



October 31, 2006

Mr. Earl Hayden
Shell Chemical LP
One Shell Plaza
910 Louisiana Street
Houston, TX 77002-4916

RE: Ready for Reuse Determination
Shell Chemical LP – Taft Facility; **AI # 583**
Hahnville, St. Charles Parish

Dear Mr. Hayden:

The Louisiana Department of Environmental Quality (LDEQ) and the United States Environmental Protection Agency (EPA) Region 6 together have determined that the Shell Chemical LP – Taft 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 sixteen (16) acre facility is located at Hahnville, St. Charles Parish, Louisiana, and was developed in 1972 as a polybutylene bulk pellet manufacturing plant. The facility was operated by Shell from 1977 until its closure in 2002. A Louisiana Risk Evaluation/Corrective Action Program (RECAP) assessment of releases of Dowtherm G™ (a heat transfer fluid) at the property was conducted, and corrective action for the constituents of this product was implemented to meet industrial use RECAP standards. The Remediation Services Division of the LDEQ granted the facility a determination of No Further Action At This Time (NFA-ATT) on August 31, 2006.

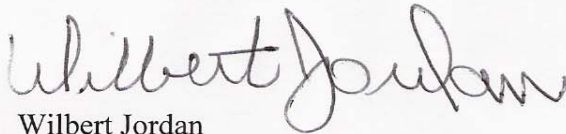
With this Ready for Reuse Determination, LDEQ and EPA Region 6 agree that Shell Chemical LP – Taft Facility has successfully conducted investigation and risk

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 letter, and a copy of the NFA-ATT is provided as Enclosure 2. Copies of relevant documents may be obtained from LDEQ or the facility at the addresses in Enclosure 3 to this letter.

If conditions at the facility 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 comes to light 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,



Wilbert Jordan
Assistant Secretary,
Office of Environmental Assessment
Louisiana Department of
Environmental Quality



Carl E. Edlund, P.E.
Director, RCRA
Multimedia Planning and
Permitting Division
EPA Region 6

Enclosure 1: Ready for Reuse Basis of Decision

Enclosure 2: NFA-ATT

Enclosure 3: Agency and Industry Contacts

c: Imaging Operations - SW

ENCLOSURE 1

READY FOR REUSE BASIS OF DECISION SHELL CHEMICAL LP, TAFT, LOUISIANA

1.0 INTRODUCTION

The Louisiana Department of Environmental Quality – Environmental Technology Division (LDEQ – ETD) has determined that Shell Chemical L P – Taft Facility, (Shell Chemical) is Ready for Reuse. The Taft facility meets the criteria for a Ready for Reuse determination because the property has been remediated to the extent that the environmental conditions are protective based on its current or planned land use. A description of the current site conditions, background information, and the results of remedial activities at the site are summarized in the following sections.

2.0 SITE DESCRIPTION AND SITE HISTORY

The former Shell Chemical Taft plant is located approximately 1 mile south of the Mississippi River in St. Charles Parish near Taft, Louisiana. The Site Location Map is provided as Figure 1. The Taft plant produced polybutylene in bulk pellet form from 1972 through 2002, and was operated by Shell from 1977 until its closure. Surface releases of Dowtherm GTM (a heat transfer fluid) were reported and site investigations and remediation focused on constituents of this product. A RECAP assessment of the property was conducted and corrective action was implemented to meet industrial use RECAP standards. The Site Plot Plan with Soil Borings, Well Locations, and Excavation Areas is provided as Figure2. The Remediation Services Division of the LDEQ granted the facility a determination of No Further Action At This Time (NFA-ATT) on August 31, 2006. A copy of the NFA-ATT is provided as Enclosure 2.

Although structures from historical industrial use are present at the site, the site is currently idle. In the future, the site will continue to be designated for industrial use. A conveyance notice was filed on August 14, 2006 in the St. Charles Parish Clerk of Court's Office following completion of remediation activities that identifies the future site land use as industrial. Additionally, the notice was filed in the St. Charles Parish mortgage records on August 22, 2006, as the site was closed under the solid waste

regulations of Title 33 of the Louisiana Administrative Code. Conveyance information is provided with the NFA-ATT in Enclosure 2.

3.0 ASSESSMENT, RISK CHARACTERIZATION, AND REMEDIAL ACTIONS

Soil and groundwater assessments at the former Taft Plant were conducted to address potential groundwater impacts of Dowtherm GTM. A chronological list of corrective action activities including site assessment, risk characterization, and remedial actions is summarized as follows:

- In the mid-1980's, Shell installed 20 shallow groundwater assessment wells to determine if the component constituents of Dowtherm GTM had impacted groundwater underlying the site. Groundwater samples from these wells have been collected and analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOC), and semi-volatile organic compounds (SVOC) since 1988.
- In 1990, Shell conducted a Phase I assessment to assess further the distribution of Dowtherm GTM, SVOCs, and TPH in soils. Soil borings were drilled to a depth of 50 feet below ground surface and the previously installed monitoring wells were gauged and sampled.
- In 1992, Shell conducted a Phase II assessment to delineate the extent of site constituents in shallow and deep groundwater. This included an evaluation of the hydrogeologic conditions influencing the occurrence and migration of constituents in groundwater and soil. As a result of this investigation, an Interim Measures Plan was submitted to the LDEQ that described the assessment results to date and provided a plan to address the presence of residual DNAPL observed in site monitoring wells (Woodward-Clyde, 1994).

The plan called for the thickness of DNAPL to be gauged on a semiannual basis. If DNAPL were encountered, the DNAPL was removed with a bailer and disposed of in accordance with regulatory requirements. DNAPL gauging and recovery was performed on a quarterly basis until 2003.

- A risk assessment report was prepared in 1993 to evaluate the potential risks due to industrial exposure to chemicals detected on site. The calculated risks were below the USEPA target risk range of 10^{-4} to 10^{-6} for incremental cancer risk and less than 1 for non-carcinogenic risks.
- In January 1998, Shell submitted a Risk-Based Corrective Action (RBCA) Plan for the site. The submittal was consistent with the LDEQ Draft RBCA program. The RBCA Plan concluded that groundwater impacts did not require further corrective action.
- In September 2003 and April 2004, Shell provided an updated RECAP assessment and addendum, respectively, to LDEQ in response to LDEQ comments on previous submittals (URS, 2003; GeoSyntec 2004). The RECAP Addendum included a DNAPL Source Characterization and Recovery Plan to improve the characterization and delineation of the soil residual DNAPL source. LDEQ provided a conditional approval of the RECAP addendum requesting that additional soil and groundwater sampling be included in the DNAPL Source Characterization and Recovery Plan.
- In 2005, a soil investigation in the vicinity of wells with measurable DNAPL (MW-5, MW-11, and MW-19) was conducted to refine the delineation of residual DNAPL in soil. In addition, all monitoring wells were gauged for the presence of DNAPL and a subset of existing wells and a temporary well located between MW-11 and MW-19 were sampled for VOCs and SVOCs.

A DNAPL gauging and recovery program was also conducted during 2005. On a quarterly basis, DNAPL was routinely recovered from only three shallow monitoring wells: MW-5, MW-11, and MW-19. The recovery amounts were documented and reported to LDEQ.

The results from these sampling programs indicated that DNAPL in groundwater and saturating the soil in the area of the three wells with DNAPL (MW-5, MW-11, and MW-19) was the sole medium at the site that exceeded site RECAP standards.

- In 2006, an investigation was conducted in the immediate vicinity of the above mentioned wells to refine the residual DNAPL delineation in the shallow-zone groundwater. The results of this investigation were used to identify the soils to be excavated for site remediation. The excavation was conducted in July 2006 and documented in the DNAPL Remediation Report (GeoSyntec, 2006c).

