From:	Williams, Jonathan
To:	Sheldrake, Beth
Cc:	Vilpas, Sirkku
Subject:	FW: Argonne Proposal -- EPA Comments
Date:	Wednesday, September 03, 2014 6:43:01 PM
Attachments:	20140903_ANL Proposal_EPA Comments.docx

FYI

Jonathan Williams, LHG
Remedial Project Manager
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900, ECL-111
Seattle, WA 98101

Telephone: (206) 553-1369
E-mail: williams.jonathan@epa.gov

-----Original Message-----
From: Gervais, Gregory
Sent: Wednesday, September 03, 2014 6:18 PM
To: Kelly Wright; Dave Reisman (dreisman@cinci.rr.com); Jill Grant (jgrant@jillgrantlaw.com); susanh@ida.net
Cc: Fiedler, Linda; Fonseca, Silvina; Adam, Michael; Williams, Jonathan
Subject: Argonne Proposal -- EPA Comments

Kelly et. al,

I've attached EPA's comments on Argonne's proposal. We have not provided them to Argonne, as we intend to wait until after our Thursday PM conference call with you to discuss the Tribes' and EPA's comments. Our goal tomorrow is to clarify comments, identify comments that will be sent to Argonne (or update/revise/add comments), and otherwise come to mutual agreement with you on how to proceed so that Mike Adam has a clear path for getting to a full notice to proceed for Argonne.

Also, after sending the Work Order to Argonne I had an opportunity to speak with EPA Region 8's RCRA project manager on the Rhodia RCRA Corrective Action site (another P4 site that has ponds...I believe in Montana). She indicated the responsible party, Solvay, has been performing P4 treatment technology evaluations for several years. She provided several Solvay reports that are publicly available. I would like to provide them to you if you don't have them. The files are very large. I may need to post them to a FTP site or mail CDs to you. I would like to also make them available to the Independent Review Team as additional background information for their consideration to be included in the Work Order attachment. I would rely on them to determine relevance to their ETT review, rather than EPA make any presumption on relevance. Please let me know your thoughts.

Finally, I spoke with Jonathan Williams this evening and Region 10 and FMC are able to facilitate a 9/16 site visit. Unless we encounter an issue tomorrow that would cause us to postpone the site visit, I recommend that we complete travel and site visit planning. This will include our asking the Independent Team to identify and communicate specific site visit data collection they would like (e.g., site features, background info) no later than COB Wednesday, 9/10 so that we can share it with Region 10, FMC and you to provide every opportunity to meet the Independent Team's needs on the site visit. Of course they can identify additional data needs after that, but it will be helpful if there are several business days for us to prepare for their specific needs. I've asked Jonathan to work with FMC to provide us all with info on required Personal Protective Equipment that we will need for the site visit. Given the possibility that the Independent Team will want information that may be best provided through specific discussions with key personnel from FMC, Region 10 and the Tribes, we will plan to have a suitable meeting space available to us. FMC indicated their meeting space is quite small, so it may be appropriate to secure a conference room from Idaho DEQ. I am working to balance the need to keep Argonne's team independent with the reality that they will be in data gathering mode and that may necessitate some flexibility in getting info from

FMC, Region 10, the Tribes and HQ in a manner that is transparent. Again, let me know your thoughts on this as there is time to adjust these plans as needed.

Best,

Greg

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Greg Gervais, P.E.
Chief, Technology Assessment Branch | EPA OSWER OSRTI TIFSD
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-----Original Message-----
From: Kelly Wright [mailto:kwright@sbtribes.com]
Sent: Tuesday, September 02, 2014 6:53 PM
To: Gervais, Gregory
Cc: Dave Reisman (dreisman@cinci.rr.com); Jill Grant (jgrant@jillgrantlaw.com); Fiedler, Linda; Fonseca, Silvina; Adam, Michael; Williams, Jonathan; Casper Appenay; Tony Galloway; Ladd R. Edmo; Arnold Appeney; susanh@ida.net; Virginia Monsisco
Subject: RE: More information on the Argonne Proposal

Hey Greg, we are fine with the partial agreement with the Argonne Team. Was a little curious with the idea that two had worked on the Simplot plant as some of their justification which is a different technology (acid digestion) than what FMC used (electric arc furnaces) but if they seem to feel that their knowledge in valid we'll see.
Thanks
Kelly

-----Original Message-----
From: Gervais, Gregory [mailto:Gervais.Gregory@epa.gov]
Sent: Tuesday, September 02, 2014 10:00 AM
To: Kelly Wright; susanh@ida.net
Cc: Dave Reisman (dreisman@cinci.rr.com); Jill Grant (jgrant@jillgrantlaw.com); Fiedler, Linda; Fonseca, Silvina; Adam, Michael; Williams, Jonathan
Subject: RE: More information on the Argonne Proposal

Kelly,

I just left you a voicemail with the same info as below.

