December 10, 2009

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

Re: Ready for Reuse Determination
Syngenta Crop Protection Inc.
St. Gabriel, Louisiana Facility
AI No. 2367
3905 Highway 75, St. Gabriel, Louisiana, 70776
Iberville Parish

Dear Mr. Caddell:

The Louisiana Department of Environmental Quality (LDEQ) and United States Environmental Protection Agency (EPA), Region 6 together have determined that the Syngenta Crop Protection Inc., St. Gabriel, Louisiana Facility (the "Property") is Ready for Reuse. A Ready for Reuse Determination is an acknowledgment by both agencies that environmental conditions on the property are protective of human health and the environment based on its current and anticipated future use.

The Property encompassed by this Ready for Reuse Determination is the entire developed area of the Syngenta Crop Protection Inc. St. Gabriel Facility, consisting of approximately 250 acres. The Facility, located about 10 miles south of Baton Rouge, Louisiana on LA Highway 75, River Road, also includes about 1,000 undeveloped acres. The St. Gabriel Facility was originally built by the CIBA-GEIGY Corporation in 1970 as a herbicide production facility, and, through a series of mergers, became owned and operated by Syngenta Crop Protection Inc. in 2001. The plant currently manufactures and formulates pesticides and specialty chemicals.

With this Ready for Reuse Determination, LDEQ and EPA Region 6 agree that Syngenta Crop Protection Inc. 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 their current and planned future commercial and/or industrial uses. The Ready for Reuse Basis of Decision is provided as Enclosure 1 to this correspondence. Information concerning investigation, evaluation and clean-up activities at the individual corrective action units undertaken to ensure protectiveness and current environmental conditions

at the site are summarized in Enclosures 2 and 3. Copies of relevant documents may be obtained from LDEQ at the addresses provided in Enclosure 4 to 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 investigation and/or 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 becomes 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 most noteworthy achievement!

Sincerely yours,

Paul D. Miller, P.E.
Assistant Secretary
Office of Environmental Assessment
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
SYNGENTA CROP PROTECTION INC., ST. GABRIEL FACILITY

INTRODUCTION

The Louisiana Department of Environmental Quality (LDEQ) – Remediation Services Division (RSD) has determined that the Syngenta Crop Protection Inc., St. Gabriel Facility (LDEQ Agency Interest 2367) is Ready for Reuse. This facility meets the criteria for a Ready for Reuse Determination because the current environmental conditions at all known corrective action Solid Waste Management Units (SWMUs) and Areas of Contamination (AOCs) are protective of human health and the environment based upon their current and/or planned land use. Background information, results of investigations and risk management activities, and the units' current conditions are summarized in the following sections.

BACKGROUND INFORMATION

The St. Gabriel Plant site was built in 1970 by Ciba-Geigy Corporation as a herbicide production facility. In 1997, Ciba-Geigy Corporation merged with Sandoz Corporation to form Novartis. The St. Gabriel Plant then became owned by Novartis Crop Protection, Inc., the agricultural wholly-owned subsidiary of Novartis. On January 1, 2001, Zeneca Ag Products, Inc. merged into Novartis Crop Protection, Inc. to form Syngenta Crop Protection, Inc. The Syngenta Crop Protection, Inc. headquarters are located in Greensboro, North Carolina. The firm is a wholly-owned subsidiary of Syngenta Corporation, whose corporate offices are located in Wilmington, Delaware. On January 1, 2001, the Novartis Crop Protection, Inc., St. Gabriel Plant and the Zeneca Ag Products, Inc., St. Gabriel Plant consolidated to become one Syngenta Crop Protection, Inc., St. Gabriel Plant site with LDEQ Agency Interest Number 2367. Syngenta's global headquarters are in Basel, Switzerland employing over 20,000 employees worldwide. Syngenta is the world's largest stand-alone agricultural chemical company. The St. Gabriel Plant is Syngenta's largest US manufacturing site.

The Syngenta Crop Protection, Inc., St. Gabriel facility consists of about 250 acres of developed area and about 1,000 acres of undeveloped land located about 10 miles south of Baton Rouge, LA on LA HWY 75 River Road (Figures 1 and 2). The Syngenta, St. Gabriel Facility manufactures and formulates pesticides and specialty chemicals. Specific processes include: (1) manufacture, formulation and packaging of s-triazine herbicides; (2) manufacture of hydrogen cyanide, a raw material, (3) manufacture of cyanuric chloride, and intermediate; (4) manufacture, formulation and packaging activities for various other pesticides, intermediates and specialty chemicals; and (5) supportive activities for the above which include effluent treatment systems, maintenance, utilities, analytical and quality control. The plant operates on a 24 hour basis, seven days per week, and employs about 340 Syngenta employees and about 408 contract employees.

The Syngenta Crop Protection Inc., St. Gabriel Facility currently operates under the Modified Hazardous Waste Operating Permit Renewal (LAD053783445-OP-RN-1-MO-1) issued

by LDEQ on May 20, 2009 and effective for the period July 4, 2009 to March 15, 2015 unless revoked, reissued, modified, or terminated in accordance with LAC 33:V.323 and 705.

PROPERTY DESCRIPTION

The Ready for Reuse Property consists of the entire developed area of the Syngenta Crop Protection Inc., St. Gabriel facility property, and includes approximately 250 acres (Figure 2).

INVESTIGATION AND REMEDIAL ACTION

A Remedial Facility Assessment (RFA) was conducted by a US EPA contractor in January, 1987. Sixty-one Solid Waste Management Units (SWMUs) and Areas of Contamination (AOCs) were identified. In 1989, the Hazardous Waste Permit (LAD053783445) jointly issued to the CIBA-GEIGY Corporation, St. Gabriel Plant by the US EPA Region 6 and LDEQ imposed a requirement that the facility conduct a Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) at eleven of the SWMUs and seven of the AOCs. The purpose of an RFI is to determine the nature and extent of releases of hazardous wastes or constituents in groundwater and/or soil. The RFI included five tasks:

I. Description of Current Conditions
II. RFI Work Plan
III. Facility Investigation
IV. Investigative Analysis
V. Reports

The RFI was performed in three phases.

RFI Phase I:
SWMU 3, Sandbed Filter Pond 1
SWMU 4, Sandbed Filter Pond 2
SWMU 5, East Pond
SWMU 6, NPDES Equalization Pond
Process Block F-4 AOC (Old Fire Training Area, Area 2; Old Hazardous Waste Pipeline, Locations 1 and 3)
Process Block F-5 AOC (Location AW-1)
Spoil Pile No. 1 AOC (Process Block H-7)
Spoil Pile No. 2 AOC (Process Block H-7)
Process Block G-7 AOC (Location No. 7)

RFI Phase II:
Process Block E-4 AOC (Old Hazardous Waste Pipeline, Locations 4, 5 and 6)

RFI Phase III:
SWMUs 21, 22, and 23, Waste Oil Recovery Tanks
SWMU 30, Waste Oil Storage Area
SWMU 35, Pilot Plant Drum Rinsing Area
Old Acid Storage Tank Area AOC (Process Block D-7)

SWMUs 10 and 32 were also identified in the RFA, but were not included in any of the RFI phases. SWMU 10, Acid Waste Storage Tank No. 2404-F, was investigated separately. SWMU 32, Underground Injection Well, was determined to require no further action by US EPA on January 9, 1991 and did not move forward in the RFI process. All of these SWMUs and AOCs have been investigated, evaluated, and cleaned-up as necessary. A summary of activities at each unit is provided in Table 1 of Enclosure 2 to the Ready For Reuse Determination letter.

Twelve other areas of contamination identified after the RFI was imposed were also investigated, evaluated and remediated as necessary at the Syngenta St. Gabriel facility.

Galecron Loading Station, Block D-4
Fly Ash Boulder Remediation Area, Process Block F-7
Isopropanolamine (IPAA) Spill Area
Block D-7 Caustic Releases and Acidic Soil Conditions (Caustic Spill Area)
Liquid Incinerator Area
Sutan Remediation Area
Lumax Spill Area
Tank 112-F Area
Inteon Construction Area
Former Trailer Parking Extended Area
Environmental Operations Area
M-3R Monitoring Well Area

Corrective action activities at all of these AOCs have also been completed. Information regarding these activities is provided in Table 2 of Enclosure 2.

