September 8, 2010

Mr. Vernon Dunn
P.O. Box 1784
Blowing Rock, NC 28605

Re: Ready for Reuse Determination
Micro Chemical Company
Winnsboro, LA
LDEQ AI # 1387
EPA I.D. Number LA008181927

Dear Mr. Dunn:

The United States Environmental Protection Agency (EPA) Region 6 and the Louisiana Department of Environmental Quality (LDEQ) have determined that the Micro Chemical Company (Micro Chemical) Winnsboro facility (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 Property covered by this Ready for Reuse Determination, encompassing approximately 3.8 acres, is located at 3393 Front Street in Winnsboro (Franklin Parish), Louisiana, just east of the intersection of LA Highway 15 and Allison Street. The Property, which was utilized to formulate, blend and package agricultural and other specialty chemicals, was operated by Micro Chemical from 1954 until September 30, 2008.

With this Ready for Reuse Determination, LDEQ and EPA Region 6 agree that Micro Chemical has successfully conducted investigation, remediation and risk management activities to ensure that the environmental conditions at the Property are protective of human health and the environment based on its current and anticipated future use as commercial and/or industrial property. The Ready for Reuse Basis of Decision is provided as Enclosure 1 to this letter. A plat of survey and legal description for Tract "A" are provided as Enclosure 2. Information regarding remedial action and risk management activities conducted to ensure protectiveness, as well as a summary of residual onsite constituent concentrations, is provided in Enclosure 3. Copies of relevant documents may be obtained from EPA and/or LDEQ at the addresses provided in

Enclosure 4. Figures showing the various units and the ground water monitoring system are provided as Enclosure 5.

If conditions on the property change (e.g., the land use is altered or new site receptors are identified) or additional impacted media are discovered, the current owner/ operator will notify EPA and LDEQ and it may become necessary to perform additional 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,

Peggy M. Hatch
Secretary
Louisiana Department
of Environmental Quality

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

Enclosures:
1. Ready for Reuse Basis of Decision
2. Plat of Survey and Legal Description for Tract "A"
3. Environmental Conditions Table
4. Agency Contacts
5. Figures

ENCLOSURE 1

READY FOR REUSE BASIS OF DECISION

MICRO CHEMICAL COMPANY
WINNSBORO, LOUISIANA FACILITY

Introduction

The United States Environmental Protection Agency (EPA) Region 6 and the Louisiana Department of Environmental Quality (LDEQ) have determined that the Micro Chemical Company (Micro Chemical) Winnsboro 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 conditions that are protective of human health and the environment, based on its current and anticipated future use as commercial and/or industrial property. A description of the Property, site background information, and a summary of remedial activities and current conditions are provided in the following sections.

Property Description

The Ready for Reuse determination is being issued for Tract "A," the Facility Area, as shown on the Plat of Survey provided in Enclosure 2. The Facility Area, or "Property," is an approximate 3.8-acre parcel of land in a commercial/industrial area on the north side of Winnsboro, Louisiana, located within Section 23 of Township 14 North, Range 7 East of Franklin Parish. A legal description of Tract "A" is as also provided in Enclosure 2.

Facility Background

The Micro Chemical facility is an inactive plant located at 3393 Front Street in Winnsboro, Louisiana, just east of the intersection of LA Highway 15 and Allison Street. From 1954 until its closure in 2008, Micro Chemical operations consisted of the formulation, blending, and packaging of agricultural and other specialty chemicals. Micro Chemical received the active ingredients (raw materials) in either liquid or solid form and combined them with solvents or clays to form either emulsifiable concentrates or dry products. What little repackaging was performed at the facility consisted of redistributing bulk quantities into smaller containers.

Approximately 1.5 acres on the northeastern portion of the property were historically used for disposal of empty containers, used equipment, and production residues. This area is referred to as the Former Disposal Site (FDS) Consolidation Area (Tract "B" on

the attached Plat of Survey, Enclosure 2). The Consolidation Area and a buffer zone, which together encompass just less than 2.2 acres, are not covered by the Ready for Reuse Determination.

Regulatory Framework and RCRA Submittals

In 1991, Micro Chemical initiated a site investigation pursuant to a Louisiana Department of Agriculture and Forestry (LDAF) directive. The investigation results showed elevated levels of organochlorine pesticides and arsenic in soil and ground water at the site. In September 1994, Micro Chemical entered into an Administrative Order issued pursuant to EPA's authority under Section 3008(h) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA). The Order and the accompanying RCRA Corrective Action Plan specified the work to be performed at the facility. The elements of work include the following: Interim Measures (IM), RCRA Facility Investigation (RFI), Corrective Measures Study and Corrective Measures Implementation. The IM were completed during the summer of 1996; EPA approved the *Interim Measures Implementation Report* in October 1996. Following the IM, Micro Chemical commenced work on the RFI. The work performed during the RFI phase included the following:

- Preparation and submittal of an *Updated Current Conditions Report*;
- Preparation and submittal of an *RFI Work Plan*;
- Implementation of the *RFI Work Plan*; and
- Preparation and submittal of an *RFI Report*.

Summary of Remedial Measures for Soils

1996 Interim Measures for Soils

In February 1995, Micro Chemical submitted to U.S. EPA and LDEQ a document entitled *Interim Measures Work Plan, Former Disposal Site* (ERM-Southwest, February 17, 1995). Section 3.0 of the *IM Work Plan* included information on stabilization activities proposed to address affected soils and debris within the Former Disposal Site (FDS) area. On April 22, 1995, U.S. EPA issued a letter approving the IM Work Plan for implementation.

Pre-construction activities for the FDS stabilization and consolidation included:

- Collection and analysis of soil and sediment samples from areas within and adjacent to the FDS in June, August and December 1995;
- Construction of decontamination facilities capable of treating wastewater from equipment decontamination;

- Pickup, consolidation and cleaning of inert debris from the FDS; and
- Preparation and submittal of an *FDS Interim Measures Stabilization Construction Package* on April 29, 1996.

