BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL ASSESSMENT

June 17, 2008

Mr. George Jones
ExxonMobil Chemical Company
Baton Rouge Polyolefins Plant
P.O. Box 53006
Baton Rouge, LA 70892-3006

RE: Ready for Reuse Determination
ExxonMobil Chemical Company **AI# 3519**
12875 Scenic Highway
Baton Rouge, Louisiana, East Baton Rouge Parish

Dear Mr. Jones:

The Louisiana Department of Environmental Quality (LDEQ) has determined that the ExxonMobil Chemical Company, Baton Rouge Polyolefins (BRPO) Plant is Ready for Reuse. A Ready for Reuse (RfR) Determination is an acknowledgment that the environmental conditions on the property are protective of human health and the environment based on its current and anticipated future use as an industrial operation.

The ExxonMobil Chemical Company, BRPO Plant (1995-present) is located at 12875 Scenic Highway on land formerly owned and operated by W.R. Grace (1957-1966), AlliedSignal (1966-1990), and Paxon Polymer Company (a joint venture between AlliedSignal and Exxon 1990-1995). Previously, it was undeveloped farm land. It encompasses approximately 210 acres, 3.5 miles north of Baton Rouge, Louisiana along U.S. Highway 61 in Section 58, Township 6 South, Range 1 West of the USGS Scotlandville 7.5 minute Quadrangle. It is bounded to the north by Clean Harbors (formerly Rollins Environmental Services), to the east by the Kansas City Southern Railway and Highway 61, to the south by LeChem (formerly Louisiana Chemical Polymers), and to the west by property owned by the Greater Baton Rouge Port Commission.

The BRPO facility manufactures high-density polyethylene (HDPE), polypropylene and oxidized polypropylene wax by the particle form process using ethylene, isobutene (as a carrier gas), and activated catalyst. HDPE product, isobutene, excess ethylene and catalyst are recovered for sale, reuse or recycling. Previous operations on this site by former owners/operators produce HDPE by the solution process.

ExxonMobil Chemical Company has submitted an RfR Request (Document ID # 35946056) that details numerous environmental investigatory and permitting activities involving LDEQ that have been conducted over the years of operation. LDEQ has evaluated 22 specific activities that

occurred at the facility over the past 24 years (1984 to present). Enclosure 1 summarizes each activity presented in the documentation supporting this RfR determination. Maps of the facility location and 22 site assessment/corrective action areas, respectively, are provided as Enclosure 2.

With this RfR Determination, LDEQ agrees that ExxonMobil Chemical Company 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 its current and anticipated future use as an industrial operation. Information concerning the current environmental conditions of the BRPO Plant (i.e., concentrations of contaminants present and their associated risks) and the risk management activities conducted to ensure protectiveness is summarized in Enclosure 3.

If conditions at the facility change, including environmental conditions, land use, site receptors, ownership, or function, it may be necessary to revisit this determination and evaluate its suitability for reuse to ensure its continuing applicability. The undersigned reserves 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 most noteworthy accomplishment!

Sincerely yours,

Harold Leggett, Ph.D.
Secretary
Louisiana Department of Environmental Quality

Enclosures:

1. Summary of Environmental Activities
2. Figures
3. Current Environmental Conditions Table
4. Agency Contacts

ENCLOSURE 1

SUMMARY OF ENVIRONMENTAL ACTIVITIES

EXXONMOBIL CHEMICAL COMPANY
BATON ROUGE POLYOLEFINS PLANT

1. The NPDES Pond (1985-1995) was a permitted Solid Waste Facility (P-0198) until LDEQ rescinded the permit in February 1994. Monitor wells associated with the NPDES Pond were plugged and abandoned in June 1995. No adverse effects to soil or groundwater were discovered based on method detection limits.

2. The Chrome Ponds (1988) operated from 1978 through 1983 as impoundments for the settling of solids generated from cooling water blowdown. Supernatant liquids were removed and the sludge was solidified prior to complete removal and disposal. A post-closure period of groundwater monitoring was completed and final closure of the impoundments was satisfactorily fulfilled. Wells continued to be sampled until May 1988 when approval to plug and abandon the wells was granted. The wells were plugged and abandoned in August 1988. No adverse effects to soil or groundwater were discovered based on method detection limits.