Determinations of the Government Performance Results Act (GPRA) Environmental Indicators Human Exposures Controlled (CA 725) and Releases to Groundwater Controlled (CA 750) were made by LDEQ on September 17, 1999.

CURRENT ENVIRONMENTAL CONDITIONS

The current status of the SWMUs and AOCs addressed at the Syngenta St. Gabriel facility, including remaining constituent concentrations, is summarized in Enclosure 3 (Environmental Conditions Tables) to the Syngenta Crop Protection Inc., St. Gabriel Facility Ready For Reuse Determination letter. Contact information for questions regarding the environmental conditions described in this Ready For Reuse Basis of Decision are provided in Enclosure 4 to the Ready For Reuse Determination letter.

REFERENCES

Documents related to the site investigations and remedial actions at the Syngenta Crop Protection Inc., St. Gabriel 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 for the Syngenta facility is provided below. References for the individual units are included in Tables 1 and 2 of Enclosure 2 to the Ready For Reuse Determination letter.

1987 *RCRA Facility Assessment;* US EPA; 1987

1989 *Final Hazardous Waste Permit, CIBA-GEIGY Corporation, #LAD053783445*; US EPA and LDEQ; Effective January 3, 1990

1990 *RCRA Facility Investigation: Preliminary Report* (includes RFI Work Plan); C-K Associates, Inc.; July 2, 1990 [EDMS Document No. 6361650]

1991 *Draft Phase I RFI Report;* CIBA-GEIGY Corporation; August 27, 1991

Addendum to Draft Phase I RFI Report; CIBA-GEIGY Corporation; November 21, 1991

1991 *Draft RFI Phase II Report*; CIBA-GEIGY Corporation; December 16, 1991

1992 *Draft Report Phase III (Solid Waste Management Units);* CIBA-GEIGY Corporation; February 26, 1992 [EDMS Document No. 6356229]

1993 *Amended Draft Phase I RFI Report*; CIBA-GEIGY Corporation; May, 1993 [Volume I, EDMS Document No. 6401258; submitted June 1, 1993]

1994 *Comments on Draft RCRA Facility Phase II Report*; US EPA; November 21, 1994 [Attachment to EDMS Document No. 6382998]

1995 *Comments on Phase III Report;* US EPA; January 9, 1995

RCRA Facility Phase II Report, Response to Comments and Revised Work Plan; CIBA-GEIGY Corporation; February 23, 1995 [EDMS Document No. 6382998]

RCRA Facility Phase III Report, Response to Comments (Completed the Phase III Report*);* CIBA-GEIGY Corporation; August 14, 1995 [EDMS Document No. 6378253]

1996 *Modified RCRA Hazardous Waste Permit #LAD053783445-MO-1*; LDEQ; effective June 14, 1996.

RCRA Facility Phases (I and II) Modified Draft Reports; Ciba-Geigy Corporation; August 29, 1996 [EDMS Document No. 934046]

Merger and Demerger Activities, Request for Class I Permit Modification (includes notification of facility name change from CIBA-GEIGY Corporation to Novartis Crop Protection Inc. effective December 28, 1996); CIBA-GEIGY Corporation; December 18, 1996

1997 *Comments on the Modified Draft RCRA Facility Investigation (RFI) Phase II Report*;

LDEQ; February 5, 1997 [EDMS Document No. 8077456]

Responses to Comments on the Modified Draft RCRA Facility Investigation (RFI) Phase II Report; Novartis Crop Protection, Inc.; March 6, 1997

Approval of the Modified Draft RCRA Facility Investigation (RFI) Phase II Report; LDEQ; August 4, 1997 [EDMS Document No. 8077324]

Approval of the RCRA Facility Investigation (RFI) Phase I Report; LDEQ; October 21, 1997 [EDMS Document No. 8077214]

1999 *Hazardous Waste Permit Renewal Application for LAD053783445-MO-1;* Novartis Crop Protection, Inc.; June, 1999 [EDMS Document No. for Volume I 6390208]

RCRA Corrective Action – GPRA Baseline List of Facilities; Environmental Indicator Events CA 725 and CA 750; LDEQ; September 17, 1999 (transmitted to Novartis Crop Protection, Inc. on January 27, 2000) [Appendix F Attachment 5 of EDMS Document No. 18077697]

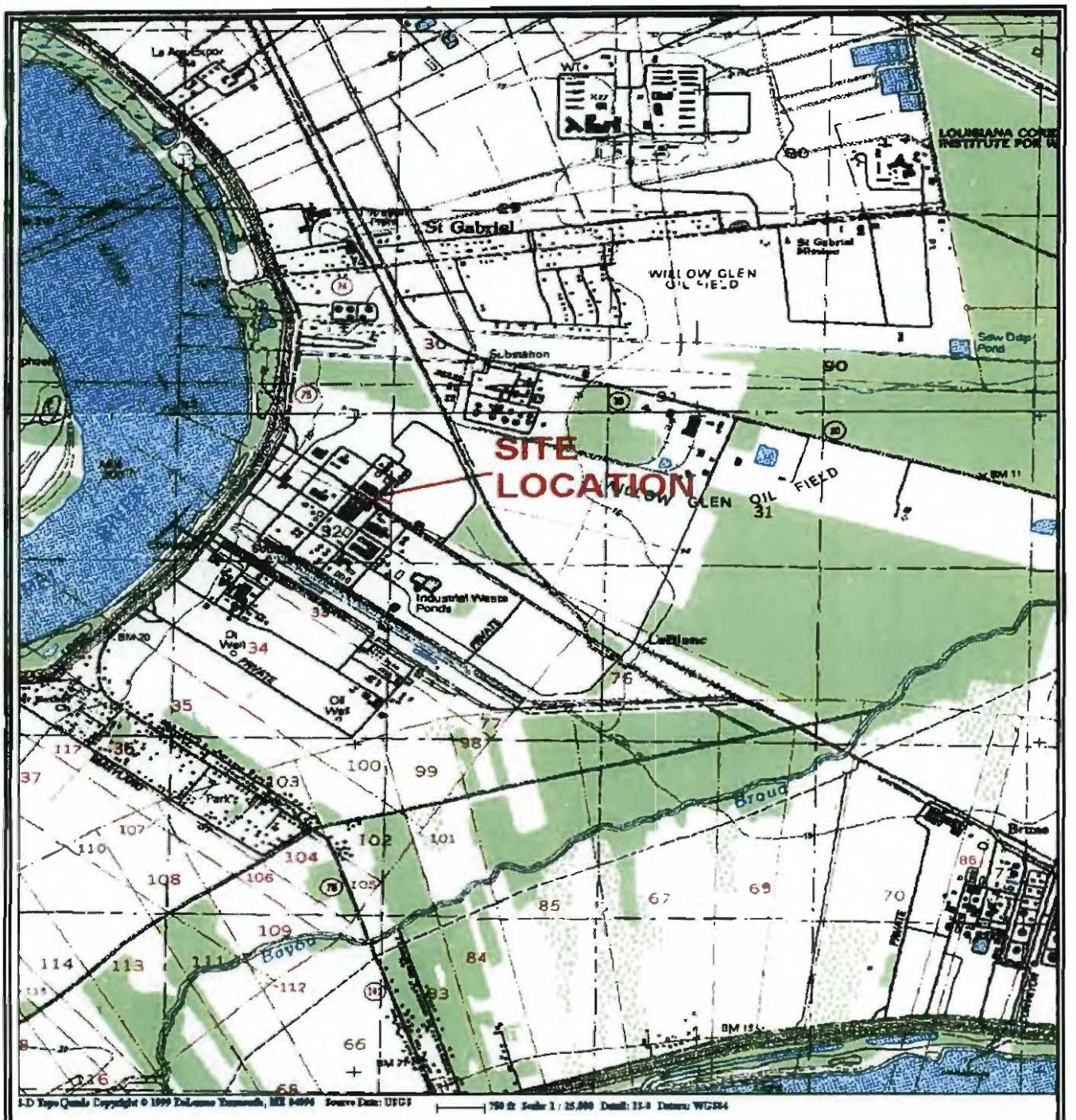
2001 *Updated Hazardous Waste Permit Renewal Application for LAD053783445-MO-1*; Syngenta Cop Protection, Inc.; April 2001 (submitted May 2, 2001; required by LDEQ after merger of Novartis Crop Protection, Inc. and Zeneca Ag Products to form Syngenta Crop Protection, Inc. on January 1, 2001) [EDMS Document No. for Volume I 18082966]

