From:	Williams, Jonathan
To:	susanh@ida.net; Kelly Wright; Zavala, Bernie; Scott.Miller@deq.idaho.gov Miller
Cc:	McDonnell, Kimberlee
Subject:	RE: AFLB north of plant--December 23 conference call follow up
Date:	Friday, January 08, 2016 10:20:33 AM
Attachments:	EMF RI Section 3_3 Figures.pdf

Susan:

Sorry you missed the teleconference. We discussed the information I sent to you, Kelly, and Scott December 23, 2015 after it was described to us by Rob Hartman during our teleconference with FMC that day. Those cross sections, provided to EPA by BAH after the call with FMC, are attached to this e-mail too.

Bernie and I looked over the cross sections, and a number of borehole logs, and the first available time to discuss our interpretation of that information with the Tribes and IDEQ was Wednesday, January 6. The next step is for me to call Marjo Carpenter, and then follow-up with an e-mail reply.

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From: Susan Hanson [mailto:susanh@ida.net]
Sent: Friday, January 08, 2016 8:44 AM
To: Kelly Wright <kwright@sbtribes.com>; Williams, Jonathan <Williams.Jonathan@epa.gov>; Zavala, Bernie <Zavala.Bernie@epa.gov>; Scott.Miller@deq.idaho.gov Miller <Scott.Miller@deq.idaho.gov>
Subject: Re: AFLB north of plant--December 23 conference call follow up

All- Jonathan:

Could you provide some clarification on this matter? On December 23 we talked at length about the need to determine, to a better degree of specificity, where the AFLB terminated to ensure we were monitoring in the proper locations. I understand from the email below and discussions with Kelly this may not be as critical at this juncture but EPA will be requiring monitoring wells at some future time. Is the thinking when weather permits? Im very perplexed with the issue surrounding the assessment zone and compliance zone as being " a sloppy way to conduct business". The Tribes voiced repeated concerns in the past surrounding points of compliance at the source only to be told the point of compliance for ground water cocs was in the river. Am I understanding correctly that this will not be the case at FMC?

I appreciate your assistance in clarifying this issue.

Thank you
Susan Hanson

From: Kelly Wright
Sent: Wednesday, January 06, 2016 11:57 AM
To: Susan Hanson <susanh@ida.net>
Subject: FW: AFLB north of plant--December 23 conference call follow up

On today's call we identified the fact that the proposed wells north of the frontage road are not necessarily important enough to install immediately and the fact that somehow, FMC has selected an assessment area and compliance area. According to those involved, this was nothing more than a sloppy way to conduct business. EPA, Tribes and IDEQ agreed that this would not be allowed in this process. Also talked about the plume in groundwater must meet the limits everyone not just the point of compliance.

EPA and IDEQ are rather upset with the fact that Rob did not provide all the necessary material as requested early in December and waited until later to try and explain it after the fact. If he was going to use something from 1993, professional curiosity would have been to provide everything. Many players or faces have changed.

From: Williams, Jonathan [mailto:Williams.Jonathan@epa.gov]
Sent: Tuesday, January 05, 2016 3:21 PM
To: Kelly Wright <kwright@sbtribes.com>
Cc: Virginia Monsisco <vmonsisco@sbtribes.com>; Sheldrake, Beth <sheldrake.beth@epa.gov>; Zavala, Bernie <Zavala.Bernie@epa.gov>;Scott.Miller@deq.idaho.gov; Susan Hanson <susanh@ida.net>; McDonnell, Kimberlee <McDonnell.Kimberlee@epa.gov>
Subject: RE: AFLB north of plant--December 23 conference call follow up

Kelly:

I believe that you, me, Susan, Bernie, and Scott all received the same information, at the same time, from FMC December 23, 2015. The information we received was not

in time for us all to adequately review prior to the conference call with FMC.

After the conference call, Bernie and I were able to further review the information provided by FMC, and some cross sections that FMC did not provide, but which Rob Hartman described over the telephone, from the original EMF RI. BAH found those cross sections, provided them to me and Bernie, and I forwarded to you and Scott 12/23/15. They're attached to this e-mail too.

Bernie and I would like to discuss our current thinking about the northern extent of the AFLB with you, Susan, and Scott. Would a conference call tomorrow, January 6, at 11 am Mountain Time (10 am Pacific) work for you and/or Susan? I know that's a good time for me, Bernie, and Scott.

This call would be in addition to the bi-weekly teleconference scheduled for Thursday, January 7, where EPA, BAH, the Tribes, and IDEQ will be discussing other aspects of the groundwater remedy intermediate RD submittal, and also the final soil remedy RD and RAWP received December 28.

