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To:	Valdez, Heather
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 #318 - September 5 to 11, 2016
Date:	Wednesday, September 14, 2016 3:51:33 PM
Attachments:	2016-09-14 RCRA Pond Continuous PH3 Monitoring_9.11.16.xlsx Attachment - Pond 16S - Graphs -Calculated Perimeter Pipe Concentration through 9-13-2016.pdf

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FMC is providing a weekly 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 source gas concentrations for the past week:

  - North standpipe – 8,223 ppm (highest 2-hour source gas reading during the week was 14,776 ppm at the north standpipe)
  - East standpipe – 6,099 ppm
  - South standpipe – 320 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.
- Other than continuous monitoring, no monitoring was performed or required pursuant to the approved work plans.
- 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.
- Submitted monthly data report on 9/7/16 and participated in monthly call on 9/8/16.

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.

- Continue continuous monitoring at two Pond 16S boundary monitoring locations during periods of gas extraction.
- In addition to continuous monitoring, monitoring planned pursuant to the approved work plans:
    - Pond 15S – Appurtenance monitoring and perimeter surface scan (weather/surface conditions permitting)
    - Pond 16S – Appurtenance monitoring and perimeter surface scan (weather/surface conditions permitting)
    - Pond 18A - Appurtenance monitoring and perimeter surface scan (weather/surface conditions permitting)
- 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 (RAWP) 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. As discussed with EPA on 9/14/16, FMC requested and EPA approved a one week extension for submittal of the RAWP which is now due on 9/23/16.

<u>Follow-up Items from 9/8/16 Monthly Call</u>

1. FMC has further reviewed EPA's request that it evaluate increasing the mass removal rate at Pond 16S. As FMC indicated during the monthly call, the daily average source gas PH3 concentrations at the north and south standpipes have remained in a relatively stable operating envelop and there have been no 2-hour GES unit source gas PH3 readings greater than the LEL of 20,000 ppm for the last 2 months. In addition, the north standpipe monthly average source gas concentration decreased from June to July and July to August. Over the course of implementation of the RCRA Pond UAO, FMC has recommended any modifications to mass removal rates based on monthly averages and trends in those averages. Considering that September is nearly half over, FMC believes that the current configuration and operation of GES units at Pond 16S is appropriate and consistent with the RIWP, and that any modifications should be made based on the September monthly average data and trends. August monthly report Attachment 2 (Pond 16S - Graphs - Calculated TMP Concentration Trend - Current through 8-31-16) updated through 9/13/16 is attached.

2. Consistent with EPA's request, FMC is preparing Excel workbooks with the Pond 16S GES unit daily logs for May through August 2016 and will forward those to EPA later this week but no later than 9/19/16.