After receiving U.S. EPA approval of the *IM Stabilization Construction Package*, Micro Chemical mobilized all necessary equipment, materials and personnel. Consolidation and capping activities began on June 3 and were completed on June 28, 1996. Consolidation and capping included the following subtasks:

1. Clearing and grubbing of the surface, including the removal of the uppermost six inches of soil;
2. Excavation of affected soils deeper than six inches and relocation to the Consolidation Area for placement and compaction;
3. Backfill of excavations with clean, off-site soils;
4. Shaping of consolidated soils;
5. Capping of the consolidation area with fabric underliner and synthetic liner;
6. Fenceline air monitoring;
7. Confirmatory soil sampling; and
8. Erosion control, revegetation, and irrigation with treated decon water.

Detailed procedures for all the above subtasks were provided in the *IM Stabilization Construction Package* and were approved by U.S. EPA. These procedures were also used during the additional soil removal, consolidation, capping and backfilling activities conducted in late-2008 and early-2009 and summarized later in this document.

Results of 2008 Soil Sampling

In 2008, Micro Chemical conducted an additional site investigation that confirmed the presence of organochlorine pesticides and arsenic in soils in areas that were not addressed during the IM consolidation and capping conducted in 1996. In addition to soil along the abandoned toxaphene delivery system (TDS) line and within the historical TDS storage area, soils containing elevated arsenic levels were encountered in an area where monosodium methanearsenate (MSMA) was historically stored and handled.

Additional Soil Removal, Consolidation and Replacement

Micro Chemical performed additional soil removal, consolidation and capping to address soils in the vicinity of the TDS line and in the MSMA area in late-2008 and early-2009. The additional soil remediation resulted in the removal of soils exceeding the EPA Regional Screening Levels in the uppermost 2 feet below land surface (bls). The removal of soils to a depth of 2 feet eliminated both the potential for direct contact with affected soils and the potential for surface water runoff to come in contact with affected soils.

Deeper excavation was performed in an area where elevated levels of toxaphene in soils were encountered at depths extending to the top of ground water. The depth and limited lateral extent of toxaphene impacts within this area (see Enclosure 5 – Figure 3) suggests a slow, long-term leak from some component of the toxaphene tankage that historically existed in this area. Soils surrounding former boring location TDS-9 were excavated and removed to a depth of approximately 20 feet below grade to address a potential source of ongoing ground water contamination.

Before backfilling excavations, soil samples were collected to document residual constituent concentrations. One composite sample was collected from the base and sidewalls of each of the following Excavation Areas: A, C, D, E and F. Due to its larger size, two composite samples were collected from Area B. All samples were analyzed for arsenic and organochlorine pesticides. Confirmation sampling results are summarized in the Environmental Conditions Table provided in Enclosure 3.

In all excavation areas except for Areas C and E, a layer of mesh fabric was placed in the base of the excavation before backfilling. The fabric will serve as a line of demarcation indicating that excavation and replacement of soils has occurred to that depth. The land use restrictions placed on the property will indicate that any proposed subsurface work (e.g., digging, grading or drilling) extending past the geotextile fabric must first be approved by EPA and LDEQ, and would also require that any materials brought to the surface from beneath the fabric be appropriately tested and managed.

All excavated areas were filled with clean soils from a local dirt pit. Excavated areas were compacted using a bulldozer and were seeded with a combination of Bermuda grass and Winter Rye grass seed.

Consolidation and Capping of Additional Materials

Again, it is important to stress that the FDS consolidation area and buffer zone are not covered by the Ready for Reuse Determination. Nonetheless, in order to fully document the work performed to address affected soils at the site, procedures for the consolidation and capping of additional soils are presented herein.

Approximately 1,000 cubic yards of soil were excavated and moved to the northwestern corner of the FDS Consolidation Area in late-2008 and early-2009. Soils were compacted and shaped to extend north and west from the previous capped area. Once all additional material had been graded and shaped, new liner was installed extending from the previously existing cap to cover the additional material. Panels of liner were welded to the existing cap and at each seam between new panels. The material was keyed into an anchor trench on the new northwest corner of the consolidation area.

Placement and Seeding of Soil on Synthetic Cap

After consolidation and capping were completed, soil was placed and vegetative cover planted over the entire FDS Consolidation Area. Before placement of soil, non-destructive vacuum testing was performed to demonstrate that the liner installed in 1996 is still viable. Approximately one foot of soil was then placed on top of the liner and lightly compacted using a bulldozer. The soil cap was seeded with a combination of Bermuda and Winter Rye grass seed.

EPA and LDEQ are currently exploring opportunities to incorporate ecological enhancements (native flowers, grasses, shrubs, etc.) into the landfill cap design.

Site Security

Once the soil cap had been constructed and seeded, the consolidation area was surveyed and a fence was installed around the perimeter of the area. The fence was constructed of driven metal posts and three strands of barbed wire. Signs were posted on the perimeter of the fence at intervals of approximately 200 feet stating, "Warning – Hazardous Area; Authorized Personnel Only."

Summary of Ground Water Conditions

From 1995 through 2007, Micro Chemical performed semiannual sampling of onsite and offsite ground water monitoring wells. Monitoring results indicate that ground water contamination beneath the site is in steady-state or declining conditions. Although site constituents are present in ground water downgradient of the facility, the number and concentrations of constituents detected are generally either unchanged or decreasing over the past five years. The two factors believed to have contributed most to these conditions are: 1) the consolidation and capping of pesticides-affected soils in 1996 (i.e., source containment); and 2) the extremely low ground water gradient in the Alluvial Aquifer (i.e., less than one foot per 1,000 feet).

