From: Williams, Jonathan
To: Kelly Wright; Scott.Miller@deq.idaho.gov; susanh@ida.net
Cc: Michele Benchouk; (b) (6) ; McDonnell, Kimberlee
Subject: RE: EPA Comments on FMC OU Soil Remedy RD/RA Resubmitted Documents
Date: Friday, May 13, 2016 5:23:18 PM

Kelly:

You've brought up some additional topics in response to what Scott and I e-mailed Susan shortly after the teleconference held this morning with FMC, EPA, the Tribes, and IDEQ. I'll address those additional topics as best I can.

But first I would like to reiterate my agreement with Susan's concern, expressed as the original e-mail on this string, about averaging gamma cap topsoil gains/losses across the site. I think that concern was addressed in response to questions we posed to FMC/MWH on the teleconference this morning. We can confirm that FMC will be addressing soil losses within relatively small decision units, and not planning to average gains/losses over the site, when FMC resubmits the PSVP on or before May 23, 2016.

1) Your comment #1 below questions the use of soil thickness monitoring as an effective way to measure gamma cap effectiveness, and thus assure long-term performance. In response, please recall the amount of effort spent requiring FMC to demonstrate what thickness of WUA silt could be expected to meet the gamma shielding RAO. That applied research is the basis of the gamma cap shielding layer thickness. Its effectiveness will be confirmed by post-remedial action construction surveys of the gamma cap. If the gamma cap as constructed meets the performance standard then maintaining that thickness (which EPA considers critical) will continue to provide the required shielding.

I'll also forward an e-mail received earlier today from Rick Poeton in response to this comment. Please feel free to discuss it with him over the telephone if that would be helpful.

2) I don't understand how your comment #2 below relates directly to the teleconference held this morning. The only gas monitoring discussed was for indoor air quality within buildings to be constructed in RA-G North. FMC alerted us that they would be proposing to design a radon mitigation system for buildings at RA-G North to address office spaces, and not storage areas of the warehouse. Monitoring of indoor air quality will still include the non-office portions of buildings. My recollection is that we collectively stated FMC would need to provide information about building usage to confirm that non-office spaces would be mostly unoccupied.

3) Your comment #3 below refers back to comments you provided to EPA April 12, 2016. I responded to those comments via e-mail April 13 and 14. As articulated in my e-mails, I did not understand the comments, and asked that you telephone me to explain them. I also alerted you about FMC's then-upcoming resubmittal of the PSVP in response to EPA comments of March 29, 2016. FMC resubmitted the PSVP April 19, 2016 and provided concurrent copies for review to EPA, the Tribes, and IDEQ. The FMC resubmittal was a topic on the April 21, 2016 bi-weekly teleconference. Draft EPA comments were provided to the Tribes and IDEQ April 22, 2016 in a Word document so that additional comments could be easily provided. I did not receive comments from the Tribes on the April 19, 2016 resubmitted PSVP, and provided EPA comments to FMC April 26, 2016. FMC will be resubmitting the PSVP on or before May 23, 2016. In anticipation of that submittal, please provide EPA with any specific Tribal comments you do not think have been adequately addressed by EPA comments to date (February 6, 2016; March 29, 2016; April 26, 2016) on the PSVP.

I trust this response has been helpful. Please feel free to call me with any questions. Thanks.

Jonathan Williams, LHG
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-----Original Message-----
From: Kelly Wright [mailto:kwright@sbtribes.com]
Sent: Friday, May 13, 2016 10:43 AM
To: Scott.Miller@deq.idaho.gov; Williams, Jonathan <Williams.Jonathan@epa.gov>; susanh@ida.net
Cc: Michele Benchouk <benchouk_michele@bah.com>; (b) (6) McDonnell, Kimberlee <McDonnell.Kimberlee@epa.gov>
Subject: RE: EPA Comments on FMC OU Soil Remedy RD/RA Resubmitted Documents

Jonathan, I have a few concerns with your response to comments and proposed monitoring. The following concerns include:

1) I disagree that radiation surveys are not needed and topographic surveys will serve as a surrogate. Radiation monitoring using TLD may provide information on direct radiation and exposure and could be done quarterly regardless of weather. Department of Energy does this at all sites especially at the INL. It is also much cheaper than what is being proposed by their survey technique.

2) I am alarmed with FMC's claim worker protection is the primary driver for gas monitoring. Monitoring of the environment and to ensure worker protection are necessary and as you may know, but gases generated may not be in the areas where worker are routinely occupying but rather moving into these. For FMC to claim no phosphine has been detected is incorrect. USC were detected throughout the site and as the Tribes conveyed to EPA last year, 1 USC may have actually been multiple, up to 40, depending on location of the material excavated. USCs are nothing more than contamination of phosphorus and based on the chemical changes and phosphine is emitted as well as other forms of phosphorus chemicals.

3) As we the Tribes comment to you in April, we are not in agreement with the currently proposed gas monitoring scheme. We ask you consider implementing phosphine monitoring in a more robust manner as described in the Tribes April 12, 2016 comments.

Thanks
Kelly

-----Original Message-----
From: Scott.Miller@deq.idaho.gov [mailto:Scott.Miller@deq.idaho.gov]
Sent: Friday, May 13, 2016 11:26 AM
To: Williams.Jonathan@epa.gov; Susan Hanson <susanh@ida.net>; Kelly Wright <kwright@sbtribes.com>
Cc: benchouk_michele@bah.com; (b) (6) ; McDonnell.Kimberlee@epa.gov
Subject: RE: EPA Comments on FMC OU Soil Remedy RD/RA Resubmitted Documents

Susan - great point. I did not get the site-wide averaging, but that may be because I had my own ideas on how it would work.

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ph: (208) 373-0328

-----Original Message-----
From: Williams, Jonathan [mailto:Williams.Jonathan@epa.gov]
Sent: Friday, May 13, 2016 11:07 AM
To: susanh@ida.net; Kelly Wright; Scott Miller

Cc: Michele Benchouk; Poeton. Rick; McDonnell, Kimberlee
Subject: RE: EPA Comments on FMC OU Soil Remedy RD/RA Resubmitted Documents

I understand and agree with the concern. Some of what Rob was saying sounded too much to me like site-wide averaging. That's why I continued the line of questioning about "decision unit" size that Scott began.

Chad's response about number of surveyed subareas struck me as helpful. If I understood him correctly, areas of erosion and deposition are likely to be measureable, to within 0.05 foot (0.6 inch), within decision units on the order of 10,000 square feet (about a quarter acre).

I've copied Rick and Michelle on this e-mail to see if they have anything to add.

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-----Original Message-----
From: Susan Hanson [mailto:susanh@ida.net]
Sent: Friday, May 13, 2016 9:37 AM
To: Kelly Wright <kwright@sbtribes.com>; Williams, Jonathan <Williams.Jonathan@epa.gov>; Scott.Miller@deq.idaho.gov Miller <Scott.Miller@deq.idaho.gov>
Subject: Re: EPA Comments on FMC OU Soil Remedy RD/RA Resubmitted Documents

Kelly-Jonathan-Scott

My question has to do with the topographic to compare to the land base. FMC recognizes that loss as well as addition of soil may occur at the site and changes will be made according to reasonable size. I just want to assure FMC will not be averaging anything.... addition the additional soils in some areas vs. losses in another that may negate additional repairs in areas that need.

Susan Hanson

On Apr 26, 2016, at 7:39 PM, "Williams, Jonathan" <Williams.Jonathan@epa.gov> wrote:

> <Comments on FMC Soil PSVP Resubmittal 4-26-16.pdf>