



June 24, 2014



Dan Kirk
Principal Program Manager
Soil and Groundwater Focus Delivery Group, Major Projects
Shell Oil Products U.S.
OSP Shell Plaza
910 Louisiana Street
Room 19040B
Houston, TX 77002

Re: Ready for Reuse Determination
Former Metairie Lube Oil Blending Facility
Shell Oil Products U.S.
309 Jefferson Highway
Jefferson, Louisiana (Jefferson Parish)
LDEQ AI Number 1274

Dear Mr. Kirk:

The Louisiana Department of Environmental Quality (LDEQ) and the United States Environmental Protection Agency (EPA) Region 6 together have determined that the Former Metairie Lube Oil Blending Facility in Jefferson, Louisiana (the "Property") is Ready for Reuse. A Ready for Reuse Determination is an acknowledgment that environmental conditions on the Property are protective of human health and the environment based on its current and anticipated future use.

The Former Metairie Lube Oil Blending Facility is located in Jefferson, Louisiana (Jefferson Parish), and consists of approximately 17 acres. The Property was previously used for the blending and packaging of motor oils, gear oils, and greases.

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

Dan Kirk
Shell Oil Products U.S.
Ready for Reuse Determination
June 24, 2014
Page 2

If conditions on the Property change (e.g., land use is altered or new site receptors are identified) or additional impacted media are discovered, the current owner/operator will notify LDEQ and it may become necessary to perform additional investigation and/or remediation to ensure continued protectiveness. The undersigned expressly reserve all rights and authorities to require further action by owners or operators if new or additional information is discovered that impacts this Ready for Reuse Determination, whether such information is known as of this date, or becomes available in the future.

Congratulations on this most noteworthy achievement!

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Peggy M. Hatch".

Peggy M. Hatch
Secretary
Louisiana Department of
Environmental Quality

A handwritten signature in blue ink, appearing to read "Susan G. Spalding".

Susan G. Spalding
Associate Director
RCRA Programs
U.S. EPA, Region 6

Enclosures

ENCLOSURE 1
READY FOR REUSE BASIS OF DECISION

FORMER METAIRIE LUBE OIL BLENDING FACILITY
SHELL OIL PRODUCTS U.S.
JEFFERSON, LOUISIANA
LDEQ Agency Interest No. 1274

INTRODUCTION

The Louisiana Department of Environmental Quality (LDEQ) Underground Storage Tank and Remediation Division (USTRD) and the United States Environmental Protection Agency (EPA) Region 6 together have determined that the Former Metairie Lube Oil Blending Facility (the “Property”) operated by Shell Oil Products U.S. (“Shell”) is Ready for Reuse. This facility meets the criteria for a Ready for Reuse Determination because the current environmental conditions on the property are protective of human health and the environment based upon its current and anticipated future use. A description of the Property, background information, a summary of investigation and risk management activities, and remediation activities are provided in the following sections.

PROPERTY DESCRIPTION

The Former Metairie Lube Oil Blending Facility is located at 309 Jefferson Highway, Jefferson, Louisiana (Jefferson Parish). The Property is surrounded by areas of light/heavy industry and commercial land uses. Originally consisting of approximately 40 acres, the Property was bounded on the north by railway lines and the Earhart Expressway, to the south by Jefferson Highway, to the east by Dakin Street and the boundary with Orleans Parish, and to the west by railway lines. The Property currently consists of approximately 17 acres, and is bounded on the north by Earhart Expressway, to the south by Jefferson Highway, to the east by other industrial facilities owned by Latter Blum Enterprises (including the former AOI-5), and to the west by other industrial facilities.

BACKGROUND INFORMATION

The Property was previously used for the blending and packaging of motor oils, gear oils, and greases. Operations at the site were initiated in 1929 by the Butterfarm Grease and Oil Company of Louisiana. Shell Oil Company acquired the site in 1949 and continued site operations. The site began reduction of output and closure during 2005. The closure process was delayed because of destruction resulting from Hurricane Katrina in August 2005 when the facility was inundated with several feet of floodwater. Shell has since decommissioned and demolished the facility.