Because wells located just south of the facility have contained low concentrations of target constituents (mostly organochloride pesticides and arsenic), Micro Chemical conducted additional investigations to delineate the lateral extent of affected ground water from 2007 through 2009. The extent of affected ground water has now been fully delineated. Micro Chemical will soon submit a post-closure ground water monitoring plan to EPA and LDEQ for review and approval. In addition to post-closure monitoring, ground water use restrictions will be placed on Tract "A,"

References

Documents related to site investigations, risk management activities, and remedial actions at the Micro Chemical Company 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 4 to the Ready for Reuse Determination letter. A list of documents supporting this Ready for Reuse Determination Basis of Decision is provided below:

"Final Environmental Site Investigation Data Report"; Gulf Engineering & Consultants Inc.; May 1991 [EDMS Document Nos. 376790, 376839, 376837, 376805, 376791, 376859, 377306, 377268,i377221, 377216,i377132,iandi376881]

"Administrative Order on Consent, Former Disposal Site"; US EPA Region 6; September 30, 1994 [EDMS Document No. 35531140]

"Final Interim Measures Workplan"; ERM-Southwest, Inc.; February 17, 1995 [EDMS Document Nos. 1361037, 6271608, 1362142, 1362004,i1361925, 1361872, 1361183, 1361178, 1361176, 1361106, 1361049, 8014595, 1363866, 1362535, 1362509, 1362505, 1362503, 1362493, 1362487, 1362477, 1362476, 1362437, 1362310, 1362236, 1361038, 1361044, and 1361040]

"Draft Current Conditions Report"; ERM-Southwest, Inc.; July 20, 1995 [EDMS Document No. 6273758]

"FDS Interim Measures Stabilization Construction Package"; Michael Pisani & Associates, Inc.; April 29, 1996 [To be submitted to EDMS]

"Interim Measures Implementation Report"; Michael Pisani & Associates, Inc.; August 29, 1996 [cover letter is EDMS Document No. 8004205; report to be submitted to EDMS]

"Updated Current Conditions Report"; Michael Pisani & Associates, Inc.; December 3, 1996 [To be submitted to EDMS]

"Draft RCRA Facility Investigation Report"; Michael Pisani & Associates, Inc.; May 10, 1999 [EDMS Document Nos. 1360415, 1360416, 1360496, 1360497, 1360495, 1360501, 1360566, 1360572, 1360607, 1363841, 1361762, 1361754, 1361731, 1361729, 1361727, 1361725, 1361722, 1361721, 1363848, 1360863, 1360834, 1360691, 1360622, 1360593, 1360570, and 1360503]

"*Work Plan for the Delineation of Affected Ground Water*"; Michael Pisani & Associates, Inc.; May 24, 2007 [EDMS Document No. 35997682]

"*Scoping Meeting Follow-up and Proposed Additional Investigations*"; Michael Pisani & Associates, Inc.; June 16, 2008 [EDMS Document No. 48921967]

"*Work Plan for Additional Soil Consolidation and Capping*"; Michael Pisani & Associates, Inc.; November 24, 2008 [EDMS Document No. 48921983]

"*Work Plan for Installation of Plume-Defining Wells*"; Michael Pisani & Associates, Inc.; December 3, 2009 [EDMS Document No. 48922002]

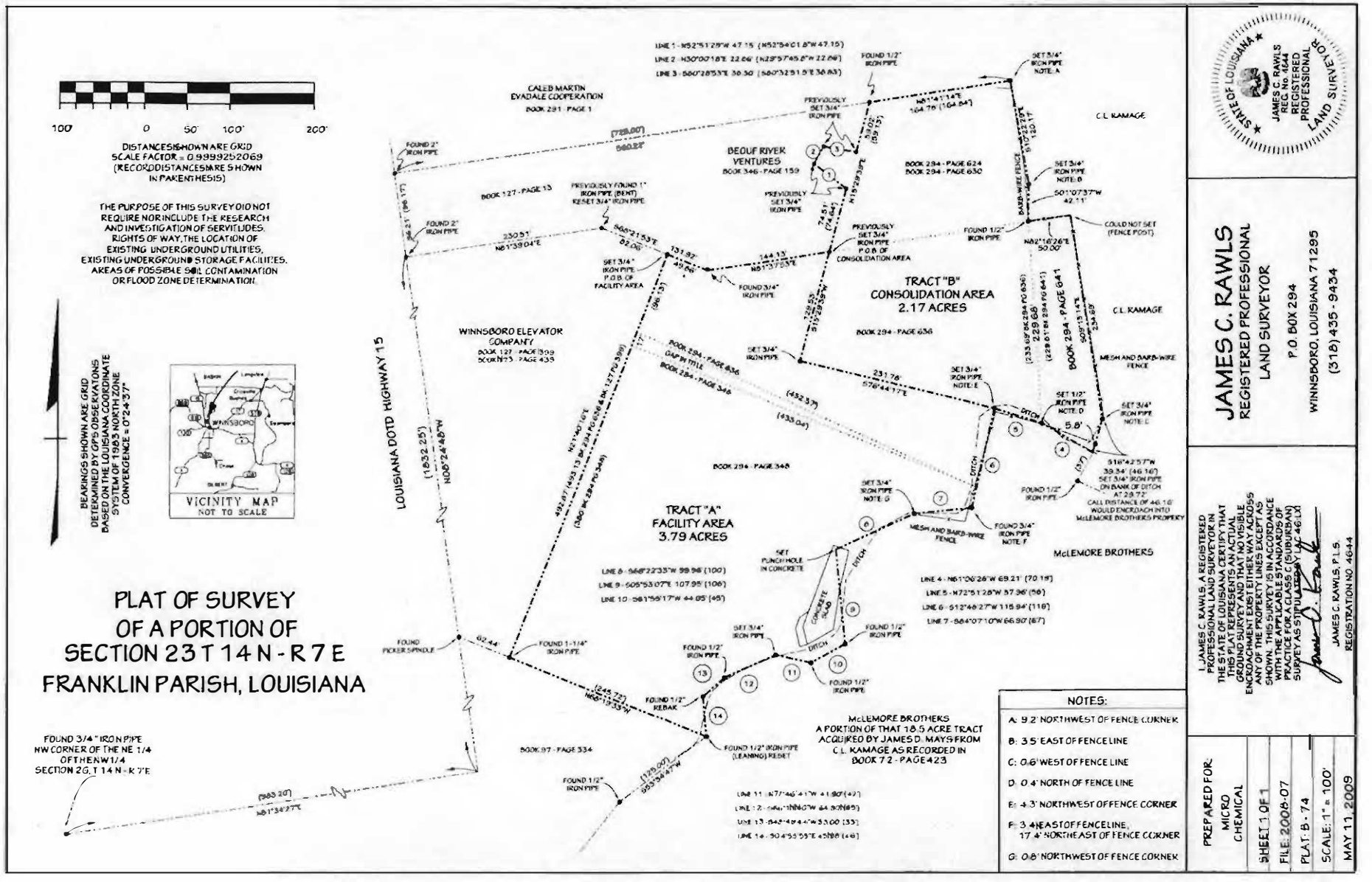
"*Risk Evaluation Report/Risk Management Plan*"; Michael Pisani & Associates, Inc.; [To be submitted prior to Final Remedy Selection]

