Message

From: Michael Ritorto [mritorto@rouxinc.com]
Sent: 8/12/2016 3:38:06 PM
To: Cirian, Mike [Cirian.Mike@epa.gov]
CC: Hoogerheide, Roger [Hoogerheide.Roger@epa.gov]; Steve Wright - CFAC [swright@cfaluminum.com]; John.Stroiazzo@glencore-ca.com; lidewitt@mt.gov
Subject: RE: CFAC - Revised SAP Addendum and Response to Comments
Attachments: removed.txt

Mike,

I received the comments. We'll work on addressing these comments next week.

Michael Ritorto
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From: Cirian, Mike [mailto:Cirian.Mike@epa.gov]
Sent: Friday, August 12, 2016 11:24 AM
To: Michael Ritorto <mritorto@rouxinc.com>
Cc: Hoogerheide, Roger <Hoogerheide.Roger@epa.gov>; Steve Wright - CFAC <swright@cfaluminum.com>; John.Stroiazzo@glencore-ca.com; lidewitt@mt.gov
Subject: FW: CFAC - Revised SAP Addendum and Response to Comments

Hello Michael,

Below comments from CDM Smith's cross check on the SAP Addendum. Would you please take a look at this and respond to these.

I did get Steve's email showing the City is funding the Overflow Ditch work.

Thanks,
Mike

Mike Cirian, PE
Libby On-site Project Manager
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From: Coan, Sean [mailto:CoanSM@cdmsmith.com]
Sent: Friday, August 05, 2016 9:48 AM

To: Cirian, Mike <Cirian.Mike@epa.gov>
Cc: Repine, Damon <RepineDL@cdmsmith.com>; Erin Formanek <Formanekek@cdmsmith.com>; Welch, August <WelchA@cdmsmith.com>
Subject: CFAC - Revised SAP Addendum and Response to Comments

Mike,

CDM Smith has performed a cross-check of the SAP Addendum and Response to Comments letter (RTC) to confirm that all comments were addressed. The majority of the comments have been addressed satisfactorily. There were a few comments that were partially incorporated, and there are a few items that require additional action, as well as comments on new items.

The following comments reference the original comment number that appears in the RTC:

- Comment 6: The RTC states that CFAC met with the City of Columbia Falls and suggested that the City should remove the vegetation from the Cedar Creek Reservoir Overflow Ditch. Please confirm that the City has agreed
- Comment 7: The revised text does state that bank stabilization will be performed, and the location of the bank stabilization project has been added to Plate 3 and referenced in the text. However, the original comment requested that a description of "the measures that will be taken to mitigate any potential impact on surface water and sediment samples and results" be provided. While the RTC states: "Please note the bank stabilization project does not include any work along the bank, and only includes driving sheet piles on the interior of the embankment. The project approval does not require or allow the contractor to disturb any material that might reach the Flathead River. The entire area where work will be performed slopes away from the river, and the engineering firm performing the work has indicated that there should be no impact to the river," this does not address the original request for mitigation efforts to be explained. Please add text to Section 2.2.1.3 describing why the bank stabilization work will likely not disturb the sampling and data quality, as well as mitigation measures to ensure that data quality is preserved.
- Comment 9: TPH and DRO were not added to Table 6, and no rationale was provided in the RTC as to why these constituents were not added. Please provide the rationale for leaving TPH and DRO off of Table 6.
- Comment 30: Please reference the revised monitoring well construction SOP in Appendix G in the text of Section 3.4.
- Comment 38: It is recognized that MacDonald et al. (2000) includes TEL values presented in Ingersoll et al. (1996), however, the TEL values in MacDonald et al. (2000) are only a sub-set of those that may be found in Ingersoll et al (1996). There are TEL values for eight more chemicals in Ingersoll et al. (1996) that should be included. For this reason, please use Ingersoll et al. (1996) as the source for the TEL values and the list of chemicals be expanded to include all available TEL values in this source.

Comments on new items:

- Figure 7: Please change the figure title to "AGI Passive Soil Gas Isopleths for Tetrachloroethene." Please revise the legend entry for the isopleth lines to state, "PCE Mass Detection Isopleth (micrograms)".
- Appendix G: It is noted in Test America's *Soil Processing SOP (*SOP No. NC-OP-044, Rev. 1) in Section 11.3.1 that "the client/data user must select the procedure that is most appropriate for the sample matrix, analytes, and quality objectives. The selection of the procedure(s) can be made by the client in consultation with the appropriate TestAmerica representatives during project planning. There is no single default procedure that can be used in the absence of client selection." However, it is unclear in the SAP Addendum which solid sample mixing and particle size reduction procedure was selected and the rationale for the selection. Please provide additional detail in the SAP Addendum to clarify this.
- Appendix G: In SOP 5.12 *For Collection of Soil Samples for Laboratory Analysis Using Incremental Sampling Methodology*, Section 5.9, it is stated, "If required by the SAP, use the remaining portion of soil to log the sample in detail and record physical characteristics (color, odor, moisture, texture, density, consistency, organic content, layering, grain size, etc.). Refer to Soil Classification and logging SOP." The entire sample should be submitted to the laboratory. This section should be removed.

Please let us know if you have any questions or would like to discuss.

Thanks very much,

Sean M. Coan, PG | Project Manager/Geologist | **CDM Smith** | 50 West 14th Street, Suite 200 | Helena, MT 59601 |
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