Message

From: Repine, Damon [RepineDL@cdmsmith.com]
Sent: 5/6/2016 10:08:36 PM
To: Cirian, Mike [Cirian.Mike@epa.gov]
CC: Coan, Sean [CoanSM@cdmsmith.com]; Welch, August [WelchA@cdmsmith.com]
Subject: FW: CFAC Phase I Site Characterization - Soil Gas Screening Scope of Work Proposed Modifications
Attachments: removed.txt; 20160422_Weekly Report_CFAC_RI-FS_Phase_I_Oversight.docx; Soil Gas Screening Comments_AW (002).docx

Mike,
Please see attached CDM Smith oversight report of the soil gas sampling event and CDM Smith comments and concerns on the Roux report. We can set up a time for us to discuss our reasoning.

Thank you,

Damon L. Repine, CSP
Libby Asbestos Project Site Manager
CDM Smith | 60 Port Blvd, Suite 201, Libby, MT 59923
P: 406.293.8595, x23 | M: 406.293.1374 | F: 406.293.8901
repinedl@cdmsmith.com | cdmsmith.com

From: Michael Ritorto [mailto:mritorto@rouxinc.com]
Sent: Monday, May 02, 2016 7:13 AM
To: Cirian.Mike@epa.gov
Cc: John.Stroiazzo@glencore-ca.com; Steve Wright - CFAC <swright@cfaluminum.com>; Andrew Baris <abaris@rouxinc.com>; cowen@mt.gov; lidewitt@mt.gov; Repine, Damon <RepineDL@cdmsmith.com>
Subject: CFAC Phase I Site Characterization - Soil Gas Screening Scope of Work Proposed Modifications

Mr. Cirian,

This email is to follow-up on the project update conference call discussion (April 27, 2016) regarding the soil gas screening scope of work being conducted at the CFAC Site. As part of the work proposed in the CFAC RI/FS Work Plan and Phase I SAP (dated November 23, 2015), Roux Associates proposed to manually install a temporary soil gas probe at various locations within the different landfills at the Site; and at each location, to screen soil gas for the presence of methane using a landfill gas meter and for VOCs using a photo-ionization detector (VOCs). As of April 29, 2016, Roux Associates field personnel have completed screening utilizing the soil gas probe method at four locations within the Wet Scrubber Sludge Pond and two locations within the Center Landfill. Roux Associates personnel also screened ten existing landfill vents present in the West Landfill. A map of the locations completed is attached to this email for reference.

Results of the screening activities completed are provided below:

Screening Location ID	Methane (%LEL)	VOCs (ppm)	Location
CFSGS-010	ND	ND	Wet Scrubber Sludge Pond
CFSGS-011	ND	ND	Wet Scrubber Sludge Pond
CFSGS-012	ND	ND	Wet Scrubber Sludge Pond
CFSGS-013	ND	ND	Wet Scrubber Sludge Pond
CFSGS-034	ND	ND	West Landfill Vent
CFSGS-035	ND	ND	West Landfill Vent
CFSGS-036	ND	ND	West Landfill Vent

CFSGS-037	ND	ND	West Landfill Vent
CFSGS-038	ND	ND	West Landfill Vent
CFSGS-039	ND	ND	West Landfill Vent
CFSGS-040	ND	ND	West Landfill Vent
CFSGS-041	0.1	ND	West Landfill Vent
CFSGS-042	ND	ND	West Landfill Vent
CFSGS-043	ND	ND	West Landfill Vent
CFSGS-014	ND	4.9	Center Landfill
CFSGS-015	ND	0.7	Center Landfill

Roux Associates personnel were unable to manually install the soil gas probe at locations proposed in the Industrial and Sanitary landfills due to refusal at approximately 1 to 2 feet below land surface. Observations by the field personnel suggest that the soils in this interval consist of compacted coarse gravel, cobbles or boulders which consistently prevent the soil gas probe from being advanced any deeper. Roux Associates personnel subsequently attempted to utilize a commercially available mechanical auger drill to attempt to bypass the refusal depth. However, refusal was still encountered between 1-2 feet below land surface at both the industrial and sanitary landfills.

Because of the difficulties encountered utilizing the manual and mechanical methods, Roux Associates is proposing to discontinue the soil gas screening effort at this time. As summarized in the above table, the soil gas screening results obtained thus far indicate landfills are not significant sources of methane or VOCs. Although soil gas samples could not be collected from the sanitary or industrial landfills, sampling for VOCs in soil and groundwater is proposed in the areas around all of the landfills as part of the Phase I Site Characterization. The locations of the existing and proposed monitoring wells adjacent to and downgradient from the landfills are shown in attached map. If the groundwater samples from these wells indicate the presence of VOCs, the need for further sampling within the landfills for VOCs will be re-evaluated, with the results of this re-evaluation to be documented in the Phase 1 Site Characterization Summary Report.

Roux Associates is requesting that you provide your concurrence with the approach outlined in this email. If you concur, the changes outlined in this email would also be documented in the SAP Addendum, which is currently being prepared by Roux Associates and will be submitted in May 2016.

If you have any questions, please feel free to give me a call at the number below. Thanks.

Michael Ritorto
Senior Hydrogeologist | ROUX ASSOCIATES, INC.
209 Shafter Street | Islandia, New York 11749
Direct: (631)630-2370 | Mobile: (631)445-4576
Email: mritorto@rouxinc.com | Website: www.rouxinc.com

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