In August of 2006, Shell submitted conveyance notification documentation to the St. Charles Clerk of Court's office to maintain the designation of industrial/commercial use at the property and to indicate that closure was completed under the solid waste regulations. The Remediation Services Division of the LDEQ granted the facility a determination of No Further Action At This Time (NFA-ATT) on August 31, 2006.

4.0 CHEMICALS OF CONCERN AND SUMMARY OF SITE CONDITONS

Previous investigations and assessment reports (RECAP September 18, 2003 Addendum [GeoSyntec, 2004], and DNAPL and Residual COC Characterization Report [GeoSyntec, 2005]) demonstrated that residual concentrations of COCs in soil and groundwater in areas that do not contain residual DNAPL are below Management Option 1 (MO-1) RECAP standards and do not present an unacceptable risk to human health or the environment. The LDEQ-approved MO-1 RECAP standards presented in the RECAP reports assume commercial/industrial use at the site. The July 2006 remediation activities, which consisted of excavation in the areas of monitoring wells MW-5, MW-11, and MW-19, resulted in the removal of all media exceeding the MO-1 standards. Residual concentrations of site COCs that exceed residential standards, along with the sampling location and the maximum reported concentration remaining on-site, are summarized in Table 1.

5.0 SUPPORTING DOCUMENTATION

A summary of relevant documents related to site investigation, risk assessment, and remediation activities at the Shell Taft Facility is provided in Table 2. Directly relevant documents are identified in the References section below.

6.0 REFERENCES

- GeoSyntec. 2006a. Groundwater DNAPL Delineation Work Plan. Submitted on behalf of Shell Chemical LP, March 2006.
- GeoSyntec. 2006b. Groundwater DNAPL Delineation Report. Submitted on behalf of Shell Chemical LP, May 2006.
- GeoSyntec. 2006c. DNAPL Remediation Report. Submitted on behalf of Shell Chemical LP, August 2006.
- GeoSyntec. 2005. DNAPL and Residual COC Characterization Report. Submitted on behalf of Shell Chemical LP, May 2005.
- GeoSyntec. 2004. RECAP September 18, 2003 Report Addendum. Submitted on behalf of Shell Chemical LP, July 2004.

LIST OF TABLES

Table 1: Summary of Constituents Remaining at Site

Table 2: Document Summary - Shell Taft

Table 1
Summary of Constituents Remaining at Site

Compound	Units	Maximum Concentration Remaining On-Site	Location	RECAP MO-1 Standard
¹SOIL				
Diesel range organics	mg/kg	3200	MW5-CS2	10000
[#] Biphenyl phenyl ether	mg/kg	160	MW19-CS4	1100
[#] Diphenyl ether	mg/kg	580	MW5-CS4	1100
²GROUNDWATER				
Diesel range organics	mg/L	4.62	SW-5	5280
Gasoline range organics	mg/L	0.555	MW-15	6820
Biphenyl phenyl ether	mg/L	0.61	MW-10	21
Diphenyl ether	mg/L	0.0737	MW-13	21
Di-isopropyl ether	mg/L	0.345	MW-15	2420
Bis(2-ethyl-hexyl)phthalate	mg/L	0.018	DW-01	0.07

Notes:

mg/kg = milligrams per kilogram

mg/L = milligrams per liter

¹ Maximum detected concentration of soil is based on analytical results for site borings that were not excavated as part of remedial activities.

^{*} Maximum concentration allowable under RECAP

[#] MO-1 standard based on soil saturation value.

² Maximum detected concentration reported in most recent sampling of site monitoring wells in which DNAPL was not observed. MO-1 standards based on GW-3 non-drinking water groundwater classification.

Table includes constituents with concentrations that exceeded published RECAP non-industrial screening standards.

Table 2
Document Summary - Shell Taft

Date	Classification	Author	Document Title/Description	Media/CD#	EDMS Doc#
1989	Report	Law	<i>Preliminary Site Assessment - Shell Chemical Company Taft, Louisiana</i>	Unavailable	Unknown
1993	Report	Woodward-Clyde	<i>Human Health Risk Assessment - Shell Chemical Company Taft, Louisiana</i>	Unavailable	Unknown
3/22/1990	Notes	LDEQ	Notes by Steve Hanson of LDEQ re: telephone conversation w/ Shell notifying LDEQ of Dowtherm release at Taft plant	2	1649056
4/4/1990	Letter	Shell	Confirmation of verbal notification of Dowtherm release at Taft plant	2	1649050
May-90	Report	Ecotech	<i>Subsurface Soil Investigation of the Polybutylene Plant Taft, Louisiana</i> (only report cover page included in NDMS files)	2	1649047
May-90	Report	Ecotech	<i>Subsurface Soil Investigation of the Polybutylene Plant Taft, Louisiana</i>	Hard copy	1654697
5/3/1990	Letter	Shell	Review of 3/23/90 telephone conversation w/ LDEQ	2	1649043
7/2/1990	Letter	Shell	Summary of 6/27/90 meeting with LDEQ	2	1649031
8/13/1990	Letter	LDEQ	Phase II assessment requested for additional horizontal and vertical delineation	2	8295134
9/21/1990	Report	Shell	Report in letter form re: Soil & groundwater contamination delineation, saturated zone characterization, and risk/exposure assessment. Contains recommendations for further delineation activities.	2	1649023
1/8/1991	Letter	LDEQ	Conditional approval of Phase II Subsurface Assessment Plan granted	2	1649020
4/22/1991	Letter	Shell	Proposal to revise sampling requirements dictated by LDEQ in letter dated 1/8/91	2	1649018
2/21/1992	Letter	LDEQ	Outline of previous conditional approval stipulations for Phase II Subsurface Site Assessment	2	1649014
2/21/1992	Letter	Shell	Request for written confirmation of Phase II Site Assessment proposal	2	1649016
2/10/1993	Report	Woodward-Clyde	Final Report: <i>Phase II Groundwater and Soil Assessment</i>	2	1654023
6/17/1993	Letter	Shell	Summary of 1990 Phase II assessment	2	1648973
6/19/1993	Letter	Woodward-Clyde	Notification of commencement of well installation activities	2	1648992
10/26/1993	Letter	LDEQ	Additional plume delineation of DNAPL required before corrective action can be considered	2	1648972
1/19/1994	Letter	Shell	Clarification of Phase II Groundwater and Soil Assessment of June 1993	2	1657170
4/28/1994	Letter	Shell	Groundwater monitoring summary 1986-1990	2	1657142
5/24/1994	Inspection report form	LDEQ	GWPD NAPL monitoring inspection	2	1657133
Jun-94	Report	Woodward-Clyde	Final Report: <i>Risk/Exposure Site Management Plan</i> . Describes the groundwater monitoring program for the Shell - Taft facility.	2	1654797
6/1/1994	Letter	Shell	Description of monitoring well construction	2	1657127
Jun-94	Report	Woodward-Clyde	<i>Interim Measures Plan - Shell Chemical Company Taft, Louisiana</i>	Hard copy	1654787

