



de maximis, inc.

**1322 Scott Street
Suite 104
San Diego, CA 92106
(619) 546-8377
(619) 546-9980 FAX**

VIA E-MAIL

January 15, 2016

Mr. J. Carton 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: Quarterly Progress Report - Fourth 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 Fourth 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 October 16, 2015, Montrose submitted to NDEP the 3rd quarter Environmental Conditions Investigation (ECI) program progress report and the updated Montrose Program Fact Sheet.
- On October 23, 2015, Montrose submitted to NDEP the draft ECI Program and Summary Plan, which provided an outline for completing the work elements associated with the Letter of Understanding (LOU) areas.
- On November 4, 2015, NDEP submitted Pay Request #79 to Montrose.
- On November 5, 2015, the NDEP Bureau of Waste Management submitted a letter to Montrose indicating compliance with the October 22, 2015 RCRA Hazardous Waste Compliance Inspection.
- On December 16, 2015, Montrose submitted to NDEP an updated version of the draft ECI Program and Summary Plan.
- On December 17, 2015, NDEP and Montrose representatives conducted a teleconference call to discuss the path forward for the LOU work elements associated with the ECI Program and Summary Plan.

- On December 18, 2015, NDEP submitted to Montrose draft comments to DNAPL Investigation Data Summary Report, MW-MW-18 Mobility Test and Monitoring and Purge Program Update.

The following provides a brief description of the Montrose ECI Program activities planned for the 1st Quarter 2016:

- Montrose and NDEP to conduct a meeting to review and discuss the draft comments to the DNAPL Investigation Data Summary Report, MC-MW-18 Mobility Test and Monitoring and Purge Program Update.
- The NDEP and OSSM Companies to conduct the annual project meeting to discuss ongoing administrative and technical project activities on March 1, 2016. Montrose and NDEP will take the opportunity to meet during this timeframe to discuss the Montrose LOU work elements.
- Complete the DUE and CSM documents for the Former Plant Site and submittal planned for the first 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 first quarter 2016.
- Submit NFA package for the Former Underground Benzene Storage Tank Area to NDEP in first quarter 2016.
- The legal description to support the previously submitted DCB Warehouse NFA package will be sent to NDEP in January 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 4th quarter of 2015. Notable among the 4th quarter GWTS operations conducted by the Companies was the following:

- On December 1, 2015, NDEP and OSSM representatives conducted the quarterly conference call to review and update project activities.
- On December 11, 2015, Hargis + Associates, Inc. on behalf of the OSSM Companies submitted the 2015 Comprehensive Groundwater Data Evaluation Report.
- On December 15, 2015, NDEP submitted to OSSM the complete VOC data set associated with the NERT Chloroform Report. OSSM is now in a position to review and respond to NDEP regarding the NERT Chloroform Report.

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

Sincerely,



Edward Modiano
de maximis, inc.
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

Distribution Via email:

Carlton Parker, NDEP
James Dotchin, NDEP
Christa Smaling, NDEP
Kirk Stowers, Broadbent and Associates
Kurt Fehling, The Fehling Group
Jeff Gibson, AMPAC
Mark Paris, Basic Environmental Company
Lee Farris, Basic Environmental Company
Ranajit Sahu, Basic Environmental Company
Joe Kelly, Montrose Chemical Corporation of California
Kelly Richardson, Latham & Watkins
Jay Steinberg, NERT
Allan DeLorme, NERT
John Pekala, NERT
Curt Richards, Olin Corporation
Dave Share, Olin Corporation
Chinny Esakkiperumal, Olin Corporation
Charles Elmendorf, Stauffer Management Company
William Carson, Stauffer Management Company
Nick Pogoncheff, PES Environmental
George Crouse, Syngenta Crop Protection
Richard Pfarrer, TIMET
Enoe Marcum, WAPA