April 15, 2021

Mr. Chad R. Schoop, P.E.
Professional Engineer
Bureau of Industrial Site Cleanup (BISC)
Nevada Division of Environmental Protection (NDEP)
375 East Warm Springs Road, Suite 200,
Las Vegas, NV 89119

RE:  First Quarter 2021 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 (Pioneer), summarizes Phase II Environmental Conditions Investigation (ECI) activities performed at the Site during the First Quarter of 2021. This QPR is submitted to NDEP in accordance with the June 28, 1996 Phase II Consent Agreement, entered into by NDEP, Pioneer, and SMC. Notable activities performed during the reporting period include:

- On behalf of Pioneer and SMC, the Fourth Quarter 2020 QPR was submitted to NDEP on January 15, 2021.
- On March 9, NDEP issued a No Further Action (NFA) determination for the Historic Caustic Storage Area.
- On March 2, Pioneer advised NDEP of their anticipated plans to perform the remedial action implementation for Letter of Understanding (LOU) Areas 17 and 20 in 2022.
The OSSM Companies (Pioneer, SMC/Syngenta, and Montrose Chemical Corporation of California) performed the following notable activities during the reporting period:

- The OSSM Companies submitted the routine annual 2020 Comprehensive Groundwater Data Evaluation report on January 12, 2021. The report demonstrated that the results of the monitoring was consistent with past data and did not identify any significantly unusual or unexpected conditions or occurrences. The report also concluded that the current scope of the standardized monitoring plan provides an appropriate level of monitoring for groundwater conditions in the study area.

- On January 13, the OSSM Companies participated in a routine quarterly status call with NDEP regarding the status and progress of the ongoing Site activities.

- The Semi-annual Underground Injection Control (UIC) and Semi-annual Operations reports for the groundwater treatment system (GWTS) were submitted to the respective agencies on February 15. The reports demonstrated that the treatment system is operating effectively and is in compliance with the applicable standards/limits.

- On March 24, the Companies submitted letter responses to NERT and NDEP comments on the Companies’ Demonstration of the Fate and Transport of Trespass Site Related Chemicals report, submitted on May 8. The Companies’ review of the received data is ongoing.

- On March 29, the 2020 GWTS Annual Air Emissions Summary Report was submitted to the Clark County Department of Environment and Sustainability (DES; formerly Dept. of Air Quality [DAQ]). The report showed that the cumulative air emissions in 2020 were below the maximum allowable limits.

- During the reporting period, the Companies performed routine system maintenance including replacement of the pump in extraction well E3 on March 10.

- The Companies evaluated analytical laboratories to transition the Companies Joint Analytical programs. The lab currently utilized, Eurofins Calscience in Irvine, have informed the Companies that they will be discontinuing their State of Nevada certification as of July 31, 2021. The Companies are likely to select Asset Laboratories (Asset) in Las Vegas, Nevada, provided Asset can obtain the relevant and necessary interim certification(s).

- The GWTS continues to operate appropriately and effectively captures and contains impacted groundwater leaving the Site.

- The Companies are continuing efforts to characterize/investigate Site LOU areas to achieve NDEP administrative closure, or no further action determinations.
Should you have any questions related to the information contained herein, please contact me [(423) 336-4675; email: cesakkiperumal@olin.com], or an appropriate alternate Company representative.

Sincerely,

Chinny Esakkiperumal, PG, CEM (EM2409; Expires October 12, 2021)
Olin Corporation

Enclosures:
Former Stauffer Chemical Company Facility Fact Sheet
Selected Site Assessment Areas Status Update

cc:  James (JD) Dotchin, Chief, BISC, NDEP, Las Vegas, NV
     J. Carlton Parker, Supervisor, BISC, NDEP, Las Vegas, NV
     BMI Compliance Coordinator – NDEP Las Vegas, NV
     NDEP c/o Broadbent & Associates [2]
     Jeff Gibson – American Pacific Corporation
     Mark Paris; Lee Farris; Ranajit Sahu – Basic Remediation Company
     Joe Kelly; Ed Modiano – Montrose Chemical Corporation of California
     Jay Steinberg; Andrew Steinberg; Steve Clough – Nevada Environmental Response Trust
     Dave Share – Olin Corporation
     Charles Elmendorf; John-Paul Rossi – Stauffer Management Company LLC
     Darren Croteau – Terraphase Engineering, Inc.
     Peter Jacobson – Syngenta Crop Protection, LLC
     Nicholas Pogoncheff – PES Environmental, Inc.
     Dick Pfarrer – TIMET