



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

July 15, 2016

Mr. Chad R. 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: Second Quarter 2016 Quarterly Progress Report  
Former Stauffer Chemical Company Facility ("Site")  
NDEP Facility ID #H-000536 Pioneer/Stauffer  
Henderson, NV**

Dear Mr. Schoop:

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 Second 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 a letter dated April 6, 2016, NDEP approved OSSM Companies' (i.e., Olin, SMC/Syngenta, and Montrose Chemical Corporation of California) *Semi-Annual Operations Report, Groundwater Treatment System, July-December 2015, dated February 15, 2016*.
- On behalf of Olin and SMC, the *First Quarter 2016 QPR* was submitted to NDEP on April 15, 2016.
- In letters dated April 28, 2016, NDEP approved SMC/Syngenta Crop Protection, LLC (Syngenta)'s:  
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), dated February 12, 2016*; and b) *Data Transmittal Report, Evaluation of Subsidence Locations in Vicinity of LOU Nos. 5 and 9, dated February 25, 2016*.
- On behalf of SMC/Syngenta, the following documents were submitted to NDEP during the reporting period:
  - *A Design Report, BHC Cake Pile 3 Cover System* was submitted on April 7, 2016. The report was approved by NDEP on May 24, 2016.
  - *A letter report, Maintenance of Subsidence Features in Vicinity of LOU Nos. 5 and 9, dated April 14, 2016*, was submitted on June 2, 2016.
- On June 8, 2016, Pioneer met with NDEP and presented the January 2016 investigation results and proposed technical and regulatory paths forward for Letter of Understanding (LOU) Areas 17

and 20. As discussed and agreed during the meeting, Pioneer will prepare and submit a multiple-milestone report.

- On behalf of OSSM Companies, the following activities were performed:
  - In April 2016, the routine annual Site-wide groundwater monitoring was implemented.
  - In response to NDEP's comments dated April 6, 2016, a *Response to Comments on DVSR No. 47, Appendix B, 2015 Comprehensive Data Evaluation Report* was submitted on May 5, 2016. The DVSR was subsequently approved by NDEP on May 16, 2016.
  - On May 19, 2016, the OSSM Companies participated in a conference call with NDEP to discuss status and path forward for revising the groundwater remedy alternative study (RAS) report.

In addition, on July 11, 2016, *OSSM Companies Responses to the Technical Memorandum – Preliminary Evaluation of Chloroform Sampling Data, Nevada Environmental Response Trust Site (NERT)* was submitted. Based on the response submittal and subsequent discussions with NDEP, it is the understanding of the OSSM Companies that NDEP doesn't plan on approving the NERT Report.

With this understanding, and as discussed and agreed during the May 19, 2016 call, the OSSM Companies are in the process of finalizing the Groundwater RAS for submittal to NDEP by the end of the Third Quarter 2016.

- On June 1, 2016, the OSSM Companies participated in a routine quarterly conference call with NDEP to discuss status and progress of several ongoing Site activities.
- A *Request for Reduction in Data Validation Efforts* was submitted on June 13, 2016. The request was approved by NDEP on June 13, 2016.

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 [dmshare@olin.com](mailto:dmshare@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  
J. Carlton Parker, Supervisor, 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