

Fact Sheet

Former Montrose Facility Henderson, Nevada

UPDATED JUNE 2017

The Montrose Chemical Corporation of California (Montrose) formerly operated a chemical manufacturing plant on various leased parcels located within what is now the Olin Chlor Alkali Products (Olin) facility in the southwestern portion of the BMI Complex, Henderson, Nevada. The Montrose plant ceased operations in 1983 and the manufacturing facilities were demolished. Various closure activities, including the closure of former evaporation ponds, continued until 1989.

Administrative History

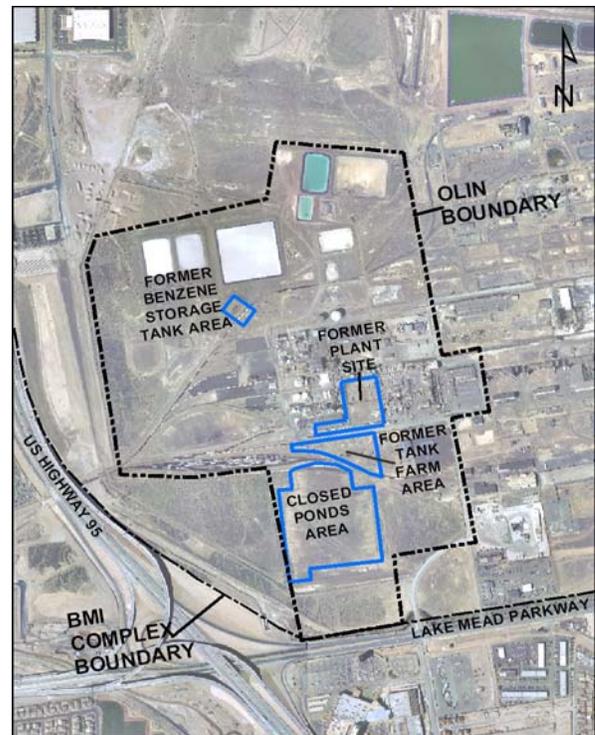
In 1991, Montrose entered into a Consent Agreement with the Nevada Division of Environmental Protection (NDEP) requiring Montrose to conduct a Phase I Environmental Conditions Assessment (ECA) of the former Montrose facility to identify areas of potential environmental concern. Montrose submitted its ECA report to NDEP in 1993.

In 1994, NDEP issued a Phase II Letter of Understanding (LOU) that outlined specific environmental issues to be investigated by Montrose. Subsequently, Montrose entered into another Consent Agreement with the NDEP in 1996 to conduct a Phase II Environmental Conditions Investigation (ECI) of areas of potential environmental concern at the former Montrose facility as identified in the LOU.

Site Investigations

Since completion of the 1996 Consent Agreement, Montrose has completed a series of soil and groundwater investigations at the former Montrose parcels under the oversight of the NDEP. This work was conducted during the time period of approximately 1996 to 2010 which resulted in the submittal of a series of reports and other correspondence to NDEP. These efforts defined areas of chemical presence at the former Montrose leased properties and laid the foundation for future preparation of risk assessments and/or close-out activities.

Also during the time period of approximately 2000 to 2008, Montrose in collaboration with parties involved in the Stauffer Management site (co-located on the Olin plant site), completed a series of additional groundwater and soil investigations which resulted in the publication of a Site Conceptual Model (CSM) document in July 2008. That comprehensive document defined the



Former Montrose Facility Locations

regional geology and hydrogeology, source area locations and the magnitude and mechanism of chemical migration at the combined sites. The CSM also identified outstanding data gaps for which further investigation was required.

Since 2008, further investigations have proceeded at targeted geographical areas. All activities tend to follow a process where the objectives of a program are defined with NDEP, a workplan that defines the work necessary to resolve the data gaps is submitted for NDEP's review, the field or research work is completed, and a report of the findings is published. Review of these reports by NDEP determines if the work has met the stated objectives or if a further phase of work is required.

Current Investigations and Document Development

As of June 2017, Montrose is in the process of finalizing investigation reports and data quality evaluations. Future work will include completion of human health risk assessments (HHRA's), evaluation of soil remedial alternatives (if remedial action is required), and/or close-out of the investigation process with a finding of No Further Action (NFA). Notable current work includes:

- The Risk Assessment for the Closed Pond/Former Tank Farm Area is currently under review by NDEP and some initial comments regarding the database associated with the risk assessment have been provided to Montrose.
- The NFA package for the Former Underground Benzene Storage Tank Area is currently under review by NDEP.
- Preparation of a CSM and Data Usability Evaluation (DUE) for the completed investigation work at the Former Plant Site (FPS) parcel was submitted to NDEP on July 3, 2017.
- Preparation of a CSM for the completed investigation at the Former Benzene Storage Tank Area and address NDEP comments regarding the Screening Risk Assessment is scheduled for submittal to NDEP in the 3rd Quarter 2017.
- The Quarterly DNAPL Purge and Monitoring Program will be conducted throughout 2017 with the 1st and 2nd quarter events being complete.

Groundwater Treatment System and Joint Programs

Montrose, Olin (formerly Pioneer), and Stauffer Management Company, LLC (SMC) collectively operate a groundwater remediation system (GWTS) near Warm Springs Road and continue to work jointly on groundwater programs. The GWTS was first installed in 1983 and consists of a series of extraction wells to capture chemicals migrating within groundwater moving downgradient from the former plant sites. The groundwater is treated by a combination of air-stripping and activated carbon adsorption to remove chemicals and the treated groundwater is then returned to the aquifer system. The GWTS operates continuously and routine ongoing evaluations are conducted to maintain the system's groundwater contaminant capture efficiency. GWTS reports, which include the groundwater capture analysis, are provided to NDEP on a semi-annual basis.

With respect to the joint groundwater programs, the revised draft Groundwater Remedial Alternatives Study (RAS) was submitted to NDEP on October 14, 2016. NDEP submitted draft comments to the RAS on February 7, 2017. The Companies met with NDEP in on July 12, 2017 to discuss the Groundwater RAS comments and path forward. Also, the OSM Companies continue to work with NDEP in regards to the Beta and Western Ditches in which NDEP approved the Companies the Sampling and Analysis Plan (SAP) on June 16, 2017. Based on the approval



of the Beta and Western Ditch SAP, the Companies will complete the field work by October 3, 2017 with the final report submitted by December 4, 2017.

Also, the 2017 Site-wide groundwater monitoring program was conducted in April 2017.

INFORMATION AND COMMUNITY INVOLVEMENT

NDEP oversees all aspects of the environmental work at the former Montrose facility. Additional information can be obtained from Chad Schoop (702-486-2850 ext. 248) at NDEP. Montrose welcomes community input to this project and recognizes the need to respond to community concerns. Previous reports related to the environmental work at the site can be obtained from NDEP's offices in Las Vegas or Carson City.