Table 2
Document Summary - Shell Taft

Date	Classification	Author	Document Title/Description	Media/CD#	EDMS Doc#
4/24/1995	Letter	LDEQ	Approval for installation of 2 perimeter monitoring wells	2	1657110
5/11/1995	Letter	Woodward-Clyde	Notification of field work dates	2	1657109
5/24/1995	Inspection report form	LDEQ	Summarizes GWPD NAPL monitoring meeting with Shell and consultants	2	1657107
Nov-95	Report	Woodward-Clyde	Final Report: <i>Risk/Exposure Site Management Program Semiannual Groundwater Monitoring Report, June 1995 Monitoring Event</i>	2	1646820
5/29/1996	Inspection report form	LDEQ	GWPD NAPL monitoring inspection	2	1657102
6/3/1996	Report	Woodward-Clyde	Final Report: <i>Risk/Exposure Site Management Program Semiannual Groundwater Monitoring Report, November-December 1995 Event</i>	2	1654298
6/16/1997	Inspection report form	LDEQ	GWPD NAPL monitoring inspection	2	1657075
8/6/1997	Inspection report form	LDEQ	GWPD NAPL monitoring inspection	2	1657094
6/25/1998	Inspection report form	LDEQ	GWPD NAPL monitoring inspection	2	1657080
6/12/2000	Inspection report form	LDEQ	Groundwater inspection report	2	9890786
11/9/2000	Letter	Shell	90-day extension requested for response to 9/1/00 NOD for Risk Based Corrective Action Plan dated 1/21/98	2	13970796
11/30/2000	Letter	LDEQ	90-day extension requested 11/9/00 granted	2	14779469
6/28/2001	Letter	Shell	Additional 30 day requested extension for response to 9/1/00 NODs for RCBA Plan dated 1/21/98	2	19258776
7/12/2001	Letter	LDEQ	30 day extension requested 6/29/01 granted	2	19444822
8/14/2001	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana; Vol II</i>	2	20070283
8/14/2001	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana; Vol I part 1</i>	2	20071508
8/14/2001	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana; Vol I part 2</i>	2	20071614
8/14/2001	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana; Vol unknown</i>	2	20072131
1/8/2003	Letter	Shell	Response to LDEQ notice of deficiency for the RECAP Risk Based Corrective Action Plan dated 1/21/98; Risk Exposure Site Management Plan.	1	24874644
5/27/2003	Letter	Shell	Request for 30 day extension to address deficiencies in NOD received 9/1/00 for Risk Based Corrective Action Plan dated 1/21/98	1	26992328
8/21/2003	Letter	LDEQ	Additional 30 day extension for NOD response requested by Shell of 5/27/03 granted	1	29063958
9/18/2003	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana. vol. II of III; Section 1</i>	1	28593747
9/18/2003	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana. vol. II of III; Section 2</i>	1	28596596
9/18/2003	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana. vol. II of III; Section 3</i>	1	28599241

Table 2
Document Summary - Shell Taft

Date	Classification	Author	Document Title/Description	Media/CD#	EDMS Doc#
9/18/2003	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana. vol. II of III; Section 4</i>	1	28601885
9/18/2003	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana. vol. III of III; Section 1</i>	1	28934327
9/18/2003	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana. vol. III of III; Section 2</i>	1	28934673
9/18/2003	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana. vol. III of III; Section 3</i>	1	28935023
9/18/2003	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana. vol. III of III; Section 4</i>	1	28935466
9/18/2003	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana. vol. I of III; Section 1</i>	1	29127246
9/18/2003	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana. RECAP report vol. I of III; Section 2</i>	1	29127624
9/18/2003	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana. vol. I of III; Section 3</i>	1	29128249
9/18/2003	Report	URS	<i>Risk Evaluation/Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish Louisiana. vol. I of III; Section 4</i>	1	29128535
7/9/2004	Report	GeoSyntec	<i>RECAP September 18, 2003 Report Addendum Shell Taft Plant St. Charles Parish, Louisiana</i>	1	31948656
11/10/2004	Letter	LDEQ	7/9/04 responses to NODs for 9/18/03 RECAP Addendum report approved	2	32499775
2/23/2005	Letter	Shell	Notice to LDEQ of commencement of field work for DNAPL Source Characterization and Recovery Plan Addendum	1	32685029
3/8/2005	Letter	LDEQ	Conditional approval of DNAPL Source Characterization and Recovery Plan Addendum	1	32725545
5/27/2005	Report	GeoSyntec	<i>DNAPL & Residual COC Characterization Report, Shell Chemical LP - Taft, Louisiana</i>	1	32889775
8/11/2005	Report	Shell	<i>DNAPL Gauging and Recovery Report - 2nd Quarter 2005, Shell Chemical LP - Taft, Louisiana</i>	1	33253007
1/23/2006	Report	Shell	<i>DNAPL Gauging and Recovery Report - 4th Quarter 2005, Shell Chemical LP - Taft, Louisiana</i>	1	33849849
3/17/2006	Letter	LDEQ	Summary of ready-for-reuse meeting	2	34082500
3/30/2006	Letter	LDEQ	Groundwater DNAPL Delineation Workplan dated 3/30/06 approved	2	34100734
5/10/2006	Report	GeoSyntec	<i>Groundwater DNAPL Delineation Report</i>	3	--
5/17/2006	Letter	LDEQ	Conditional Approval of <i>Groundwater DNAPL Delineation Report and Corrective Action Work Plan</i>	3	--
5/22/2006	Letter	GeoSyntec	Plug and Abandonment - Supporting Information	3	--
6/2/2006	Meeting Attendance Record	LDEQ	Meeting to discuss DNAPL Corrective Action, Conveyance Notification/NFA, Water Permit, and Potential VRP	3	--
6/6/2006	Letter	LDEQ	Conveyance Notice Requirements for No Further Action	3	--
8/3/2006	Report	GeoSyntec	Plug and Abandonment Report	3	

