Message

From: Laura Jensen [ljensen@rouxinc.com]
Sent: 6/27/2017 8:08:30 PM
To: Cirian, Mike [Cirian.Mike@epa.gov]
CC: lidewitt@mt.gov; John.Stroiazzo@glencore-ca.com; Steve Wright - CFAC [swright@cfaluminum.com]; Andrew Baris [abaris@rouxinc.com]; Michael Ritorto [mritorto@rouxinc.com]
Subject: RE: CFAC Concrete Sampling Proposed Path Forward
Attachments: Pot Room 2,3,4 Validated Data Tables.pdf

Mr. Cirian,

As stated in the below e-mail sent last week, Roux previously provided Calbag's unvalidated concrete chip sampling results from Pot Rooms 2,3, and 4. The attached tables were updated to include validated concrete chip sampling results from Calbag (Tables 1-3) and validated results from Roux Associates (Tables 4-9).

Please feel free to reach out if you have any questions.

Laura Jensen | Project Hydrogeologist | Roux Associates, Inc.
209 Shafter Street, Islandia, New York 11749
Main: (631) 232-2600 | Direct: (631) 630-2358
Email: ljensen@rouxinc.com | Website: www.rouxinc.com

ROUX *Environmental Consulting & Management*

We solve our clients' most challenging environmental problems

NOTICE: This electronic communication, including any authorized attachments, contains information that may be legally privileged, protected, confidential and/or exempt from disclosure or certain types of use under applicable law. This information is for the sole use of the intended recipient(s). If you are not the intended recipient(s) or the employee or agent responsible for delivery of this message to the intended recipient(s), you are hereby notified that any review, use, disclosure, copying, distribution or the taking of any action in reliance on the contents of this e-mail or any attachments is strictly prohibited. You are further advised that review by an individual other than the intended recipient(s) shall not constitute a waiver of any attorney-client privilege which may apply to this communication. If you have received this communication in error, please notify the sender immediately by return e-mail, permanently delete this e-mail and any attachments from all computers on which they may be stored and destroy any print-outs of this email and any attachments.

From: Michael Ritorto
Sent: Monday, June 19, 2017 7:07 PM
To: Cirian.Mike@epa.gov
Cc: Dewitt, Lisa <lidewitt@mt.gov>; John.Stroiazzo@glencore-ca.com; Steve Wright - CFAC <swright@cfaluminum.com>; Andrew Baris <abaris@rouxinc.com>; Laura Jensen <ljensen@rouxinc.com>
Subject: CFAC Concrete Sampling Proposed Path Forward

Mr. Cirian,

Roux Associates has prepared this email to summarize our proposed path forward for further evaluating concrete for use as subgrade backfill at the CFAC Site.

Background

Roux Associates submitted a letter to the USEPA dated May 19, 2017, which summarized the results of concrete sampling activities performed in Pot Room #1 and requested approval to use concrete from Pot Room #1 as subgrade backfill during the CFAC demolition activities. In response to the May 19,2017 letter, the USEPA provided a letter to Roux Associates dated June 7,2017. The USEPA letter dated June 7, 2017 indicated that the "USEPA has no objection under the CERCLA provisions to using the ground floor and structural concrete from pot Room #1 for use as subgrade fill material as part of the ongoing site demolition activities being performed by Calbag. However, we recommend that after

the existing waste materials are removed in the basement of Pot Room #1 , and prior to removal and crushing activities, pressure washing must occur for any concrete to be re-used. In addition, the floor will need to be cleaned using a mechanical floor scrubber prior to the concrete being removed, crushed and replaced in the Pot Room #1 basement." The USEPA letter also indicated that "Final approval must be coordinated with the MDEQ per the Waste Management Plan".

As discussed on our conference call held on June 19, 2017, Calbag has also collected concrete chip samples from Pot Rooms 2 through 4 in accordance with the approved Waste Management Plan and Roux Associates, on behalf of CFAC, has also collected concrete chip samples from Pot Rooms 2 through 4 in accordance with the approved Concrete Sampling and Analysis Plan dated August 31, 2016. The concrete chip sampling results from Calbag (unvalidated – Tables 1-3) and Roux Associates (validated – Tables 4-9) are provided attached to this email. As discussed on the conference call, the concrete chip sample results are similar to the results observed in the concrete chip samples collected from Pot Room #1.

Path Forward

As noted in the Roux Associates letter dated May 19, 2017, the concrete that will potentially be used for backfill from each pot room is at least six inches thick and will be crushed and mixed before Calbag uses the concrete as backfill. As a result, the concrete chip samples collected only at the surface of the concrete do not adequately represent the conditions of the concrete that is proposed to be placed as backfill.

Moving forward, to provide a more accurate characterization of the concrete being considered for use as backfill, Roux Associates is proposing to perform concrete sampling after the concrete is removed from the basement, once the concrete is stockpiled outside of the building. The concrete sampling will be performed as one five-point composite sample per every 5,000 cubic yards of concrete, which is the frequency requested by the USEPA. The composite samples will be sampled for the same parameters outlined in Calbag's WMP and Roux's Concrete Sampling and Analysis Plan. The concrete sampling results will be provided to the USEPA and MDEQ for concurrence prior to using the concrete as backfill material.

Roux Associates, on behalf of CFAC, is requesting concurrence with the proposed path forward outlined above. If you have any questions, please do not hesitate to contact me at the number below.

Michael Ritorto | Principal Hydrogeologist/Office Manager | Roux Associates, Inc.
209 Shafter Street, Islandia, NY 11749
Main: 631-232-2600 | Direct: 631-630-2370
Email: mritorto@rouxinc.com | Website: www.rouxinc.com

ROUX *Environmental Consulting & Management*

We solve our clients' most challenging environmental problems

NOTICE: This electronic communication, including any authorized attachments, contains information that may be legally privileged, protected, confidential and/or exempt from disclosure or certain types of use under applicable law. This information is for the sole use of the intended recipient(s). If you are not the intended recipient(s) or the employee or agent responsible for delivery of this message to the intended recipient(s), you are hereby notified that any review, use, disclosure, copying, distribution or the taking of any action in reliance on the contents of this e-mail or any attachments is strictly prohibited. You are further advised that review by an individual other than the intended recipient(s) shall not constitute a waiver of any attorney-client privilege which may apply to this communication. If you have received this communication in error, please notify the sender immediately by return e-mail, permanently delete this e-mail and any attachments from all computers on which they may be stored and destroy any print-outs of this email and any attachments.