



January 8, 2016



Mr. Matthew J. Ward  
Plant Manager  
Monsanto Company  
P.O. Box 174  
Luling, Louisiana 70070

Re: Ready for Reuse Determination  
Project Holly Site (AOI-1)  
Monsanto Company, Luling Plant  
LDEQ AI Number 1096; EPA ID Number LAD001700756  
12501 S. River Road  
Luling (St. Charles Parish), Louisiana

Dear Mr. Ward:

The Louisiana Department of Environmental Quality (LDEQ) and the United States Environmental Protection Agency (EPA) Region 6 together have determined that the Project Holly Site at the Monsanto Company's Luling Plant (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 Monsanto Company's Luling Plant is an operating manufacturing facility that produces agricultural and organic specialty chemicals. Prior to construction of the plant, the area was used as farmland. The Project Holly area consists of a vacant area approximately 6.5 acres in size located on the east side of the facility in the North Plant. The area was previously used by Monsanto as a lay down yard.

With this Ready for Reuse Determination, LDEQ and EPA Region 6 agree that Monsanto has successfully conducted investigation, remediation 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 industrial future use. 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.

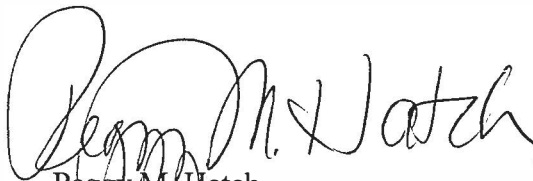
If conditions on the Property change (e.g., land use is altered or new site receptors are identified) or additional impacted media are discovered, the current owner/operator will notify

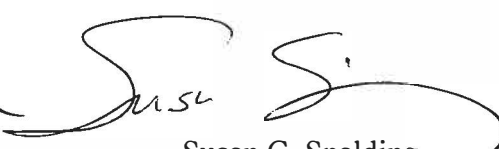
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LDEQ and it may become necessary to perform additional investigation and/or remediation to ensure continued protectiveness. The undersigned expressly reserve all rights and authorities to require further action by owners or operators if new or additional 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,

  
Peggy M. Hatch  
Secretary  
Louisiana Department of  
Environmental Quality

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

Enclosures

**ENCLOSURE 1**  
**READY FOR REUSE BASIS OF DECISION**

**PROJECT HOLLY SITE (AOI-1)**  
**MONSANTO COMPANY, LULING PLANT**  
**LDEQ Area of Interest No. 1096; EPA ID No. LAD001700756**

**INTRODUCTION**

The Louisiana Department of Environmental Quality (LDEQ) – Underground Storage Tank and Remediation Division (USTRD) has determined that the Project Holly Site (AOI-1) at the Monsanto Company's Luling Plant is Ready for Reuse. This site meets the criteria for a Ready for Reuse Determination because its current environmental conditions are protective of human health and the environment based upon its current and/or planned land use. Background information, closure activities, post-closure requirements, and the planned future use of the site are summarized in the following sections.

**PROPERTY DESCRIPTION**

The Monsanto Company Luling Plant is an operating manufacturing facility that produces agricultural and organic specialty chemicals that include ammonia, organic herbicides, bleaching compounds, and pharmaceutical chemicals. Prior to construction of the plant, the area was used as farmland. Production, maintenance, and waste treatment operations are conducted 24 hours per day, seven days per week.

The Luling Plant is located on the west bank of the Mississippi River on Louisiana Highway 18 (River Road) in the City of Luling, St. Charles Parish, Louisiana in Sections 18, 19, 20, 49, 50, and 63 of Township 13 South, Range 21 East and Sections 5 and 19 of Township 13 South, Range 8 East. The Luling Plant is situated within an industrial and commercial area that is bounded to the north by LA Highway 18 and to the south by U.S. Highway 90. Both residential and commercial communities are located beyond the vacant land, including the City of Lone Star, located east of the plant, and the City of Luling, located due west of the plant. The City of Mimosa Park is located south of the facility, across U. S. Highway 90. The Mississippi River is located north of the facility, directly across LA Highway 18.

The Luling Plant encompasses 2,000 acres, of which approximately 400 acres have been developed into a manufacturing plant. The active manufacturing areas within the plant are bounded by vacant land to the fence line on the east (approximately 1,000 feet), west (approximately 2,500 feet), south (approximately 2,000 feet), and north (approximately 800 feet).

**SITE BACKGROUND INFORMATION**

The Project Holly Site consists of a vacant area approximately 6.5 acres in size located on the northeastern portion of the facility. This area was previously used as a lay down yard. The

uppermost groundwater zone that may be impacted by contamination at the Monsanto facility is the Groundwater Class 3a Zone, designated as Layer II.

## **INVESTIGATION AND REMEDIATION**

Potential soil and groundwater impact at the site was discovered in April 2014 during a Limited Phase II Environmental Assessment performed to evaluate current environmental conditions prior to leasing the parcel to another company. Soil and groundwater were sampled and analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, and process-specific compounds. Additional sampling for delineation purposes was performed in October 2014. The results of the investigation (report dated May 28, 2014) and a limited risk evaluation performed in accordance with LDEQ's Risk Evaluation/Corrective Action Program (RECAP) (report and addendum dated August 21, 2014 and November 13, 2014 respectively) were submitted to LDEQ for review and approval. Concentrations of all soil constituents were less than the applicable RECAP non-industrial screening standards. Concentrations in groundwater did not exceed the appropriate Management Option 1 standards. The RECAP evaluation and addendum reports were approved on December 8, 2014.