"*Ground Water Monitoring Plan*"; Michael Pisani & Associates, Inc.; [To be submitted prior to Final Remedy Selection]

ENCLOSURE 2

PLAT OF SURVEY AND LEGAL DESCRIPTION FOR TRACT "A"

MICRO CHEMICAL COMPANY WINNSBORO, LOUISIANA FACILITY


100' 0 50' 100' 200'
DISTANCES SHOWN ARE GRID
SCALE FACTOR = 0.99992520 69
(RECORD DISTANCES ARE SHOWN IN PARENTHESIS)
THE PURPOSE OF THIS SURVEY DID NOT REQUIRE NOR INCLUDE THE RESEARCH AND INVESTIGATION OF SERVITUDES, RIGHTS OF WAY, THE LOCATION OF EXISTING UNDERGROUND UTILITIES, EXISTING UNDERGROUND STORAGE FACILITIES, AREAS OF POSSIBLE SOIL CONTAMINATION OR FLOOD ZONE DETERMINATION.
BEARINGS SHOWN ARE GRID DETERMINED BY GPS OBSERVATIONS BASED ON THE LOUISIANA COORDINATE SYSTEM OF 1983 NORTH ZONE CONVERGENCE = 0°24'37"
VICINITY MAP
NOT TO SCALE
PLAT OF SURVEY
OF A PORTION OF
SECTION 23 T 14 N - R 7 E
FRANKLIN PARISH, LOUISIANA
CALEB MARTIN EVADALE COOPERATION
BOOK 291 - PAGE 1
BOEUF RIVER VENTURES
BOOK 346 - PAGE 159
BOOK 294 - PAGE 624
BOOK 294 - PAGE 630
C.L. RAMAGE
TRACT "B"
CONSOLIDATION AREA
2.17 ACRES
BOOK 294 - PAGE 636
BOOK 294 - PAGE 641
WINNSBORO ELEVATOR COMPANY
BOOK 127 - PAGE 309
BOOK 133 - PAGE 439
LOUISIANA DOTD HIGHWAY 15
TRACT "A"
FACILITY AREA
3.79 ACRES
BOOK 294 - PAGE 348
McLEMORE BROTHERS
BOOK 97 - PAGE 334
McLEMORE BROTHERS
A PORTION OF THAT 18.5 ACRE TRACT
ACQUIRED BY JAMES D. MAYS FROM
C.L. RAMAGE AS RECORDED IN
BOOK 72 - PAGE 423
FOUND 3/4" IRON PIPE
NW CORNER OF THE NE 1/4
OF THE NW 1/4
SECTION 26, T 14 N - R 7 E
NOTES:
A: 9.2' NORTHWEST OF FENCE CORNER
B: 3.5' EAST OF FENCE LINE
C: 0.6' WEST OF FENCE LINE
D: 0.4' NORTH OF FENCE LINE
E: 4.3' NORTHWEST OF FENCE CORNER
F: 3.4' NEAST OF FENCE LINE, 17.4' NORTHEAST OF FENCE CORNER
G: 0.8' NORTHWEST OF FENCE CORNER
STATE OF LOUISIANA
JAMES C. RAWLS
REG. No. 4644
REGISTERED
PROFESSIONAL
LAND SURVEYOR
JAMES C. RAWLS
REGISTERED PROFESSIONAL
LAND SURVEYOR
P.O. BOX 294
WINNSBORO, LOUISIANA 71295
(318) 435-9434
I, JAMES C. RAWLS, A REGISTERED PROFESSIONAL LAND SURVEYOR IN THE STATE OF LOUISIANA CERTIFY THAT THIS PLAT REPRESENTS AN ACTUAL GROUND SURVEY AND THAT NO VISIBLE ENCROACHMENT EXIST EITHER WAY ACROSS ANY OF THE PROPERTY LINES EXCEPT AS SHOWN. THIS SURVEY IS IN ACCORDANCE WITH THE APPLICABLE STANDARDS OF PRACTICE FOR A CLASS C (SUBURBAN) SURVEY AS STIPULATED IN LAC 46:LXI
JAMES C. RAWLS, P.L.S.
REGISTRATION NO. 4644
PREPARED FOR:
MICRO CHEMICAL
SHEET 1 OF 1
FILE: 2008-07
PLAT: B - 74
SCALE: 1" = 100'
MAY 11, 2009

Facility Property Area "Tract A"

A certain tract or parcel of land situated in Section 23, Township 14 North, Range 7 East, Franklin Parish, Louisiana; being more particularly described as follows:

Commence at the Northwest corner of the Northeast Quarter of the Northwest Quarter (NE ¼ of NW ¼) of Section 26, Township 14 North, Range 7 East, Franklin Parish, Louisiana, a found ¾" iron pipe.

Thence run N 81°34'27" E, a distance of 983.20 feet, more or less.

Thence run N 08°24'48" W, a distance of 1832.25 feet, more or less, to a found 2" iron pipe.

Thence run N 81°39'04" E, a distance of 230.51 feet, more or less, to a previously set ¾" iron pipe.

Thence run S 68°21'53" E, a distance of 82.06 feet, more or less, to a set ¾" iron pipe and a POINT OF BEGINNING.

Thence continue S 68°21'53" E, a distance of 49.86 feet, more or less, to a found ¾" iron pipe.

Thence run N 81°37'53" E, a distance of 144.13 feet, more or less, to a previously set ¾" iron pipe.

Thence run S 15°29'39" W, a distance of 129.53 feet, more or less, to a set ¾" iron pipe.

Thence run S 76°44'17" E, a distance of 231.78 feet, more or less, to a set ¾" iron pipe.

Thence run S 12°48'27" W, a distance of 115.94 feet, more or less, to a found ¾" iron pipe.

Thence run S 84°07'10" W, a distance of 66.90 feet, more or less, to a set ¾" iron pipe.

