protection, LLC (Syngenta)'s *Data Usability Evaluation Summary Report (Revised), Vadose Zone Soil Datasets, for the former Stauffer Leach Beds (LOU No. 9) and Phosphoric Acid Pond and Three Trenches (LOU No.4)*, dated September 25, 2015.
- On behalf of SMC/Syngenta, the following activities were performed and documents were submitted to NDEP during the reporting period:
 - In response to NDEP's Comments dated January 8, 2016, a *Revised Conceptual Site Model and Data Usability Evaluation Summary Report for Vadose Zone, BHC Cake Pile 3 & Former BHC Haul Route (LOU No. 12)* was submitted on February 12, 2016.

- *A Data Transmittal Report, Evaluation of Subsidence Locations in Vicinity of LOU Nos. 5 and 9* was submitted on February 25, 2016. The observed subsidence areas were backfilled (and observed by NDEP) on March 7, 2016.
- *A Conceptual Site Model and Data Usability Evaluation Summary Report for Former ACD Plant Areas (LOU Nos. 8, 10, & 12)* was submitted on March 31, 2016.
- On behalf of OSSM Companies (i.e., Olin, SMC/Syngenta, and Montrose Chemical Corporation of California), the following activities were performed and documents were submitted during the reporting period:
 - On March 1, 2016, the OSSM Companies participated in an annual meeting with NDEP to discuss status and progress of several ongoing Site activities.
 - The *Semi-annual Underground Injection Control, Semi-annual Operations, and Annual Air Emissions Summary* reports for the groundwater treatment system (GWTS) were submitted to respective agencies on February 4, February 15, and March 22, 2016, respectively.
 - *A Replacement Wells Installation report for GWTS Extraction Wells D3 and J2* was submitted on March 27, 2016.
 - In March 2016, a select set of GWTS extraction wells were redeveloped and the redevelopment activities were observed by NDEP. The redevelopment program is a routine event implemented by the Companies for effective operations of GWTS.
- On March 30, 2016, NDEP inspected the GWTS for RCRA compliance. No violations or corrective actions were noted by NDEP during the inspection.

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 dshare@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