January 24, 2007

Kenneth Massett
Shell Chemical Company
15536 River Road
Norco, LA 70079

Re: Ready for Reuse Determination
CS Metals of Louisiana, LLC; **AI # 32814**
7591 Highway 3214
Convent, Louisiana; St. James Parish

Dear Mr. Massett:

The Louisiana Department of Environmental Quality (LDEQ) and the United States Environmental Protection Agency (EPA) Region 6 together have determined that the CS Metals of Louisiana, LLC (CS Metals) Convent Facility (the "Property") is Ready for Reuse. A Ready for Reuse Determination is an acknowledgement that environmental conditions on the property are protective of human health and the environment based on its current and anticipated future use.

The Property, comprised of approximately 52 acres, is located on LA Highway 3214 in Convent (St. James Parish), Louisiana, approximately 0.9 miles southwest of LA Highway 3125. The Property, which was utilized to recover elemental metals from used catalyst from refining and petrochemical industries, was operated by CS Metals from 2000 until 2004.

With this Ready for Reuse Determination, LDEQ and EPA Region 6 agree that CS Metals has successfully conducted investigation and risk management activities and the environmental conditions at the Property are protective of human health and the environment based on its current and anticipated future use as a commercial and industrial operation. The Ready for Reuse Basis of Decision is provided as Enclosure 1 to this correspondence. Information concerning the current environmental conditions of the site and risk management activities to ensure protectiveness is summarized at Enclosure 2. Copies of relevant documents may be obtained from LDEQ at the addresses provided in Enclosure 3 to this correspondence.

If conditions on the property change, including, environmental conditions, land use, site receptors, and remedy performance, the current owner/operator will notify LDEQ and it may become necessary to perform additional remediation to ensure continuing protectiveness. The undersigned expressly reserve all rights and authorities to require future action by owners or operators if new or additional information become apparent that impacts this Ready for Reuse Determination, whether such information is known as of this date, or is discovered in the future.

Congratulations on this most noteworthy achievement!

Sincerely yours,

Karen Gautreaux
Deputy Secretary
Louisiana Department of
Environmental Quality

Troy Hill
Associate Director for RCRA
Multimedia Planning and
Permitting Division
EPA Region 6

Enclosures:
1. Ready for Reuse Basis of Decision
2. Environmental Conditions Table
3. Agency Contacts

cc: Imaging Operations - HW

ENCLOSURE 1

READY FOR REUSE BASIS OF DECISION
CS METALS OF LOUISIANA, LLC – CONVENT FACILITY

INTRODUCTION

The Louisiana Department of Environmental Quality (LDEQ) – Environmental Technology Division has determined that CS Metals of Louisiana, LLC's (CS Metals) Convent Facility (the "Property") is Ready for Reuse. The Property meets the criteria for a Ready for Reuse determination because the property has been remediated to the extent that the environmental conditions on the Property are protective based on its current or planned land use. A description of the Property's current conditions, background information and the results of remedial activities at the Property are summarized in the following sections.

DESCRIPTION AND HISTORY

The Ready for Reuse determination is being provided for the entire CS Metals Convent Facility. The property's legal description (as per the conveyance notification) is provided below:

A certain tract of land located in Sections 12, 13, and 14, Township 11 South, Range 4 East, St. James Parish, Louisiana, (Southeastern Land District, East of Mississippi River), which is more particularly described as follows:

For a POINT OF REFERENCE, commence at a concrete monument located at Section 15, Township 11 South, Range 4 East, St. James Parish, Louisiana, (Southeastern Land District, East of Mississippi River) on an easterly property line of Occidental Chemical Corporation, said concrete monument having Occidental Chemical Corporation Plant Grid coordinates of North 1428.90 and West 374.56; thence proceed along the westerly boundary of an existing Transcontinental Gas Pipe Line Corporation pipeline servitude on a bearing of North 24° 37' 46" West a distance of 1728.34 feet to a concrete monument marking the southeasterly corner of the herein described 52.697 acre tract of land, which is the POINT OF BEGINNING.