2006 LDEQ approval of the Phase II RFI Report; LDEQ; November 14, 2006

2007 *Ready for Reuse Determination, Block F-7, Syngenta Crop Protection, Inc*; LDEQ/EPA; January 24, 2007 [EDMS Document No. 35737964]

Ready for Reuse Determination, Block G-6, Syngenta Crop Protection, Inc; LDEQ/EPA; January 24, 2007 [EDMS Document No. 35737964]

2009 *Modified Hazardous Waste Operating Permit Renewal* (LAD053783445-OP-RN-1-MO-1); LDEQ; July 4, 2009 [EDMS Document No. 41576470]



PSI Information To Build On
Engineering • Consulting • Testing

PSI, Inc.
6022 Crestmount Drive
Baton Rouge, Louisiana 70809
(225) 293-8378
Fax (225) 292-8132

PROJECT NAME:
Syngenta Crop Protection, Inc.

RECAP
LUMAX Spill Area
3905 Highway 75
St. Gabriel, Iberville Parish, LA 70776

PROJECT NO.:
259-4G467

SITE VICINITY MAP
Carville, Louisiana
Quadrangle Map

SCALE:
(1:24,000)

N

Figure
1

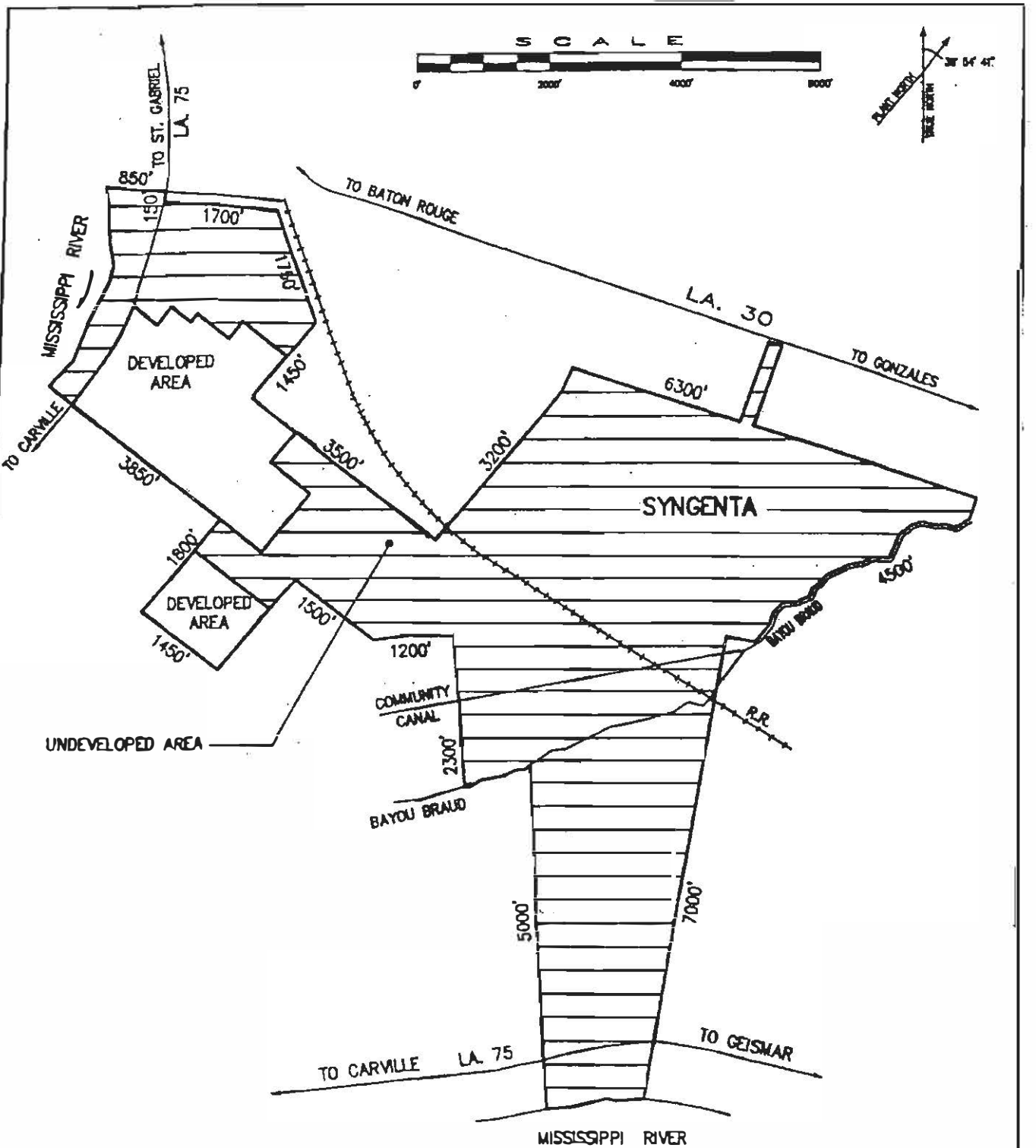


Figure 2

SYNGENTA

ST. GABRIEL LOUISIANA

ENCLOSURE 2

DESCRIPTION OF CORRECTIVE ACTION UNITS
SYNGENTA CROP PROTECTION INC., ST. GABRIEL FACILITY

Table 1. Solid Waste Management Units (SWMUs) and Areas of Contamination (AOCs) Identified in the RCRA Facility Assessment (RFA; US EPA January 1987) That Required a RCRA Facility Investigation

Unit/Area	Description	References
SWMUs 3 and 4, Sandbed Filter Ponds 1 and 2, Block 6 (RFI Phase I)	SWMUs 3 and 4 are managed under Solid Waste Permit GD-047-0224/P-0017 and operated from the early 1970s to 1991. Voluntary closure under the Solid Waste Regulations included removal of triazine herbicide-impacted sludges and impacted soils in 1998. These units were included in a Ready for Reuse Determination for Process Block G-6 issued January 24, 2007. Post-closure care was terminated by LDEQ in a letter dated July 2, 2008.	*Ready for Reuse Determination, Block G-6, Syngenta Crop Protection, Inc*; LDEQ; January, 24, 2007 [EDMS Document No. 35737964] *Acknowledgement of Completion of Post-Closure for Sand Bed Filters, Syngenta Crop Protection, Inc.*; LDEQ; July 2, 2008 [EDMS Document No. 37066831]
SWMU 5, East Pond (Baker's Lake) (RFI Phase I)	The East Pond was addressed under RFI Phase I and the US EPA determined that no further remedial action was required under HSWA authority on October 21, 1997. The East Pond was subsequently used for the land farming of soil and construction debris from the Spoil Piles 1 and 2 AOCs, followed by certification of clean closure approved by LDEQ on September 11, 2009. LDEQ acknowledged that all post-closure requirements were complete on November 24, 2009 (Solid Waste Permit GD-047-0224/P-0017).	*Clean Closure Notification, East Pond (Integrated Bioremediation)*; LDEQ; September 11, 2009 [EDMS Document No. 43142980] *Acknowledgment of Completion of Post-Closure Requirements for the East Pond*; LDEQ; November 24, 2009
SWMU 6, NPDES Equalization Pond, Block F-7 (RFI Phase I)	The NPDES Equalization Pond was a former treated effluent impoundment that operated from 1970 to 1989. Soils and sludges were removed 1989-1992 and the unit was addressed under RFI Phase I. The impoundment was closed under Solid Waste Regulations (Solid Waste Permit GD-047-0224/P-0017) in accordance with an LDEQ-approved closure plan to risk-based clean-up levels. A Ready for Reuse Determination was issued on January 24, 2007 by EPA and LDEQ , and LDEQ acknowledged that the post-closure period was completed on August 22, 2007.	*Proposed Closure and Post-Closure Plan;* Ciba-Geigy Corp.; April 8, 1992 [EDMS Document No. 177931] *Final Closure Certification Report*; CIBA-GEIGY Corporation; May 4, 1995 [EDMS Document No. 32855770] *Ready for Reuse Determination, Block F-7, Syngenta Crop Protection, Inc*; LDEQ; January 24, 2007 [EDMS Document No. 35737964] *Acknowledgement of Completion of Post-Closure for Equalization Basin;* LDEQ; August 22, 2007 [EDMS Document No. 36205564]