3. The OPEX V Expansion Groundwater Certification (1990) was an investigation associated with an air quality permit issued for a new emission source. LDEQ policy required that a boring to the first water bear zone be sampled for appropriate constituents prior to certain construction activities. In this case hexane and cyclohexane were sampled for in the shallow soils and groundwater. The well was plugged and abandoned in April 1992 as no adverse effects to soil or groundwater were discovered based on method detection limits.

4. The Unit D & E Reactor Expansion Groundwater Certification (1990) was an investigation associated with an air quality permit issued for a new emission source. LDEQ policy required that a boring to the first water bear zone be sampled for appropriate constituents prior to certain construction activities. In this case Volatile and Semi-volatile Organic Compounds (VOCs and SVOCs) were sampled for in the shallow soils and groundwater. There were no detections of these compounds above method detection limits and a "Letter of No Objection" was issued on August 21, 1990.

5. The UST and Maintenance Sump Investigation (1991) was initiated as a due diligence examination of the former location of the tank hold and sump. Soils and groundwater were sampled for Total Petroleum Hydrocarbons (TPH), Volatile Organic Compounds, methyl tertiary butyl ether (MTBE), chromium, zinc and lead. TPH, chromium, zinc and lead were found at low levels in soil, and lead was found in groundwater at low levels. None of these compounds exceeded the matrix standards for Underground Storage Tanks (UST) sites in place at that time. There were no established limits for metals under the UST Matrix, however, the remaining constituents meet current RECAP screening standards.

6. The OPEX VI Expansion Groundwater Certification was an investigation associated with an air quality permit issued for a new emission source. LDEQ policy required that a boring to the first water bear zone be sampled for appropriate constituents prior to certain construction activities. In this case Volatile Organic Compounds were sampled for in the shallow soils and groundwater. There were no detections of these compounds above method detection limits and a "Letter of No Objection" was issued on June 3, 1991.

7. The 1974 Pond Area (1990-2004) was an investigation and remedial action instituted as a result of a due diligence study of the facility. An aerial photograph of the site dated 1974 showed the short term use of a pond for impounding some type of liquid. The investigation proceeded in iterative steps from the discovery of tetrachloroethene in the soil and groundwater to the horizontal and vertical delineation of its extent to the fourth permeable zone beneath the site (four assessment phases). A Corrective Action Plan and Remedial Action Work Plan were developed and implemented using air sparging coupled with soil vapor extraction and pump withdrawal of groundwater followed by low-profile air stripping of the water. Final polishing of the w ater was accomplished with granular activated charcoal prior to discharge through the permitted outfall. A Risk Evaluation/Corrective Action Program (RECAP) evaluation of the remaining constituents in May 2002 allowed for "rebound" of constituent levels after shut-down of the remediation systems. Decommissioning of monitor wells and treatment systems was approved in October 2003 and final closure activities were completed and documented by May 2004. After a conveyance notice was filed with the East Baton Rouge Clerk of Courts, a No Further Action – At This Time (NFA-ATT) under the Management Option 1 (MO-1) Industrial Standards was issued on June 9, 2005.

8. The Compressor Station (1992-1994) investigation resulted from the discovery of stained soil during the installation of a new drain. A monitor well was installed to assess the groundwater in the immediate vicinity. After two years of monitoring with no indications of impact to the groundwater, the well was approved for plugging and abandonment on November 9, 1994.

9. The OPEX VII Expansion Groundwater Certification was an investigation associated with an air quality permit issued for a new emission source. LDEQ policy required that a boring to the first water bear zone be sampled for appropriate constituents prior to certain construction activities. In this case, Volatile Organic Compounds were sampled for in the shallow soils and groundwater. Hexane and cyclohexane were found in soil, prompting further investigation. A "Letter of No Objection" was issued on June 5, 1995 with the contingency that the contamination must be remediated. Ultimately, soils were excavated in conjunction with foundation preparations. In the OPEX VII Additional Assessment Report dated August 1995, confirmatory sampling showed that these compounds no longer were present above method detection limits.

