Message

From: Michael Ritorto [mritorto@rouxinc.com]
Sent: 4/22/2016 4:02:17 PM
To: Cirian, Mike [Cirian.Mike@epa.gov]
CC: Hoogerheide, Roger [Hoogerheide.Roger@epa.gov]; Repine, Damon (RepineDL@cdmsmith.com) [RepineDL@cdmsmith.com]; lidewitt@mt.gov; Owen, Colleen [COwen@mt.gov]; John.Stroiazzo@glencore-ca.com; Andrew Baris [abaris@rouxinc.com]; Steve Wright - CFAC [swright@cfaluminum.com]
Subject: RE: UST Area Vapor Screening Scope of Work at the CFAC Site

Thank you Mike,

I will include the appropriate language in the SAP addendum as you requested.

Michael Ritorto
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From: Cirian, Mike [mailto:Cirian.Mike@epa.gov]
Sent: Friday, April 22, 2016 11:24 AM
To: Michael Ritorto <mritorto@rouxinc.com>
Cc: Hoogerheide, Roger <Hoogerheide.Roger@epa.gov>; Repine, Damon (RepineDL@cdmsmith.com) <RepineDL@cdmsmith.com>; lidewitt@mt.gov; Owen, Colleen <COwen@mt.gov>
Subject: RE: UST Area Vapor Screening Scope of Work at the CFAC Site

Hi Michael,

I concur with your approach, but would like to add. "If necessary additional sample will be taken." If evidence petroleum impacts continue, it will be identified and discussed.

Thanks
Mike

Mike Cirian, PE
Libby On-site Project Manager
US EPA
108 East 9th Street
Libby, MT 59923
(406) 293-6194 Office

From: Michael Ritorto [mailto:mritorto@rouxinc.com]
Sent: Friday, April 22, 2016 7:58 AM
To: Cirian, Mike <Cirian.Mike@epa.gov>
Subject: RE: UST Area Vapor Screening Scope of Work at the CFAC Site

Hey Mike,

I haven't heard anything on this. Just checking in since we have our people in the field this week and next week.

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From: Michael Ritorto
Sent: Friday, April 15, 2016 9:39 AM
To: Cirian.Mike@epa.gov
Cc: John.Stroiazzo@glencore-ca.com; swright@cfaluminum.com; Andrew Baris (abaris@rouxinc.com) <abaris@rouxinc.com>; repinedl@cdmsmith.com; lidewitt@mt.gov; cowen@mt.gov
Subject: UST Area Vapor Screening Scope of Work at the CFAC Site

Mr. Cirian,

This email is to follow-up on the project update conference call discussion (April 14, 2016) regarding the AGI soil vapor screening scope of work proposed near the CFAC Former Fueling Area (i.e., UST area). As discussed, Roux Associates performed reconnaissance of the former fueling area USTs as part of the Site reconnaissance activities, which are currently being conducted in accordance with the RI/FS Work Plan and SAP. During the Site reconnaissance, it was observed that the USTs in the former fueling area are still in place, surrounded by concrete (See photo of area attached).

Roux Associates feels we should not utilize the AGI sampling approach (i.e., the passive vapor samplers) as a screening tool in the concrete above or nearby the existing USTs. The AGI samples are not made to be placed in concrete and likely won't produce representative results of the vapor conditions in the soils beneath the USTs. Additionally, the area where the tanks are present is raised about 5-10 feet above the area directly to the north of the plant (i.e., ground level). It's likely that we will not encounter native material below the concrete in the first 5-10 feet.

In lieu of performing the AGI sampling in this area, Roux Associates is proposing to add two extra soil borings to the Phase I Scope of Work, which would be completed as part of the upcoming drilling activities. The two soil borings would be in addition to the one soil boring that was already proposed in the same area. The three borings would be placed in close proximity and/or downgradient of the USTs, to the extent possible given site conditions in the area. A map of the area and each of the approximate locations of the proposed soil borings will be provided in the SAP addendum. At each boring location, we are proposing to collect a soil sample in the first two-foot interval of native material encountered while drilling and one soil sample between 8 to 10 feet below the first occurrence of native material. If evidence of petroleum impacts is observed in the borings through visual observations and/or screening with a PID, the second sample will be taken in the interval observed to be most impacted. If impacts are observed to be present in the 8 to 10 foot sample(s), the borings will be extended to delineate the impacts vertically. Samples collected from the two added borings are proposed to be analyzed for TCL VOCs and TCL SVOCs.

As discussed on the conference call, Calbag is responsible for the final closure of the USTs as part of their demolition activities at the Site. Roux/CFAC will provide updates on the final disposition of the USTs in future project update reports.

Since vapor screening activities are scheduled to begin next week on Monday, April 18th, we are 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.

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