The Property included five Areas of Investigation (AOIs) that were investigated, remediated, and issued determinations of No Further Action - At This Time (NFA-ATT) by LDEQ:

- (1) AOI-1, Southwest Tank Farm
- (2) AOI-2, Southeast Tank Farm
- (3) AOI-3, Northwest Tank Farm
- (4) AOI-4, Northeast Tank Farm
- (5) AOI-5, Compound Blending House

In addition to these AOIs, Shell also closed the Former Oxidation Settling Ponds located within the northwest corner of the property on the north side of Hoey's Canal. The system consisted of five holding ponds that operated in series. Wastewater from the plant, consisting primarily of storm water runoff from the main plant (>90%) and process wastewater (<10%), was piped to an oil/water separator to remove free product (if present) and then pumped through a series of ponds for further treatment by aeration and settling. The ponds discharged through Outfall 001 into Hoey's Canal.

SITE INVESTIGATION AND REMEDIATION

Areas of Investigation (AOIs)

Remedial activities at the various AOIs included assessment, groundwater monitoring, light non-aqueous phase liquid (LNAPL) recovery, surfactant flushing, and excavation and disposal of impacted soils. Site-specific limiting standards were developed for all five AOIs using LDEQ's Risk Evaluation/Corrective Action Program (RECAP) Management Option 1 (MO-1). All five AOI received determinations of NFA-ATT from LDEQ. Conveyance Notifications stating that the AOIs were closed using industrial standards and thereby limiting the use of the property to industrial/commercial activities were filed for each AOI with the Jefferson Parish Clerk of Court. Details regarding site assessments, remedial actions, and institutional controls are provided in Enclosure 2 and in the Bases of Decision in LDEQ's NFA-ATT notifications. References for the NFA-ATTs are provided below.

Former Oxidation Settling Ponds

Closure requirements for the Oxidation Ponds were outlined in the facility solid waste permit (P-0194) issued by LDEQ. Closure requirements included: dewatering of the ponds, drying of the sludges, sludge characterization sampling, excavation, confirmation soil sampling, backfill, grading, and re-vegetation. Pond closure activities were conducted between July 2006 and April 2007. The Closure Report for the five impoundments was submitted to LDEQ on July 31, 2008, and on January 4, 2010. LDEQ issued its determination that the facility had met all conditions of the permit's Closure Plan and there were no further closure and/or post-closure requirements. In preparation for a property transaction, Shell conducted a Phase II

Environmental Site Assessment (ESA) in September 2013 and submitted a report of the results to LDEQ on November 25, 2013. Soil and groundwater samples were analyzed and the results were compared to RECAP screening standards for non-industrial use. One sample contained a constituent (arsenic) at a level exceeding these standards, however the calculated 95% upper confidence limit of the arithmetic mean (UCL-AM) was below the non-industrial standard.

DEMOLITION OF THE SITE

In July 2013 Shell submitted a soil management plan describing planned activities for assessment, characterization, management, and disposal of any impacted soil encountered during site demolition and slab removal. Shell submitted a post-demolition summary report in April 2014, describing demolition and post-demolition activities conducted at AOIs 1, 2, 3, and 4 as well as the former Oxidation Settling Ponds. The report was approved by LDEQ on May 7, 2014. It should be noted that activities associated with AOI 5, the former Compound Blending House, were not included in the demolition plan or report because that area is under separate ownership and site activities are being conducted by separate contractors.

Demolition activities included residual product removal from piping and tanks, removal of asbestos-containing building materials and piping insulation, universal waste removal and disposal, building and piping support demolition, tank and building foundation removal, draining and plugging of subsurface piping, in-place abandonment of an oil-water separator, and crushing and stockpiling of concrete debris. The majority of the waste streams were recycled to the extent possible: used oil, universal waste, and scrap metal were recycled off-site and concrete was recycled on-site. The remaining wastes from the demolition were sent off to a local landfill for disposal as construction debris. Following demolition, Shell conducted site assessment activities at the former Oxidation Settling Pond area and AOI-4 to confirm that any remaining constituents did not exceed the site-specific standards.

