From: Kelly Wright
To: Scott.Miller@deq.idaho.gov; Williams, Jonathan; 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 10:43:06 AM

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.

Scott A. Miller, P.G.
Hydrogeologist | Idaho DEQ
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.

Jonathan Williams, LHG
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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>