



December 9, 2003

Mr. Richard Mohring, Plant Manager
ExxonMobil Chemical Company
Baton Rouge Plastics Plant
P.O. Box 1607
Baton Rouge, LA 70821

Dear Mr. Mohring:

The Louisiana Department of Environmental Quality (LDEQ) and United States Environmental Protection Agency (EPA) Region 6 together have determined that the ExxonMobil Chemical Company, Baton Rouge Plastics Plant (BRPP), 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.

BRPP is located at 11675 Scotland Avenue at the southwestern corner of the intersection of Highway 19 and Thomas Road on approximately 153 acres of property between Scotlandville and Baker, Louisiana. BRPP has been in operation since August 31, 1968. BRPP produces low-density polyethylene in the form of plastic pellets. Products are produced from high purity ethylene and a combination of modifiers, comonomers, catalysts, and organic peroxides. In November 1980, BRPP submitted a "Notification of Hazardous Waste Activity" to the EPA, which identified the facility as a generator of hazardous wastes. Upon promulgation of the EPA's Boiler and Industrial Furnace Regulation in 1991, BRPP notified EPA of its change in status from a generator only to also a treater of hazardous wastes. In response, the EPA initiated a Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) of the BRPP facility, pursuant to the 1984 Hazardous and Solid Waste Amendments to RCRA. The assessment included a Preliminary Review/Visual Site Inspection (PR/VSI) in 1991 and 1992, respectively. The findings of the PR/VSI were incorporated into EPA's RFA Report, which was issued April 17, 1992. The RFA identified 35 Solid Waste Management Units (SWMUs) and 6 Areas Of Concern (AOCs). Of these, 12 SWMUs were recommended for progression to a RCRA Facility Investigation (RFI) to determine whether hazardous wastes or hazardous constituents were present in the air, soil, groundwater, or surface water.

In 1999, EPA Region 6 conducted a Screening Level Risk Evaluation (SLRE) of all 35 SWMU's. This SLRE concluded that the locations and media sampled to date were not adequate to determine if a release occurred or to determine the nature and extent of potential contamination at the facility. A review of the activities and observations presented in the 1992 PR/VSI indicated that SWMUs Nos. 18, 19, 21, 22, 24, 25, 26, 27, 28, 30, 31 and 32 had the greatest potential for the presence and release of hazardous constituents. Following a request from the EPA and the LDEQ, BRPP developed a sampling and analysis plan (SAP) to evaluate potential current and future health risks associated with this site. BRPP voluntarily implemented the SAP in order to complete a risk evaluation of their facility.

Pursuant to discussions between LDEQ, EPA Region 6 and BRPP, it was agreed that BRPP would address its corrective action needs according to the EPA Region 6 Corrective Action Strategy (CAS). With this Ready for Reuse Determination, LDEQ and EPA Region 6 agree that BRPP has successfully completed its investigation and risk management activities under the CAS and that environmental conditions at the property are protective of human health and the environment based on its current and anticipated future use as a commercial/industrial operation.

BRPP has met its obligation to LDEQ and EPA to collect additional data, as documented by a "no further action" determination letter from LDEQ to BRPP, dated November 24, 2003. This Ready for Reuse Determination is based on information contained in the *Risk Evaluation Report of Solid Waste Management Units for the BRPP Facility (September 2002)* (the "Risk Evaluation Report"). A copy of this document may be obtained from LDEQ or BRPP at the addresses provided in Enclosure 1 to this letter. Information concerning the current environmental conditions of the Property (i.e., concentrations of contaminants present and their associated risks) and the risk management activities conducted to ensure protectiveness are summarized in Enclosure 2.

The Risk Evaluation Report demonstrates that, although releases of hazardous constituents have occurred as a result of manufacturing activities at BRPP, residual concentrations do not present an unacceptable risk to human health or the environment, based on risk-based cleanup levels established by LDEQ and given the current and reasonably expected future commercial/industrial use of the facility. The Risk Evaluation Corrective Action Program (RECAP) Standard selected by BRPP in the Risk Evaluation Report, and approved by LDEQ, to ensure protection of human health and the environment is Management Option 1 (MO-1). MO-1 provides LDEQ-derived RECAP Standards (RS) for soil and groundwater. The MO-1 RS represent constituent concentrations in media that are protective of human health and the environment. The MO-1 RS were derived for non-industrial (residential) and industrial land use scenarios using currently recommended default exposure parameters and toxicity criteria issued

by the EPA. Current zoning in the area already restricts the BRPP facility to industrial use. Shallow groundwater in the area is not used or designated for use as a drinking water source or beneficial resource.