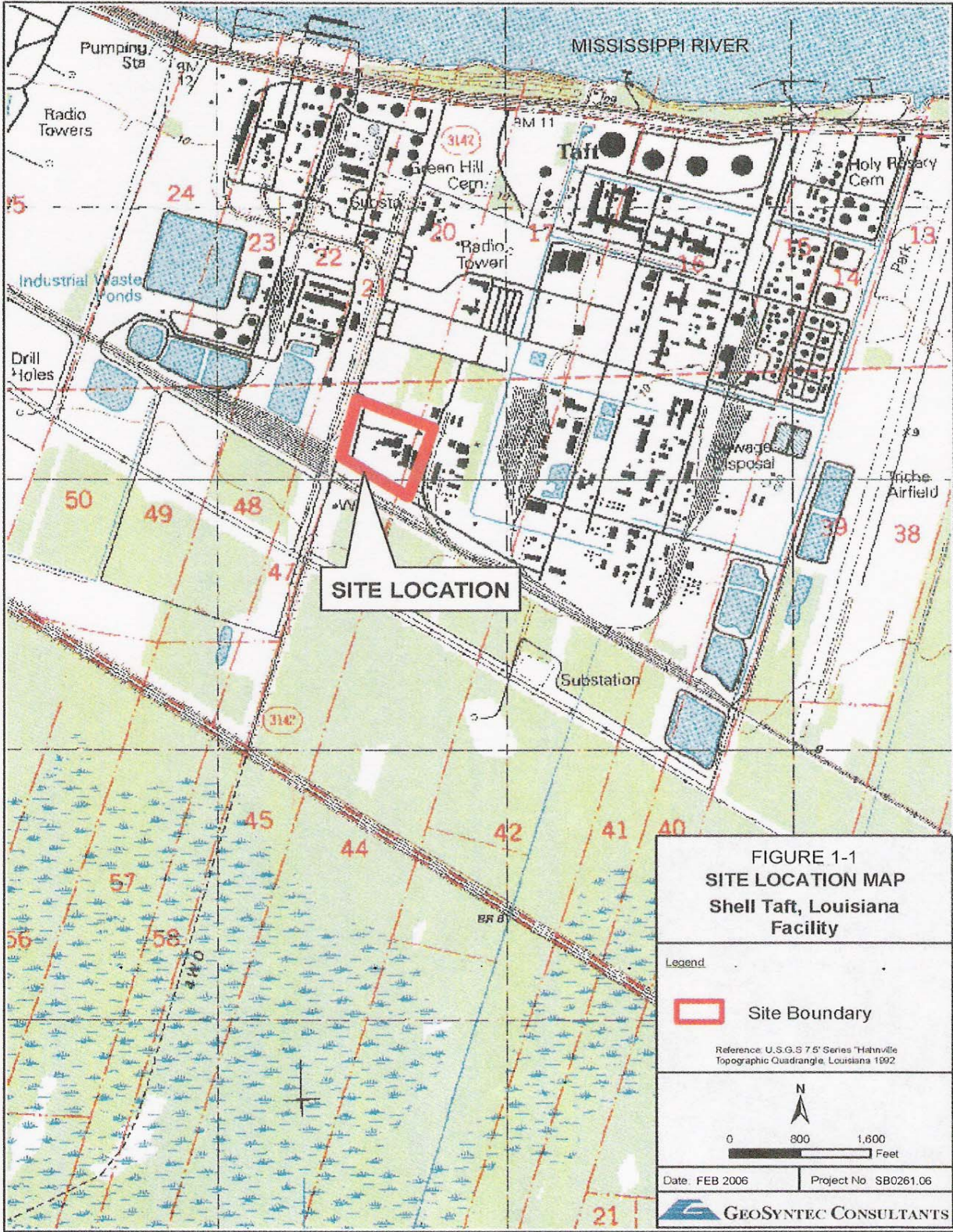
Table 2
Document Summary - Shell Taft

Date	Classification	Author	Document Title/Description	Media/CD#	EDMS Doc#
8/14/2006	Report	GeoSyntec	DNAPL Remediation Report	3	
	Figure	Woodward-Clyde	Monitoring well locations	2	18194265
	Figure	Woodward-Clyde	Site location	2	18194389
	Figure	Woodward-Clyde	Soil sampling locations	2	18194391
	Figure	Woodward-Clyde	Potentiometric surface map	2	18194388
	Figure	Woodward-Clyde	Potentiometric surface map	2	18194399
	Figure	Woodward-Clyde	Shallow zone ether isopac	2	18194400

LIST OF FIGURES

Figure 1: Site Location Map, Shell Chemical LP – Taft Plant

Figure 2: Site Plot Plan with Soil Borings, Well Locations, and Excavation Areas



**FIGURE 1-1
SITE LOCATION MAP
Shell Taft, Louisiana
Facility**

Legend

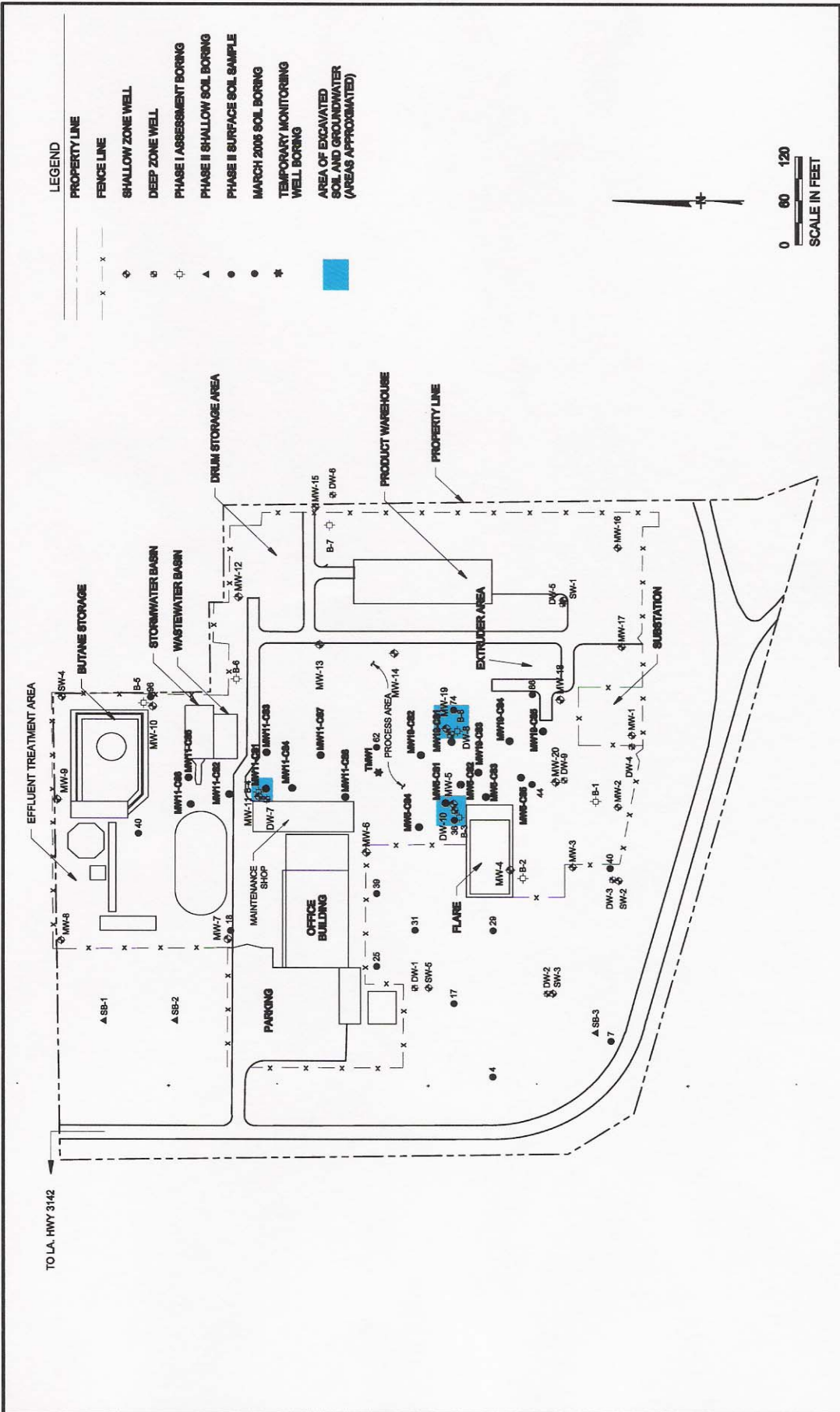
Site Boundary

Reference: U.S.G.S 7.5' Series "Hahnville"
Topographic Quadrangle, Louisiana 1992

N
0 800 1,600
Feet

Date: FEB 2006 Project No: SB0261.06

GEOSYNTEC CONSULTANTS



TO LA HWY 3142

- LEGEND**
- X --- X --- PROPERTY LINE
 - - - - - FENCE LINE
 - ⊕ SHALLOW ZONE WELL
 - ⊕ DEEP ZONE WELL
 - ⊕ PHASE I ASSESSMENT BORING
 - ⊕ PHASE II SHALLOW SOIL BORING
 - ⊕ PHASE II SURFACE SOIL SAMPLE
 - MARCH 2009 SOIL BORING
 - TEMPORARY MONITORING WELL BORING
 - AREA OF EXCAVATED SOIL AND GROUNDWATER (AREAS APPROXIMATED)



0 60 120
SCALE IN FEET

GeoSyntec Consultants
 SITE PLOT PLAN WITH SOIL BORINGS, WELL LOCATIONS,
 AND EXCAVATION AREAS
 SHELL TAFT PLANT
 ST. CHARLES PARISH, LOUISIANA

FIGURE NO. 2
 PROJECT NO. 980348
 FILE NO. 980261.08/011.DWG
 DATE: OCTOBER 2006

ENCLOSURE 2

No Further Action At This Time Determination

Louisiana Department of Environmental Quality, Remediation Services Division
August 31, 2006



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY


FILE COPY

REC'D SEP 05 2006

AUG 31 2006

CERTIFIED MAIL – RETURN RECEIPT REQUESTED (7004 1160 0000 3798 0422)

Mr. Earl Hayden
Shell Chemical LP
One Shell Plaza
910 Louisiana Street
Houston, TX 77002-4916

 GEO SYNTEC CONSULTANTS
PROJECT NO. SB0337
PROJECT NAME : _____
CATEGORY : _____

RE: No Further Action Notification
Shell Chemical LP – Taft Facility; AI Number 583
Hahnville, St. Charles Parish

Dear Mr. Hayden:

The Louisiana Department of Environmental Quality – Remediation Services Division (LDEQ-RSD) has completed its review of your *Groundwater DNAPL Delineation Report* dated August 16, 2006 for the above referenced facility located in St. Charles Parish. Based on our review of this document and all previously submitted information, we have determined that no further action is necessary at this time. The Basis of Decision for this notification is attached.

