



January 24, 2007

Mr. Ralph Caddell, Site Manager
Syngenta Crop Protection, Inc.
Post Office Box 11
St. Gabriel, LA 70776

Re: Ready for Reuse Determination, Block G-6
Syngenta Crop Protection, Inc.
3905 Highway 75
St. Gabriel, LA (Iberville Parish)
AI #2367

Dear Mr. Caddell:

The Louisiana Department of Environmental Quality (LDEQ) and the United States Environmental Protection Agency (EPA) Region 6 together have determined that Syngenta Crop Protection, Inc.'s Block G-6 (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, located on Syngenta's St. Gabriel Facility, is a 5.7-acre area that included a wastewater impoundment referred to as the Sand Bed Filters. The Sand Bed Filters operated from the 1970s until 1991.

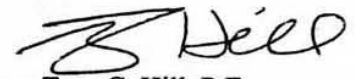
With this Ready for Reuse Determination, LDEQ and EPA Region 6 agree that Syngenta has successfully conducted investigation and risk management activities and the environmental conditions at the Property are protective of human health and the environment based on its current and anticipated future use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

Sincerely yours,


Karen Gautreaux
Deputy Secretary
Louisiana Department of
Environmental Quality


Troy C. Hill, P.E.
RCRA Associate Director
Multimedia Planning and
Permitting Division
U.S. EPA Region 6

Enclosures:

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

cc: Imaging Operations – Solid Waste
Narendra M. Dave – ETD-GG1
Richard Boudreau – Syngenta

ENCLOSURE 1

READY FOR REUSE BASIS OF DECISION FOR BLOCK G-6 SYNGENTA CROP PROTECTION, INC. – ST. GABRIEL PLANT AI #2367

INTRODUCTION

The Louisiana Department of Environmental Quality (LDEQ) – Environmental Technology Division has determined that Syngenta Crop Protection, Inc.'s (Syngenta) Block G-6 (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

Syngenta's St. Gabriel Plant, through its legacy companies, began its land revitalization program with voluntary discontinuation of use and the initiation of remediation in 1987 of its wastewater treatment surface impoundments that were initially permitted under the NPDES/LWPDES permit program in the early 1970s, and then under the LDEQ Solid Waste program in 1983. The Block G-6 area is a 5.7-acre block within the Syngenta St. Gabriel Plant that included a wastewater impoundment referred to as the Sand Bed Filters. The Sand Bed Filters operated from the 1970s until 1991.

Syngenta and its legacy companies have revitalized the Block G-6 property at the St. Gabriel Facility by voluntary discontinuation of the use of the Sand Bed Filters and remediation of the surface impoundment. The Sand Bed Filters were formerly contaminated with triazine herbicides. The total triazine herbicides (atrazine, simazine, and propazine) were contaminants in the impoundment residues up to 1-2% prior to clean up. During closure, all sludges were removed and soil was removed to a clean up level of less than 10 ppm total triazine herbicide level. The closure certification report was submitted to LDEQ on December 16, 1998. The post-closure period was completed in December 2003.

BACKGROUND

The St. Gabriel Facility is a 200-acre developed site that includes a 5.7-acre Block G-6 area where the Sand Bed Filters were located. Syngenta and its legacy companies completed the LDEQ-approved closure in 1998 and post-closure in 2003. Syngenta has requested approval to discontinue monitoring of the Sand Bed Filter monitoring wells SW-1R, SW-2R, SW-3R and SW-4R.

Upon approval to discontinue monitoring, Syngenta will consider use of the Property for future construction of production or production service facilities. A site map, defining the location of the Property is included in Figure 1.

CHRONOLOGY

April 1983 – Solid Waste permit (P-0017) issued by LDEQ for operation of three surface impoundments, including the Sand Bed Filters.

August 1991 – Draft RCRA Facility Investigation Report Addendum submitted to EPA and LDEQ.

December 1995 – January 1996 – 6200 tons of sludge removed from base of impoundment and transported to White Castle for treatment and disposal.

February 1996 – Updated closure plan for Sand Bed Filters submitted to LDEQ.

April 1997 – Closure plan approved by LDEQ.