CURRENT ENVIRONMENTAL CONDITIONS

A list of the maximum remaining concentrations of Constituents of Concern remaining in soil and groundwater can be found in Enclosure 2 (Environmental Conditions Table) to the Ready for Reuse Determination letter. Contact information for questions regarding the environmental conditions described in this Ready for Reuse Basis of Decision is provided in Enclosure 3 to the Ready for Reuse Determination letter.

INTENDED FUTURE USE

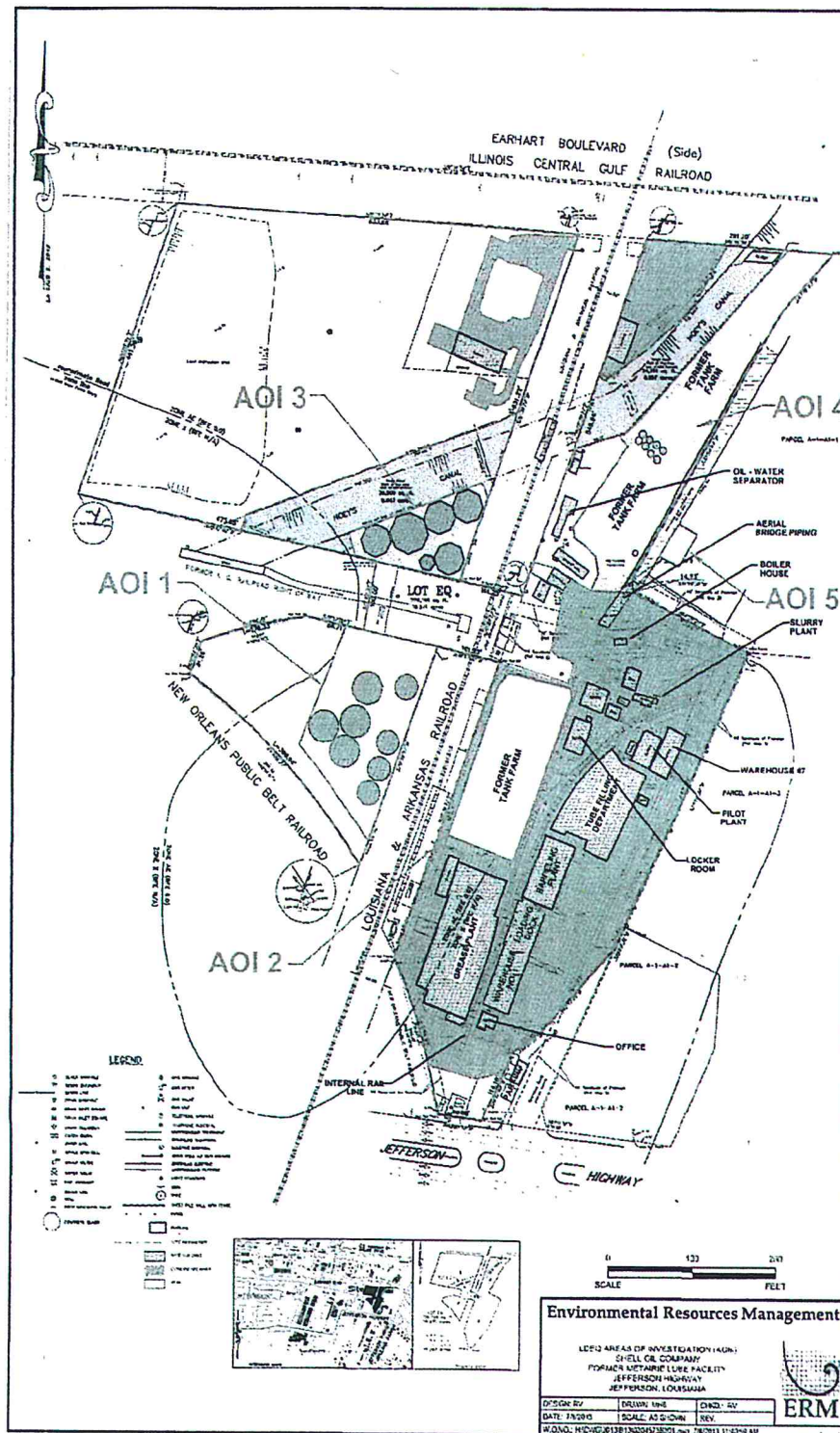
The intended future use of the Property is for commercial/industrial purposes.