Unit/Area	Description	References
SWMU 10, Acid Waste Storage Tank No. 2404-F , Process Block D-7 (RFI)	A plume of carbon tetrachloride and chloroform in groundwater was detected near Acid Tank 2404-F in 1984-1985. This unit was also included in the RFI. A groundwater recovery system was installed in 1987 and operated until constituents were below RECAP screening standards for at least three consecutive years. A determination of no further action was issued by LDEQ on March 25, 2009.	*No Further Action Notification, Syngenta Crop Protection, Inc., Tank 2404-F Area*; LDEQ; March 25, 2009 [EDMS Document No. 40603547]
SWMUs 21-23, Three Waste Oil Recovery Tanks (RFI Phase III)	The three Waste Oil Recovery Tanks are used to store used oil generated during the maintenance of equipment at Syngenta. Soil and groundwater investigations were conducted in 1992 in the area as part of RFI Phase III, and resulting concentrations of constituents were below RECAP screening or background concentrations. No remedial action was required, and a determination of no further action was issued by LDEQ on December 1, 2006.	*No Further Action Notification, Syngenta Crop Protection, Inc., Waste Oil Recovery Tanks* (SWMUs 21, 22, and 23); LDEQ; December 1, 2006 [EDMS Document No. 35524492]
SWMU 30, Waste Oil Storage Area (RFI Phase III)	The Waste Oil Storage Area is used to temporarily store new and used oil. Soil and groundwater investigations were conducted in 1992 in the area as part of RFI Phase III, and resulting concentrations of constituents were below RECAP screening or background concentrations. No remedial action was required, and a determination of no further action was issued by LDEQ on December 1, 2006.	*No Further Action Notification, Syngenta Crop Protection, Inc., Waste Oil Storage Area* (SWMU 30); LDEQ; December 1, 2006 [EDMS Document No. 35524490]
SWMU 32, Underground Injection Well	The Injection Well was a disposal well installed on October 13, 1970 and plugged and abandoned by CIBA-GEIGA Corp. on March 8, 1973. It was initially included in the RFI, however, the removal of the area from the RFI work plan was approved by EPA on January 9, 1991.	*Revised RCRA Facility Investigation Workplan, Response to Notice of Deficiencies*; US EPA, Region 6; January 9, 1991
SWMU 35, Pilot Plant Drum Rinsing Area (RFI Phase III)	Soil and groundwater investigations were conducted at the Pilot Plant Drum Rinsing Area in 1992 as part of RFI Phase III, and resulting concentrations of constituents were below RECAP MO-2 non-industrial standards. No remedial action was required. The area was demolished in 2004, and a determination of no further action was issued by LDEQ on March 25, 2009.	*No Further Action Notification, Syngenta Crop Protection, Inc., Pilot Plant Drum Rinsing Area*; LDEQ; March 25, 2009 [EDMS Document No. 40603529]
Process Block F-5 AOC, Location AW-1 (RFI Phase I)	Soil slightly contaminated with triazine herbicides was excavated from Location AW-1 and bioremediated on-site with LDEQ approval. A no further action under HSWA authority was approved by LDEQ on October 21, 1997 and the area was removed from the RFI.	*Approval of the RCRA Facility Investigation (RFI) Phase I Report*; LDEQ; October 21, 1997 [EDMS Document No. 8077214]

Unit/Area	Description	References
Old Fire Training Area, Block F-4, Area 2	The plant's fire training facility was located on the eastern portion of Block F-4. Soil contaminated with low levels of diesel fuel and toluene was removed in preparation for construction of the Multi-Purpose Dyestuffs Facility. A determination that no further action was necessary was made by US EPA on September 28, 1990.	*Subsurface Soil Investigation* (includes the Old Fire Training Area); CIBA-GEIGY Corporation; January 9, 1990 [EDMS Document No. 932487] *Installation, Development, Sampling, and Analysis of Two Assessment Wells – Block F-4 – Old Fire Training Area*; CIBA-GEIGY Corporation; March 13, 1990 [EDMS Document No. 6328131] EPA Response to *RCRA Facility Investigation Workplan* (Includes concurrence that the Old Fire Training Area – Block F-4, Area 2 requires no further action); US EPA, Region 6; September 28, 1990
Process Block F-4 AOC, Old Hazardous Waste Pipeline, Location 1 (RFI Phase I)	Location 1 is one of five isolated areas at the facility where leaks occurred from a pipeline in an above-ground pipe rack used to transfer hazardous and non-hazardous liquid waste from the Chemical Manufacturing Process Unit in Block D-4 to the Liquid Incinerator in Block F-6 in the 1970s. These areas were added to the RFI in 1990 and investigated. Location 1 is at the pipeline bridge located at the intersection at Avenue D and 4th Street. Soil contaminated with chloroform and chloroaminotoluene was excavated in 1990-1991. Remaining concentrations in soil were less than the LDEQ-approved cleanup standards. A no further action under HSWA authority was approved by LDEQ on October 21, 1997 and the area was removed from the RFI.	*Approval of the RCRA Facility Investigation (RFI) Phase I Report*; LDEQ; October 21, 1997 [EDMS Document No. 8077214]
Process Block F-4 AOC, Old Hazardous Waste Pipeline, Location 3 (RFI Phase I)	Location 3 is one of five isolated areas at the facility where leaks occurred from a pipeline in an above-ground pipe rack used to transfer hazardous and non-hazardous liquid waste from the Chemical Manufacturing Process Unit in Block D-4 to the Liquid Incinerator in Block F-6 in the 1970s. These areas were added to the RFI in 1990 and investigated. Location 3 is situated beneath a 90-degree turn in the pipe rack (northeast corner of Process Block E-4). Soil contaminated with o-toluidine was excavated in 1990. Remaining concentrations in soil were less than the LDEQ-approved cleanup standard. A no further action under HSWA authority was approved by LDEQ on October 21, 1997 and the area was removed from the RFI.	*Approval of the RCRA Facility Investigation (RFI) Phase I Report*; LDEQ; October 21, 1997 [EDMS Document No. 8077214]