December 1998 – Closure of Sand Bed Filters completed and closure certification report submitted to LDEQ. All sludges and soil had been removed to meet clean up level of 10 ppm total triazine.

December 2003 – Post-closure period ended.

1980's to Present – Semiannual groundwater monitoring reports provided to the LDEQ.

REFERENCES

April 1983 – Permit (P-0017) issued for three surface impoundments including the Sand Bed Filters.

November 22, 1991 – Draft RCRA Facility Investigation Report Addendum.

January 8, 1993 – EPA Correspondence – “Draft Report Comments, Draft Phase I RFI Report.” Text in letter indicated that “EPA concurs with Ciba Geigy’s determination that future closure activities and the authority to remediate the groundwater . . . should remain with the Solid Waste Division and Groundwater Protection Division of the Louisiana Department of Environmental Quality (LDEQ).”

August 29, 1996 – “Phase I RCRA Facility Investigation (RFI) Report.”

October 21, 1997 – LDEQ Correspondence – “Approval of the RCRA Facility Investigation (RFI) Phase I Report.”

February 1996 – “Updated Closure Plan for Sand Bed Filters.”

April 1997 – LDEQ Correspondence – Closure Plan Approved.

December 1998 – St. Gabriel Correspondence – “Closure Certification Report.”

August 15, 2000 – Novartis Correspondence – “Report of Groundwater Parameter Exceeding Control Limits and Assessment Plan.”

May 10, 2001 – Syngenta Correspondence – “Conductance Assessment Report for SW-1R.”

May 23, 2002 – Syngenta Correspondence – “Evaluation of Chloride values beyond the UCL.”

August 7, 2002 – LDEQ Correspondence – “Chloride Assessment Report for SW-1R” (in response to May 23, 2002 report).

March 13, 2003 – Syngenta Correspondence – “Results of Additional Assessment, Solid Waste Monitoring Well SW-1R.”

July 7, 2003 – LDEQ Correspondence – “Chloride Assessment Report for Solid Waste Monitoring Well SW-1R” (in response to March 13, 2003 report).

November 17, 2003 – “Results of Additional Monthly Monitoring Solid Waste Monitoring Well SW-1R.”

April 6, 2004 – LDEQ Correspondence – “Assessment Report for Solid Waste Monitoring Well SW-1R” (in response to November 2003 report).

1980’s-Present – Solid Waste Groundwater Monitoring Semiannual Reports submitted for three impoundments, including the Sand Bed Filters.

ENCLOSURE 2

ENVIRONMENTAL CONDITIONS TABLE – BLOCK G-6

Site Name/ Site Number	Remedial Action Taken	Contaminants of Concern (COCs)	Cleanup Status	Cleanup Standards	Institutional Control(s)
Syngenta Crop Protection, Inc. St. Gabriel Facility, Block G-6, Sandbed Filter, Ponds 1 and 2	Ponds 1 and 2 closed under LDEQ Solid Waste Regulations. During closure, sludges and impacted soils were removed.	<p>Soil: Soils impacted by Triazines above 10 ppm were removed.</p> <p>Groundwater: Latest sampling document Triazines at <0.001 ppm</p>	Cleanup complete. Post-closure care period complete.	<p>Soil: Triazine at 10 ppm (Established agricultural application rate for triazine herbicide).</p> <p>Groundwater: Atrazine at 0.003 ppm (MCL), Simazine at 0.004 ppm (MCL)</p>	Active site zoned industrial.

ENCLOSURE 3

AGENCY CONTACTS

For a copy of the administrative record providing detailed information regarding environmental conditions at Syngenta Crop Protection, Inc.'s Block G-6 (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. Drukell Trahan, Geologist
Office of Environmental Services
Waste Permits Division
Louisiana Department of Environmental Quality
Post Office Box 4314
Baton Rouge, LA 70821-4314
(225) 219-3417

or

Mr. Richard B. Boudreau
Senior Staff Environmental Engineer
Environmental Regulatory Affairs Group
Syngenta Crop Protection, Inc.
Post Office Box 11
St. Gabriel, LA 70776
(225) 642-1257