The RS requires that a conveyance notice be filed with the respective Parish Clerk of Court. BRPP has filed such a notice with the East Baton Rouge Parish Clerk of Court, including a description of the environmental conditions at the BRPP facility at the time of the RS selection. BRPP is responsible for maintaining the RS, and reporting to LDEQ if conditions at the site change, including environmental conditions, land use, site receptors, and remedy performance. If site conditions do change, it will be necessary to revisit this determination of suitability for reuse to ensure its continuing protectiveness. A complete description of the RS for the facility is found in the Risk Evaluation Report.

The undersigned expressly reserve all rights and authorities to require future action by owners or operators if new or additional information comes to light that materially impacts this Ready for Reuse Determination, whether such information is known as of this date, or is discovered in the future.

Congratulations on this noteworthy accomplishment!

Sincerely yours,

L. Hall Bohlinger
Secretary
Louisiana Department of
Environmental Quality

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

Enclosures

ENCLOSURE 1
AGENCY CONTACTS

For a copy of the *Risk Evaluation Report of Solid Waste Management Units for the BRPP Facility (September 2002)*, please contact:

Louisiana Department of Environmental Quality

Public Records Center
Galvez Building, Room 127
602 N. Fifth St.
Baton Rouge, LA 70802

ExxonMobil Chemical Company

Baton Rouge Plastics Plant
Attn: Pat Carrasco
11675 Scotland Ave.
Baton Rouge, LA 70807

ENCLOSURE 2

Current Environmental Conditions^a Table

Site Name/ Site No.	Remedial Action Taken	Residual Contaminants of Concern (COCs)	Screening / Cleanup Standard ^b	Cleanup Status	Institutional Control(s) ^c (Type/Purpose /Location)
SWMU 18 - Oily Water Separator Transfer Area	No action necessary; below screening or risk levels	Surface, potential surface or subsurface soils: no VOCs, SVOCs or PAHs detected Antimony: 3.1mg/kg 0-2 ft Arsenic: 8.4 mg/kg 0-2 ft (max) 5.46 (mean)	12mg/kg RECAP SSGW 7 mg/kg RECAP SS background	Complete; NFA 11/24/03	Zoned commercial/ industrial Conveyance notice filed with Clerk of Court, E. Baton Rouge Parish
SWMU 19 - Tanks TK-281 and TK-950	No action necessary; below screening or risk levels	Surface, potential surface or subsurface soils: no VOCs, SVOCs or PAHs detected Antimony: 3.1 mg/kg 26-28 ft (max) Arsenic: 4.3 mg/kg 10-11 ft (max) Groundwater: no VOCs, SVOCs, PAHs, or metals were detected	12 mg/kg RECAP SSGW 7 mg/kg RECAP SS background	Complete; NFA 11/24/03	Zoned commercial/ industrial Conveyance notice filed with Clerk of Court, E. Baton Rouge Parish

Site Name/ Site No.	Remedial Action Taken	Residual Contaminants of Concern (COCs)	Screening / Cleanup Standard ^b	Cleanup Status	Institutional Control(s) ^c (Type/Purpose /Location)
SWMU 21 - Hazardous Waste Fuel Lines	No action necessary ; below screening or risk levels	Surface, potential surface or subsurface soils: no VOCs, detected B(a)P: 0.428 mg/kg 8-10 ft Antimony: 4.2 mg/kg 26-28 ft (max) Arsenic: 12.3 mg/kg (max) 5.46 (mean)	0.36 mg/kg RECAP Soil 12 mg/kg RECAP SSGW 7 mg/kg RECAP SS background	Complete; NFA 11/24/03	Zoned commercial/ industrial Conveyance notice filed with Clerk of Court, E. Baton Rouge Parish
SWMU 22 - Boilers B, C and D	No action necessary ; below screening or risk levels	Surface, potential surface or subsurface soils: no VOCs, SVOCs or PAHs detected Antimony: 4.2 mg/kg 8-10 ft (max) Arsenic: 14.6 mg/kg 8-10 ft (max) 5.46 (mean) Thallium: 11.8 mg/kg 8-10 ft (max) Groundwater: no SVOCs or PAHs VC: 0.0116 mg/l (max) Nickel: 0.166 mg/l (max)	12 mg/kg RECAP SSGW 7 mg/kg RECAP SS background 13 mg/kg RECAP RS 0.836 mg/l RECAP GW3-DW (MO-1) 294.8 mg/l RECAP GW3-DW (MO-1)	Complete; NFA 11/24/03	Zoned commercial/ industrial Conveyance notice filed with Clerk of Court, E. Baton Rouge Parish