10. The New Catalyst Area Groundwater Certification (1996) was granted based on information provided according to LDEQ policy. No sampling was performed and a "Letter of No Objection" was issued on May 6, 1996.

11. The W/P 10 Densifier Groundwater Certification (1997) was an investigation associated with an air quality permit issued for a new emission source. LDEQ policy required that a boring to the first water bear zone be sampled for appropriate constituents prior to certain construction activities. In this case, the Constituents of Concern (COCs) included VOCs, hexane, cyclohexane, and chromium. No COCs other than chromium were found in either soil or groundwater. Chromium was detected in soil, but below proposed RECAP standards. A "Letter of No Objection" was issued on December 19, 1997.

12. The Polypropylene Project Groundwater Certification (1998) was an investigation associated with an air quality permit issued for a new emission source. LDEQ policy required that a boring to the first water bear zone be sampled for appropriate constituents prior to certain construction activities. In this case, three borings were installed and sampled for VOCs, hexane, cyclohexane, and chromium. No COCs other than chromium were found in either soil or groundwater. Chromium was detected in both, but below proposed RECAP standards. A "Letter of No Objection" was issued on August 14, 1998.

13. The Construction Contractor Storage Demolition Project (1998) was a voluntary investigation in conjunction with the demolition of the Contractor/Paint Storage facilities. Near surface soils were collected and sampled for TCLP VOCs and TCLP metals. No constituents were found above RECAP standards. LDEQ did not participate in this voluntary assessment, however, all results have been reviewed and accepted by LDEQ for this RfR Determination.

14. The Paint Storage Demolition Project (1998) was a voluntary investigation in conjunction with the demolition of the Contractor/Paint Storage facilities. Near surface soils were collected and sampled for Toxicity Characteristic Leaching Program (TCLP) VOCs and TCLP metals. No constituents were found above RECAP standards. LDEQ did not participate in this voluntary assessment, however, all results have been reviewed and accepted by LDEQ for this Ready for Reuse (RfR) Determination.

15. The Sand Blast Area Demolition Project (1998) was a voluntary investigation of the area after demolition. Near surface soils were collected and sampled for TCLP VOCs and TCLP metals. No constituents were found above RECAP standards. LDEQ did not participate in this voluntary assessment, however, all results have been reviewed and accepted by LDEQ for this RfR Determination.

16. The Ultra Unit Area Groundwater Certification (1998) was an investigation associated with an air quality permit issued for a new emission source. LDEQ policy required that a boring to the first water bear zone be sampled for appropriate constituents prior to certain construction activities. In this case, one boring was installed and sampled for VOCs and chromium. No VOCs were found in either soil or groundwater. Chromium was detected in both, but below proposed RECAP standards. A "Letter of No Objection" was issued on October 21, 1998.

17. The Waste Drum Storage Building – Bays 1 & 2 (1998) was a voluntary investigation of the area after demolition (completed in 1997). Near surface soils were collected and sampled

for TPH, hexane, cyclohexane, and total chromium. No constituents were found above RECAP standards. LDEQ did not participate in this voluntary assessment, however, all results have been reviewed and accepted by LDEQ for this RfR Determination.

18. The Waste Drum Storage Building – Bays 3, 4, & 5 (1999) was a voluntary investigation of the area after demolition (completed in 1999). Near surface soils were collected and sampled for TPH, hexane, cyclohexane, and TCLP chromium. No constituents were found above RECAP standards. LDEQ did not participate in this voluntary assessment, however, all results have been reviewed and accepted by LDEQ for this RfR Determination.

19. The Fire Training Area (1998) was a voluntary investigation and corrective action of the area after demolition. Near surface soils were collected from 14 locations and sampled for Total Petroleum Hydrocarbons – Diesel (TPH-D). All areas that failed the proposed RECAP standard (SOIL-SSGW) of 6.5mg/kg were removed and disposed at the Woodside Landfill in Walker, LA. Additional soils were removed after confirmation samples indicated remaining concentrations above the RECAP limit. Final confirmation samples (July 13, 1998) indicated no soils remained with TPH-D above the RECAP standards. LDEQ did not participate in this voluntary assessment, however, all results have been reviewed and accepted by LDEQ for this RfR Determination.

