**From:** Valdez, Heather
**To:** "Rob Hartman"
**Cc:** "Kelly Wright"; susanh@ida.net; brian.english@deq.idaho.gov; Al Lam; Ex. 6 ; vannoyj@dhw.idaho.gov; Williams, Jonathan; Marguerite Carpenter; Ex. 6 ; rachel.greengas@fmc.com; Ross, Carrie
**Subject:** RE: RCRA Pond UAO Weekly Report #305 - June 6 to 12, 2016
**Date:** Thursday, June 16, 2016 2:03:00 PM
**Attachments:** image001.png
image002.png
image003.png
image004.png
image005.png
image006.png

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Thanks Rob

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**From:** Rob Hartman [mailto:Rob.J.Hartman@mwhglobal.com]
**Sent:** Wednesday, June 15, 2016 3:41 PM
**To:** Valdez, Heather <Valdez.Heather@epa.gov>
**Cc:** 'Kelly Wright' <kwright@sbtribes.com>; susanh@ida.net; brian.english@deq.idaho.gov; Al Lam <lam@ae-eng.com>; Ex. 6 >; vannoyj@dhw.idaho.gov; Williams, Jonathan <Williams.Jonathan@epa.gov>; Marguerite Carpenter <MARGUERITE.CARPENTER@fmc.com>; Ex. 6 rachel.greengas@fmc.com; Ross, Carrie <Carrie.Ross@parsons.com>
**Subject:** RCRA Pond UAO Weekly Report #305 - June 6 to 12, 2016

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:

- Continued implementation of the Pond 15S RIWP and continued operation of one GES unit extracting from the southwest standpipe, one GES unit extracting from the east standpipe and one GES unit extracting from the new northwest standpipe (for a total of three GES units operating at Pond 15S) on an 80-hour per week schedule. In RCRA Pond UAO Weekly Report #304 / May monthly report, FMC provided notification to EPA that it would cease gas extraction

and treatment at Pond 15S on 6/10/16 at the end of the shift (1900 hours MDT) consistent with the Pond 15S Readily Implementable Work Plan (RIWP; June 10, 2014). As specified in Section 3.3 of the RIWP:

> "Should the monthly GES unit source gas PH3 concentration at both (now three) standpipes decrease below 2,000 ppm as measured using the dilution box method specified in Section 4.2.2, FMC will notify EPA and cease gas extraction and treatment at Pond 15S. Monitoring will continue pursuant to the then-applicable EPA-approved plan (e.g., this Readily Implementable Work Plan or an amended RCRA Pond Post-Closure Plan)."

The Pond 15S standpipe source gas PH3 concentrations using the dilution box method measured on 6/10/16, were:

- East standpipe- 55 ppm
- SW standpipe - 84 ppm
- NW standpipe - 102 ppm

Per FMC's confirmation email on 6/10/16 and consistent with FMC's notification, gas extraction and treatment ceased at Pond 15S at the end of the shift on 6/10/16.

- Pursuant to EPA's 4/25/16 email directing FMC to commence gas extraction and treatment at Pond 16S and the Pond 16S RIWP, continued operation of one GES unit extracting from the north standpipe and one unit extracting on the east standpipe at Pond 16S on an 80-hour per week schedule.

  PH3 sources gas concentrations for the past week:

  - North standpipe – 10,224 ppm
  - East standpipe – 7,123 ppm

- Continued continuous monitoring at four 15S boundary monitoring locations through 6/10/16 and 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:
  - Pond 15S – Appurtenance monitoring and perimeter surface scan
  - Pond 16S – Appurtenance monitoring and perimeter surface scan
  - Pond 18A - Appurtenance monitoring and perimeter surface scan
- Continued to compile information for Pond 15S NW Standpipe Replacement project construction completion report.
- Compiled data for monthly report submitted on 6/8/16 and participated in monthly call on 6/9/16 at 1200 PDT / 1300 MDT / 1500EDT.

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<u>Problems Encountered:</u>

None.

<u>Unplanned Events Encountered:</u>

None.

Work to be performed the following week:

- Continue operation of one GES unit extracting from the north standpipe and one unit extracting on the east standpipe at Pond 16S on an 80-hour per week schedule.
- 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 compiling information for Pond 15S NW Standpipe Replacement project construction completion report.

Additional Information on Pond 15S GES Unit Operation Prior to Cessation on 6/10/16

The Pond 15S GES unit were operated consistent with the Pond 15S NW Standpipe Replacement Work Plan that states: "As described in this work plan, the gas extraction and treatment system will be operated on a 24-hour per day, 7 day per week schedule at least 15 days before commencing construction activities. FMC considers suspension of steady-state operation in favor of stepping–up the mass removal rate to be a prudent strategy so that execution of this work plan for removal of the remaining piping/alignment and installation of the replacement northwest connection and outlet can be safely performed."

The Pond 15S GES unit operations began 24/7 operation on 3/28/16 with a target to begin the project on 4/12/16 (15 days after starting 24/7 operation). However, due to the weather forecast for that week, the weather-delayed project started on 4/18/16 and was completed on 4/28/16, for a total of 32 days of 24/7 operation. GES operations returned to 80 hours/week on 4/29/16; however, source gas concentrations were already below 500 ppm at the southwest standpipe and TMP #2, and below 100 ppm at the east standpipe. When GES operations were re-configured on 5/2/16 and operated on the 80 hour/week schedule, source gas concentrations remained below 500 ppm at the southwest standpipe, were below 500 ppm at the northwest standpipe, and remained below 100 ppm at the east standpipe. As discussed during the monthly conference call on 6/9/16, Pond 15S source gas concentrations remained far below 2,000 ppm throughout May with no trend indicating rebound. If and when gas extraction and treatment is reinitiated at Pond 15S, FMC intends to configure and operate the GES units in a steady-state mode.