Unit/Area	Description	References
Process Block E-4 AOC, Old Hazardous Waste Pipeline, Location 4 (RFI Phase II)	Location 4 is one of five isolated areas at the facility where leaks occurred from a pipeline in an above-ground pipe rack used to transfer hazardous and non-hazardous liquid waste from the Chemical Manufacturing Process Unit in Block D-4 to the Liquid Incinerator in Block F-6 in the 1970s. These areas were added to the RFI in 1990 and investigated. Location 4 is located at the west end of the pipe rack. Soil and groundwater investigations were conducted in 1991 in the area as part of RFI Phase II, and soil and groundwater were determined to be contaminated with 5-chloro-2-amino-toluene (5-CAT) and o-toluidine. Remedial standards were developed using a toxicity assessment for soil and RECAP Management Option 3 for groundwater. Excavation and disposal of contaminated soil was followed by monitored natural attenuation for groundwater. A conveyance notification was filed in Iberville Parish 09/28/06 limiting property use to industrial/commercial. LDEQ issued a determination of no further action on October 11, 2006.	*No Further Action Notification, Syngenta Crop Protection, Inc., Location 4 Area* [Process Block E-4, Old Hazardous Waste Pipeline]; LDEQ; October 11, 2006 [EDMS Document No. 34744635]
Process Block E-4 AOC, Old Hazardous Waste Pipeline, Location 5, (RFI Phase II)	Location 5 is one of five isolated areas at the facility where leaks occurred from a pipeline in an above-ground pipe rack used to transfer hazardous and non-hazardous liquid waste from the Chemical Manufacturing Process Unit in Block D-4 to the Liquid Incinerator in Block F-6 in the 1970s. These areas were added to the RFI in 1990 and investigated. Location 5 is located along the northern edge of the pipe rack and Process Block E-4. Soil contaminated with toluene, o-toluidine, and 5-chloroamino-toluene was removed prior to the RFI. The RFI findings included no significant impact on soil and groundwater by hazardous constituents. A no further action under HSWA authority was approved by LDEQ on October 21, 1997 and the area was removed from the RFI.	*Approval of the RCRA Facility Investigation (RFI) Phase I Report*; LDEQ; October 21, 1997 [EDMS Document No. 8077214]

Unit/Area	Description	References
Process Block E-4 AOC, Old Hazardous Waste Pipeline, Location 6 (RFI Phase II)	Location 6 is one of five isolated areas at the facility where leaks occurred from a pipeline in an above-ground pipe rack used to transfer hazardous and non-hazardous liquid waste from the Chemical Manufacturing Process Unit in Block D-4 to the Liquid Incinerator in Block F-6 in the 1970s. These areas were added to the RFI in 1990 and investigated. Location 6 is located near the southern end of the pipe rack and Process Block E-4. Toluene contamination in soil was reported to LDEQ and removed in 1990. Toluene was not detected in soil during the RFI. A no further action under HSWA authority was approved by LDEQ on October 21, 1997 and the area was removed from the RFI.	*Approval of the RCRA Facility Investigation (RFI) Phase I Report*; LDEQ; October 21, 1997 [EDMS Document No.8077214]
Process Block G-7 AOC, Location No. 7 (RFI Phase I)	A visible seam of soil contaminated with o-toluidine was noted during 1989 grading activities for installation of a roadway in Process Block G-7 and excavated in 1990. Confirmation sampling verified that remaining concentrations were below the approved clean-up level. A no further action under HSWA authority was approved by LDEQ on October 21, 1997 and the area was removed from the RFI.	*Approval of the RCRA Facility Investigation (RFI) Phase I Report*; LDEQ; October 21, 1997 [EDMS Document No. 8077214]
Process Block D-7 AOC, Old Acid Storage Tank Area (RFI Phase III)	The Old Acid Storage Tank Area, located in the HCN Tank Farm in Process Block D-7, consisted of a raw material acid storage tank from the early 1970s to late 1989. Soil and groundwater investigations were conducted as part of RFI Phase III, and the resulting concentrations were below the RECAP screening standards. No corrective action was required, and a determination of no further action was issued by LDEQ on December 1, 2006.	*No Further Action Notification, Syngenta Crop Protection, Inc., Old Acid Storage Tank Area (Block D-7)*; LDEQ; December 1, 2006 [EDMS Document No. 35524494]
Spoil Pile 1 AOC and Spoil Pile 2 AOC, Process Block H-7 (RFI Phase I)	Spoil Piles 1 and 2 were used for the disposal of soil and construction debris from on-site excavation activities from 1985 to 1991. Soil and groundwater investigations were conducted in 1991 as part of RFI Phase I, and Atrazine-contaminated soils and construction debris were removed and placed in the East Pond Bioremediation System for treatment. (Solid Waste Permit GD-047-0224/P-0017) A determination of no further action was issued by LDEQ on November 23, 2009.	*No Further Action Notification – Basis of Decision, Syngenta Crop Protection, Inc. Spoils Piles #1 and #2*; LDEQ; November 23, 2009

Table 2. Corrective Action Areas of Concern (AOCs) Not Included in the RFI.

Unit/Area	Description	References
Galecron® Loading Station, Block D-4	The Galecron® Loading Station was originally used as a loading station to load product into railcars, but was subsequently changed to a decontamination facility for railcars contaminated with Galecron® (Chlordimeform; pesticide active ingredient) residuals. Galecron® - contaminated soils were removed and the area was closed in accordance with standards approved by LDEQ. Subsequent review indicated the presence of 5-Chloroamino toluene (5-CAT) in subsurface soils, however the concentrations were below LDEQ-approved standards. Groundwater in the area was also investigated and although the concentration of Galecron® was below the detection limit, 5-CAT was detected. Syngenta conducted a monitoring program including both constituents until the concentrations decreased to a level of 25 µg/L or less for four consecutive sampling events. LDEQ approved the discontinuation of monitoring on October 25, 1999. A conveyance notification was filed in Iberville Parish on May 10, 2004, and a no further action determination was issued by LDEQ on April 27, 2005.	*No Further Action Notification, Syngenta Crop Protection, Inc., Galecron Loading Station*; LDEQ; April 27, 2005 [EDMS Document No. 32842113]
Fly Ash Boulder Remediation Area, Process Block F-7	Triazine-contaminated solidified fly ash and/or bentonite clay liner from previous closure activities was discovered in 2005 near the former Equalization Pond (SWMU 6) during a construction project in Block F-7. The contaminated material was removed and confirmatory soil samples were collected to confirm that the remaining soil met the risk-based clean-up levels established for the nearby Equalization Pond. LDEQ approved that the removal was performed in accordance with the work plan on November 28, 2005, and no further action was required for this area.	*Final Report Block F-7 Fly Ash Boulder Remediation Report*; Syngenta Crop Protection Inc., July 19, 2005 [EDMS Document No. 33064624] Approval of *Final Report Block F-7 Fly Ash Boulder Remediation Report*; LDEQ; November 28, 2005

Unit/Area	Description	References
Isopropanolamine (IPAA) Spill Area	A release of IPAA was discovered outside the IPAA storage tank containment area in 2002 resulting in multiple phases of removal of contaminated soil. Remaining concentrations were below industrial RECAP Management Option 1 standards. Groundwater was not impacted. A conveyance notification was filed with Iberville Parish on November 22, 2005, and a no further action determination was issued by LDEQ on February 2, 2006.	*No Further Action Notification, Syngenta Crop Protection, Inc. Isopropanolamine (IPAA) Release Remediation Near Tank T-911 at the Micro Manufacturing Unit (MMU)*]; LDEQ; February 2, 2006 [EDMS Document No. 33920704]
Block D-7 Caustic Releases and Acidic Soil Conditions (aka Caustic Spill Area)	Two releases of sodium hydroxide (caustic) from a supply pipeline occurred in 2003 and 2004. Impacted soil was excavated, however elevated pH conditions remained, presumed to be associated with the calcium carbonate fill. Groundwater was not impacted, however borings installed during the investigation showed unexpected low pH (acidic) conditions in soil and groundwater. A RECAP evaluation was conducted, and the high and low pH conditions were determined to be below and above respectively) the MO-2 standards developed for both conditions. A no further action determination was issued by LDEQ on March 31, 2006.	*No Further Action Notification, Syngenta Crop Protection, Inc., Block D-7 Caustic Releases and Acidic Soil Conditions* [Caustic Spill Area]; LDEQ; March 31, 2006 [EDMS Document No. 34102002]
Liquid Incinerator Area	The closure of the Hazardous Waste Liquid Incinerator was completed in February 2007. Concentrations of total triazines in soil samples collected during the closure exceeded the approved clean-up standard of 10 mg/kg. The impacted soils were excavated and transported off-site for disposal. Confirmation samples were non-detect for triazines. Syngenta's Closure Certification, dated May 14, 2007, was approved by LDEQ on September 25, 2007.	*Liquid Incinerator Closure Plan Certification Report, Syngenta Crop Protection, Inc*; Syngenta Crop Protection, Inc.; May 14, 2007 [EDMS Document No. 35968612] Approval of the *Closure Certification for the Liquid Incinerator*; LDEQ; September 25, 2007 [EDMS Document No. 36297086]
Sutan Remediation Area	A tank used for recycled toluene at the former Sutan (Butylate) Production Unit was found to have leaked into underlying soils in 1992. Contaminated soils were removed, and investigations were conducted in phases. A vacuum extraction system installed for the remediation of groundwater began operation in 1998. Remaining concentrations in groundwater are below remedial standards developed using Draft Risk-based Corrective Action (RBCA) Groundwater Corrective Action Level-2 (GWCAL-2). A no further action determination was issued by LDEQ on December 7, 2007.	*No Further Action Notification, Syngenta Crop Protection, Inc. Sutan Remediation Area*; LDEQ; December 7, 2007 [EDMS Document No. 36459262]