20. The South Perimeter Groundwater Quality Assessment (2001) was a voluntary investigation of the perimeter area along the southern boundary of the BRPO facility. Twelve temporary monitor wells were installed approximately 300 feet apart to assess the quality of groundwater in the upper permeable zone. Samples of water were analyzed for total and dissolved chromium, cyclohexane, tetrachloroethene and n-hexane. No COCs were detected above the RECAP Screening Standards. LDEQ did not participate in this voluntary assessment, however, all results have been reviewed and accepted by LDEQ for this RfR Determination.

21. The Regenerative Thermal Oxidizer Groundwater Certification (2003) was an investigation associated with an air quality permit issued for a new emission source. LDEQ policy required that a boring to the first water bear zone be sampled for appropriate constituents prior to certain construction activities. In this case, six borings were installed and sampled for VOCs and total and dissolved chromium. No COCs were detected above RECAP Screening Standards in either soil or groundwater. A "Letter of No Objection" was issued on October 17, 2003.

22. The North Perimeter/Clean Harbors Property Boundary Area (1985 – Present) is an ongoing monitoring program required of Clean Harbors (AI# 1516) by LDEQ as part of their permitted hazardous waste activities. BRPO is not responsible for this program, however as COCs from activities at Clean Harbors have impacted the BRPO facility, this RfR Determination must take these environmental conditions into account. Using data from the last semi-annual groundwater monitoring report of 2006, the constituents remaining in the groundwater were compared to RECAP standards utilizing the same criteria as used in the 1974 Pond calculations. No constituents exceed the limits established under the MO-1 GW3NDW.