An inspection of the site was performed on December 9, 2014 confirming that no investigation-derived waste remains on site. No permanent wells were installed for the investigation. A No Further Action At This Time determination was issued by LDEQ on December 29, 2014. No remedial action was required at the site. There are no institutional controls on this property, however further evaluation and approval from LDEQ is warranted prior to the construction of enclosed structures over the site.

## **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 to the Ready for Reuse Determination letter (Environmental Conditions Table). 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 continued industrial use. Monsanto has leased the Property to Momentive Specialty Chemicals Inc. for the construction of an on-site formaldehyde plant.

## **REFERENCES**

Documents related to the Project Holly Site 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:

Limited Phase II Environmental Site Assessment Report, Project Gulfstream/Holly; Monsanto Company; May 28, 2014 [EDMS Document No. 9360476]

Notification of Screening Level Exceedance and Limited Phase II Environmental Site Assessment Report; Monsanto Company; July 3, 2014 [EDMS Document No. 9360476]

Response to Notification of Screening Level Exceedance and Limited Phase II Environmental Site Assessment Report; LDEQ; August 11, 2014 [EDMS Document No. 9436953]

Limited RECAP Evaluation for Project Holly Site; Monsanto Company; August 21, 2014 [EDMS Document No. 9438961]

Response to Limited RECAP Evaluation for Project Holly Site; LDEQ; September 16, 2014 [EDMS Document No. 9477867]

Limited RECAP Evaluation Addendum for Project Holly Site (AOI-1); Monsanto Company; November 13, 2014 [EDMS Document No. 9539111]

Approval of Limited RECAP Evaluation and Addendum for Project Holly Site; LDEQ; December 8, 2014 [EDMS Document No. 9561667]

No Further Action Notification; LDEQ; December 29, 2014 [EDMS Document No. 9584121]





## SAMPLE LOCATION MAP

PROJECT HOLLY  
LULING, LOUISIANA



10352 PLAZA AMERICANA DRIVE  
BATON ROUGE, LA 70816  
TEL: 225-292-1004  
FAX: 225-218-9677  
WWW.ARCADIS-US.COM

### Legend

- Sampling Location & Designation
- Area of Investigation (AOI-1)
- Area of Concern (AOC-A)

|                                  |                     |
|----------------------------------|---------------------|
| PROJECT MANAGER:<br>GHC          | CHECKED BY:<br>BM   |
| DRAWING FILE:                    | GIS FILE:           |
| DRAWING BY:<br>JEC               | DATE:<br>11.05.2014 |
| PROJECT NUMBER:<br>LA003258.0001 | FIGURE NUMBER:<br>1 |

## ENCLOSURE 2

### ENVIRONMENTAL CONDITIONS TABLE<sup>1</sup> PROJECT HOLLY SITE (AOI-1), MONSANTO COMPANY, LULING PLANT, LULING, LOUISIANA

| Area of Investigation     | Remedial Actions Taken      | Constituents of Concern <sup>2</sup> and Maximum Levels Remaining (mg/L) |  | Limiting RECAP Standards (MO-1) <sup>3</sup> | Clean-up Status             | Institutional Controls                   |
|---------------------------|-----------------------------|--|--|--|-----------------------------|--|
| AOI-1, Project Holly Site | No remedial action required | Soil (mg/kg)   | All constituent concentrations were less than RECAP non-industrial screening standards | N/A  | No Further Action, 12/29/14 | None. Conveyance notice is not required. |
|                           |                             | Groundwater <sup>4</sup> (mg/L)  | 1,2-Dichlorobenzene - 1.2  | 160  |                             |  |
|                           |                             |  | 1,3-Dichlorobenzene - 0.11   | 6.6  |                             |  |
|                           |                             |  | 1,4-Dichlorobenzene - 0.67   | 11   |                             |  |
|                           |                             |  | Benzene - 0.016  | 1.9  |                             |  |
|                           |                             |  | Chlorobenzene - 1.7  | 104  |                             |  |

<sup>1</sup> Information for this table was derived from LDEQ's No Further Action - At This Time Notification for this AOI dated December 29, 2014 [EDMS Document No. 9584121].

<sup>2</sup> Constituents of Concern (COCs) are those contaminants present at a site at concentrations that exceed the Risk Evaluation and Corrective Action Program (RECAP) Screening Standards.

<sup>3</sup> RECAP Management Option 1.

<sup>4</sup> Groundwater standards are not designated as industrial or nonindustrial.

### **ENCLOSURE 3**

#### **READY FOR REUSE AGENCY CONTACTS PROJECT HOLLY SITE, MONSANTO COMPANY, LULING PLANT LULING, LOUISIANA**

For a copy of the administrative record providing detailed information regarding environmental conditions at the Project Holly Site, 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 Project Holly Site, please contact:

Mr. Bradley Phillips  
Senior Environmental Engineer  
Monsanto Company  
Post Office Box 174  
Luling, Louisiana 70070  
(985) 785-8211  
[bradley.scott.phillips@monsanto.com](mailto:bradley.scott.phillips@monsanto.com)

or

Ms. Noelle Chalona  
Underground Storage Tank and Remediation Division  
Office of Environmental Compliance  
Louisiana Department of Environmental Quality  
Post Office Box 4314  
Baton Rouge, LA 70821-4314  
(225) 219-3362  
[noelle.chalona@la.gov](mailto:noelle.chalona@la.gov)