REFERENCES

Documents related to the site investigations and remedial actions at the Former Metairie Lube Oil Blending Facility are public records, and are available through LDEQ's Electronic

Document Management System (EDMS). Contact information for obtaining access to these records is provided in Enclosure 3 to the Ready For Reuse Determination letter. A list of documents supporting this Ready for Reuse Determination Basis of Decision is provided below:

- 2008 *Closure Report – Permit No. P-019, SOPUS Products*; Pennzoil-Quaker State Company; July 31, 2008 [EDMS Document Nos. 6722953 and 6722956] (Note: Includes the five solid waste impoundments)
- 2010 *Approval of Final Closure – Metairie Plant*; LDEQ; January 4, 2010 [EDMS Document No. 6147616] (Note: Includes the five Solid Waste impoundments)
- 2011 *No Further Action At This Time Notification, Southwest Tank Farm (SWTF)/Area of Investigation 1 (AOI 1)*; LDEQ; October 18, 2011 [EDMS Document No. 8173234]
- No Further Action At This Time Notification, Northwest Tank Farm (NWTF)/Area of Investigation 3 (AOI-3)*; LDEQ; October 18, 2011 [EDMS Document No. 8173236]
- 2012 *No Further Action At This Time Notification, Southeast Tank Farm (SETF)/Area of Investigation 2 (AOI-2)*; LDEQ; February 7, 2012 [EDMS Document No. 8279187]
- No Further Action At This Time Notification, Northeast Tank Farm (NETF)/Area of Investigation 4 (AOI-4)*; LDEQ; June 7, 2012 [EDMS Document No. 8421430]
- No Further Action At This Time Notification, Compound Blending House (CBH)/Area of Investigation 5 (AOI-5)*; LDEQ; June 18, 2012 [EDMS Document No. 8433328]
- 2013 *Former Shell Lubricants Facility Soil Management Plan*; Environmental Resources Management Southwest, Inc.; July 2013 [EDMS Document No. 9000060]
- Phase II Environmental Assessment Report, Former Oxidation Settling Pond Area*; ARCADIS; November 15, 2013 [EDMS Document No. 9259968, pp. 435 - 635]
- 2014 *Post Demolition Summary Report*; ARCADIS; April 8, 2014 [EDMS Document No. 9259968]
- Approval of Post Demolition Summary Report*; LDEQ; May 7, 2014 [EDMS Document No. 9327647]