No soils may be removed from this site without prior approval from LDEQ unless they are removed and disposed at a permitted disposal facility.

If you have any questions or need further information, please call Jeffrey Jones at (225) 219-3397. Thank you for your cooperation in addressing this site.

Sincerely,



Keith L. Casanova, Administrator
Remediation Services Division

jtj

Attachment

ENVIRONMENTAL ASSESSMENT

: PO BOX 4314, BATON ROUGE, LA 70821-4314

P:225-219-3236 F:225-219-3239

WWW.DEQ.LOUISIANA.GOV

Mr. Earl Hayden
Shell Chemical LP
Page 2

c: Imaging Operations - SW

Jeffrey Jones, LDEQ, Environmental Technology Division, Geology Section
Carolyn Bourn, LDEQ, Environmental Technology Division, Toxicology Section

GeoSyntec Consultants, Attn.: Warren Brady
5420 Corporate Blvd., Suite 303, Baton Rouge, LA 70808

Environmental Issues Management, LLC, Attn.: Robert Phelan
75438 River Road, Covington, LA 70435

BASIS OF DECISION FOR NO FURTHER ACTION
Shell Chemical LP – Taft Facility
AI# 583

The Louisiana Department of Environmental Quality – Remediation Services Division (LDEQ-RSD) has determined that the Shell Chemical LP – Taft Facility requires No Further Action At This Time.

The Facility previously produced polybutylene in bulk pellet form from 1972 through 2002, and was operated by Shell Chemical LP (Shell) from 1977 until its closure. Surface releases of Dowtherm GTM (a heat transfer fluid) were reported and site investigations and remediation focused on constituents of this product.

Soil and groundwater assessments at the former Taft Plant were conducted to address potential impacts of Dowtherm GTM. A chronological list of corrective action activities including site assessment, risk characterization, and remedial actions is summarized as follows:

- In the mid-1980's, Shell installed 20 shallow groundwater assessment wells to determine if the component constituents of Dowtherm GTM had impacted groundwater underlying the site. Groundwater samples from these wells were collected and analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOC), and semi-volatile organic compounds (SVOC) since 1988.
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- A risk assessment report was prepared in 1993 to evaluate the potential risks due to industrial exposure to chemicals detected on site. The calculated risks were below the

¹ Woodward-Clyde Consultants, 1994. "Interim Measures Plan. Shell Chemical Company, Taft, Louisiana."

USEPA target risk range of 10^{-4} to 10^{-6} for incremental cancer risk and less than 1 for non-carcinogenic risks.

- In January 1998, Shell submitted a Risk-Based Corrective Action (RBCA) Plan for the site. The submittal was consistent with the LDEQ Draft RBCA program. The RBCA Plan concluded that groundwater impacts did not require further corrective action.
- In September 2003² and April 2004³, Shell provided an updated RECAP assessment and addendum, respectively, to LDEQ in response to LDEQ comments on previous submittals. The RECAP Addendum included a DNAPL Source Characterization and Recovery Plan to improve the characterization and delineation of the soil residual DNAPL source. LDEQ provided a conditional approval of the RECAP addendum requesting additional soil and groundwater sampling in the DNAPL Source Characterization and Recovery Plan.
- In 2005, a soil investigation in the vicinity of wells with measurable DNAPL (MW-5, MW-11, and MW-19) was conducted to refine the delineation of residual DNAPL in soil. In addition, all monitoring wells were gauged for the presence of DNAPL and a subset of existing wells and a temporary well located between MW-11 and MW-19 were sampled for VOCs and SVOCs.
- A DNAPL gauging and recovery program was also conducted during 2005. On a quarterly basis, DNAPL was only routinely recovered from three shallow monitoring wells (MW-5, MW-11, and MW-19) and the subsequent recovery was documented and provided to LDEQ.
- Results from these sampling programs indicated that groundwater in the area of the three wells with DNAPL (MW-5, MW-11, and MW-19) was the sole medium at the site that exceeded site RECAP standards.
- In 2006, an investigation was conducted in the immediate vicinity of the above mentioned wells to refine the residual DNAPL delineation in the shallow-zone groundwater. The results of this investigation were used to identify the soils to be excavated for site remediation. The excavation was conducted in July 2006 and documented in the DNAPL Remediation Report⁴ (GeoSyntec, 2006c).

² URS, 2003. "Risk Evaluation Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish, Louisiana, LDEQ AI No. 583," Shell Chemical Company, Taft, Louisiana, September 18.

³ GeoSyntec Consultants, 2004. "Risk Evaluation Corrective Action Program (RECAP) September 18, 2003 Report Addendum, Shell Taft Plant, St. Charles Parish, Louisiana, LDEQ AI Number 583," Shell Chemical LP, Taft, Louisiana, July.

⁴ GeoSyntec Consultants, 2006. "Groundwater DNAPL Remediation Report, Shell Chemical LP, Taft, Louisiana, AI Number 583," August.

Remedial standards were developed for this property using LDEQ's RECAP Management Option 1 (MO-1) standards. The standards that were applied to this site are listed in the table that appears at the end of this BOD. The yield of the shallow-zone and deep-zone groundwater bearing units are below 800 gallons per day and no domestic or agricultural water supply wells are located within one mile of the site. Additionally, the nearest surface water body down gradient from the site is not classified as a drinking water supply. Consequently, the groundwater at this site is classified as GW3 non-drinking water. The Facility was previously used for industrial purposes. Although structures from historical industrial use are present at the site, the site is currently idle. In the future, the site will continue to be designated for industrial use.

Remedial actions consisted of the excavation and disposal of soil and groundwater exceeding the MO-1 standards in the areas of monitoring wells MW-5, MW-11, and MW-19. Approximately 412 tons of soil and groundwater were removed and disposed of at the Waste Management, Inc. Facility in Walker, Louisiana as a result of this remedial action. No Further Action At This Time is granted when contamination is reduced to the extent necessary to achieve the established standards.

In accordance with LAC 33:I. Chapter 13, if land use is going to be changed from industrial to non-industrial, the responsible party shall notify the LDEQ within thirty (30) days and the Shell Chemical LP-Taft Facility shall be reevaluated to determine if conditions are appropriate for the proposed land use. Future use may dictate additional remedial activities. A conveyance notice indicating that the Facility was closed under industrial standards and identifying the future site land use as industrial was filed in both the deed records and mortgage records of the St. Charles Parish Clerk of Court's Office following completion of remediation activities.

An inspection of the site was performed on August 3, 2006 confirming that no investigation derived waste remains on site. No soils may be moved from this location without written authorization from the LDEQ unless they are removed and disposed of at a permitted disposal facility. All site monitoring wells were plugged in accordance with LDEQ/LDOTD requirements in July 2006.

The impacted soil and groundwater, constituents of concern, maximum concentration remaining on site and limiting RECAP standards established for this site are listed in the following table:

Medium	Constituent of Concern	Maximum Remaining Concentration	Limiting RECAP Standard
Soil	Diesel Range Organics	3,200 mg/kg	*10,000 mg/kg
Soil	Biphenyl phenyl ether	160 mg/kg	1,100 mg/kg
Soil	Diphenyl ether	580 mg/kg	1,100 mg/kg
Groundwater	Diesel Range Organics	4.62 mg/L	5,280 mg/L
Groundwater	Gasoline Range Organics	0.55 mg/L	6,860 mg/L
Groundwater	Biphenyl phenyl ether	0.61 mg/L	21 mg/L
Groundwater	Diphenyl ether	0.0737 mg/L	21 mg/L
Groundwater	Di-isopropyl ether	0.345 mg/L	2,420 mg/L
Groundwater	Bis(2-ethyl-hexyl)phthalate	0.018 mg/L	0.07 mg/L

*Maximum concentration allowable under RECAP.