From said POINT OF BEGINNING, proceed on a bearing of North 90° 00' 00" West a distance of 2051.02 feet to a concrete monument marking a corner of said 52.697 acre tract; thence proceed on a bearing of North 00° 00' 32" West a distance of 27.11 feet to a concrete monument marking a corner of said 52.697 acre tract; thence proceed on a bearing of North 90° 00' 00" West a distance of 13.53 feet to a concrete monument marking a corner of said 52.697 acre tract; thence proceed on a bearing of North 00° 00' 32" West a distance of 1087.78 feet to a concrete monument marking the northwesterly corner of said 52.697 acre tract; thence proceed on a bearing of North 77° 46' 14" East a distance of 2476.52 feet to a concrete monument marking the northeasterly corner of

said 52.697 acre tract; thence proceed on a bearing of South 08° 34' 46" East a distance of 40.08 feet to a concrete monument marking a corner of said 52.697 acre tract; thence proceed on a bearing of South 77° 46' 14" West a distance of 1019.19 feet to a concrete monument marking a corner of said 52.697 acre tract; thence proceed on a bearing of South 24° 37' 46" East a distance of 1522.47 feet to the POINT OF BEGINNING.

The bearings and coordinates cited herein refer to the Occidental Chemical Corporation coordinate system based on Occidental Chemical Corporation Plant Grid Monument Number 1 and a 2 inch iron pipe located at the northeasterly corner of said Occidental Chemical Corporation property.

BACKGROUND

CS Metals built and operated a metals recovery facility for approximately four years. The site is located on LA Highway 3214 in Convent (St. James Parish), Louisiana, approximately 0.9 miles southwest of LA Highway 3125. The primary feedstock for this site was used catalyst from refining and petrochemical industries. The containment building and container storage areas were used to store bulk and containerized feedstock (primarily used catalysts), which were then fed into extraction and recovery processes, resulting in the recovery of elemental metals after hydrocarbons were stripped in the oil extraction area.

Some of the used catalysts stored in the containment building and container storage areas were listed hazardous wastes. These management units were regulated under the hazardous waste regulations of the State of Louisiana (implementing the federal Resource Conservation and Recovery Act, or RCRA, and the State's equivalent statutes). The waste management units operated under interim status.

CS Metals decided to terminate operations at the site, decommission and/or demolish the aboveground equipment and buildings, and transfer or sell the property to its former owner. Closure activities (as per the LDEQ-approved *Container Storage Areas and Containment Building Closure Plan - Amended,* Environmental Resources Management, March 31, 2005) began on November 7, 2005 and were completed on March 9, 2006.

A VRP application for the subject site was submitted to the LDEQ on June 2, 2006. A *Remedial Action Plan (RAP)* was then submitted to same on June 14, 2006. Following LDEQ approval of the RAP, the document was published in local newspapers (*The Enterprise* and *News Examiner*) for a period of 30 days from June 28, 2006 through July 27, 2006 as per the VRP public review and comment requirements. No comments were reported during the public comment period; therefore, the RAP was implemented on August 8, 2006. CS Metals requested a Certificate of Completion from the LDEQ, as defined by the VRP, and the Conveyance Notification, which restricts future land use to industrial in a *Remedial Action Report* dated September 8, 2006. The LDEQ issued a Certification of Completion to CS Metals on October 9, 2006.

CHRONOLOGY

Concurrent with and subsequent to site decommissioning and demolition activities, a preliminary site investigation and site investigation, respectively, were conducted to assess potential impacts from site operations to soil and shallow groundwater. The results of these investigations are summarized in the sections below.

Surface soil (i.e., 0-3 feet below ground surface (ft bgs)) samples were collected from seventeen (17) locations in the Process Area. No exceedances of Risk Evaluation/Corrective Action Program (RECAP) Screening Standards (SS) were reported by the laboratory in soil samples collected from these locations for volatile, semi-volatile, or TPH constituents. However, laboratory-reported concentrations of metal constituents exceeded RECAP SS from sample locations PAS-6, PAS-7, PAS-10, and PAS-14, as listed in Table 3 of the *Preliminary Site Investigation Report* (Environmental Resources Management, March 11, 2005). As previously noted, CS Metals delineated this area within a *Remedial Action Plan (RAP)* which was submitted to the LDEQ on June 14, 2006. The RAP was approved by the LDEQ, and implemented on August 8, 2006. The LDEQ issued a Certification of Completion to CS Metals on October 9, 2006.