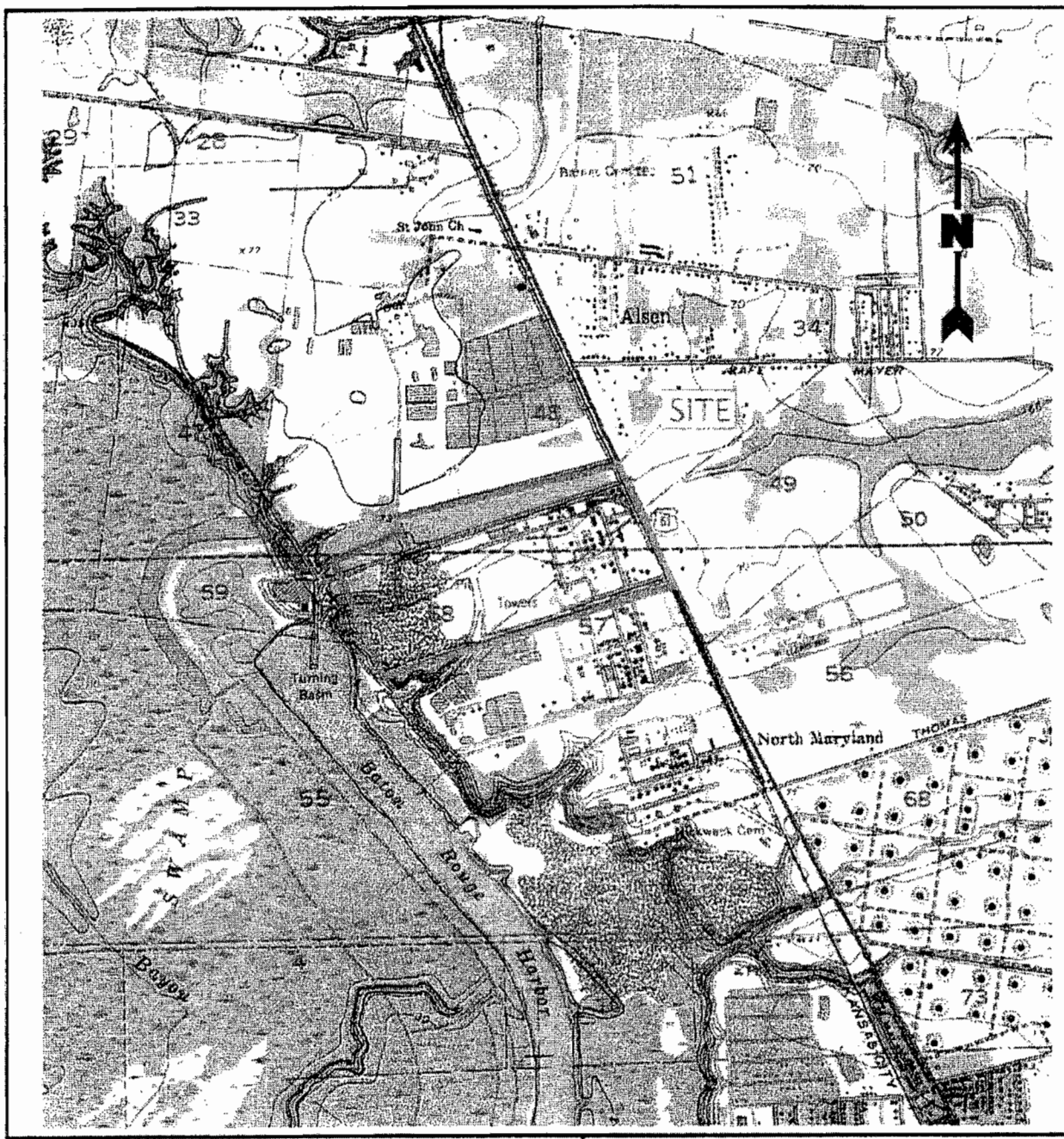
ENCLOSURE 2

FIGURES

EXXONMOBIL CHEMICAL COMPANY
BATON ROUGE POLYOLEFINS PLANT

Figure 1: Site Location Map, ExxonMobil Chemical Company, Baton Rouge Polyolefins Plant

Figure 2: Historical Site Assessment/Corrective Actions



0 2000 4000

SCALE: 1" = 2,000'

Note:

Base map taken from U.S.G.S. Quadrangle "Scotlandville, Louisiana" dated 1995, at a scale of 1:24,000.