Mr. Earl Hayden
Shell Chemical LP
Page 6

Additional information on the details of the investigation and evaluation of this site may be obtained from LDEQ's Public Records Center located in the Galvez Building, Room 127, 602 N. Fifth Street, Baton Rouge, LA 70802. Additional information regarding the Public Records may be obtained by calling (225) 219-3168 or by emailing publicrecords@la.gov

Recordation Certificate

Charles J. Oubre, Jr.
Clerk of Court
St. Charles Parish Courthouse
PO Box 424
Hahnville, LA 70057
(985) 783-6632

First VENDOR

SHELL CHEMICAL LP

First VENDEE

Index Type : CONVEYANCE
Type of Document : AFFIDAVIT

Entry Number : 321565

Recording Pages : 6

Book : 676 Page : 338

Recorded Information

Brandon J. Landry
Deputy Clerk

On (Recorded Date) : 08/14/2006

At (Recorded Time) : 12:42:09PM



Doc ID - 003711000006



CONVEYANCE NOTIFICATION

SHELL TAFT FACILITY

Shell Chemical LP hereby notifies the public that the following Facility located at Agency Interest Number (AI # 583) was closed with contaminant levels present that are acceptable for industrial/commercial use of the property as described in the Louisiana Department of Environmental Quality's (LDEQ) Risk Evaluation/Correction Action Program (RECAP), Section 2.9. In accordance with LAC 33:I., Chapter 13, if land use changes from industrial to non-industrial, the responsible part shall notify the LDEQ within 30 days and the site shall be reevaluated to determine if conditions are appropriate for the proposed land use.

This site was closed in accordance with the Louisiana Administrative Code, Title 33:I, Chapter 13. Information regarding the site is available in the LDEQ public record and may be obtained by contacting the LDEQ Records Manager at (225) 219-3168. Inquiries regarding the contents of the site may be directed to Earl Hayden at Shell Chemical LP, One Shell Plaza, 910 Louisiana, Houston, Texas 77002-4916.

Site Legal Description

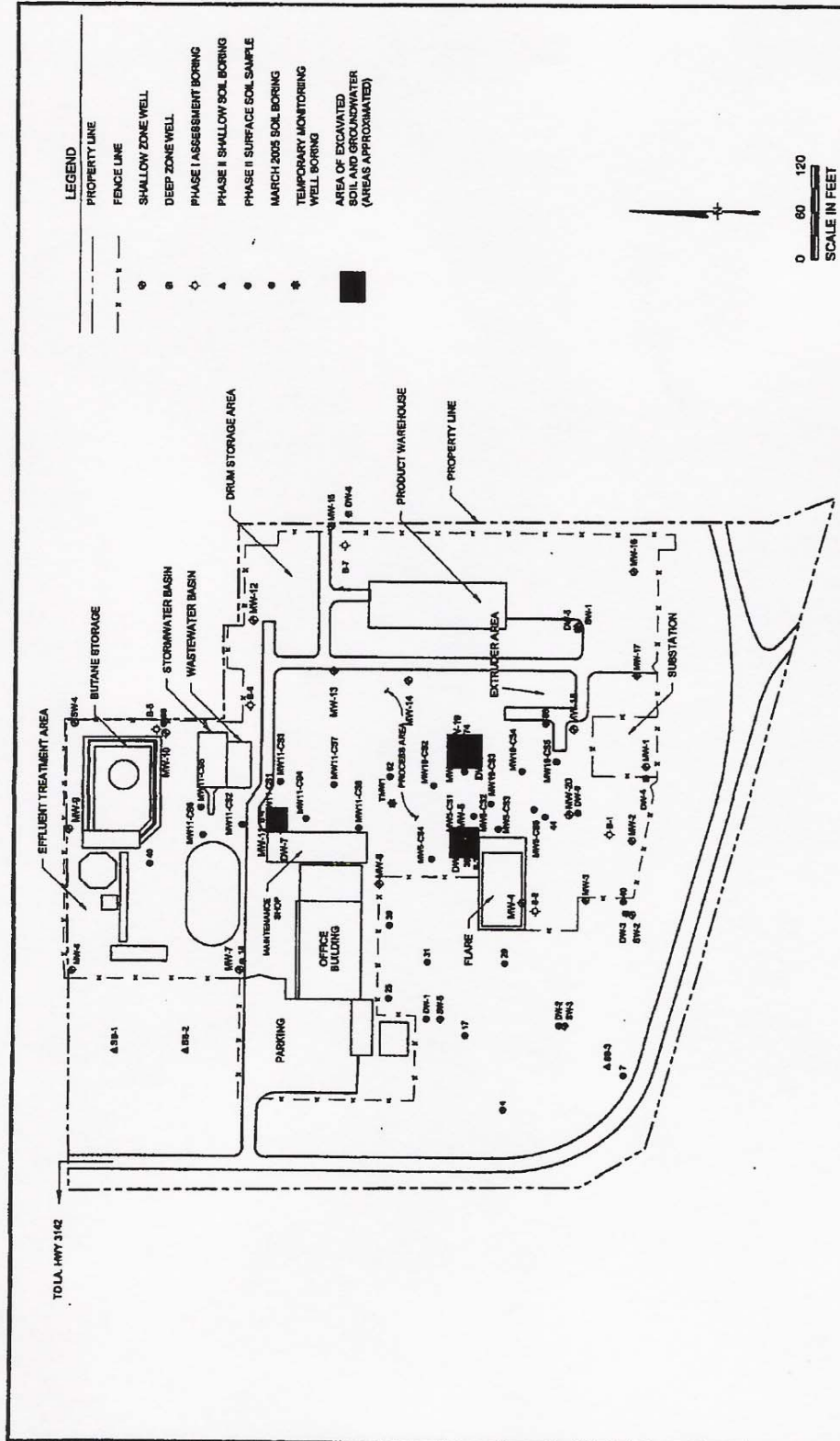
That certain tract or parcel of land being located in portions of Sections 44 and 45 of T. 13 S., R. 20 E., West of the Mississippi River, near Taft in St. Charles Parish, Louisiana, and being more particularly described as follows:

Beginning at an ½" iron pipe in concrete which is the southeast corner of a tract of land containing 29.904 acres conveyed by deed from Union Carbide Corporation to the Argus Chemical Corporation (presently the Chemtura Corporation) dated March 29, 1966 and filed and recorded in the Registry's office in Conveyance Office Book 54, Folio 338, said beginning point also being located 200 feet northerly, measured at right angles, from the centerline of the Texas and Pacific Railroad right-of-way, and running thence from said beginning point with a line parallel to and 200 feet from centerline of the railroad right-of-way which is the southernmost boundary of the Chemtura Corporation tract N 57°01'00" W for a distance of 493.18 feet to the "Point of Beginning";

Thence running, from the "Point of Beginning", N 57°01'00" W for a distance of 903.13 feet;

Thence running N 16°20'30" W for a distance of 103.48 feet;

Thence running N 17°51'00" E for a distance of 630.97 feet;



LEGEND

—	PROPERTY LINE
- - -	FENCE LINE
○	SHALLOW ZONE WELL
●	DEEP ZONE WELL
◇	PHASE I ASSESSMENT BORING
△	PHASE II SHALLOW SOIL BORING
◊	PHASE II SURFACE SOIL SAMPLE
●	MARCH 2005 SOIL BORING
⊛	TEMPORARY MONITORING WELL BORING
■	AREA OF EXCAVATED SOIL AND GROUNDWATER (AREAS APPROXIMATED)