Unit/Area	Description	References
Lumax Spill Area	The Lumax Spill Area is located in the MPF Liquid Packaging block of the plant. Multiple breaks in the aboveground Lumax product line in 2003 caused the release of approximately 4,640 pounds of Lumax product. Virtually the entire release of product, the washings and contaminated sludges from the ditches that contained the spill were recovered for treatment and disposal by February 2004. Sampling of soil and groundwater was followed by a RECAP evaluation of the results, demonstrating that remaining concentrations in soil and groundwater are below the respective industrial MO-2 standards. A conveyance notification was filed in Iberville Parish in September 2007, and a no further action determination was issued by LDEQ on December 7, 2007	*No Further Action Notification, Syngenta Crop Protection, Inc., Lumax Spill Area*; LDEQ; December 7, 2007 [EDMS Document No. 36459260]
Tank 112-F Area	Tank 1d2-F was removed from service in 1998 following the discovery of leaking toluene, carbon tetrachloride, and cyanuric chloride. Contaminated sand beneath the ring wall was removed and a soil and groundwater investigation was conducted in 1999. Additional contaminated soil was removed and quarterly groundwater sampling to evaluate monitored natural attenuation began in 2000. Remaining constituent concentrations did not exceed the applicable RECAP Management Option 1industrial standards. Groundwater monitoring wells were plugged and abandoned in 2007. A conveyance notification was filed with Iberville Parish September 24, 2007, and a no further action determination was issued by LDEQ on January 16, 2008.	*No Further Action Notification, Syngenta Crop Protection, Inc., Tank 112-F Area*; LDEQ; January 16, 2008 [EDMS Document No. 36553589]
Inteon Construction Area	Impacted soil was discovered during a 2006 groundwater certification investigation of soil and groundwater conducted for the Inteon Construction Project. This area is located in an area of the plant formerly used for van and tanker trailer parking. The contaminated soil was excavated and remaining soil concentrations were lower than the remedial standards developed under RECAP Management Option 2. A no further action determination was issued by LDEQ on June 17, 2008.	*No Further Action Notification, Syngenta Crop Protection, Inc., Inteon Project Construction Area*; LDEQ; June 17, 2008 [EDMS Document No. 37034677]

Unit/Area	Description	References
Former Trailer Parking Extended Area	The Former Trailer Parking Extended Area of Concern is located in and adjacent to an area of the plant used for van and trailer parking. Impacted soil was discovered in 2006 during a groundwater certification investigation of soil and groundwater conducted for the Inteon Construction Project. The contaminated soil was excavated and remaining soil concentrations were lower than the remedial standards developed under RECAP Management Option 2. A no further action determination was issued by LDEQ on June 17, 2008.	*No Further Action Notification, Syngenta Crop Protection, Inc., Former Trailer Parking Extended Area of Concern;* LDEQ; June 17, 2008 [EDMS Document No. 37034681; 37034679]
Environmental Operations Area	The Environmental Operations Area is located adjacent to the Liquid Incinerator Unit that was closed in August 2007. An investigation of potential impacts to soil and groundwater in the area was conducted in 2008. The detected concentrations were below the RECAP Management Option 2 standards developed for soil and groundwater. No remedial action was required. A no further action determination was issued by LDEQ on November 6, 2008.	*No Further Action Notification, Syngenta Crop Protection, Inc. Environmental Operations Area*; LDEQ; November 6, 2008 [EDMS Document No. 38543730]
M-3R Monitoring Well Area	Monitoring Well M-3 was an inactive monitoring well sampled in 1989 prior to abandonment. Because herbicide constituents were identified (atrazine, propazine and simazine), LDEQ requested that the well be upgraded and resampled. The well was damaged during the upgrade process, abandoned, and replaced with Well 3-MR in 1991 to assess herbicide contamination in the area. Groundwater in the well was monitored until concentrations were below MCLs for three consecutive years. The termination of monitoring was approved by LDEQ on September 28, 2009 and the well was plugged and abandoned on October 28, 2009.	*Final M-3R Groundwater Monitoring Report;* Syngenta Crop Protection, Inc.; September 4, 2009 [EDMS Document No. 43320762] *Approval of Final M-3R Groundwater Monitoring Report*; LDEQ; September 28, 2009 [44142315] *Groundwater Monitoring Well M-3R Plug and Abandonment Report;* Syngenta Crop Protection Inc.; November 6, 2009 [EDMS Document No. 44057292]

Notes:
RCRA – Resource Conservation and Recovery Act
HSWA – Hazardous and Solid Waste Amendments
RFI – RCRA Facility Investigation
SWMU -- Solid Waste Management Unit
AOC -- Areas of Contamination or Areas of Concern
RECAP – LDEQ's Risk Evaluation/Corrective Action Program
MO-1 – Management Option 1
MO-2 – Management Option 2
MO-3– Management Option 3

RBCA -- Draft Risk-based Corrective Action
GCAL-2 – RBCA Groundwater Corrective Action Level-2
NFA-ATT – No Further Action At This Time
mg/kg – milligrams per kilogram
mg/L – milligrams per liter
MCL – Maximum Contaminant Level, National Primary Drinking Water Regulations (40 CFR 141)
EDMS – LDEQ's Electronic Document Management System

ENCLOSURE 3

ENVIRONMENTAL CONDITIONS TABLES
SYNGENTA CROP PROTECTION INC., ST. GABRIEL FACILITY

Table 1. RFI SWMUs and Areas of Contamination

Unit/Area Name	Contaminants of Concern and Maximum Level Remaining	Clean-up Standards	Clean-up Status	Institutional Controls
SWMUs 3 and 4, Sandbed Filter Ponds 1 and 2, Block 6 (RFI Phase I)	Soil Soils impacted by Triazines above 10 mg/kg were removed. Groundwater Triazines - <0.001 mg/L	Soil Triazine - 10 mg/kg (LDEQ-approved background level standard) Groundwater Atrazine – 0.003 (MCL) Simazine – 0.004 mg/L (MCL)	Ready for Reuse Determination issued 01/24/07; post-closure care terminated 07/02/08.	Conveyance Notice filed with Iberville Parish 12/15/98 though not required.
SWMU 5, East Pond (Baker's Lake) (RFI Phase I)	All sampled constituents below detection limits or within background limits. Land Farming results: Soil (last three lifts in East Pond plus levee soil) Avg. Atrazine – 12.2 mg/kg Avg. Propazine – 0.6 mg/kg Avg. Simazinee- 2.0 mg/kg	Not applicable. Land Farming Standards Soil (Revised Closure Plan): Atrazine – 587 mg/kg (MO-2, SOILni) Propazine – 343 mg/kg (MO-2, SOILni) Simazine – 79 mg/kg (MO-2, SOILni)	No Further Action required under HSWA authority approved 10/21/97; Clean closure approved 09/lel/09.	Modified Hazardous Waste Operating Permit Renewal LAD053783445-OP-RN-MO-1; conveyance notification not required.
SWMU 6, NPDES Equalization Pond, Block F-7 (RFI Phase I)	Soil Total Triazine - <10 mg/kg Groundwater Triazines - <0.001 mg/L	Soil Total Triazine - <380 mg/kg (risk-based standard) and <10 mg/kg LDEQ approved background level Groundwater Atrazine – 0.003 (MCL) Simazine – 0.004 mg/L (MCL)	Ready for Reuse Determination issued 01/24/07; Post-closure period completed 08/22/07.	Conveyance notice filed with Iberville Parish after closure certification 5/5/95 though not required.
SWMU 10, Acid Waste Storage Tank No. 2404F (RFI)	Groundwater Chloroform – <0.001 mg/L 2-Chlorotoluene – 0.0061 mg/L Carbon tetrachloride – 0.001 mg/L	Groundwater Chloroform – 0.10 mg/L (SS) 2-Chlorotoluene – 0.012 mg/L (SS) Carbon tetrachloride – 0.005 mg/L (SS)	NFA-ATT 03/25/09	Modified Hazardous Waste Operating Permit Renewal LAD053783445-OP-RN-MO-1; conveyance notification not required.

