From: Williams, Jonathan
To: McDonnell, Kimberlee
Subject: FW: RCRA Pond UAO Weekly Report #273 - October 26 to November 1, 2015 and October monthly data
Date: Monday, November 23, 2015 5:48:26 PM
Attachments: Attachment 1-1- Pond 15S Perimeter GES Log Sheets - Oct 2015.pdf
Attachment 1-2 - Pond 15S TMP GES Log Sheets - Oct 2015.pdf
Attachment 2-1 - Pond 15S - Calculated Perimeter Pipe Concentration trend current through 10-31-2015.pdf
Attachment 2-2 - Pond 15S - Graphs -Calculated TMP Concentration trend current through 10-31-2015.pdf
Attachment 3 - Pond 18A GES Log Sheets -Oct 2015.pdf
Attachment 4 - Pond 18A - Graphs - Calculated Perimeter Pipe Concentration trend current and cumulative through 10-31-2015.pdf
Attachment 5 - Pond Appurtenance Monitoring - Oct 2015.pdf
Attachment 6 - Pond Perimeter Surface Scans - Oct 2015.pdf
Attachment 7 - Perimeter Pipe Concentrations - Oct 2015.pdf
2015-11-04 RCRA Pond Continuous PH3 Monitoring_11.1.15.xlsx

From: Rob Hartman [mailto:Rob.J.Hartman@mwhglobal.com]
Sent: Wednesday, November 04, 2015 3:05 PM
To: Weigel, Greg <Weigel.Greg@epa.gov>
Cc: Hastings, Janis <Hastings.Janis@epa.gov>; 'Kelly Wright' <kwright@sbtribes.com>; susanh@ida.net; brian.english@deq.idaho.gov; Al Lam <lam@ae-eng.com>; Mark Smith <kasewarbonnet@earthlink.net>; vannoyj@dhw.idaho.gov; Paden, Norka E - CO 6th <PadenN@dhw.idaho.gov>; Williams, Jonathan <Williams.Jonathan@epa.gov>; Marguerite Carpenter <MARGUERITE.CARPENTER@fmc.com>; Valdez, Heather <Valdez.Heather@epa.gov>; (b)(6) [redacted] rachel.greengas@fmc.com
Subject: RCRA Pond UAO Weekly Report #273 - October 26 to November 1, 2015 and October monthly data

Greg,

As you had directed, FMC is providing a weekly/monthly report, pursuant to the RCRA Pond UAO, describing field activities conducted pursuant to work plans you have approved.

WEEKLY

Work Performed this week:

- Continued implementation of the IWP and, per FMC verbal notification to EPA on 9/15/15 and weekly report #266 transmitted on 9/16/15, 70-hour per week operation of the extraction system at Pond 18A east standpipe.
- Continued implementation of the RIWP and, per FMC verbal notification to EPA on 9/15/15 and weekly report #266 transmitted on 9/16/15, 70-hour per week operation of the two GES units extracting from the southwest standpipe, one GES unit extracting from the east standpipe and one GES unit extracting from TMP #2 (for a total of four GES units operating at Pond 15S).
- Continued continuous monitoring at three Pond 18A boundary locations and four 15S boundary monitoring locations during periods of gas extraction. There were no TWA or maximum values above the thresholds specified in the Air Monitoring Plan. A spreadsheet summarizing the results of this monitoring to date is attached.
- In addition to continuous monitoring at Ponds 15S and 18A, monitoring performed pursuant to the approved work plans:

- Pond 15S – Southwest and east perimeter standpipe monitoring using the dilution box method (Note: The dilution box results are reported on monthly report Attachment 7 – Perimeter Pipe Concentrations -October 2015. The October monthly average for the Pond 15S southwest standpipe was 956 ppm and the east standpipe was 85 ppm.)

- As discussed with EPA and documented in a follow-up email on 10/22/15, and approved by EPA on 10/29/15, FMC continued planning for decreasing the GES operating hours at Pond 15S and 18A from 70 hrs/week to 40 hrs/week beginning on 11/2/15.
- Began compiling data for October monthly report targeted for submittal 11/4/15 and discussion during monthly call scheduled for 11/6/15 at 1000 PST / 1100 MST / 1300 EST.

Problems Encountered:

None.

Unplanned Events Encountered:

None.

Work to be performed the following week:

- Continue implementation of the IWP and, per EPA approval on 10/29/15, on 11/2/15 begin 40-hour per week operation of the extraction system at Pond 18A east standpipe.
- Continue implementation of the RIWP and, per EPA approval on 10/29/15, on 11/2/15 begin 40-hour per week operation of the two GES units extracting from the southwest standpipe, one GES unit extracting from the east standpipe and one GES unit extracting from TMP #2 (for a total of four GES units operating at Pond 15S).
- Continue continuous monitoring at three Pond 18A boundary locations and four 15S boundary monitoring locations during periods of gas extraction.
- Other than continuous monitoring at Ponds 15S and 18A, no monitoring is planned or required pursuant to the approved work plans.
- Compile data for October monthly report.
- Submit October monthly report on 11/4/15 and participate in monthly call scheduled for 11/6/15 at 1000 PST / 1100 MST / 1300 EST.

MONTHLY (October 2015) DATA REPORTING

- Attachment 1-1 – Pond 15S Perimeter GES Log Sheets – October 2015
- Attachment 1-2 – Pond 15S TMP GES Log Sheets - October 2015
- Attachment 2-1 – Pond 15S – Graphs - Calculated Perimeter Pipe Concentration Trend - Current through 10-31-15
- Attachment 2-2 – Pond 15S – Graphs - Calculated TMP Concentration Trend - Current through 10-31-15
- Attachment 3 – Pond 18A GES Log Sheets – October 2015
- Attachment 4 – Pond 18A – Graphs – Calculated Perimeter Pipe Concentration Trend current and cumulative through 10-31-15

- Attachment 5 – Pond Appurtenance Monitoring – October 2015; Ponds 15S, 16S, 17 and 18A cumulative through 10-31-15
- Attachment 6 – Pond Perimeter Surface Scans – October 2015; all ponds cumulative through 10-31-15
- Attachment 7 – Perimeter Pipe Concentrations - October 2015; Ponds 15S, 16S and 18A cumulative through 10-31-15

During October, FMC contractors KASE/Warbonnet and A&E Engineering personnel logged a total of 1,334 man-hours on site including work associated with implementing the RCRA Pond UAO; no IH personnel monitoring alarm was experienced.