Thanks again for getting back with us regarding the preferred site visit date being 9/16. **Since EPA HQ won't be talking with you until this Thursday regarding comments on Argonne's proposal, would the Tribes agree that EPA should provide the conditional approval listed below to Argonne right away so that they can finalize their team membership and be positioned to participate on 9/16?** I'm concerned that, if we wait until later this week to give Argonne the go-ahead on the team, we may not be able to pull off a 9/16 site visit.

Please let me know.

Best,

Greg

@@

Greg Gervais, P.E.
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-----Original Message-----
From: Gervais, Gregory
Sent: Thursday, August 28, 2014 11:19 PM
To: Kelly Wright; susanh@ida.net
Cc: Dave Reisman (dreisman@cinci.rr.com); Jill Grant (jgrant@jillgrantlaw.com); Fiedler, Linda; Fonseca, Silvina; Adam, Michael; Williams, Jonathan
Subject: RE: More information on the Argonne Proposal

Kelly,

We have not yet finalized the date for the site visit as we need to approve Argonne's team membership, allow them to start reviewing materials, re-verify their availability, and have Region 10 confirm the date with FMC. Additionally, it would be appropriate to allow the Argonne team let us all know what they would like to see during the site visit so we can ensure it's as productive as possible.

If you agree that EPA should give the conditional approvals listed below, we can finalize plans for the site visit concurrent with EPA HQ and the Tribes working through our respective comments in the next week.

Finally, I will review our calendars and identify a time on Thursday of next week that should work for us to talk. I may need to wait until Tuesday as I know we will need to move some other meetings on our end to make it work.

Best,

Greg

****

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me for another solution. Thanks!**

Gregory Gervais, P.E.
Chief, Technology Assessment Branch
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From: Kelly Wright [kwright@sbtribes.com]
Sent: Thursday, August 28, 2014 1:55 PM
To: Gervais, Gregory; susanh@ida.net
Cc: Dave Reisman (dreisman@cinci.rr.com); Jill Grant (jgrant@jillgrantlaw.com); Fiedler, Linda; Fonseca, Silvina; Adam, Michael; Williams, Jonathan
Subject: RE: More information on the Argonne Proposal

Greg, we have already scheduled the week of the 15th for their site visit with it being the 16th and traveling on the 15th and 17th for you guys?
Thursday seems to work for our side. I have some conference calls between 10am to 12pm (MST) so any time after that would be best for me.
Let me know the exact time and looking forward to the call.
Thanks
Kelly

-----Original Message-----
From: Gervais, Gregory [mailto:Gervais.Gregory@epa.gov]
Sent: Thursday, August 28, 2014 8:05 AM
To: Kelly Wright; susanh@ida.net
Cc: Dave Reisman (dreisman@cinci.rr.com); Jill Grant (jgrant@jillgrantlaw.com); Fiedler, Linda; Fonseca, Silvina; Adam, Michael; Williams, Jonathan
Subject: RE: More information on the Argonne Proposal

Kelly,

I just left you a voicemail with the same information as below.

EPA's HQ team won't be able to talk with you this week after all. I apologize for the delay. We would like to schedule a call between our EPA HQ team and you (no Argonne participation) for the latter part of next week to discuss comments. We will be able to send our comments on Argonne's draft proposal by Wednesday evening. Can you let us know your availability on Thursday and Friday of next week? We'd like to discuss and agree on which comments are relevant to ANL's proposal and which ones are more focused on the Work Order/scope and require discussion between the Tribes and EPA before we mutually agree on whether a Work Order change is appropriate or otherwise how to reconcile the comments. I am hopeful this will be a quick process given how productive our meetings and calls have been so far.

In the meantime, I would like to have Mike Adam of our team provide a conditional approval to Argonne restricted to the following items:

1. Since the Tribes and EPA HQ both accept Argonne's proposed independent expert team membership, EPA would direct ANL to finalize team membership including any admin work ANL must do to 'hire' the two team members who aren't presently ANL employees. They should also complete the conflict of interest clearance process if not already done.
2. EPA would direct ANL's team to begin review of the 20+ referenced documents attached to the Work Order we sent them on 7/2/14.
3. EPA would direct ANL to verify team member availability (i.e., available dates) for the site visit. As I mentioned in my voicemail, with it being 8/28/14 and with updates to the Tribes' representatives and EPA availability, the only week in September that is possible would be 9/15/14. We should also identify available October dates right away so the site visit schedule can be confirmed through EPA Region 10's Jonathan Williams with FMC.

This would allow ANL to move forward with several items that shouldn't be affected by the Tribes' and EPA's comments. EPA is committed to working through the comments with you so we can have ANL provide a revised proposal ASAP and allow them to proceed with the full scope of the effort.
If any or all of these 3 conditional approvals are acceptable to the Tribes, please let me know right away so I can have Mike provide direction to ANL.