Table 1. RFI SWMUs and Areas of Contamination (Continued)

Unit/Area Name	Contaminants of Concern and Maximum Level Remaining	Clean-up Standards	Clean-up Status	Institutional Controls
SWMUs 21-23, Three Waste Oil Recovery Tanks (RFI Phase III)	Soil Chromium – 12.9 mg/kg	Soil Chromium – 23mg/kg (SS, SOILssni)	NFA-ATT 12/01/06	None
SWMU 30, Waste Oil Storage Area (RFI Phase III)	Soil Chromium – 12.9 mg/kg	Soil Chromium – 23mg/kg (SS, SOILssni)	NFA-ATT 12/01/06	None
SWMU 32, Underground Injection Well	None	None	No Further Action determination by US EPA, 01/09/91	None
SWMU 35, Pilot Plant Drum Rinsing Area (RFI Phase III)	Soil Atrazine – 26 mg/kg Propazine – 6.0 mg/kg Simazine – 17 mg/kg Groundwater Atrazine – <0.5 mg/L Propazine – <0.5 mg/L Simazine – <0.5 mg/L	Soil Atrazine – 587 mg/kg (MO-2, SOILni) Propazine – 343 mg/kg (MO-2, SOILni) Simazine – 79 mg/kg (MO-2, SOILni) Groundwater Atrazine – 3,025 mg/L (MO-2) Propazine – 1,727 mg/L (MO-2) Simazine – 432 mg/L (MO-2)	NFA-ATT 03/25/09	Modified Hazardous Waste Operating Permit Renewal LAD053783445-OP-RN-MO-1; conveyance notification not required.
Process Block F-5, Location AW-1 (RFI Phase I)	Soil o-toluidine – <0.1 mg/kg	Soil o-toluidine – 0.1 mg/kg (LDEQ-approved standard)	No Further Action required under HSWA authority approved 10/21/97	None
Old Fire Training Area, Block F-4, Area 2 (Now Ciba Specialty Chemicals Property- Plant built in 1989 over this area after backfilling with clean soil)	None	Background	No Further Action determination by US EPA, 09/28/90	None
Old Hazardous Waste Pipeline, Location 1, Block F-4 (RFI Phase I)	Soil Chloroform – <0.1 mg/kg Chloroaminotoluene – <0.1 mg/kg	Soil Chloroform – <0.1 mg/kg (1990 LDEQ-approved standard) Chloroaminotoluene – <0.1 mg/kg (1990 DEQ-approved standard)	No Further Action required under HSWA authority approved 10/21/97	None

Table 1. RFI SWMUs and Areas of Contamination (Continued)

Unit/Area Name	Contaminants of Concern and Maximum Level Remaining	Clean-up Standards	Clean-up Status	Institutional Controls
Old Hazardous Waste Pipeline, Location 3, Block F-4 (RFI Phase I)	Soil o-toluidine – <0.à mg/kg	Soil o-toluidine – 0.1 mg/kg (LDEQ-approved standard)	No Further Action required under HSWA authority approved 10/21/97	None
Old Hazardous Waste Pipeline, Location 4, Block E-4 (RFI Phase II)	Soil 5-Chloro-2-amino-toluene (5-CAT) – 1.4 mg/kg o-Toluidine – 22 mg/kg Groundwater 5-Chloro-2-amino-toluene (5-CAT) – <0.01 mg/L o-Toluidine – <0.02 mg/L	Soil 5-Chloro-2-amino-toluene (5-CAT)a- 23.9 mg/kg (toxicity assessment) o-Toluidine – 23.9 mg/kg (toxicity assessment) Groundwater 5-Chloro-2-amino-toluene (5-CAT) – 0.6204 mg/L (MO-2) o-Toluidine – <0.6204 mg/L (MO-3)	NFA-ATT 10/1à/06	Use limited to industrial/commercial use. Conveyance notification filed in Ioerville Parish 09/28/06
Old Hazardous Waste Pipeline, Location 5, Block E-4 (RFI Phase II)	None	None	No Further Action required under HSWA authority approved 10/21/97	None
Old Hazardous Waste Pipeline, Location 6, Block E-4 (RFI Phase II)	Soil Soils impacted by Triazines above <10 mg/kg were removed.	Soil Triazines - <10 mg/kg (LDEQ-approved background standard)	No Further Action required under HSWA authority approved 10/21/97	None
Process Block G-7, Location No. 7 (RFI Phase I)	Soil o-toluidine – <0.à mg/kg	Soil o-Toluidine – 0.1 mg/kg (LDEQ-approved standard)	No Further Action required under HSWA authority approved 10/2à/97	None
Old Acid Storage Tank Area, Block D-7 (RFI Phase III)	Groundwater Carbon disulfide – 0.056 mg/L	Groundwater Carbon disulfide – 0.01 mg/L (SS)	NFA-ATT 12/0à/06	None
Spoils Piles 1 and 2 AOCs, Block H-7 (RFI Phase I)	Soil Atrazine – 0.097 mg/kg Propazine – 0.88 mg/kg Simazine – 0.à6 mg/kg Zinc – 79 mg/kg Total Chromium – 20 mg/kg Chromium VI – 0.97 mg/kg	Soil Atrazine – 587 mg/kg (MO-2, SOILni) Propazine – 343 mg/kg (MO-2, SOILni) Simazine – 79 mg/kg (MO-2, SOILni) Zinc – 2,300 mg/kg (SS, SOILssni) Total Chromium – 100 mg/kg (SS, SOILssgw) Chromium VI – 23 mg/kg (SS, SOILssni)	NFA-ATT 11/23/09	Modified Hazardous Waste Operating Permit Renewal LAD053783445-OP-RN-MO-1; conveyance notification not required.

Table 2. Corrective Action Areas of Concern (Not in the RFI)