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From: Kelly Wright [mailto:kwright@sbtribes.com]
Sent: Monday, December 28, 2015 8:43 AM
To: Williams, Jonathan <Williams.Jonathan@epa.gov>
Cc: Virginia Monsisco <vmonsisco@sbtribes.com>; Sheldrake, Beth <sheldrake.beth@epa.gov>
Subject: FW: AFLB north of plant

Jonathan, it appears that the Tribes are being left out on information that impacts our lands and resources. I hope in the future that FMC and EPA's contractor includes the Tribes on correspondences regarding the FMC OU. Some of the timeframes involved are becoming undoable. More time is needed to ensure that we can provide a more thorough review and participation in these meetings.

Hopefully, we can get these resolved in the near future so we can be pro-active rather than reactive.
Thanks
Kelly

From: Susan Hanson [mailto:susanh@ida.net]
Sent: Monday, December 28, 2015 9:30 AM
To: Kelly Wright <kwright@sbtribes.com>
Cc: Jonathan Williams <Williams.Jonathan@epa.gov>; Virginia Monsisco <vmonsisco@sbtribes.com>
Subject: Re: AFLB north of plant

Kelly,

I participated on this call but a couple comments. It is difficult, if not impossible to be prepared or have any value when the information is forwarded 15 minutes prior to the call. The call in number was forwarded less than 10 minutes prior to the call as was the information from Ed.

Again, it would be really helpful if you could remind Jonathan to have Marjo copy us directly so we have some time to prepare, rather than sending out emails to check on status of calls and call in numbers.

FMC will be drilling additional monitoring wells across from hiway 30 to determine if the AFLB extends. This area is very ? as to how far the AFLB extends and if it is continuous. As you know, the original RI reports drafted by Bechtel actually described the AFLB pinching off and turning to michaud gravels north of the facility towards the river.

FMC will be providing a work plan after the first of the year for this work. Could you request a date for comments due from Jonathon on 60% design?

thanks
Susan Hanson

On Dec 23, 2015, at 12:42 PM, "Williams, Jonathan" <Williams.Jonathan@epa.gov> wrote:

> Thanks for the information. I think we disagree with the interpreted extent of the AFLB shown on the map sent to us last week, and would like to explain why over the telephone. And the borehole information provided earlier today does not appear to support that MWH interpretation of the continuous extent of the AFLB (shown in purple in map view) either.
>
> Attached are some interpretive cross sections I recently reviewed. My initial review suggests that along section C-C' the AFLB is present at MW 133/134, MW 112 is too shallow, and it's absent at MW 500/501. Along

section D-D' it appears to be present only as far north as MW 309/310. It appears that the AFLB is not present anywhere along section G-G'.

Let's talk as planned about how far down gradient from potential extraction well locations we can expect the AFLB to be present, and how that might be confirmed. Also, I think we should talk about orienting extraction wells more or less perpendicular to groundwater flow. Some proposed extraction well locations appear to be oriented more parallel to the flow of contaminated groundwater.

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From: Marguerite Carpenter [mailto:MARGUERITE.CARPENTER@fmc.com]
Sent: Wednesday, December 23, 2015 10:15 AM
To: Zavala, Bernie <Zavala.Bernie@epa.gov>; Ed Greutert <greutert_ed@bah.com>; susanh@ida.net; Williams, Jonathan <Williams.Jonathan@epa.gov>; Kelly Wright <kwright@sbtribes.com>; Scott Miller <scott.miller@deq.idaho.gov>
Cc: Rob Hartman <Rob.J.Hartman@mwhglobal.com>
Subject: AFLB north of plant

Jonathan

During our conference call last Friday, you requested additional information regarding the EMF RI, FMC Groundwater Current Conditions Report (GWCCR) and Simplot Phosphoric Acid Plant (PAP) Investigation Report) data and interpretations that the American Falls Lake Bed deposits are laterally continuous to the north and northeast of the FMC Plant site as depicted on the figures we reviewed during the call which are attached again here. Also attached are 1) Figure 3-1 from the Draft CERCLA Groundwater Monitoring Plan, annotated with a dashed line around the borings / lithologic logs that were again reviewed, 2) a tabulated summary of the boring designations showing the depth to and elevation of the top of the AFLB, and 3) copies of the lithologic logs. We believe the attached information fully supports the original EMF RI / GWCCR interpretation that the AFLB is laterally continuous to the north of the FMC Plant (at least north of I-86) and to the northeast (northeast of well 517 as inferred from

the data presented in Simplot's PAP Investigation Report). With your concurrence, we believe this information obviates the need for further discussion on this topic and propose that we cancel the conference call scheduled for this afternoon.

Thank you,
Marjo

Marguerite Carpenter, PhD
Associate Director, EHS Rem/Gov
FMC Corporation
1735 Market Street
Philadelphia, PA 19103
Phone 215-299-6210
<image003.png>

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<EMF RI Figure 3_1 series.pdf>

<EMF RI Section 3_3 Figures.pdf>