Soil samples were collected in accordance with the LDEQ-approved *Site Investigation Work Plan* (Environmental Resources Management, September 22, 2005) to a general depth of 20 ft bgs at sixteen (16) locations in the Process Area and nineteen (19) sample locations outside the process area. No exceedances relative to Management Option-1 (MO-1) RECAP Standards (RS) were reported by the laboratory in soil samples collected from these locations for metal (except arsenic), volatile, semi-volatile, or TPH constituents. Arsenic was detected in 4 of 91 samples in excess of the MO-1 RS of 12 mg/kg. Reported arsenic concentrations ranged from 0.598 mg/kg at boring location UA-3 to 27.7 mg/kg at boring UA-13. However, soil samples for arsenic resulted in an average concentration of 4.33 mg/kg, which is significantly less than the MO-1 RS of 12 mg/kg. Based on infrequent detections of arsenic and an average concentration that is less than the background concentration (as per RECAP Section 2.13), LDEQ does not consider arsenic a constituent of concern. Soil analytical results from the site investigation are summarized in Table 3-2 of the *Site Investigation Report* (Environmental Resources Management, June 1, 2006).

Groundwater samples were collected from temporary piezometers screened from a general depth of 10 to 20 ft bgs at eight (8) locations in the Process Area and, in general, along the perimeter site fence line. No exceedances of MO-1 RS were reported by the laboratory in groundwater samples collected from those locations for metal, volatile, semi-volatile, or TPH constituents. Groundwater analytical results are summarized in Table 3-3 of the *Site Investigation Report* (Environmental Resources Management, June 1, 2006).

The scope of the remedial activities included the removal and disposal of affected soil and a concrete slab, where necessary, from an area proximal to surface soil sample location PAS-6. PAS-6 was collected during the Preliminary Site Investigation and the analytical results

reported elevated concentrations of molybdenum when compared to the limiting MO-1 RS (sample result of 696 mg/kg compared to a limiting RECAP MO-1 RS of 366 mg/kg). The lateral and vertical extent of affected soil in this area was then assessed during the site investigation. The results of the site investigation are listed in Table 3-2 of the *Site Investigation Report* (Environmental Resources Management, June 1, 2006). At each location (i.e., PAS-6A (12-14), PAS-6A (14-16), PAS-6B (12-14), PAS-6B (14-16), PAS-6C (16-18), PAS-6C (18-20), PAS-6D (16-18), and PAS-6D (18-20)), the analytical results reported concentrations of arsenic, molybdenum, vanadium, and TPH-D below their respective limiting MO-1 RS. In an attempt to further reduce the size of the excavation area proximal to PAS-6, additional samples were collected as part of a supplemental investigation conducted on or between May 15 and May 25, 2006. Analytical results from the supplemental investigation were included as Appendix A of the *Remedial Action Plan* dated June 14, 2006.

The results of the supplemental investigation also reported concentrations of molybdenum below the limiting MO-1 RS. Therefore, the size of the excavation area (and thus the scope of the voluntary remedial action as required by the VRP) was reduced. The depth of the excavation in this area was approximately 5 feet. No additional confirmation soil sampling was conducted following completion of the soil removal activities since the lateral and vertical extent of affected soil (i.e., soil with molybdenum concentrations greater than the limiting MO-1 RS) was delineated during past investigations. After removing the affected soil from the aforementioned excavation area, the material was transported to an appropriate landfill for disposal and the excavation was backfilled with unclassified soil fill.

The *Preliminary Site Investigation Report* (Environmental Resources Management, March 11, 2005) and the *Site Investigation Report* (Environmental Resources Management, June 1, 2006) reported no impacts to shallow ground water at the site from historical facility operations. In addition, no impacts to surface soils were reported with the exception of molybdenum in a small area proximal to sample location PAS-6. As mentioned above, a remedial action was then conducted and, as documented in the *Remedial Action Report* (Environmental Resources Management, dated September 8, 2006), all impacted media was subsequently removed and transported offsite to an appropriate landfill for disposal. The facility has been demolished and only concrete slabs remain. No constituents above their respective RECAP MO-1 standards remain onsite in surface soils or shallow groundwater.

REFERENCES

Relevant documents related to site investigations, closure activities, and remedial actions reside in the public record (available through LDEQ's Electronic Document Management System (EDMS). A list of relevant documents supporting this Ready for Reuse Determination is provided below:

- *Container Storage Areas and Containment Building Closure Plan - Amended,* Environmental Resources Management, March 31, 2005.

- *Preliminary Site Investigation Report*, Environmental Resources Management, March 11, 2005.

- *Site Investigation Report*, Environmental Resources Management, June 1, 2006.

- *Remedial Action Report*, Environmental Resources Management, September 8, 2006.