Thence run S66°22'33"W, a distance of 99.96 feet, more or less, to a set punch hole in concrete.

Thence run S05°53'07"E, a distance of 107.95 feet, more or less, to a found ½" iron pipe.

Thence run S 61°55'17" W, a distance of 44.95 feet, more or less, to a found ½" iron pipe.

Thence run N 77°46'41" W, a distance of 41.90 feet, more or less, to a set ¾" iron pipe.

Thence run S 66°11'40" W, a distance of 64.90 feet, more or less, to a found ½" iron pipe.

Thence run S 48°49'44" W, a distance of 33.00 feet, more or less, to a found ½" rebar.

Thence run S 4°55'55" E, a distance of 45.98 feet, more or less, to a found ½" iron pipe.

Thence run N 68°19'33" W, a distance of 245.72 feet, more or less, to a found 1-¼" iron pipe.

Thence run N 21°40'16" E, a distance of 492.87 feet, more or less, back to the POINT OF BEGINNING, and containing 3.79 acres, more or less.

This description is based on the boundary survey and plat made by James C. Rawls, Registered Professional Land Surveyor, dated May 11, 1998.

James C. Rawls, PLS

STATE OF LOUISIANA
JAMES C. RAWLS
REG. No. 4644
REGISTERED
PROFESSIONAL
LAND SURVEYOR

ENCLOSURE 3

ENVIRONMENTAL CONDITIONS TABLE

MICRO CHEMICAL COMPANY
WINNSBORO, LOUISIANA FACILITY

Unit/AOC Name	Remedial Action Taken	Contaminants of Concern (COCs)	Cleanup Standards	Cleanup Status	Institutional Controls
Former Toxaphene Delivery System	Removed piping and affected soil to a depth of 2' bls	Max. Remaining: 4,4'-DDD - 2.29 ppm 4.4'-DDT - 1.02 ppm Dieldrin - 4.64 ppm Heptachlor - 2.11 ppm Toxaphene - 228 ppm Arsenic - 5.25 ppm	EPA RSL[1]: 720 ppm 510 ppm 11 ppm 38 ppm 160 ppm 160 ppm	NFA-ATT to be issued as part of the final remedy Statement of Basis	Conveyance notice will stipulate non-residential use only. Also, no excavation, drilling and/or pile driving without notice to EPA/LDEQ and proper management of soils.
Former Toxaphene Storage/MSMA Handling Area	Removed piping and affected soil to a depth of 2' bls Affected soils near boring TDS-9 removed to a depth of 20' bls	Max. Remaining: 4,4'-DDD - 0.0992 ppm 4.4'-DDT - 0.0974 ppm Dieldrin - 0.0562 ppm Endosulfan Sulfate - 0.0036 ppm Toxaphene - 4.67 ppm Arsenic - 150 ppm	EPA RSL[1]: 720 ppm 510 ppm 11 ppm 450 ppm[2] 160 ppm 160 ppm	NFA-ATT to be issued as part of the final remedy Statement of Basis	Conveyance notice will stipulate non-residential use only. Also, no excavation, drilling and/or pile driving without notice to EPA/LDEQ and proper management of soils.

ENVIRONMENTAL CONDITIONS TABLE (Cont.)

Unit/AOC Name	Remedial Action Taken	Contaminants of Concern (COCs)	Cleanup Standards	Cleanup Status	Institutional Controls
Former Septic Tank Leach Field	Removed piping and affected soil to a depth of 3' bls.	Max. Remaining: Aldrin - 0.499 ppm Beta-BHC - 0.00665 ppm Delta-BHC - 0.00449 ppm 4,4'-DDD - 4.48 ppm 4,4'-DDE - 1.26 ppm 4.4'-DDT - 9.51 ppm Dieldrin - 1.69 ppm Endosulfan Sulfate - 2.43 ppm Endrin & Endrin Aldehyde - 4.3 ppm Heptachlor - 1.44 ppm Heptachlor Epoxide - 0.00295 ppm Toxaphene - 106 ppm Disulfoton - 0.0538 ppm Naled - 0.194 ppm Arsenic - 17.3 ppm	EPA RSL[1]: 10 ppm 96 ppm 1.6 ppm[3] 720 ppm 510 ppm 700 ppm 11 ppm 450 ppm[2] 18,000 ppm[4] 29 ppm 19 ppm 160 ppm 2,500 ppm 12,000 ppm 160 ppm	NFA-ATT to be issued as part of the final remedy Statement of Basis	Conveyance notice will stipulate non-residential use only. Also, no excavation, drilling and/or pile driving without notice to EPA/LDEQ and proper management of soils.

ENVIRONMENTAL CONDITIONS TABLE (Cont.)

Unit/AOC Name	Remedial Action Taken	Contaminants of Concern (COCs)	Cleanup Standards	Cleanup Status	Institutional Controls
Site Ground Water[5]	Containment and control via Monitored Natural Attenuation proposed as final remedy	Max. Remaining: Alpha-BHC - 0.00092 ppm Beta-BHC - 0.00517 ppm Delta-BHC - 0.00248 ppm 4,4'-DDD - 0.000338 ppm Dieldrin - 0.000259 ppm Endosulfan I & II - 0.0006774 ppm Arsenic - 0.259 ppm	RECAP GW_{sse}[6]: 0.00003 ppm 0.00006 ppm 0.00006 ppm[7] 0.0002 ppm 0.0025 ppm 0.022 ppm[8] 0.01 ppm	Post-closure ground water monitoring will be performed in accordance with an approved plan	Deed restriction prohibiting ground water use will be imposed on Tract "A".

1 Per agreement with EPA and LDEQ, soils within the uppermost 2 feet below land surface (bls) have been cleaned up to EPA Regional Screening Levels (RSLs) for industrial use; institutional controls will be placed on soils below a depth of 2 feet bls. All values shown in the table are confirmation samples taken at depth.

2 LDEQ RECAP industrial soil screening standard for endosulfan is compared to the total concentrations of endosulfan, endosulfan I, endosulfan II, and endosulfan sulfate.

3 LDEQ RECAP industrial soil screening standard for beta-BHC is utilized as a surrogate for delta-BHC due to beta-BHC exhibiting the same critical effect as delta-BHC and having the greatest chronic toxicity of all the BHC isomers.

