



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 F-7
Syngenta Crop Protection, Inc.
3905 Highway 75
St. Gabriel, Louisiana (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 F-7 (the "Property") is Ready for Reuse. A Ready for Reuse Determination is an acknowledgement that environmental conditions on the property are protective of 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 where a former wastewater effluent impoundment (Equalization Pond) was located. The Pond operated from the 1970s until 1989.

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 F-7 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 F-7 (the 'Property') is Ready for Reuse. The Property meets the criteria for a Ready for Reuse determination because it 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 in 1987 with voluntary discontinuation of use and the initiation of remediation of its wastewater treatment surface impoundments that were permitted under the NPDES/LWPDES permit program initially in the early 1970s and then under the LDEQ Solid Waste program in 1983. Culminating its land revitalization efforts for the Property under the approval of the LDEQ, Syngenta and a joint venture company, Ecoproducts Solutions, LLC, have constructed a calcium chloride production facility on the Property.

The Property is a 5.7-acre area of the facility where, prior to 1990, a former treated effluent impoundment (Equalization Pond) was located. A site map defining the location of the Property is included in Figure 1.

BACKGROUND

Syngenta's Equalization Pond was originally constructed on the Property in 1972 by Ciba Geigy, and later owned by Novartis Corporation from 1997 to January 2001. A summary of the past and current land use is as follows:

- Constructed under LDEQ Solid Waste permit GPD 047-0224/P0017.
 - Used from 1970-1978 for effluent primary settling containing 0-5 % sodium and calcium chloride, and moderate levels (ppm) of triazine herbicides.
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- From 1978-1989, used for equalization of treated wastewater from carbon absorption and acid neutralization unit, and unit stormwater containing sodium and calcium chloride and ppm levels of triazine herbicides.
- Ceased operation in 1989 -- replaced with 4MM gallon tank.
- Sludges and residues removed 1989-1992.
- LDEQ approved an updated closure plan, performed by IT Corporation, during February of 1994.
- Closure certification report submitted during April of 1995, based on impoundment being cleaned to LDEQ-approved, risk-based levels.
- Post-closure period ended May 2000.

As previously noted, legacy Syngenta companies completed the closure and post-closure periods in 1995 and 2000, respectively, under an approved LDEQ closure and post-closure plan. Syngenta obtained approval to build a calcium chloride production unit on this block in 2005 and completed construction in 2006. The construction of the calcium chloride production facility on the Property resulted in the following economic and environmental benefits in terms of pollution prevention and land revitalization:

- Eliminated approximately 230,000 tons/year of a hazardous waste by-product (11% hydrochloric acid). Syngenta's by-product is now converted to a high demand, commercial product (38 % calcium chloride solution) used in the petroleum production industry. The former hydrochloric acid waste had been treated for the last 30 years in an onsite NPDES-permitted neutralization unit and discharged to the Mississippi River as 2% calcium chloride mixed with Syngenta's wastewater effluent.
- Converted a former brownfield area, used previously for wastewater impoundment equalization, to a revitalized area with a new production unit used for pollution prevention to convert a waste to a valuable product.
- Eliminated the permitted discharge of approximately 77,000 tons/year of anhydrous calcium chloride to the Mississippi River.
- The project significantly reduced the whole effluent toxicity of Syngenta's effluent to the Mississippi River, by substantially reducing the calcium concentration in Syngenta's NPDES-permitted effluent, the primary constituent impacting the whole effluent toxicity of Syngenta's effluent.
- Provided other economic benefits to the local area such as: payroll for construction workers during the eight month construction period, purchasing of

construction materials in the area, purchasing of goods and services in the area for long-term operational and maintenance needs, and additional job security for Syngenta environmental operations personnel needed to operate the facility.

CHRONOLOGY

1972 – Construction of Equalization Pond.

April 1983 – Permit (P-0017) issued by LDEQ for operation of three surface impoundments, including Equalization Pond.

1978-1989 – Equalization Pond used for equalization of treated wastewater from carbon adsorption and acid neutralization unit and unit stormwater.

1989 – Ceased operation of Equalization Pond.

1989-1992 – Sludges and residues removed from base of Equalization Pond.

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

April 8, 1992 – Closure and Post-closure Plan submitted to LDEQ.

February 16, 1994 – LDEQ granted approval to close Equalization Pond.

October 11, 1994 – St. Gabriel provided responses to comments from February 16, 1994 correspondence.

April 1995 – Closure certification report provided to LDEQ.

May 2000 – Post closure period ended.

March 18, 2004 – Syngenta submitted a groundwater quality certification application for construction on Block G-7.

June 16, 2004 – Syngenta submitted Addendum to Groundwater Quality Certification Application.

July 19, 2005 – Syngenta submitted a remediation report documenting that the clean up levels had been attained for the fly ash boulder remediation.

2005-2006 – Construction of calcium chloride unit on Block F-7.

1980's-Present – Semiannual groundwater monitoring reports for Equalization Pond.

REFERENCES

April 1983 – Permit (P-0017) issued for three surface impoundments including the Equalization Pond.

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.”

April 8, 1992 – “Proposed Closure and Post-Closure Plan.”

February 16, 1994 – LDEQ Correspondence – Comments concerning closure plan.

October 11, 1994 – Ciba Correspondence – “Equalization Pond Closure Plan – Response to Comments.”

May 4, 1995 – Ciba Correspondence – “Final Closure Certification Report.”

September 26, 2002 – Syngenta Correspondence – “Proposed changes to Monitoring Program”

May 26, 2003 – Syngenta Correspondence – “Groundwater Monitoring Notification”

June 3, 2003 – Syngenta Correspondence – “Groundwater Assessment, SW-5R Barium Exceedance of Upper Control Limit.”

July 9, 2003 – Syngenta Correspondence – “Completion of 5-Year Post-Closure Care Period.”

July 23, 2003 – LDEQ Correspondence – “Proposed changes to Monitoring Program” (in response to Syngenta correspondence of September 26, 2002).

September 2, 2003 – LDEQ Correspondence – “Groundwater Monitoring Notification and Groundwater Assessment, SW-5R Barium Exceedance” (in response to Syngenta correspondence of May 26, 2003 and June 3, 2003).

October 3, 2003 – LDEQ Correspondence – “Completion of 5-Year Post-Closure Care Period for the Equalization Pond” (in response to Syngenta correspondence of July 9, 2003).

March 18, 2004 – “Groundwater Quality Certification Application for Block F-7 Project.”

April 8, 2004 – LDEQ correspondence – “Additional Information Request” (in response to Syngenta report of March 18, 2004).

June 16, 2004 – Syngenta Correspondence – “Addendum to Groundwater Quality Certification Application.”

October 10, 2005 – Syngenta Correspondence – “Request to Discontinue Groundwater Monitoring, Follow-up to Groundwater Assessment of SW Well Barium Assessment Report, Low Risk of Chlorides and Barium Levels in Upper Saturated Stratum, Ready for Reuse Program for Blocks F-7 and G-6.”

July 19, 2005 – “Final Report Block F-7 Fly Ash Boulder Remediation Report.”

1980’s-Present – Semiannual groundwater monitoring reports for solid waste impoundments, including the Equalization Pond.

ENCLOSURE 2

ENVIRONMENTAL CONDITIONS TABLE – BLOCK F-7

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 F-7, Equalization Pond	Equalization Pond 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 F-7 (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
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Environmental Regulatory Affairs Group
Syngenta Crop Protection, Inc.
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