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VIA E-MAIL

October 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 - Third 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 programs at the former Montrose facility in Henderson, Nevada during the Third 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 July 15, 2016, Montrose submitted to NDEP the 3<sup>rd</sup> Quarter 2016 Environmental Conditions Investigation (ECI) program progress report and the updated Montrose Program Fact Sheet.
- Converse Consultants on behalf of Montrose submitted the Closed Ponds Area Annual Monitoring Report to NDEP on July 19, 2016. Subsequently, NDEP provided a letter to Montrose on July 29, 2016 which accepted the report.
- On August 2, 2016, Montrose submitted to NDEP the asbestos meeting materials in advance of the August 4, 2016 NDEP and Montrose call regarding the Human Health Risk Assessment (HHRA) for the Closed Pond Area and Former Tank Farm (CPA-FTF)
- On August 4, 2016, Montrose and NDEP representatives conducted a teleconference call to discuss the current status of the HHRA for the CPA-FTF.
- On August 18, 2016, NDEP submitted draft notes to Montrose regarding the HHRA CPA-FTF teleconference call conducted on August 4, 2016. Montrose reviewed the draft meeting notes and provided a response to NDEP on August 23, 2016.
- On August 29, 2016, NDEP submitted a letter to Montrose that provided a No Further Action Determination for the DCB Warehouse Area.
- On September 1, 2016, NDEP submitted to Montrose Pay Request #83 (Adjusted).

- On September 8, 2016, Montrose submitted payment to NDEP in regards to Pay Request #82.
- On September 9, 2016, NDEP submitted to Montrose a letter that accepted the repackaged MC-MW-18 Mobility Test and DNAPL Monitoring and Purge Program Data Submittal.
- On September 19, 2016, NDEP submitted to Montrose the final meeting notes from the HHRA CPA-FTF teleconference call conducted on August 4, 2016.
- Montrose conducted the 3Q2016 DNAPL purge and monitoring program during the period September 27 through 30, 2016.
- On September 29, 2016, Montrose and NDEP representatives conducted an in-person meeting to review the historical work conducted as related to the DNAPL program, NDEP comments, and path forward.

The following provides a brief description of the Montrose ECI Program activities planned for the 4<sup>th</sup> Quarter 2016:

- Based on conversations with NDEP, Montrose anticipates receiving comments regarding the Former Underground Benzene Storage Tank Area No Further Action Determination Package.
- Montrose will continue to prepare the CPA-FTF HHRA and it is anticipated that this document will be submitted to NDEP in 4<sup>th</sup> Quarter 2016.
- NDEP to submit meeting minutes from the Montrose/NDEP DNAPL meeting, which was conducted on September 29, 2016. Montrose to formally respond to NDEP's comments regarding the DNAPL Program.
- Montrose to conduct the 4<sup>th</sup> Quarter DNAPL Purge and Monitoring Program in December 2016.
- Complete the DUE and CSM documents for the Former Plant Site and submittal planned for the 4<sup>th</sup> 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 4<sup>th</sup> 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) and Joint Programs during the 3<sup>rd</sup> Quarter 2016. Notable among the 3<sup>rd</sup> Quarter GWTS operations/Joint Programs conducted by the Companies was the following:

- On July 11, 2016, the OSSM Companies submitted a letter to NDEP that provided a formal review of the statements, interpretations, and conclusions provided in the report prepared by Ramboll-Environ (June 2015) on behalf of the Nevada Environmental Remediation Trust

(NERT). The Ramboll Environ report was primarily associated with the assessment of the extent of chloroform in soil, soil gas, and groundwater at the NERT Site.

- On July 13, 2016, the OSSM Companies submitted a Notice of Dispute letter to the Nevada Office of the Attorney General in response to their letter dated June 29, 2016 regarding the investigations of the Beta and Western Ditch.
- On July 29, 2016, the OSSM Companies submitted a letter to NDEP, which responded to NDEP's March 25, 2016 letter regarding the Underground Injection Control Permit UNEV2007200 Parameter Non Compliance.
- On August 4, 2016, NDEP submitted a letter to the OSM Companies requesting an investigation and characterization of the Beta Ditch and Western Ditch. Additionally, NDEP requested that the OSSM Companies submit a work plan by October 3, 2016.
- On August 15, 2016, the OSSM Companies submitted to NDEP the Semi-annual Operations Report (January to June 2016) for the Groundwater Treatment System and Semi-annual UIC permit report.
- On August 19, 2016, the OSM Companies submitted a letter in response to the NDEP August 4, 2016 letter regarding the request to investigate, characterize, and submit a work plan in regards to the Beta Ditch and Western Ditch.
- On August 29, 2016, NDEP submitted a letter to the OSSM Companies that accepted the Semi-annual Operations Report for the Groundwater Treatment System report dated August 15, 2016.
- On September 7, 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 September 15, 2016, a teleconference call was conducted between the OSM representatives and new attorney general in regards to the Beta Ditches. It was agreed that a meeting would be set-up to further discuss the Beta Ditches.
- Throughout the reporting period, the OSSM Companies continued to work on the Groundwater RAS and 2016 Annual Site-wide Groundwater Monitoring Report. Both these reports will be submitted to NDEP in the 4<sup>th</sup> Quarter 2016.

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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