4 EPA Regional Screening Level for endrin is utilized for comparison to the total concentrations of endrin and endrin aldehyde.

5 The remaining contaminant levels shown are from wells just downgradient of the southern property boundary during the most recent ground watermonitoring event.

6 Per agreement with EPA and LDEQ, ground water has been delineated to LDEQ RECAP Ground Water Screening Standards; post-closure ground water monitoring will be performed to demonstrate monitored natural attenuation.

7 LDEQ RECAP Ground Water Screening Standard for beta-BHC is utilized as a surrogate for delta-BHC due to beta-BHC exhibiting the same critical effect as delta-BHC and having the greatest chronic toxicity of all the BHC isomers.

8 LDEQ RECAP Ground Water Screening Standard for endosulfan is compared to the total concentrations of endosulfan, endosulfan I, endosulfan II, and endosulfan sulfate.

ENCLOSURE 4

AGENCY CONTACTS

MICRO CHEMICAL COMPANY
WINNSBORO, LOUISIANA FACILITY

For a copy of the administrative record providing detailed information regarding environmental conditions at the Micro Chemical Winnsboro facility (the "Property"), please contact:

Louisiana Department of Environmental Quality
Public Records Center
Galvez Building, Room 127
602 N. Fifth Street
Baton Rouge, LA 70802
(225) 219-3il 68

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

Mr. Rick Ehrhart
U.S. Environmental Protection Agency Region 6
Corrective Action/Waste Minimization Section
Mail Code 6PD-C
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
(214) 665-6765
ehrhart.richard@epa.gov

or

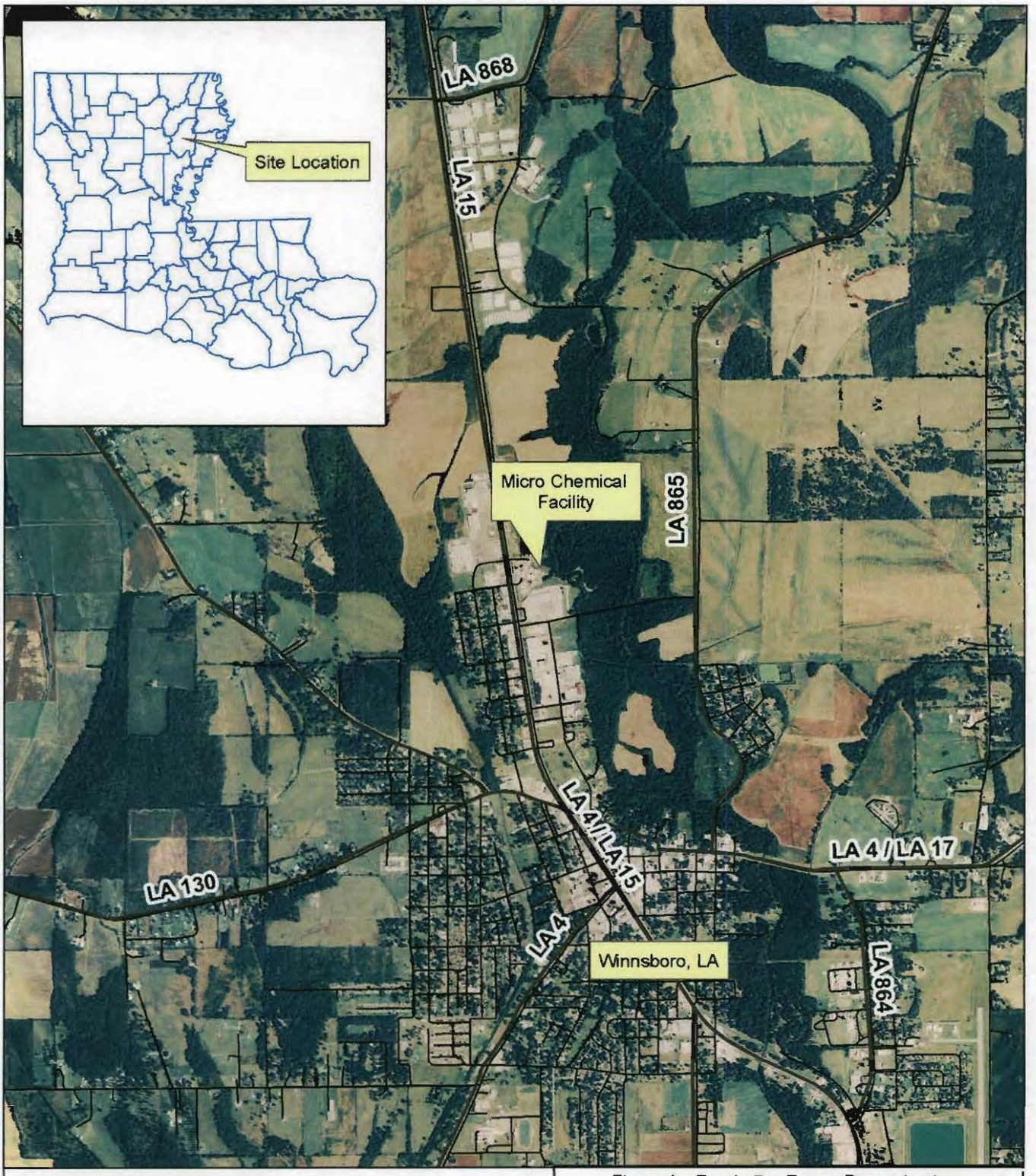
Mri Steve Archibald
Louisiana Department of Environmental Quality
Northeast Regional Office
1823 Hwy 546
West Monroe, LA 71292-0442
(318) 362-5439
steven.archibald@la.gov

ENCLOSURE 5

FIGURES

MICRO CHEMICAL COMPANY
WINNSBORO, LOUISIANA FACILITY

Figure 1 – Site Location Map
Figure 2 – Facility Map with Areas of Investigation
Figure 3 – 2008-2009 Soil Removal Areas
Figure 4 – Current Ground Water Monitoring System



2007 digital orthophoto from USDA.