ENCLOSURE 2
ENVIRONMENTAL CONDITIONS TABLE – CS METALS CONVENT FACILITY

Site Name/ Site Number	Remedial Action Taken	Contaminants of Concern (COCs)	Cleanup Status	Cleanup Standards	Institutional Control(s)
Containment Building Area	Regulated unit clean-closed under LDEQ Hazardous Waste Regulations. Razed building. Concrete and soils excavated/removed from site.	COCs included Arsenic, Nickel, Vanadium, and TPH - Diesel Range. Max. levels remaining: Arsenic 6 ppm Nickel 19 ppm Vanadium 25 ppm TPH – Diesel 23 ppm	Closure completed. No further action required.	Underlying soils meet LDEQ residential soil screening standards under RECAP. RECAP limits: Arsenic 12 ppm Nickel 160 ppm Vanadium 55 ppm TPH - Diesel 65 ppm	Use limited to industrial land use only, by Conveyance Notice filed in St. James Parish deed records.
Feed Materials Storage Area	Regulated unit closed under LDEQ Hazardous Waste Regulations. Concrete storage surfaces cleaned.	COCs included Arsenic, Nickel, Vanadium, and TPH – Diesel Range. Max. levels remaining: Arsenic 8 ppm Nickel 40 ppm Vanadium 43 ppm TPH - Diesel 23 ppm	Closure completed. No further action required.	Underlying soils meet LDEQ industrial soil MO-1 RECAP screening standards. RECAP limits: Arsenic 12 ppm Nickel 1,500 ppm Vanadium 520 ppm TPH - Diesel 260 ppm	Use limited to industrial land use only, by Conveyance Notice filed in St. James Parish deed records.
Process and Non-Process Areas (excluding Containment Building and Feed Materials Storage Areas)	No remedial action required.	COCs included Arsenic, Molybdenum, Vanadium, and TPH – Diesel Range. Max. levels remaining: Arsenic * 28 ppm Molybdenum 9 ppm Vanadium 40 ppm TPH - Diesel 28 ppm	No further action required	Underlying soils meet LDEQ industrial soil MO-1 RECAP screening standards RECAP limits: Arsenic 12 ppm Molybdenum 366 ppm Vanadium 520 ppm TPH - Diesel 260 ppm	Use limited to industrial land use only, by Conveyance Notice filed in St. James Parish deed records.

*Only 4 soil samples taken during the facility investigation exceeded the RECAP soil screening level of 12 ppm. The average level of arsenic in soil samples was 4.33 ppm.

ENCLOSURE 2
ENVIRONMENTAL CONDITIONS TABLE – CS METALS CONVENT FACILITY

Site Name/ Site Number	Remedial Action Taken	Contaminants of Concern (COCs)	Cleanup Status	Cleanup Standards	Institutional Control(s)
Groundwater (sampled in Process Area and, generally, along site perimeter)	Groundwater classified as a non-drinking water source (class 3). No remedial action is required.	COCs included Arsenic, Molybdenum, Vanadium, and TPH – Diesel Range. Max. levels remaining: Groundwater: Arsenic 0.37 ppm Molybdenum 1.27 ppm Vanadium 2.07 ppm TPH-Diesel 0.31 ppm	No further action is required.	Groundwater meets the site-specific (MO-1, GW3) standard. RECAP limits: Groundwater: Arsenic 22 ppm Molybdenum 67 ppm Vanadium 114 ppm TPH-Diesel 1.0 ppm	Use limited to industrial land use only, by Conveyance Notice filed in St. James Parish deed records.
	For soil to groundwater migration pathway, no remedial action is required.	Max. levels remaining: Soils: Arsenic 28 ppm Molybdenum 9 ppm Vanadium 40 ppm TPH-Diesel 28 ppm	No further action is required.	RECAP limits: Soil to Groundwater migration: Arsenic 100 ppm Molybdenum 366 ppm Vanadium 520 ppm TPH-Diesel 260 ppm	

ENCLOSURE 3

AGENCY CONTACTS

For a copy of the administrative record providing detailed information regarding environmental conditions at the CS Metals Convent Facility (the "Property"), please contact:

Louisiana Department of Environmental Quality
Public Records Center
Galvez Building, Room 127
602 North Fifth Street
Baton Rouge, LA 70802
(225) 219-3168

For questions regarding the environmental conditions described in the Ready for Reuse Basis of Decision for the Property, please contact:

Mr. Carey Dicharry
Environmental Technology Division
Office of Environmental Assessment
Louisiana Department of Environmental Quality
Post Office Box 4314
Baton Rouge, LA 70821-4314
(225) 219-3410

or

Mr. Kenneth Massett
Shell Chemical Company
15536 River Road
Norco, LA 70079
(504) 465-7262