Unit/Area Name	Contaminant of Concern and Maximum Level Remaining	Clean-up Standards	Clean-up Status	Institutional Controls
Galecron Loading Station, Block D-4	Soil 5-Chloroamino toluene (5-CAT)a- 0.2 mg/kg Galecron® (Chlordimeform)a- 0.4 mg/kg Groundwater 5-Chloroamino toluene (5-CAT)a- <0.01 mg/L Galecron® (Chlordimeform) – <0.02 mg/L	Soil 5-Chloroamino toluene (5-CAT) – 1.32 mg/kg (MO-1) Galecron® (Chlordimeform) – 0.4 mg/kg (LDEQ-approved standard) Groundwater 5-Chloroamino toluene (5-CAT)a- 0.025 mg/L (LDEQ-approved standard) Galecron® (Chlordimeform)a- 0.025 mg/L (LDEQ-approved standard)	NFA-ATT 04/27/05	Use limited to industrial/commercial use. A conveyance notification was filed in Iberville Parish 05/10/04
Fly Ash Boulder Remediation Area, Process Block F-7	Soil Total Triazine - <10 mg/kg	Soil Total Triazine - <380 mg/kg (risk-based standard)	No Further Action approved by LDEQ 11/28/05	Solid Waste Permit GD-047-0224/P-0017.
Isopropanolamine (IPAA) Spill Area	Soil Isopropanolamine (IPAA)a- <26 mg/kg Groundwater Isopropanolamine (IPAA) – <10 mg/L Best available detection limits exceeded RECAP screening standards, but substantially lower than MO-2.	Soil Isopropanolamine (IPAA) – 165,000 mg/kg (MO-2) Groundwater Isopropanolamine (IPAA) – 50,600 mg/L (MO-2)	NFA-ATT 02/02/06	Use limited to industrial/commercial use. Conveyance notification filed with Iberville Parish 11/22/05
Block D-7 Caustic Releases and Acidic Soil Conditions (aka Caustic Spill Area)	High pH Area (AOI #1) Soil – 8.99 Groundwater – 6.76 Low pH Area (AOI #2) Soila- 4.42 Groundwater – 4.80	High pH Area Soil – 11.14 (MO-2) Groundwater – 11.14 (MO-2) Low pH Area Soil – 3.36 (MO-2) Groundwater – 3.36 (MO-2)	NFA-ATT 03/31/06	Use limited to industrial/commercial use.
Liquid Incinerator Area	Soil Triazines – <10 mg/kg Carbon tetrachloride – <0.1 mg/kg Chloroform – <0.12 mg/kg Toluene – <0.1 mg/kg	Soil Atrazine – 587 mg/kg (MO-2, SOILni) Propazine – 343 mg/kg (MO-2, SOILni) Simazine – 79 mg/kg (MO-2, SOILni) Carbon tetrachloride – <0.1 mg/kg (LDEQ-approved standard) Chloroform – <0.4 mg/kg (LDEQ-approved standard) Toluene – <0.1 mg/kg (LDEQ-approved standard)	Closure Certification (05/14/07) approved 09/25/07.	None

Table 2. Corrective Action Areas of Concern (Not in the RFI) (Continued)

Unit/Area Name	Contaminant of Concern and Maximum Level Remaining	Clean-up Standards	Clean-up Status	Institutional Controls
Sutan Remediation Area	Groundwater Chloroform <0.001 mg/L Toluene – 0.0013 mg/L Trichloroethylene – <0.001 mg/L	Groundwater Chloroform – 7.0 mg/L (RBCA, GWCAL-2) Toluene – 63.1 mg/L (RBCA, GWCAL-2) Trichloroethylene – 2.1 mg/L (RBCA, GWCAL-2)	NFA-ATT 12/07/07	None
Lumax Spill Area	Soil Atrazine – 5.9 mg/kg Metolachlor – 470 mg/kg Mesotrione – 108 mg/kg Ethylene glycol – 7.07 mg/kg Propylene glycol – <0.7 mg/kg Benoxacor – <0.037 mg/kg Groundwater Atrazine – <0.0002 mg/L Metolachlor – 0.0271 mg/L Mesotrione – <0.037 mg/L Ethylene glycol – 1.2 mg/L Propylene glycol – <0.4 mg/L Benoxacor – <0.00044 mg/L	Soil Atrazine – 10,500 mg/kg (MO-2) Metolachlor – 990 mg/kg (MO-2) Mesotrione – 6,170 mg/kg (MO-2) Ethylene glycol – 120,000 mg/kg (MO-2) Propylene glycol – 312 mg/kg (MO-2) Benoxacor – 22 mg/kg (MO-2) Groundwater Atrazine – 3,025 mg/L (MO-2) Metolachlor – 12,980 mg/L (MO-2) Mesotrione – 605 mg/L (MO-2) Ethylene glycol – 172,700 mg/L (MO-2) Propylene glycol – 43,230 mg/L (MO-2) Benoxacor – 346.5 mg/L (MO-2)	NFA-ATT 12/07/07	Use limited to industrial/commercial use. A conveyance notification was filed in Iberville Parish on September 24, 2007
Tank 112-F Area	Soil Toluene – 150 mg/kg Carbon tetrachloride - <3.5 mg/kg (95% UCL calculated was less than the Clean-up Standard) Groundwater Toluene – 2.9 mg/L Carbon tetrachloride - <0.025 mg/L	Soil Toluene – 520 mg/kg (MO-1) Carbon tetrachloride – 1.2 mg/kg (MO-1) Groundwater Toluene – 530 mg/L (MO-1) Carbon tetrachloride – 2.2 mg/L (MO-1)	NFA-ATT 01/16/08	Use limited to industrial/commercial use. Conveyance notification filed with Iberville Parish 09/24/07
Inteon Construction Area	Soil Atrazine – <0.033 mg/kg Propazine – <0.033 mg/kg Simazine – <0.033 mg/kg Groundwater Atrazine – <0.001 mg/L Propazine – <0.001 mg/L Simazine – <0.001 mg/L	Soil Atrazine – 587 mg/kg (MO-2, SOILni) Propazine – 343 mg/kg (MO-2, SOILni) Simazine – 79 mg/kg (MO-2, SOILni) Groundwater Atrazine – 3,025 mg/L (MO-2) Propazine – 1,727 mg/L (MO-2) Simazine – 432 mg/L (MO-2)	NFA-ATT 06/17/08	None

Table 2. Corrective Action Areas of Concern (Not in the RFI) (Continued)

Unit/Area Name	Contaminant of Concern and Maximum Level Remaining	Clean-up Standards	Clean-up Status	Institutional Controls
Former Trailer Parking Extended Area	Soil Atrazine – 242.5 mg/kg (95% UCL) Propazine – 62.9 mg/kg (95% UCL) Simazine – 32.8 mg/kg (95% UCL)	Soil Atrazine – 587 mg/kg (MO-2, SOILni) Propazine – 343 mg/kg (MO-2, SOILni) Simazine – 79 mg/kg (MO-2, SOILni)	NFA-ATT 06/18/08	Per NFA-ATT, no soils removed without LDEQ approval or disposal at permitted facility.
Environmental Operations Area	Soil Atrazine – 0.36 mg/kg Propazine – 1.4 mg/kg Simazine – 0.34 mg/kg Groundwater Atrazine – 0.006 mg/L Propazine – 0.03 mg/L Simazine – 0.0024 mg/L	Soil Atrazine – 587 mg/kg (MO-2, SOILni) Propazine – 343 mg/kg (MO-2, SOILni) Simazine – 79 mg/kg (MO-2, SOILni) Groundwater Atrazine – 3,025 mg/L (MO-2) Propazine – 1,727 mg/L (MO-2) Simazine – 432 mg/L (MO-2)	NFA-ATT 11/06/08	None
M-3R Monitoring Well Area	Groundwater Atrazine – <0.001 mg/L Propazine – <0.001 mg/L Simazine- <0.001 mg/L	Groundwater Atrazine – 3,025 mg/L (MO-2) Propazine – 1,727 mg/L (MO-2) Simazine – 432 mg/L (MO-2)	Closure approved 09/28/09; Well plugged and abandoned 10/28/09.	None

Notes:
NFA-ATT – No Further Action At This Time
RCRA – Resource Conservation and Recovery Act
HSWA – Hazardous and Solid Waste Amendments
RFI – RCRA Facility Investigation
MCL – Maximum Contaminant Level, National Primary Drinking Water Regulations (40 CFR 141)
mg/kg- milligrams per kilogram
mg/L- milligrams per liter
95% UCL-AM- 95% Upper Confidence Level on the Arithmetic Mean is the upper limit of a 95 percent confidence interval for the mean; there is only a five percent probability that the true mean is greater than this value. The concentration represented by the 95% UCL-AM must be less than the Clean-up Standard.
RECAP – Risk Evaluation/Corrective Action Program
SS – RECAP Screening Standard
MO-1 – RECAP Management Option 1
MO-2 – RECAP Management Option 2
MO-3 – RECAP Management Option 3
ni – RECAP non-industrial standard
RBCA -- Draft Risk-based Corrective Action
GCAL-2 – RBCA Groundwater Corrective Action Level-2

ENCLOSURE 4
READY FOR REUSE AGENCY CONTACTS

SYNGENTA CROP PROTECTION INC.
ST. GABRIEL FACILITY

For a copy of the administrative record providing detailed information regarding environmental conditions at the Syngenta Crop Protection Inc., St. Gabriel 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 Syngenta Crop Protection Inc., St. Gabriel Facility, please contact:

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