Legend

Major Road — Other Road

0 0.25 0.5 1 Miles

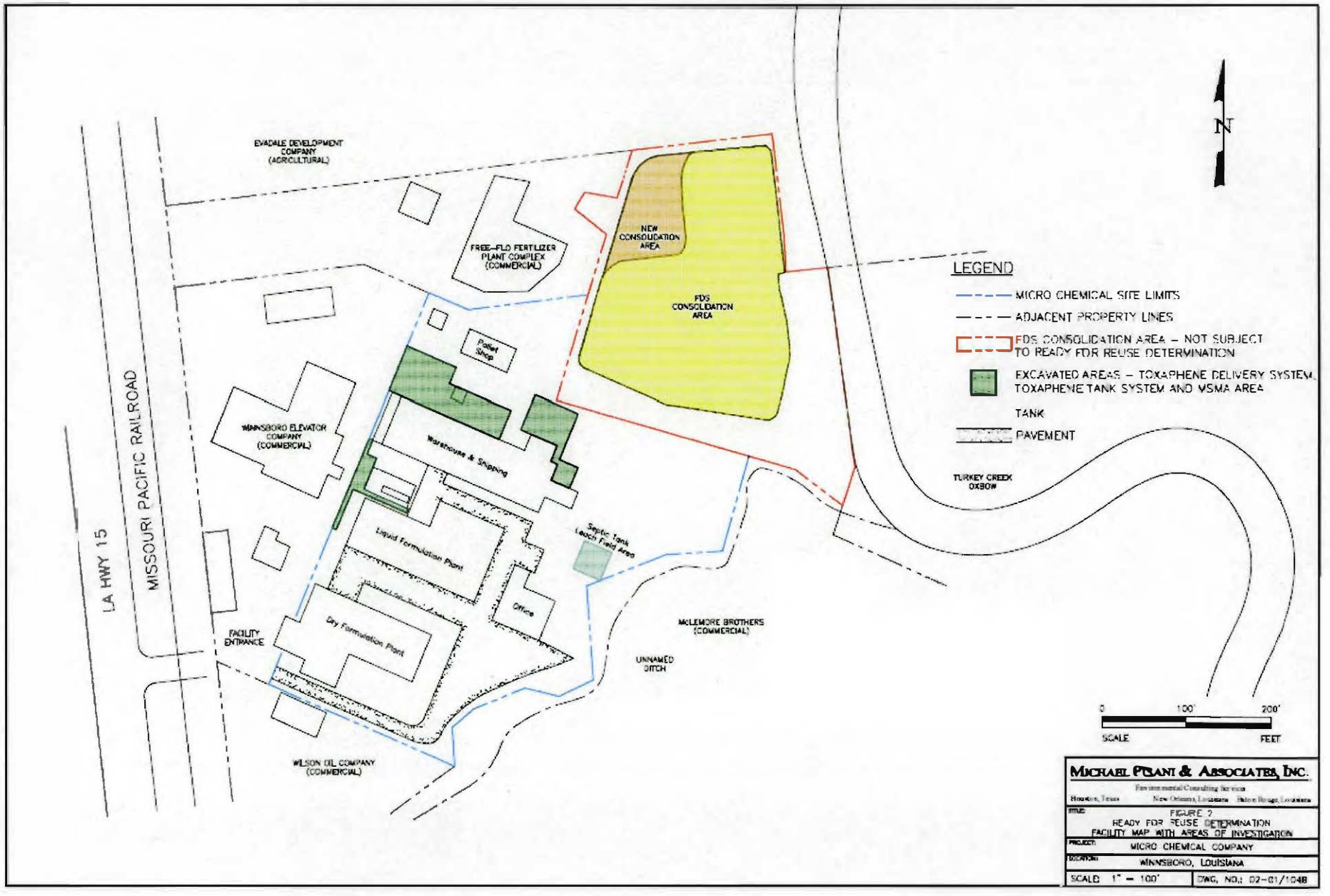
N

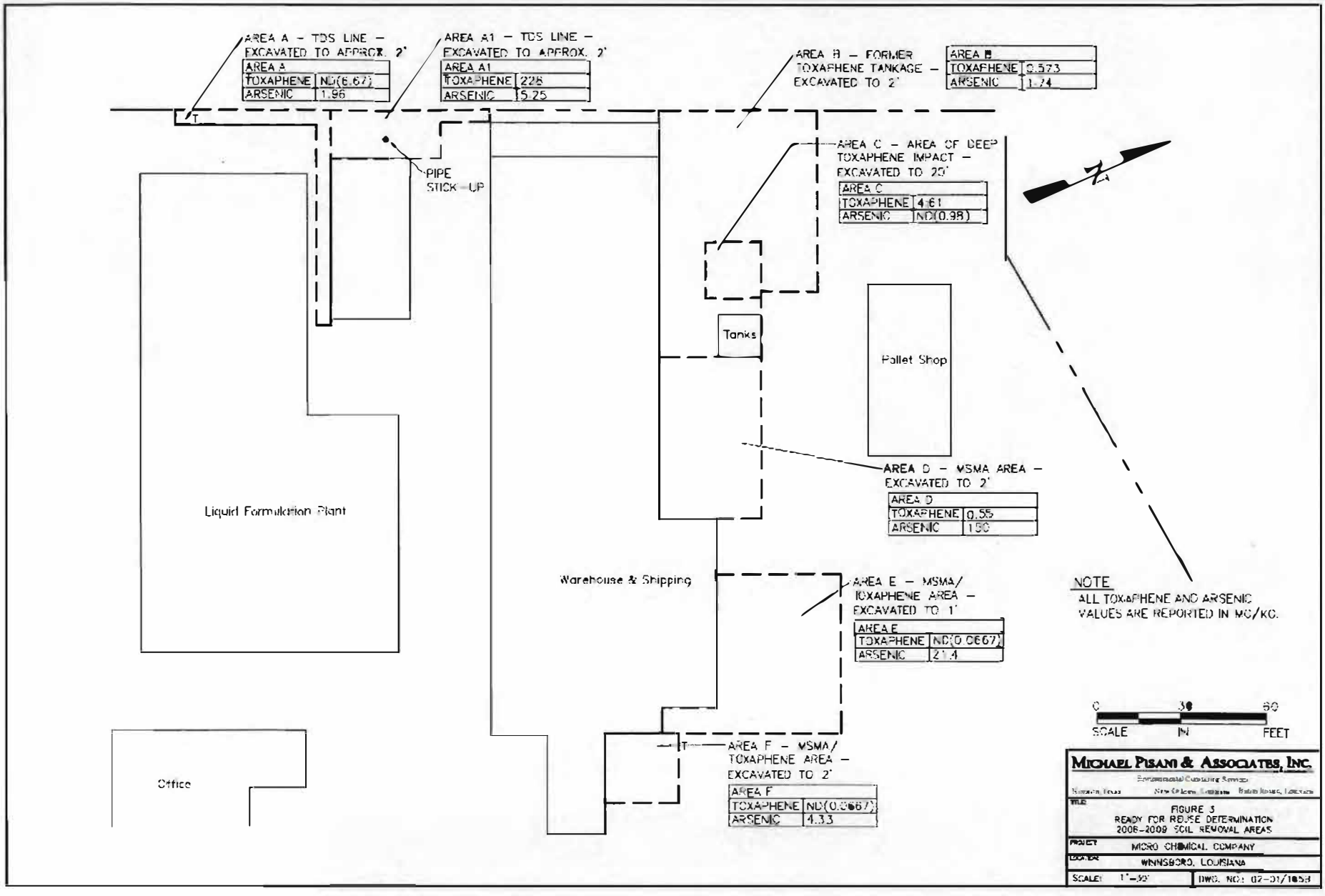
Figure 1 - Ready For Reuse Determination
Site Location Map
Micro Chemical Company
Winnsboro, Louisiana