GeoSyntec Consultants
 SITE PLOT PLAN WITH SOIL BORINGS AND WELL LOCATIONS
 SHELL TAFT PLANT
 ST. CHARLES PARISH, LOUISIANA

FIGURE NO.	1
PROJECT NO.	SB0348
FILE NO.	SB0261.08E010.DWG
DATE:	AUGUST 2006

10/20/06 - 10/20/06 10:00 AM

Table 1
Summary of Constituents Remaining at Site

Compound	Units	Maximum Concentration Remaining On-Site	Location	RECAP MO-1 Standard
SOIL				
Diesel range organics	mg/kg	3200	MW5-CS2	10000
*Biphenyl phenyl ether	mg/kg	160	MW19-CS4	1100
#Diphenyl ether	mg/kg	580	MW5-CS4	1100
GROUNDWATER				
Diesel range organics	mg/L	4.62	SW-5	5280
Gasoline range organics	mg/L	0.555	MW-15	6820
Biphenyl phenyl ether	mg/L	0.61	MW-10	21
Diphenyl ether	mg/L	0.0737	MW-13	21
DH-isopropyl ether	mg/L	0.345	MW-15	2420
Bis(2-ethyl-hexyl)phthalate	mg/L	0.018	DW-01	0.07

Notes:

mg/kg = milligrams per kilogram
mg/L = milligrams per liter

¹ Maximum detected concentration of soil is based on analytical results for site borings that were not excavated as part of remedial activities.

* Maximum concentration allowable under RECAP

MO-1 standard based on soil saturation value.

² Maximum detected concentration reported in most recent sampling of site monitoring wells in which DNAPL was not observed. MO-1 standards based on GW-3 non-drinking water groundwater classification.

Table includes constituents with concentrations that exceeded published RECAP non-industrial screening standards.



22 August 2006

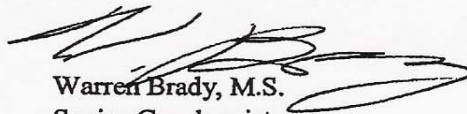
Mr. Jeffery Jones
Remediation Services Division
Louisiana Department of Environmental Quality
602 N. Fifth Street
Baton Rouge, LA 70802

**Subject: DNAPL Remediation Report and No Further Action Request
Supplemental Information
Shell Chemical LP- Taft, Louisiana
AI # 583**

Dear Mr. Jones:

At the request of Mr. Earl Hayden (Shell Chemical LP), GeoSyntec Consultants has developed the following information in support of the DNAPL Remediation Report submitted on August 14, 2006 for the above-referenced facility. Attached please find additional conveyance notification information that documents that these records were incorporated into the St. Charles Parish mortgage records. This information is provided based on your verbal request made on 21 August 2006. If you require additional information please feel free to contact me at 225-929-7333.

Sincerely,


Warren Brady, M.S.
Senior Geochemist

Enclosure

cc: E. Hayden - Shell
B. Phelan - EIM
R. Ettinger - GeoSyntec

Recordation Certificate

Charles J. Oubre, Jr.
Clerk of Court
St. Charles Parish Courthouse
PO Box 424
Hahnville, LA 70057
(985) 783-6632

First MORTGAGOR

SHELL CHEMICAL LP

First MORTGAGEE

Index Type : MORTGAGE

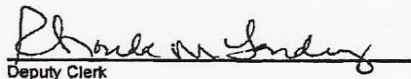
Entry Number : 321838

Type of Document : AFFIDAVIT

Book : 1159 **Page :** 643

Recording Pages : 6

Recorded Information


Deputy Clerk

On (Recorded Date) : 08/22/2006

At (Recorded Time) : 10:11:59AM



Doc ID - 003726740006



CONVEYANCE NOTIFICATION

SHELL TAFT FACILITY

Shell Chemical LP hereby notifies the public that the following Facility located at Agency Interest Number (AI # 583) was closed with contaminant levels present that are acceptable for industrial/commercial use of the property as described in the Louisiana Department of Environmental Quality's (LDEQ) Risk Evaluation/Correction Action Program (RECAP), Section 2.9. In accordance with LAC 33:I., Chapter 13, if land use changes from industrial to non-industrial, the responsible part shall notify the LDEQ within 30 days and the site shall be reevaluated to determine if conditions are appropriate for the proposed land use.

This site was closed in accordance with the Louisiana Administrative Code, Title 33:I, Chapter 13. Information regarding the site is available in the LDEQ public record and may be obtained by contacting the LDEQ Records Manager at (225) 219-3168. Inquiries regarding the contents of the site may be directed to Earl Hayden at Shell Chemical LP, One Shell Plaza, 910 Louisiana, Houston, Texas 77002-4916.

Site Legal Description

That certain tract or parcel of land being located in portions of Sections 44 and 45 of T. 13 S., R. 20 E., West of the Mississippi River, near Taft in St. Charles Parish, Louisiana, and being more particularly described as follows:

Beginning at an ½" iron pipe in concrete which is the southeast corner of a tract of land containing 29.904 acres conveyed by deed from Union Carbide Corporation to the Argus Chemical Corporation (presently the Chemtura Corporation) dated March 29, 1966 and filed and recorded in the Registry's office in Conveyance Office Book 54, Folio 338, said beginning point also being located 200 feet northerly, measured at right angles, from the centerline of the Texas and Pacific Railroad right-of-way, and running thence from said beginning point with a line parallel to and 200 feet from centerline of the railroad right-of-way which is the southernmost boundary of the Chemtura Corporation tract N 57°01'00" W for a distance of 493.18 feet to the "Point of Beginning";

Thence running, from the "Point of Beginning", N 57°01'00" W for a distance of 903.13 feet;

Thence running N 16°20'30" W for a distance of 103.48 feet;

Thence running N 17°51'00" E for a distance of 630.97 feet;

Thence running S 72°15'00" E for a distance of 642.01 feet to a 1" rod;

Thence running S 17°45'00" W for a distance of 194.73 feet to a 1" rod;

Thence running S 72°15'00" E for a distance of 121 .68 feet to a 1" rod;

Thence running S 17°45'00" W for a distance of 18.54 feet to a 1" rod;

Thence running S 72°15'00" E for a distance of 135.70 feet to a 1" rod;

Thence running S 17°45'00" W for a distance of 663.98 feet;

Thence running S 02°54'00" E for a distance of 81.98 feet the "Point of Beginning".

Said tract contains 15.78 acres and is shown as Parcel "A" on a drawing entitled "Proposed Shell Land Purchase of Taft Facility" by Waldemar S. Nelson & Co., Inc., Revision 1, dated June 15, 1990

Being the same property acquired by Shell Oil Company from Witco Corporation (currently Chemtura Corporation) by act on June 25th, 1990, recorded in the Conveyance Records of St. Charles Parish in Book 425, Folio 562, Entry No. 151385.

A site map is provided in the attached figure. Table 1 identifies the concentration of constituents remaining on-site in soil and groundwater.