ExxonMobil Chemical

Baton Rouge Polyolefins Plant
Baton Rouge Louisiana

Ready For Reuse Determination

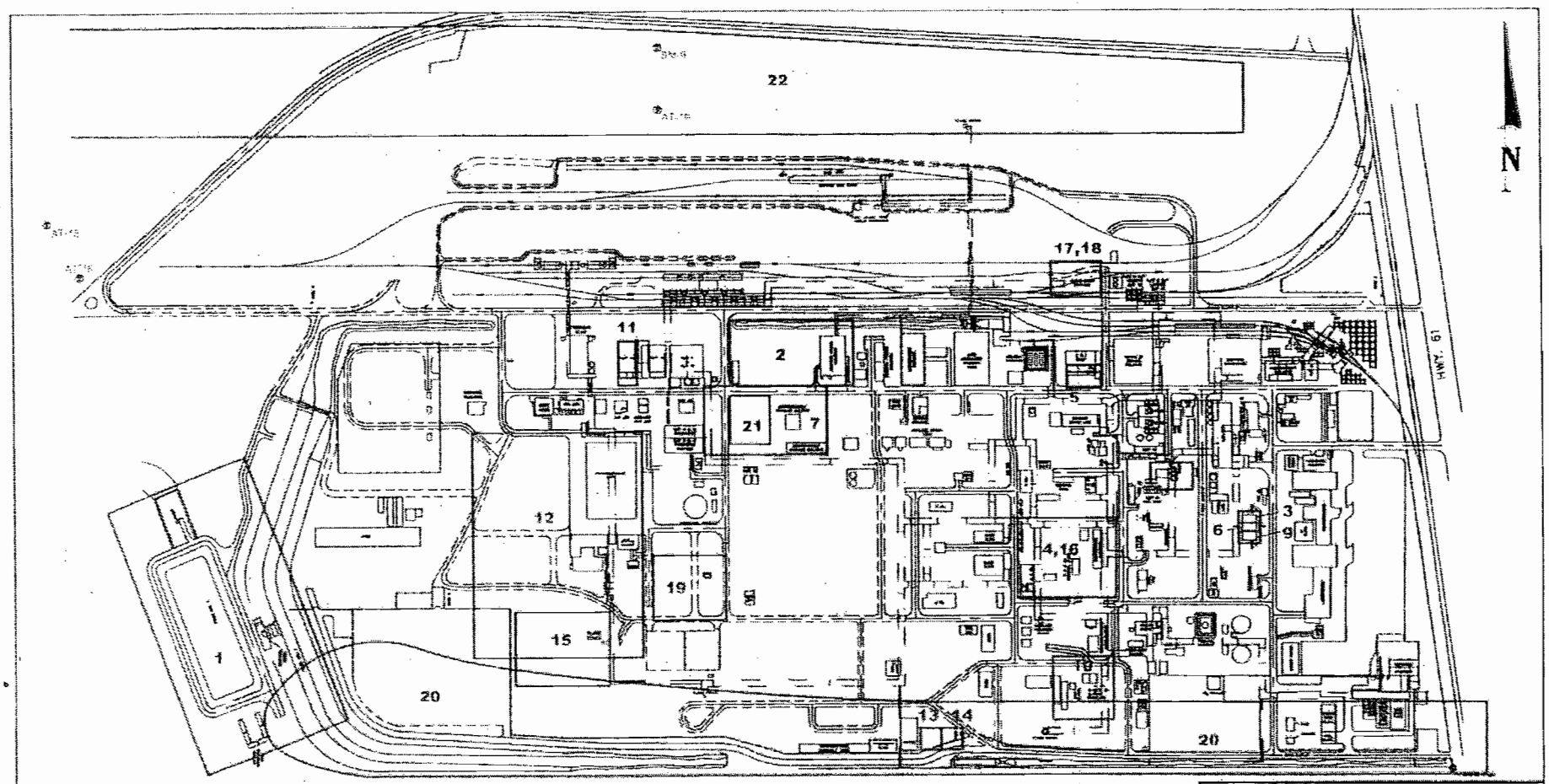
Site Location Map

East Baton Rouge Parish

E·A·G·L·E ENVIRONMENTAL SERVICES, INC.

Drawn:	BB
Checked:	RS
Approved:	RS
Date:	03/14/08
Dwg. No.	02-0005-C001

Figure 1



ExxonMobil Chemical

Baton Rouge Polyolefins Plant
Baton Rouge, Louisiana

Ready For Reuse Determination

Historical Site Assessments/ Corrective Actions

East Baton Rouge Parish

EAGLE

Drawn:	RHM
Checked:	JCH
Approved:	BS
Date:	05/14/08
Dwg. No.	02-0005-B101

Figure 2

ENCLOSURE 3

TABLE OF CURRENT ENVIRONMENTAL CONDITIONS

EXXONMOBIL CHEMICAL COMPANY
BATON ROUGE POLYOLEFINS PLANT

Site No.	Site Name	Remedial Action Taken	Residual Chemical of Concerns (COCs)	Screening/Cleanup Standard	Cleanup Status	Institutional Control(s) (Type/Purpose/Location)
1	NPDES Ponds	None	None	None	Complete/Permit rescinded (Feb. 1, 1994)	None required by LDEQ
2	Chrome Ponds	Clean-closure	None	Clean-closure	Clean-closure (Oct. 8, 1985)	None required by LDEQ
3	OPEX V Expansion Groundwater Certification	None	None	Assessment results evaluated against MDL's (prior to implementation of RECAP, 1998) [1]	"Letter of No Objection" (Mar. 6, 1992)	None required by LDEQ
4	Unit D & E Reactor Expansion Groundwater Certification	None	None	Assessment results evaluated against MDL's (prior to implementation of RECAP, 1998) [1]	"Letter of No Objection" (Aug. 21, 1990)	None required by LDEQ