MICHAEL PISANI & ASSOCIATES, INC.
Environmental Consulting Services
Houston, Texas New Orleans, Louisiana Baton Rouge, Louisiana

Designed: JRB	Drawn: JRB	Checked: DCU	Date: 9/1/2010	Project: 02-01

O:\02-01 Micro Chemical\GIS\MXDs\09_ReadyForReuse\Figure 1.mxd


EVADALE DEVELOPMENT COMPANY (AGRICULTURAL)
FREE-FLO FERTILIZER PLANT COMPLEX (COMMERCIAL)
NEW CONSOLIDATION AREA
FDS CONSOLIDATION AREA
Pellet Shop
WINNSBORO ELEVATOR COMPANY (COMMERCIAL)
Warehouse & Shipping
Liquid Formulation Plant
Septic Tank Leach Field Area
Office
Dry Formulation Plant
FACILITY ENTRANCE
LA HWY 15
MISSOURI PACIFIC RAILROAD
McLEMORE BROTHERS (COMMERCIAL)
UNNAMED DITCH
WILSON OIL COMPANY (COMMERCIAL)
TURKEY CREEK OXBOW
N
LEGEND
MICRO CHEMICAL SITE LIMITS
ADJACENT PROPERTY LINES
FDS CONSOLIDATION AREA – NOT SUBJECT TO READY FOR REUSE DETERMINATION
EXCAVATED AREAS – TOXAPHENE DELIVERY SYSTEM, TOXAPHENE TANK SYSTEM AND VSMA AREA
TANK
PAVEMENT
0
100'
200'
SCALE
FEET
MICHAEL PEARI & ASSOCIATES, INC.
Environmental Consulting Services
Houston, Texas
New Orleans, Louisiana
Baton Rouge, Louisiana
TITLE: FIGURE 2
READY FOR REUSE DETERMINATION
FACILITY MAP WITH AREAS OF INVESTIGATION
PROJECT: MICRO CHEMICAL COMPANY
LOCATION: WINNSBORO, LOUISIANA
SCALE 1" = 100'
DWG. NO.: 02-01/1048


AREA A – TDS LINE – EXCAVATED TO APPROX. 2'
AREA A
TOXAPHENE ND(6.67)
ARSENIC 1.96
AREA A1 – TDS LINE – EXCAVATED TO APPROX. 2'
AREA A1
TOXAPHENE 226
ARSENIC 15.25
AREA B – FORMER TOXAPHENE TANKAGE – EXCAVATED TO 2'
AREA B
TOXAPHENE 0.573
ARSENIC 1.74
AREA C – AREA OF DEEP TOXAPHENE IMPACT – EXCAVATED TO 20'
AREA C
TOXAPHENE 4.61
ARSENIC ND(0.98)
PIPE STICK-UP
Tanks
Pallet Shop
Liquid Formulation Plant
AREA D – MSMA AREA – EXCAVATED TO 2'
AREA D
TOXAPHENE 0.55
ARSENIC 1.50
Warehouse & Shipping
AREA E – MSMA/ TOXAPHENE AREA – EXCAVATED TO 1'
AREA E
TOXAPHENE ND(0.0667)
ARSENIC 21.4
NOTE
ALL TOXAPHENE AND ARSENIC VALUES ARE REPORTED IN MG/KG.
0 30 60
SCALE IN FEET
Office
AREA F – MSMA/ TOXAPHENE AREA – EXCAVATED TO 2'
AREA F
TOXAPHENE ND(0.0667)
ARSENIC 4.33
MICHAEL PISANI & ASSOCIATES, INC.
Environmental Consulting Services
Houston, Texas New Orleans, Louisiana Baton Rouge, Louisiana
TITLE
FIGURE 3
READY FOR REUSE DETERMINATION
2006-2009 SOIL REMOVAL AREAS
PROJECT MICRO CHEMICAL COMPANY
LOCATION WINNSBORO, LOUISIANA
SCALE 1"=30' DWG. NO.: 07-01/1058

2004 digital orthophoto from Atlas (http://atlas.lsu.edu).

Legend

Monitoring Well

0 50 100 200 Feet

1 inch = 175 feet

N

Figure 4 - Ready For Reuse Determination
Current Ground Water Monitoring System
Micro Chemical Company
Winnsboro, Louisiana

MICHAEL PISANI & ASSOCIATES, INC.
Environmental Consulting Services
Houston, Texas New Orleans, Louisiana Baton Rouge, Louisiana

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D:\02-01 Micro Chemical\GIS_MXDs\09_ReadyforReuse\Figure 4.mxd