



***de maximis, inc.***

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VIA E-MAIL

July 15, 2016

Mr. Chad Schoop, P.E.  
Bureau of Industrial Site Cleanup (BISC)  
Nevada Division of Environmental Protection (NDEP)  
2030 E. Flamingo Road, Suite 230  
Las Vegas, NV 89119

**Re: Quarterly Progress Report - Second Quarter 2016  
Environmental Conditions Investigation Program  
Former Montrose Facility - Henderson, Nevada**

Dear Mr. Schoop,

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 Second Quarter of 2016. This Quarterly Progress Report has been prepared in accordance with the Montrose Phase II Consent Decree Agreement, dated June 18, 1996.

- On April 14, 2016, Converse Consultants on behalf of Montrose conducted the annual groundwater sampling of four monitor wells associated with the Closed Ponds Area.
- On April 15, 2016, Montrose submitted to NDEP the 1st quarter 2016 Environmental Conditions Investigation (ECI) program progress report and the updated Montrose Program Fact Sheet.
- On April 15, 2016, NDEP submitted a letter to Montrose that transmitted Pay Request #81 for the period January 1 to March 31, 2016. Subsequently, Montrose reviewed and approved prior to the payment date of May 6, 2016.
- On June 3, 2016, Montrose submitted to NDEP the Human Health Risk Assessment (HHRA) Scoping Document for the Closed Pond and Former Tank Farm Areas (CPA-FTF).
- On June 9, 2016, Montrose submitted to NDEP the repackaged DNAPL Investigation Data Submittal.
- On June 27, 2016, Montrose and NDEP representatives conducted a teleconference call to discuss the CPA-FTF HHRA Scoping Document.
- During the period June 28 to 30, 2016 Montrose conducted the 2Q2016 DNAPL Monitoring and Purge Program. NDEP provided regulatory oversight during this event.

The following provides a brief description of the Montrose ECI Program activities planned for the 3<sup>rd</sup> Quarter 2016:

- Montrose anticipates receiving “No Further Action” designations from NDEP on the DCB Warehouse and Former Underground Benzene Storage Tank Areas.
- Montrose and NDEP representatives to continue discussions and working on the CPA-FTF HHRA.
- Montrose and NDEP representatives to conduct a meeting regarding the DNAPL Program.
- Complete the DUE and CSM documents for the Former Plant Site and submittal planned for the Third Quarter 2016.
- A CSM revision and a response to NDEP comments on the previously submitted Screening Risk Assessment for the Former Benzene Storage Tank Area intended for submittal to NDEP in the Third Quarter 2016.
- 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.

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 2<sup>nd</sup> quarter of 2016. Notable among the 2<sup>nd</sup> quarter GWTS operations conducted by the Companies was the following:

- On April 6, 2016, NDEP submitted a letter to the OSSM Companies that accepted the 4Q2015 GWTS Operations Report with several comments noted for the Administrative Record.
- On April 7, 2016, NDEP submitted comments to the DVSR associated with the 2015 Comprehensive Data Evaluation Report. As requested by NDEP, the OSSM Companies responded to the comments and provided a revised DVSR on May 6, 2016.
- On May 19, 2016, NDEP and OSSM Companies representatives conducted a teleconference call to discuss the schedule for the Groundwater Remedial Alternative Study (GW RAS). As a result of this call, the NDEP and OSSM Companies agreed that the GW RAS would be submitted by the end of the third quarter 2016.
- On June 1, 2016, representatives from NDEP and the OSSM Companies conducted the Quarterly Project Status Call to review the GWTS/Joint Programs and individual Company ECI Programs.
- On June 13, 2016, the OSSM Companies submitted a letter to NDEP requesting a modification to the data validation efforts associated with the annual site wide groundwater monitoring program. Subsequently, NDEP approved the OSSM Companies request on the same day.
- The OSSM Companies reviewed the NERT Chloroform Report during the 2<sup>nd</sup> Quarter 2016 and are in the process of preparing a response document for submittal to NDEP.

If you should have any questions or require additional information regarding the above contents, please contact me at 619-991-9074.

Sincerely,



Edward Modiano  
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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

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