Site No.	Site Name	Remedial Action Taken	Residual Chemical of Concerns (COCs)	Screening/Cleanup Standard	Cleanup Status	Institutional Control(s) (Type/Purpose/Location)
5	UST and Maintenance Sump Investigation [2]	None	***Soil:*** TPH = 195 mg/kg Cr = 13 mg/kg Pb = 7.5 mg/kg Zn = 38 mg/kg ***Groundwater:*** Pb = 0.1 mg/l	***Soil:*** TPH = 500 mg/kg (UST Matrix) Cr $Soil_{SSGW}$ = 100 mg/kg Pb $Soil_{SSGW}$ = 100 mg/kg Zn $Soil_{SSGW}$ = 2,800 mg/kg ***Groundwater:*** [3] Pb $GW3_{NDW}$ = 11 mg/l (Cr, Pb, and Zn analyses were not required under LDEQ UST Matrix, but meet current RECAP, 2003 Standards)	No action taken	None required by LDEQ [2]
6	OPEX VI Expansion Groundwater Certification	None	None	Assessment results evaluated against MDL's (prior to implementation of RECAP, 1998) [1]	"Letter of No Objection" (Jun. 3, 1991)	None required by LDEQ
7	1974 Pond Area	Air sparging, soil vacuum extraction, and groundwater recovery with air and water effluent carbon polishing	***Groundwater:*** PCE = 0.152 mg/l 1,2-DCE = 0.03 mg/l	***Groundwater:*** [3] PCE $GW3_{NDW}$ = 0.55 mg/l 1,2-DCE $GW3_{NDW}$ = 374 mg/l (RECAP, 2000)	"No Further Action - At This Time" (NFA-ATT) letter (Jun. 9, 2005)	Conveyance Notice Filed, East Baton Rouge Parish Clerk of Court (Jan. 8, 2004)

Site No.	Site Name	Remedial Action Taken	Residual Chemical of Concerns (COCs)	Screening/Cleanup Standard	Cleanup Status	Institutional Control(s) (Type/Purpose/Location)
8	Compressor Station	None	None	Assessment results evaluated against MDL's (prior to implementation of RECAP, 1998) [1]	No action taken, letter to plug and abandon monitor well system (Nov. 9, 1994)	None required by LDEQ
9	OPEX VII Groundwater Certification	Soil source removal	None	Confirmatory sample results evaluated against MDL's (prior to implementation of RECAP, 1998) [1]	"Letter of No Objection" (Jun. 5, 1995)	None required by LDEQ
10	New Catalyst Area Groundwater Certification	None	No sampling required	Not applicable	"Letter of No Objection" (May 6, 1996)	None required by LDEQ
11	W/P 10 Installation Groundwater Certification	None	***Soil:*** Cr = 10.6 mg/kg	***Soil:*** Cr $Soil_{SSGW}$ = 100 mg/kg (RECAP, 1998)	"Letter of No Objection" (Dec. 22, 1997)	None required by LDEQ
12	Polypropylene Project Groundwater Certification	None	***Soil:*** Cr = 14.4 mg/kg ***Groundwater:*** Cr = 1.14 mg/l	***Soil:*** Cr $Soil_{SSGW}$ = 100 mg/kg ***Groundwater:*** [3] Cr $GW3_{NDW}$ = 140,800 mg/l (RECAP, 1998)	"Letter of No Objection" (Aug. 14, 1998)	None required by LDEQ
13	Construction Contractor Area [2]	None	None	RECAP Screening Standards	No action taken	None required by LDEQ [2]