Signature of Person Filing Parish Record

Warren Brady, Senior Geochemist, GeoSyntec Consultant
Typed Name and Title of Person Filing Parish Record

8/22/06
Date

Table 1
Summary of Constituents Remaining at Site

Compound	Units	Maximum Concentration Remaining On-Site	Location	RECAP MO-1 Standard
SOIL				
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Notes:

mg/kg = milligrams per Kilogram

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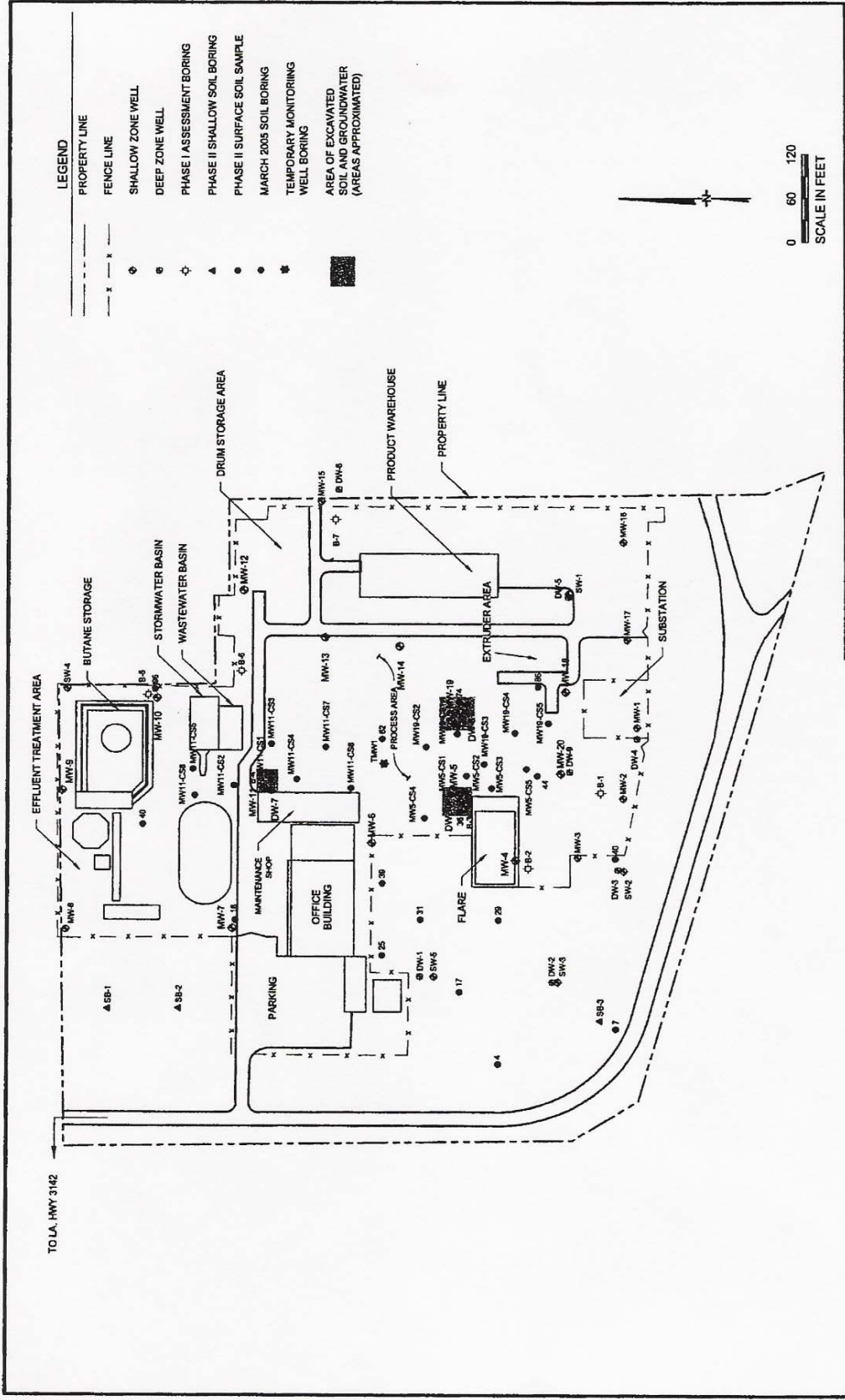
¹ Maximum detected concentration of soil is based on analytical results for site borings that were not excavated as part of remedial activities.

* Maximum concentration allowable under RECAP

MO-1 standard based on soil saturation value.

² Maximum detected concentration reported in most recent sampling of site monitoring wells in which DNAPL was not observed. MO-1 standards based on GW-3 non-drinking water groundwater classification.

Table includes constituents with concentrations that exceeded published RECAP non-industrial screening standards.



GeoSyntec Consultants

SITE PLOT PLAN WITH SOIL BORINGS AND WELL LOCATIONS
SHELL TAFT PLANT
ST. CHARLES PARISH, LOUISIANA

FIGURE NO.	SB0348
PROJECT NO.	SB0281.06FD10.DWG
FILE NO.	AUGUST 2006
DATE:	

TO I.A. HWY 3142

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
FIELD INTERVIEW FORM**

AGENCY INTEREST#: 583 INSPECTION DATE: 8/03/06 TIME OF ARRIVAL: 9:00 AM
 ALTERNATE ID#: _____ DEPARTURE DATE: 8/05/06 TIME OF DEPARTURE: 10:45 AM
 FACILITY NAME: Shell Chemical - TART PLANT PH #: (713) 241-1232
 LOCATION: 413 Hwy 8142

RECEIVING STREAM (BASIN/SUBSEGMENT): _____ PARISH NAME: St. Charles
 MAILING ADDRESS: One Shell Plaza, 910 Louisiana Houston TX 77002
(Street/P.O. Box) (City) (State) (ZIP)
 FACILITY REPRESENTATIVE: Earl Shatten TITLE: Business Representative
 FACILITY REPRESENTATIVE PHONE NUMBER: (713) 241-1232
 NAME, TITLE, ADDRESS and TELEPHONE of RESPONSIBLE OFFICIAL (if different from above): Same

INSPECTION TYPE: MS-NA PROGRAM INVOLVED: AIR WASTE WATER OTHER (SW/WW)
 INSPECTOR'S OBSERVATIONS: (e.g. AREAS AND EQUIPMENT INSPECTED, PROBLEMS, DEFICIENCIES, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES)

Conducted NFA inspection of facility. All monitoring wells appeared to be properly plugged and abandoned and all waste associated with the remediation program - DNAPL impacted zone (acrolinther) - has been removed from the site. No current permits of any kind, permit for shell chemical, conducted the remediation work. Excavation areas were completely backfilled. Reviewed draft monitoring notification

AREAS OF CONCERN:

REGULATION	EXPLANATION	CORRECTED?	
		YES	NO
<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NO</u>
		YES	NO

PHOTOS TAKEN: YES NO SAMPLES TAKEN: YES NO (Attach Chain-of-custody)
 RECEIVED BY: SIGNATURE: Signature of Earl Shatten, Shell Chemical
 PRINT NAME: _____
 (NOTE: SIGNATURE DOES NOT NECESSARILY INDICATE AGREEMENT WITH INSPECTOR'S STATED OBSERVATIONS)
 INSPECTOR(S): Jeffrey Jones, EIT CROSS REFERENCE: _____
Geordie ATTACHMENTS: NA
 REVIEWER: _____

NOTE: The information contained on this form reflects only the preliminary observations of the inspector(s). It should not be interpreted as a final determination by the Department of Environmental Quality or any of its officers or personnel as to any matter including, but not limited to, a determination of compliance or lack thereof by the facility operator with any requirements of statute regulations or permits. Each day of non-compliance constitutes a separate violation of the regulations and/or the Louisiana Environmental Quality Act.

ENCLOSURE 3

AGENCY AND INDUSTRY CONTACTS

For a copy of the administrative record providing detailed information regarding environmental conditions at Shell Chemical LP – Taft Facility, please contact:

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

For questions regarding the environmental conditions described in the Ready for Reuse Basis of Decision for Shell Chemical L P – Taft Facility, please contact:

Mr. Jeffrey Jones, Geologist & Team Leader
Environmental Technology Division
Louisiana Department of Environmental Quality
P.O. Box 4314
Baton Rouge, Louisiana 70821-4314
(225) 219-3397

Mr. Earl Hayden, Business Representative
Shell Chemical LP
One Shell Plaza
910 Louisiana Street
Houston, TX 77002-4916
(713) 241-1232