From:	Williams, Jonathan
To:	Rob Hartman; Marguerite Carpenter
Cc:	Greutert, Ed [USA]; Doug Tanner; Scott.Miller@deq.idaho.gov; "wayne.crowther@deq.idaho.gov"; Kelly Wright (kwright@sbtribes.com); susanh@ida.net; Benchouk, Michele [USA]; Tim.Norman@Akana.us; Cliff Merrill; McDonnell, Kimberlee
Subject:	RE: EPA Comments on Remedial Action Work Plan - Revised Contractor"s Construction Plan and CQC Plan
Date:	Thursday, October 15, 2015 5:41:33 PM

Rob and Marjo:

EPA has reviewed FMC responses to EPA comments of October 14, 2015 in coordination with the Shoshone-Bannock Tribes and Idaho Department of Environmental Quality. Below are EPA comments on the responses.

General Comment

Provide a redline/strikeout which shows the revisions to be made in response to EPA comments of October 14, 2015 and October 15, 2015.

Specific Comments

1) FMC Response to EPA General Comment about 4:1 slope criteria: EPA generally agrees with statements made in the response. The comment was made about the construction plan itself and not field conversations and other information. Modify the written plan, which the contractor is to follow, so that it states no areas will exceed the 4:1 slope criteria.

2) FMC Response to EPA comment about Section 1.2 of the Site-Wide Grading and 2015 ET Capping Construction Plan: The proposed fourth bullet is acceptable. The proposed fifth bullet is inconsistent with FMC's response to the previous comment.

3) FMC Response to EPA comment about Section 2.7.12 regarding ET cap construction in portions of RA-F: EPA understands that the text commented upon was not revised from that approved in September 2014. Neither has the contractor followed this portion of the approved plan. This inconsistency has been noted. EPA agrees that resolution can be deferred as suggested, and no revision to the text is needed.

4) FMC Response to EPA comment about Section 2.7.13 regarding ET Cover Soil Placement prioritization: The proposed modification is acceptable.

5) FMC Response to EPA comment about Section 2.7.13 regarding heavy equipment decontamination: The proposed modification is acceptable.

6) FMC Response to EPA comment about Section 3.4 regarding dust suppression in areas where work has been completed: The proposed modification is acceptable.

7) FMC Response to EPA comment about Section 3.4 regarding dust suppression and haul truck speed limit: EPA appreciates the explanation and does not require any change to the text.

8) FMC Response to EPA comment about Section 7.4 of the Construction Quality Plan: FMC will need to investigate alternate methods of verifying density compaction of soil cover for the gamma and ET caps.

ASTM D6938 is specified for the testing method to be performed for in-place density by nuclear methods. This standard (see sections 5.1.7, 5.2.3, 10.4.7, 10.5.2) includes the statement: "Keep all other radioactive sources at least 9m (30 ft) away from the gauge to avoid affecting the measurement." EPA suggests an alternate in-field density measurement be performed or modified and intensified quality assurance testing performed to correlate the nuclear density reading to another method. There are several methods available that can replace the nuclear densitometer test method. There is the Sand Cone test ASTM D1556 and the Drive Cylinder test method ASTM D2937. Currently Simplot is employing the Drive Cylinder method for doing compaction testing of the fine grained gypsum fill on their property.

EPA agrees with FMC's clarifying statement that comments on the Health and Safety Plan were provided as a courtesy. No EPA approval of the HSP is required.

Please let me know if you have any questions. Thanks.

