

# Paul V. Sundberg

## Project Consultant

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July 15, 2015

Carlton Parker  
Nevada Division of Environmental Protection  
Bureau of Corrective Actions  
2030 E. Flamingo Road, Suite 230  
Las Vegas, NV 89119

**Re: Quarterly Progress Report - Second 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 Second 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 April 2, 2015, Montrose and the Stauffer site Companies provided resources to conduct a tour of the environmental project areas related to the former Montrose and Stauffer plant sites for the purpose of orientation of new NDEP personnel.
- Subsequent to receipt on April 15, Montrose reviewed NDEP's draft of a document entitled "*Up-gradient Groundwater Quality Technical Memorandum for TDS, Arsenic, and Perchlorate*".
- On April 23, 2015, Montrose submitted for NDEP's review a revised "*Data Usability Evaluation*" including a Project Summary and a request for a No Further Action designation for the former DCB Warehouse Area. The DUE document was approved by NDEP on May 21, 2015.
- On May 20, 2015, Montrose and the Stauffer site Companies participated in a quarterly conference call with NDEP to discuss the status and progress of ongoing site activities.
- On May 29, 2015, Montrose and the Stauffer site Companies submitted to NDEP for review a "*Response to Comments on the 2014 Comprehensive Groundwater Data Evaluation Report*". NDEP approved the submittal on June 11, 2015.

- On June 22, 2015 Montrose and the Stauffer site Companies submitted a revised “*DVSR No. 46, Site Wide Groundwater Monitoring Program – Annual 2014*” For NDEP’s review.
- During the second quarter, consultants for Montrose and the Stauffer site Companies completed the field sampling phase of the annual site-wide groundwater monitoring program.

As of the end of the 2<sup>nd</sup> quarter, Montrose and its consultants were working on the following programs or documents:

- Revision of the DUE for the CPA-FTF area originally submitted October 31, 2014. The document was submitted for review on July 7, 2015.
- A Data Usability Evaluation (DUE) document for the Former Plant Site (FPS) to accompany a CSM for submittal planned for the third 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 (FBST) intended for submittal to NDEP in the third quarter 2015.
- A package of information requested by NDEP to process a NFA for the Former Underground Benzene Storage Tank Area (FUBST), intended for submittal to NDEP in August 2015.
- Development of a Data Summary Report for the MC-MW-18 DNAPL mobility test, expected for submittal to NDEP by mid-August 2015.
- Development of a long-term access agreement 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.

While not directly part of the Phase II ECI program, per the NDEP approved Amended Closure/Post-closure Plan, Montrose consultants, submitted to NDEP on June 30 the 2015 annual report of post-closure monitoring for the closed ponds area.

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 2015. Notable among the 2<sup>nd</sup> quarter GWTS operations conducted by the Companies was the submittal of a letter report on April 24 documenting the completion of the extraction well C shutdown program, a subsequent submittal of a letter report on June 30 responding to NDEP’s comments on the well C shutdown program and the field startup of two replacement extraction wells serving the GWTS system.

Should you have any comments on this progress report, do not hesitate to call me.

Submitted by,

A handwritten signature in black ink that reads "Paul V. Sundberg". The signature is written in a cursive, flowing style.

Paul V. Sundberg  
Consultant to Montrose

Cc:

Joseph Kelly - Montrose - Bainbridge Island - via e-mail  
Kelly Richardson - Latham & Watkins - San Diego - via e-mail  
BMI Interested Parties via document distribution website