Site Name/ Site No.	Remedial Action Taken	Residual Contaminants of Concern (COCs)	Screening / Cleanup Standard ^b	Cleanup Status	Institutional Control(s) ^c (Type/Purpose /Location)
SWMU 24 - Firewater Pond	No action necessary; below screening or risk levels	Sediments: no VOCs, SVOCs or PAHs detected Arsenic: 4.8 mg/kg (max) Surface water: no VOCs, SVOCs, PAHs or metals detected	7 mg/kg RECAP SS background	Complete; NFA 11/24/03	Zoned commercial/ industrial Conveyance notice filed with Clerk of Court, E. Baton Rouge Parish
SWMU 25 - Pre-1960 Oil Impoundment and Pre-1980 Landfarm	No action necessary; below screening or risk levels	Surface, potential surface or subsurface soils: no VOCs, SVOCs or PAHs detected Antimony: 5.9 mg/kg 28 ft (max) Arsenic: 9.0 mg/kg 28 ft (max) 5.46 mg/kg (mean) Lead: 121 mg/kg 0-2 ft (max)	12 mg/kg RECAP SSGW 7 mg/kg RECAP SS background 1,700 mg/kg RECAP RS	Complete; NFA 11/24/03	Zoned commercial/ industrial Conveyance notice filed with Clerk of Court, E. Baton Rouge Parish

Site Name/ Site No.	Remedial Action Taken	Residual Contaminants of Concern (COCs)	Screening / Cleanup Standard ^b	Cleanup Status	Institutional Control(s) ^c (Type/Purpose /Location)
SWMU 26 - Pre-1966 Oil Impoundment / Landfill	No action necessary ; below screening or risk levels	Surface, potential surface or subsurface soils: no VOCs detected Antimony: 4.6 mg/kg 28 ft (max) Arsenic: 15.1 mg/kg 28 ft (max) 5.46 mg/kg (mean) Lead: 215 mg/kg 6-8 ft (max) Thallium: 5.6 mg/kg 28 ft (max) Barium: 641 mg/kg 28 ft (max) B(a)P: 0.596 mg/kg 8-10 ft (max) Groundwater: no VOCs, SVOCs, PAHs or metals detected	12 mg/kg RECAP SSGW 7mg/kg RECAP SS background 1,700 mg/kg RECAP RS 13 mg/kg RECAP RS 2,000 mg/kg RECAP SSGW 0.36 mg/kg RECAP Soil	Complete; NFA 11/24/03	Zoned commercial/ industrial Conveyance notice filed with Clerk of Court, E. Baton Rouge Parish
SWMU 27 - North Stormwater Drainage System and Lake Eger	No action necessary ; below screening or risk levels	Surface, potential surface or subsurface soils: no VOCs, SVOCs or PAHs detected Antimony: 63.9 mg/kg 0-2 ft (max) Arsenic: 17.1 mg/kg 0-2 ft 5.46 mg/kg (mean) Lead: 171 mg/kg 0-2 ft (max) Sediment: no VOCs, SVOCs or PAHs detected Arsenic: 5 mg/kg Groundwater: no VOCs, SVOCs, PAHs or metals detected Surface water: no VOCs, SVOCs, PAHs or metals detected	12 mg/kg RECAP SSGW 7 mg/kg RECAP SS background 1,700 mg/kg RECAP RS 7 mg/kg RECAP SS background	Complete; NFA 11/24/03	Zoned commercial/ industrial Conveyance notice filed with Clerk of Court, E. Baton Rouge Parish