Jonathan Williams, LHG
Remedial Project Manager
U.S. Environmental Protection Agency
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From: Rob Hartman [mailto:Rob.J.Hartman@mwhglobal.com]
Sent: Thursday, October 15, 2015 11:45 AM
To: Williams, Jonathan; Marguerite Carpenter
Cc: Greutert, Ed [USA]; Doug Tanner; Scott.Miller@deq.idaho.gov; 'wayne.crowther@deq.idaho.gov'; Kelly Wright (kwright@sbtribes.com); susanh@ida.net; Benchouk, Michele [USA]; Tim.Norman@Akana.us; Cliff Merrill; McDonnell, Kimberlee
Subject: RE: EPA Comments on Remedial Action Work Plan - Revised Contractor's Construction Plan and CQC Plan

Jonathan: On behalf of FMC Corporation, FMC's responses to EPA's October 14, 2015 comments on the Contractor's Construction Plan, Construction Quality Control Plan and HASP (Rev 4). Following you review and approval, hard copies of the updated Construction Plan and Construction Quality Control Plan, revised as appropriate will be transmitted. Following your review of the responses, hard copies of the HASP (Rev 4) will also be transmitted.

Please call Marjo Carpenter at (215) 299-6210 or me at (801) 617-3256 if you have any

questions or to schedule the suggested conference call. Thank you,

Rob J. Hartman
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From: Williams, Jonathan [mailto:Williams.Jonathan@epa.gov]
Sent: Wednesday, October 14, 2015 4:11 PM
To: Rob Hartman; Marguerite Carpenter
Cc: Greutert, Ed [USA]; Doug Tanner; Scott.Miller@deq.idaho.gov; 'wayne.crowther@deq.idaho.gov'; Kelly Wright (kwright@sbtribes.com); susanh@ida.net; Benchouk, Michele [USA]; Tim.Norman@Akana.us; Cliff Merrill; McDonnell, Kimberlee
Subject: EPA Comments on Remedial Action Work Plan - Revised Contractor's Construction Plan and CQC Plan

Rob and Marjo:

Attached are EPA comments, developed in coordination with the Shoshone Bannock Tribes and Idaho Department of Environmental Quality, on the following documents.

- CBI "Construction Quality Control Plan" as revised and submitted October 1, 2015
- CBI "FMC Operable Unit Site Wide Grading and 2015 ET Capping Construction Plan" as revised and submitted October 1, 2015
- CBI "Health and Safety Plan" revised and submitted October 2, 2015
- Project Overview Bar Chart for the 2015 ET Capping Phase submitted October 2, 2015

These documents were submitted in response to EPA's partial approval of August 7, 2015 for ET capping portions of the July 2015 Revised Pre-final Remedial Design Report and Revised Pre-final Remedial Action Work Plan. EPA granted the partial approval in an effort to continue the pace of ongoing remedial action construction.

Please let me know if you have any questions. Thanks.

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From: Rob Hartman [mailto:Rob.J.Hartman@mwhglobal.com]
Sent: Thursday, October 01, 2015 5:00 PM

To: Williams, Jonathan
Cc: Greutert, Ed [USA]; Doug Tanner; Scott.Miller@deq.idaho.gov; 'wayne.crowther@deq.idaho.gov'; Kelly Wright (kwright@sbtribes.com); susanh@ida.net
Subject: FMO OU Remedial Action Work Plan - Revised Contractor's Construction Plan and CQC Plan

Jonathan: On behalf of FMC Corporation, attached for your review and approval are: (1) the revised Contractor's Construction Plan (Appendix A of the Draft Remedial Action Work Plan [RAWP]) and (2) the revised Contractor's Construction Quality Control Plan (Appendix B of the RAWP). Both have been revised to include the 2015 evapotranspiration (ET) cap construction phase. Added text is shown in yellow highlight (the un-highlighted text is unchanged from the September 2014 RAWP for Site Wide Grading Appendices A and B). We would appreciate your expedited review and approval of the attached revised plans so that the ET capping phase can begin during the week of October 5. In addition, FMC plans to transmit the revised Contractor's Health and Safety Plan (Appendix J of the RAWP) for your review and a Project Overview Bar Chart for the 2015 ET Capping Phase (new RAWP Figure 6-2) tomorrow.

Please call Marjo Carpenter at (215) 299-6210 or me at (801) 617-3256 if you have any questions. Thank you,

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