I am out of the office through Monday, 9/1/14 but can be reached at 703-603-0690 (desk also rings to my cell) if you'd like to talk.

Best,

Greg

****

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me for another solution. Thanks!**

Gregory Gervais, P.E.
Chief, Technology Assessment Branch
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____
From: Kelly Wright [kwright@sbtribes.com]
Sent: Tuesday, August 26, 2014 1:41 PM
To: Gervais, Gregory; susanh@ida.net
Cc: Dave Reisman (dreisman@cinci.rr.com); Jill Grant (jgrant@jillgrantlaw.com); Fiedler, Linda; Fonseca, Silvina; Adam, Michael; Williams, Jonathan
Subject: RE: More information on the Argonne Proposal

Greg based on your question on availability, it appears that the following times are not times we can talk:
Wednesday 12-2 Eastern,
Thursday 2-3:30 Eastern, and
Friday any time after 3:00 PM
Any other time seems to be fine from our stands.
Thanks
Kelly

-----Original Message-----
From: Gervais, Gregory [mailto:Gervais.Gregory@epa.gov]
Sent: Monday, August 25, 2014 9:05 AM
To: Kelly Wright; susanh@ida.net
Cc: Dave Reisman (dreisman@cinci.rr.com); Jill Grant (jgrant@jillgrantlaw.com); Fiedler, Linda; Fonseca, Silvina; Adam, Michael; Williams, Jonathan
Subject: RE: More information on the Argonne Proposal

Thank you, Kelly! We are reviewing your comments. EPA HQ will prepare our comments and send them to you soon. I don't think we will have many comments. It may be useful to set up a call to discuss, so that we can ensure all comments are addressed appropriately and quickly. What would be your availability for a conference call, and will your whole team need to participate?

Best,

Greg

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-----Original Message-----
From: Kelly Wright [mailto:kwright@sbtribes.com]
Sent: Friday, August 22, 2014 4:17 PM
To: Gervais, Gregory; susanh@ida.net
Cc: Dave Reisman (dreisman@cinci.rr.com); Jill Grant (jgrant@jillgrantlaw.com); Fiedler, Linda; Fonseca, Silvina; Adam, Michael; Williams, Jonathan
Subject: RE: More information on the Argonne Proposal

Greg, sorry for the delay in getting our comments was checking with the Policy makers so they are aware and agree with it. Please find attached a copy of our comments.
Thanks
Kelly

-----Original Message-----
From: Gervais, Gregory [mailto:Gervais.Gregory@epa.gov]
Sent: Monday, August 18, 2014 6:56 AM
To: susanh@ida.net; Kelly Wright
Cc: Dave Reisman (dreisman@cinci.rr.com); Jill Grant (jgrant@jillgrantlaw.com); Fiedler, Linda; Fonseca, Silvina; Adam, Michael; Williams, Jonathan
Subject: RE: More information on the Argonne Proposal

Kelly - Please let me know the status of the Tribes' review of Argonne's proposal, and in particular their proposed independent expert review team. Additionally, please advise on your team's availability for a site visit as we'll need to finalize the day as soon as possible once we've agreed on the Argonne proposal. Thanks!

Susan - Thanks for the update.

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Greg Gervais, P.E.
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-----Original Message-----
From: Susan Hanson [mailto:susanh@ida.net]
Sent: Wednesday, August 06, 2014 5:00 PM
To: Gervais, Gregory
Cc: Dave Reisman (dreisman@cinci.rr.com); Jill Grant (jgrant@jillgrantlaw.com); Kelly Wright (kwright@sbtribes.com); Fiedler, Linda; Fonseca, Silvina; Adam, Michael; Williams, Jonathan
Subject: Re: More information on the Argonne Proposal

Kelly-Greg

I am not available Sept 22-26

Susan

On Aug 6, 2014, at 1:01 PM, "Gervais, Gregory" <Gervais.Gregory@epa.gov> wrote:

> Kelly et. al.,
>
> I wanted to find out how your review of Argonne's proposal is coming along, and when you anticipate providing comments or your concurrence with their planned approach. We won't be able to have Mike Adam issue a notice to proceed to Argonne until working out any EPA and Tribes comments, or gaining concurrence. I've left a voicemail with Kelly regarding the same, and hope to hear back from you soon.
>
> Finally, I understand that Argonne's team should be available in September for a site visit. I spoke with Jonathan Williams of EPA Region 10, who you know is responsible for coordinating site access etc. with FMC for the independent expert panel site visit. He will verify site visit access and any limitation for the September dates and get back to me soon with any limitations. Once Argonne is issued notice to proceed we can finalize the site visit date. If your availability for the weeks of 9/8, 9/15 or 9/22 has changed since we talked in June please let me know right away.
>
> Many thanks,
>
> Greg
>
> @@@
>
> Greg Gervais, P.E.
> Chief, Technology Assessment Branch | EPA OSWER OSRTI TIFSD
> 1200 Pennsylvania Ave NW, MC 5203P | Washington, DC 20460
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> options** @@@
>
> -----Original Message-----
> From: Adam, Michael
> Sent: Wednesday, July 30, 2014 4:34 PM
> To: Dave Reisman (dreisman@cinci.rr.com); Fiedler, Linda; Fonseca,
> Silvina; Gervais, Gregory; Jill Grant (jgrant@jillgrantlaw.com); Kelly
> Wright (kwright@sbtribes.com); susanh@ida.net; Williams, Jonathan
> Subject: More information on the Argonne Proposal
>
> So we are all informed the same, Argonne has provided more information on Dr. Jerden, who is proposed for the team. He was mentioned in the accompanying email with the proposal, but not the proposal, but now that is rectified. I have attached two references of his work that Argonne also sent over.
>
> There is a Simplot IDR (Independent Design Review/Optimization Review) mentioned in the proposal, as example of experience for some of the team members. I have also attached that document in case not everyone had it.
>
> Thanks.
>
> Mike
>
> --
> ----------------------------------
> Michael Adam, Environmental Scientist; Cleanup Technology Advocate
> U.S. EPA, Technology Integration and Information Branch
> Phone: 703-603-9915 | Mobile: 703-399-4268 | Web:
> http://www.cluin.org
> --

> ----------
>
> This email does not contain Contract Technical Direction. If you feel it does, please contact me ASAP. If you believe you have received this email in error, please contact me ASAP.
>
> -----Original Message-----
> From: Quinn, John [mailto:quinnj@anl.gov]
> Sent: Wednesday, July 30, 2014 1:03 PM
> To: Adam, Michael
> Cc: Kimmell, Todd A.; Jerden, James L., Jr.; martinol.anl.gov
> Subject: RE: Response to the work order of 7/1/2014
>
> Michael,
> The summary information about Jim Jerden is below. In addition, I added the info to the attached Word file, updating what Lou sent you on July 25.
> John
>
> Jim Jerden, PhD, Geochemist, Argonne. Dr. Jerden has expertise in the reactive transport of contaminants and environmental mineralogy. He has over a decade of experience in the characterization and modeling of processes by which radionuclides and other metals are transported into the biosphere. His recent work has focused on the speciation and mineralogy of actinides and phosphorous in the environment.
>
>
> -----Original Message-----
> From: Adam, Michael [mailto:Adam.Michael@epa.gov]
> Sent: Wednesday, July 30, 2014 8:40 AM
> To: Martino, Louis E.
> Cc: Quinn, John; Kimmell, Todd A.
> Subject: RE: Response to the work order of 7/1/2014
>
> Lou, sorry for repeat. Reply to all, since I know you are out of the office.
>
> Can you give me a paragraph about Dr. Jim Jerden, like the others in the proposal, so I can forward?
>
> ----------
> ----------
> Michael Adam, Environmental Scientist; Cleanup Technology Advocate
> U.S. EPA, Technology Integration and Information Branch
> Phone: 703-603-9915 | Mobile: 703-399-4268 | Web:
> http://www.cluin.org
> ----------
> ----------
>
> This email does not contain Contract Technical Direction. If you feel it does, please contact me ASAP. If you believe you have received this email in error, please contact me ASAP.
>
> -----Original Message-----
> From: Martino, Louis E. [mailto:martinol@anl.gov]
> Sent: Friday, July 25, 2014 3:56 PM
> To: Adam, Michael
> Cc: Quinn, John; Kimmell, Todd A.
> Subject: Response to the work order of 7/1/2014
>
> Michael,
>
> Attached please find our response to the work order of 7/1/2014 for the performance of an Independent Review of excavation and treatment technologies (ETT) for soils contaminated with elemental phosphorus. The make up of

the expert review team has been included in the response. At this time we want to use the efficacy and feasibility review parameters that have been established by the stakeholders. We have included a description of the tasks to be performed, a summary of the relevant manufacturing and waste handling practices at the Operable Unit (OU) and a brief description of elemental phosphorus contamination to be addressed in the review. Also included are the assumptions we will use to guide our work. I want to let you know that we may want to augment the expert review team with Dr. Jim Jerden of Argonne, a geochemist who is an expert in geochemistry with a focus in environmental mineralogy and reaction path modeling.
>
> We have prepared a tentative cost proposal for internal review within Argonne. I can provide the cost proposal once EPA and the Tribes are in agreement regarding the tasks to be performed as they are described in the Argonne response.
>
> Louis Martino
> Argonne National Laboratory
> 955 L'Enfant Plaza SW Suite 600
> Washington DC 20024
>
>
> 202 488 2422
> fax 2413
>