Site Name/ Site No.	Remedial Action Taken	Residual Contaminants of Concern (COCs)	Screening / Cleanup Standard ^b	Cleanup Status	Institutional Control(s) ^c (Type/Purpose /Location)
SWMU 28 - Tank 4580	No action necessary; below screening or risk levels	Surface, potential surface or subsurface soils: no VOCs, SVOCs or PAHs detected Antimony: 5.1 mg/kg 32 ft (max) Arsenic: 12.3 mg/kg 26-28 ft (max) 5.46 mg/kg (mean) Groundwater: no SVOCs or PAHs detected VC: 0.0116 mg/l (max) Nickel: 0.166 mg/l (max)	12 mg/kg RECAP SSGW 7 mg/kg RECAP SS background 0.836 mg/l RECAP GW3-DW (MO-1) 294.8 mg/l RECAP GW3-DW (MO-1)	Complete; NFA 11/24/03	Zoned commercial/ industrial Conveyance notice filed with Clerk of Court, E. Baton Rouge Parish
SWMU 30 - Oily Water Initiator and Process Sewers	No action necessary; below screening or risk levels	Surface, potential surface or subsurface soils: no VOCs, SVOCs or PAHs detected Antimony: 5.1 mg/kg 32 ft (max) Arsenic: 11.8 mg/kg 32 ft (max) Groundwater: no SVOCs or PAHs detected VC: 0.0116 mg/l (max) Nickel: 0.166 mg/l (max)	12 mg/kg RECAP SSGW 7 mg/kg RECAP SS background 0.836 mg/l RECAP GW3-DW (MO-1) 294.8 mg/l RECAP GW3-DW (MO-1)	Complete; NFA 11/24/03	Zoned commercial/ industrial Conveyance notice filed with Clerk of Court, E. Baton Rouge Parish

Site Name/ Site No.	Remedial Action Taken	Residual Contaminants of Concern (COCs)	Screening / Cleanup Standard ^b	Cleanup Status	Institutional Control(s) ^c (Type/Purpose /Location)
SWMU 31 - North Pond	No action necessary; below screening or risk levels	Surface, potential surface or subsurface soils: no VOCs, SVOCs or PAHs detected Arsenic: 4mg/kg 6-7 ft (max) Groundwater: no VOCs, SVOCs, PAHs or metals detected	7 mg/kg RECAP SS background	Complete; NFA 11/24/03	Zoned commercial/ industrial Conveyance notice filed with Clerk of Court, E. Baton Rouge Parish
SWMU 32 - South Pond	No action necessary; below screening or risk levels	Surface, potential surface or subsurface soils: no VOCs, SVOCs or PAHs detected Arsenic: 1.9 mg/kg 32 ft (max) Groundwater: no VOCs, SVOCs, PAHs or metals detected	7 mg/kg RECAP SS background	Complete; NFA 11/24/03	Zoned commercial/ industrial Conveyance notice filed with Clerk of Court, E. Baton Rouge Parish

^a Based on the *Risk Evaluation Report of Solid Waste Management Units for the BRPP Facility (September 2002)*.

^b RECAP Regulations are the mechanism for addressing releases at a facility. They were promulgated by LDEQ on December 20, 1998 at LAC 33:1.Chaper 13 and were revised on June 20, 2000. RECAP is a tiered framework that consists of a Screening Option (SO) and three risk Management Options (MOs), referred to as MO-1, MO-2 and MO-3. The SO provides LDEQ-derived Screening Standards (SSs) for soil and groundwater. The MO-1 provides LDEQ-derived default RS for soil and groundwater that are protective of human health and the environment. MO-2 and MO-3 are more intense evaluations which include site-specific data for the evaluation of exposure and environmental fate and transport at the site.

RECAP risk MO-1 was used as the screening standard for all areas of investigation described in the above table. The MO-1 RS represent constituent

concentrations in media that are protective of human health and the environment for both residential and industrial land use scenarios using default exposure parameters and toxicity criteria.

°LDEQ deed conveyance is issued pursuant to RECAP Regulations at LAC 33:1.Chapter 13, June 20, 2000.