From:	Sheldrake, Beth
To:	Gervais, Gregory; Fonseca, Silvina
Cc:	McDonnell, Kimberlee; Williams, Jonathan
Subject:	FW: FMC SITE REDEVELOPMENT AND USCs
Date:	Thursday, January 07, 2016 12:10:29 PM
Attachments:	FMC Pocatello Memo_121515.pdf 2015 CERCLA Parameters for Managing Relocated USC aterial.pdf

Hi, Greg and Silvina. Happy New Year! I am not sure whether Jonathan has shared these with you yet. We are in the process of reviewing. I will also send you the input we received from the Tribes.

Beth

Beth Sheldrake | **Unit Manager**
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From: Lizanne Davis [mailto:Lizanne.Davis@fmc.com]
Sent: Friday, December 18, 2015 3:39 PM
To: Sheldrake, Beth <sheldrake.beth@epa.gov>; Williams, Jonathan <Williams.Jonathan@epa.gov>
Subject: FW: FMC SITE REDEVELOPMENT AND USCs

Attached/Below is email correspondence from Barry Crawford to Dennis McLerran.

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From: Barry Crawford
Sent: Tuesday, December 15, 2015 4:44 PM
To: mclerran.dennis@epa.gov
Subject: FMC SITE REDEVELOPMENT AND USCs

Dear Dennis,

During our recent calls, we have discussed redevelopment and "Undocumented Subsurface

Conditions" (USC) materials at the FMC Pocatello site. This message provides an update on both issues.

On the subject of redevelopment, I am excited to report that FMC has signed a lease with Valley Agronomics for redevelopment of a portion of the Pocatello site. We expect to make the formal public announcement tomorrow.

The Valley Agronomics project reflects a capital investment of $12 million and at full scale will employ 60-70 people. The initial phase of the redevelopment will encompass approximately 15 acres on the former plant site. A second phase of development will encompass an additional 12 acres across Highway 30 from the former plant site, where warehousing and retail operations will be located. Both parcels are outside of the Fort Hall Reservation.

Valley Agronomics is a partnership between Valley Wide Cooperative and WinField Solutions, LLC, which is a Land O'Lakes company. Valley Wide Cooperative is an Idaho-based co-op with multiple farm service locations throughout Idaho, Oregon, and Wyoming.

When in operation, the facility will provide specialized fertilizer blends to Snake River Plain farmers and ranchers. Given the agricultural economy of Southeast Idaho and the Fort Hall Reservation in particular (20% of the land base is dedicated to farming), the project will provide significant benefits to the community. I am hopeful that this redevelopment will also set the standard for additional redevelopment opportunities at the site, especially the land within the Reservation.

My staff met with your staff last week to discuss how to move this redevelopment project forward. Representatives of Valley Agronomics, IDEQ and the Shoshone Bannock Tribes also participated in that meeting. I appreciate your staff's continuing efforts to support this project. There remains a great deal of work to be done to ensure that construction can begin in mid-February, 2016, in order to meet market demand in the Fall of 2016. There is also a great deal of work to be done to coordinate that construction with construction of FMC's remedial action. You have my commitment that we will work diligently on both fronts.

On the subject of USCs, you may recall that USC materials contain embedded elemental phosphorus. We have encountered them during site-wide grading and relocated them within the remediation area as necessary to protect workers and allow the grading work to proceed.

I'm attaching a copy of a risk evaluation report by our consultant, Gradient. The report details the occupational, transportation and practical risks associated with drumming the USC materials and transporting them to an Ohio facility for incineration rather than including them within the remedial action and covering them onsite. The second document I'm attaching here is a legal analysis drafted by our outside counsel. This analysis shows that the on-site management of these materials is consistent with EPA's CERCLA "Area of Contamination" policy and with Region 10 decisions applying this policy at other sites. Both of these documents provide compelling information and demonstrate that on-site disposition is the safest and most environmentally protective method for managing the USC materials at the Pocatello site.

After you and your staff have had the opportunity to review these documents, I would like to visit with you to find a path to resolution of this issue.

Regards,

Barry Crawford