From: Williams, Jonathan
To: Helm, Nancy
Cc: McGown, Michael; Wilson, Wenona; Todd, Bill; Sheldrake, Beth; Rochlin, Kevin; Vilpas, Sirkku
Subject: RE: Superfund Response to Tribal Comments at FMC
Date: Friday, September 12, 2014 3:06:36 PM

My apologies for not providing you and Bill a copy of the letter. I did speak with Bill about the limits of his review before sending the letter.

I would like to visit with you and Bill further about EPA's thorough review of the FMC Remedial Action Work Plan Site Wide Grading Phase submittals of March, June, and July 2014 and also about EPA's efforts to obtain timely comments from the SB Tribes. I think that Kevin Rochlin (former RPM) can also provide you with some helpful input based upon his review as someone very familiar with dust control and monitoring plans.

Please let me know what dates/times would be workable for you and Bill. Thanks.

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From: Helm, Nancy
Sent: Tuesday, September 09, 2014 10:28 AM
To: Williams, Jonathan
Cc: McGown, Michael; Wilson, Wenona; Todd, Bill; Sheldrake, Beth
Subject: Superfund Response to Tribal Comments at FMC

Jonathan,
I got this letter from Penny, via Mike McGown, the air coordinator in IOO. I have a few comments.

First, I'm sure that managing the clean-up at FMC is a difficult and at times frustrating job. I know you're an experienced RPM and are doing your best. Also, I genuinely do not want to undermine your work. We are on the same team.

I wish you would have copied EPA air program personnel on this letter, especially since you refer to Bill Todd's review of the dust plan. I'd like to point out that we reviewed the dust plan, not the monitoring plan. My sense is that the monitoring plan is the thing that holds the most concern for the tribe. Mike McGown, who is a meteorologist, did take a brief look at the monitoring plan, subsequent to receiving this letter. Mike notes that the FMC plan is focused on protecting worker health and makes the assumption that if worker health is protected then ambient air is also protected. We don't think the plan supports that assumption. At least not as currently written.

The Tribe has contacted the Tribal Air Monitoring Support (TAMS) Center for assistance with

additional, independent monitoring at FMC to help ensure that contaminates of concern are not leaving the site via an air pathway. I know the EPA Superfund program is very confident that will not happen but a modest amount of additional monitoring would go a long way toward helping the Tribe feel more confident. Would you consider asking FMC to pay for filter analysis if the Tribe and the TAMS Center would site and service a couple of filter-based monitors? The cost would be in the thousands of dollars per year. Miniscule in the total cost of FMC clean-up.

Thank you for your attention to this matter.

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