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Cc:	"Kelly Wright"; susanh@ida.net; brian.english@deq.idaho.gov; Al Lam; Mark Smith; vannoyj@dhw.idaho.gov; Williams, Jonathan; Marguerite Carpenter; Gary Resh; rachel.greengas@fmc.com; Ross, Carrie
Subject:	RCRA Pond UAO Weekly Report #317 - August 29 to September 4, 2016 and August monthly data
Date:	Wednesday, September 07, 2016 2:57:23 PM
Attachments:	2016-09-07 RCRA Pond Continuous PH3 Monitoring_9.4.16.xlsx Attachment 1 - Pond 16S GES Log sheets -August 2016.pdf Attachment 2 - Pond 16S - Graphs -Calculated Perimeter Pipe Concentration through 8-31-2016.pdf Attachment 3 - Pond Appurtenance Monitoring -August 2016.pdf Attachment 4 - Pond Perimeter Surface Scans - August 2016.pdf Attachment 5 - Perimeter Pipe Concentrations -August 2016.pdf

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FMC is providing a weekly/monthly report, pursuant to the RCRA Pond UAO, describing field activities conducted pursuant to EPA-approved work plans.

WEEKLY

Work Performed this week:

- Pursuant to EPA's 4/25/16 email directing FMC to commence gas extraction and treatment at Pond 16S and weekly #308 / June monthly report, continue operation of one GES unit extracting from each of the north, east and south standpipes at Pond 16S for a total of three GES units operating on an 80-hour per week schedule.

  Pond 16S PH3 sources gas concentrations for the past week:

  - North standpipe – 10,082 ppm (highest 2-hour source gas reading during the week was 16,779 ppm at the north standpipe)
  - East standpipe – 8,264 ppm
  - South standpipe – 430 ppm
- Continued continuous monitoring at two boundary locations at Pond 16S during periods of gas extraction. There were no TWA or maximum values above the thresholds specified in the Air Monitoring Plan. A spreadsheet summarizing the results of this monitoring to date is attached.
- In addition to continuous monitoring, monitoring performed pursuant to the approved work plans:
  - Phase IV ponds and Pond 17 – Annual appurtenance monitoring
- Continued preparation of a work plan for perimeter standpipe monitoring at RCRA Ponds 8S, 8E, Phase IV ponds, Pond 9E and Pond 17 and a Removal Action Work Plan for RCRA Ponds 15S, 16S and 18A consistent with EPA's verbal description, during the 8/8/16 monthly conference call, and EPA's letter, received by FMC on 8/17/16, requiring modification of plans per RCRA Pond UAO Paragraph 76.
- Began preparation of monthly data report targeted for submittal on 9/7/16 and discussion during monthly call scheduled on 9/8/16 at 1000 PDT / 1100 MDT / 1300 EDT.

Problems Encountered:

None.

Unplanned Events Encountered:

None.

Work to be performed the following week:

- Pursuant to EPA's 4/25/16 email directing FMC to commence gas extraction and treatment at Pond 16S and weekly #308 / June monthly report, continue operation of one GES unit extracting from each of the north, east and south standpipes at Pond 16S for a total of three GES units operating on an 80-hour per week schedule. Based on the flat (no) trend in extracted source gas concentrations at Pond 16S, FMC plans to continue with the current GES unit configuration and operating schedule in September.
- Continue continuous monitoring at two Pond 16S boundary monitoring locations during periods of gas extraction.
- Other than continuous monitoring, no monitoring is planned or required pursuant to the approved work plans.
- Continue preparation of a work plan for perimeter standpipe monitoring at RCRA Ponds 8S, 8E, Phase IV ponds, Pond 9E and Pond 17 and a Removal Action Work Plan for RCRA Ponds 15S, 16S and 18A consistent with EPA's verbal description, during the 8/8/16 monthly conference call, and EPA's letter, received by FMC on 8/17/16, requiring modification of plans per RCRA Pond UAO Paragraph 76.
- Prepare monthly data report targeted for submittal on 9/7/16 and discussion during monthly call scheduled on 9/8/16 at 1000 PDT / 1100 MDT / 1300 EDT.

MONTHLY (August 2016) DATA REPORTING

- Attachment 1 – Pond 16S GES Log sheets – August 2016
- Attachment 2 – Pond 16S - Graphs - Calculated TMP Concentration Trend - Current through 8-31-16
- Attachment 3 – Pond Appurtenance Monitoring – August 2016; Ponds 8S, 8E and 9E, Phase IV ponds, and Ponds 15S, 16S, 17 and 18A cumulative through 8-31-16
- Attachment 4 – Pond Perimeter Surface Scans – August 2016; all ponds cumulative through 8-31-16
- Attachment 5 – Perimeter Pipe Concentrations – August 2016; Ponds 15S, 16S and 18A cumulative through 8-31-16

During August, FMC contractors KASE/Warbonnet and A&E Engineering personnel logged a total of 1,442 man-hours on site including work associated with implementing the RCRA Pond UAO; no IH personnel monitoring alarm was experienced.