Site No.	Site Name	Remedial Action Taken	Residual Chemical of Concerns (COCs)	Screening/Cleanup Standard	Cleanup Status	Institutional Control(s) (Type/Purpose/Location)
14	Paint Storage Area [2]	None	None	RECAP Screening Standards	No action taken	None required by LDEQ [2]
15	Sand Blast Area [2]	None	None	RECAP Screening Standards	No action taken	None required by LDEQ [2]
16	Ultra Unit Area Groundwater Certification	None	***Soil:*** Cr = 19.1 mg/kg ***Groundwater:*** Cr = 0.472 mg/l	***Soil:*** Cr $Soil_{SSGW}$ = 100 mg/kg ***Groundwater:*** [3] Cr $GW3_{NDW}$ = 140,800 mg/l (RECAP, 1998)	"Letter of No Objection" (Oct. 21, 1998)	None required by LDEQ
17	Waste Drum Storage Building, Bays 1 & 2 [2]	None	***Soil:*** Cr = 14.6 mg/kg	***Soil:*** Cr $Soil_{SSGW}$ = 100 mg/kg (RECAP, 1998)	No action taken	None required by LDEQ [2]
18	Waste Drum Storage Building, Bays 3, 4, and 5 [2]	None	None	RECAP Screening Standards	No action taken	None required by LDEQ [2]
19	Fire Training Area [2]	Soil Source Removal	***Soil:*** TPH-D = 6.5 mg/kg	***Soil:*** TPH-D $Soil_{SSGW}$ = 6.5 mg/kg (RECAP, 1998)	No action taken	None required by LDEQ [2]

Site No.	Site Name	Remedial Action Taken	Residual Chemical of Concerns (COCs)	Screening/Cleanup Standard	Cleanup Status	Institutional Control(s) (Type/Purpose/Location)
20	South Perimeter Groundwater Quality Assessment [2]	None	None	RECAP Screening Standards	No action taken	None required by LDEQ [2]
21	Regenerative Thermal Oxidizer Groundwater Certification	None	***Groundwater:*** Cr = 0.11 mg/l 1,2-DCE = 0.039 mg/l VC = 0.0076 mg/l	***Groundwater:*** [3] Cr $GW3_{NDW}$ = 211,200 mg/l 1,2-DCE $GW3_{NDW}$ = 374 mg/l VC $GW3_{NDW}$ = 7.92 mg/l (RECAP, 2000)	"Letter of No Objection" (Oct. 17, 2003)	None required by LDEQ
22	North Perimeter / Clean Harbors Property Boundary [4]	Ongoing (Clean Harbors)	None	RECAP Management Option 1 – $GW3_{NDW}$ Standards [3]	Corrective Actions Ongoing by Clean Harbors	None required by LDEQ for BRPO property; responsibility assigned to Clean Harbors (LDEQ Agency Interest No. 1516) [4]

Notes:

1) Method Detection Limits (MDL's) from appropriate SW-846 analytical methods at the time of assessment activities (Methods 8020, 8240, and 8260 for VOC's; Method 8270 for SVOC's; and 6000 series for metals analysis).

2) LDEQ did not participate in this assessment. All data has been reviewed and accepted by LDEQ for this "Ready for Reuse" determination.

3) RECAP MO-1 $GW3_{NDW}$ Standards calculated using a site-specific Dilution Attenuation Factor of 220, as per RECAP guidelines.

4) LDEQ has reviewed the Clean Harbors groundwater monitoring submittals for this "Ready for Reuse" determination and concurs that site conditions on ExxonMobil BRPO property meet RECAP MO-1 standards.

ENCLOSURE 4

AGENCY AND FACILITY CONTACTS

For a copy of the administrative record providing detailed information regarding environmental conditions as the ExxonMobil Chemical Company, Baton Rouge Polyolefins Plant (the "Property"), 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

One may also log on to http://www.deq.louisiana.gov and click on EDMS for access to the past five years of public records.

For questions regarding the environmental conditions described in the Ready for Reuse Request for the Property (Document ID # 35946056), or the Basis of Decision please contact:

Mr. William H. Schramm, Geologist III
Environmental Technology Division
Office of Environmental Assessment
Louisiana Department of Environmental Quality
P.O. Box 4314
Baton Rouge, LA 70821-4314
(225) 219-3396

or

Mr. George Jones
Coordinator-Safety, Health and Environmental
ExxonMobil Chemical Company
P.O. Box 53006
Baton Rouge, LA 70892-3006
(225) 977-9795