ENCLOSURE 2

ENVIRONMENTAL CONDITIONS TABLE FORMER METAIRIE LUBE OIL BLENDING FACILITY, SHELL OIL PRODUCTS U.S., JEFFERSON, LOUISIANA

Area of Investigation	Remedial Actions Taken	Constituents of Concern ¹ and Maximum Levels Remaining in Soil and Groundwater ²	Limiting RECAP Standards (MO-1)	Location of Maximum Concentration (Year)	Clean-up Status	Institutional Controls
AOI-1, Southwest Tank Farm	Excavation and off-site disposal of impacted soil	Soil	N/A	N/A	NFA, 10/18/11	Conveyance notification filed in Jefferson Parish on 06/14/11; use limited to industrial/commercial activities
		Groundwater	Arsenic – 0.22 mg/L TPH-ORO – 24 mg/L TPH-DRO – 24 mg/L	MW-39 (2010) MW-39 (2003) MW-39 (2003)		
AOI-2, Southeast Tank Farm	Excavation and off-site disposal of barium-impacted soil	Soil	Barium – 1,570 mg/kg Lead – 16.30 mg/kg TPD-DRO – 440 mg/kg	AOI2-EX2-SW1 (3') SB-10-01 (0-2') GP-SETF-2 (2-3')	NFA, 02/07/12	Conveyance notification filed in Jefferson Parish on 12/19/11; use limited to industrial/commercial activities
		Groundwater	Arsenic – 0.099 mg/L TPH-DRO – 3.02 mg/L TPH-ORO – 3.82 mg/L	MW-66 (2010) MW-65 (2003) MW-66 (2003)		
AOI-3, Northwest Tank Farm	No remedial action required	Soil	All concentrations were less than screening standards	N/A	NFA, 10/18/11	Conveyance notification filed in Jefferson Parish on 06/14/11; use limited to industrial/commercial activities
		Groundwater	TPG-ORO – 2.98 mg/L TPH-DRO – 0.728 mg/L C21-C35 Aromatics – 0.21 mg/L	MW-38 (2003) MW-36 (2003) MW-38 (2009)		
AOI-4, Northeast Tank Farm	Installation of sheet pile wall, fluid extraction, passive recovery and vacuum extraction of LNAPL; excavation of impacted soil	Soil	TPH-DRO – 2430 mg/kg TPH-ORO – 8500 mg/kg	HA-NETF-4 (0-1') HA-NETF-1 (0-1')	NFA, 06/07/12	Conveyance notification filed in Jefferson Parish on 04/05/12; use limited to industrial/commercial activities
		Groundwater	C10-C12 Aromatics – 0.24 mg/L 2-Methylnaphthalene – 0.008 mg/L Naphthalene – 0.15 mg/L Arsenic – 0.0193 mg/L	MW-10-06 (2012) MW-10-06 (2012) MW-10-06 (2012) MW-10-06 (2012)		
AOI-5, Compound Blending House	LNAPL recovery (sump free product recovery system and vacuum extraction) and impacted soil excavation	Soil	All soil COCs were less than screening standards by 2011	N/A	NFA, 06/18/12	Conveyance notification filed in Jefferson Parish on 05/30/12; use limited to industrial/commercial activities
		Groundwater	All groundwater COCs were less than screening standards by 2012	N/A		

Former Metairie Lube Oil Blending Facility, Shell Oil Products U.S. “Ready for Reuse Determination”

Enclosure 2 – “Environmental Conditions Table”

Page 1 of 2

- ¹ Constituents of Concern (COCs) are those contaminants present at a site at concentrations that exceed the RECAP Screening Standards.
- ² In cases of multiple year sampling events, the most recent results are reported.

Information for this table was derived from the No Further Action - At This Time notification for each AOI:

Document Name	Document Date	EDMS Document No.
No Further Action At This Time Notification, Southwest Tank Farm (SWTF)/Area of Investigation 1 (AOI-1)	October 18, 2011	8173234
No Further Action At This Time Notification, Southeast Tank Farm (SETF)/Area of Investigation 2 (AOI-2)	February 7, 2012	8279187
No Further Action At This Time Notification, Northwest Tank Farm (NWTF)/Area of Investigation 3 (AOI-3)	October 18, 2011	8173236
No Further Action At This Time Notification, Northeast Tank Farm (NETF)/Area of Investigation 4 (AOI-4)	June 7, 2012	8421430
No Further Action At This Time Notification, Compound Blending House (CBH)/Area of Investigation 5 (AOI-5)	June 18, 2012	8433328

ENCLOSURE 3

**READY FOR REUSE AGENCY CONTACTS
FORMER METAIRIE LUBE OIL BLENDING FACILITY
SHELL OIL PRODUCTS U.S.
JEFFERSON, LOUISIANA**

For a copy of the administrative record providing detailed information regarding environmental conditions at the Former Metairie Lube Oil Blending Facility, 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 Former Metairie Lube Oil Blending Facility please contact:

Mr. Fernando Iturralde
Geologist 3
Underground Storage Tank and Remediation Division
Office of Environmental Compliance
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or

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