From: Rochlin, Kevin
Sent: Thursday, April 03, 2014 9:26 AM
To: Douglas.Tanner@deq.idaho.gov; Greutert, Ed [USA]; Kelly Wright; Scott Miller - Idaho DEQ (Scott.Miller@deq.idaho.gov); Stifelman, Marc; susanh@ida.net; Zavala, Bernie
Subject: Rough cut of Kevin's comments on FMC
Attachments: FMC RD comments.docx

Categories: Lepic 3-22 to 4-4

These are not the entire set of EPA comments, but wanted you all to see where we are headed.

Kevin

From:

Kevin Rochlin | **Superfund Remedial Project Manager**
U.S. Environmental Protection Agency | Region 10
Office of Environmental Cleanup
1200 6th Avenue, Suite 900, ELC-111 | Seattle, WA 98101
(206) 553-2106
(206) 553-0124 (fax)
rochlin.kevin@epa.gov

Design Drawings

1. Sheet 10. Note 2. The reference of where the grubbed material will be placed is incorrect. Update note with the correct location.
2. Sheet 40.

2/49 – The thickness for the gamma caps has always been discussed as approximately 12 inches. The ET caps are being designed using a slag subgrade. Is there any difference in field placement, compaction etc. that could cause the 30 inch ET caps to not be effective in shielding gamma?

3/49 – Is the 30 inches accurate or should it be 24 inches?

4/49 – drawing has reference to Note 1, which is not on this sheet. Update sheet.

3. Sheet 40.
    a. Can the ponds be outlined so that they show up on the sheet?
    b. Pond 2 does not seem to have any flow lines going to it. Is this accurate?
    c. Basins 6 and 9 and the east side of 8 do not seem to drain to a pond.

FMC Support Documents

<u>Draft Emergency Response Plan</u>

1. 4.3.4 Undocumented Subgrade Conditions, page 4-6. What are the criteria to be used in determining if P4 material can be "safely moved using available mobile equipment"?
2. Page 5-2. How will the visual signals be communicated to workers?

<u>Preliminary Draft OM&M Plan</u>

1. Section 3.2.1, page 3-3. In the event of a major failure to the gamma cap, additional gamma monitoring will be required to ensure that repair is complete. The types of failures will need to be discussed.
2. Figures. Because there are O&M requirements for P4 areas and for non P4 area ET caps, provide a figure demarcating the locations of each.
3. Figure 2-2. This figure can be amended to show P4 and non P4 areas. The note to Detail A pointing to area RA-K is difficult to follow as is the note pointing to the sewer piping (which looks like it is referring to the same blocked area. Amend the drawing to be clearer.
4. Table 3.1. The frequency of inspections should be quarterly during the first year for those marked semiannually.
5. Table 3.2. The frequency of inspections should be quarterly during the first year for those marked semiannually.

6. Table 3.2. Phosphine gas survey needs to be more frequent than annually. The frequency needs to be discussed with EPA.
7. Table 3.3, 3.4, 3.5. The frequency of inspections should be quarterly during the first year for those marked semiannually.

Engineering Design Submittals

General Comments:

1. The design documents leave construction deliverables for the RA contractor to prepare. In addition, the document provides for the Engineers review of 10 days (Page 01300-5). Many of these documents will require EPA review and approval. This timing has not been added to the Specifications.

Documents which EPA will require review and approval are the following (note some are review and comment without approval):

H&S Plan (review and comment only)

Stormwater Pollution Plan

SPCC Plan

Dust Control Plan

Materials Management Plan

Emissions Reduction Plan (Review and comment only)

Water Management Plan

List of Permits (Review and comment only)

Construction Plan

Project Overview Bar Chart (at this time Review and Comment)

2. Dust Control Plan Requirements

The Dust Control and Monitoring Plan must be submitted in advance of the RA award. It can be modified by the contractor if necessary. Dust control activities and monitoring will probably require a significant amount of discussion. The following will need to be addressed:

The plan will need to provide for air monitoring for dust and site contaminants during remediation. Real time air monitors will be required both for particulate monitoring and as surrogates for contaminant concentrations. Air action levels will need to be developed. Hi volume air sampling or other means will also be required to provide confirmation for the real time monitors. Air monitor locations will need to be determined.

There will be a no visible dust goal for the site.
Roadways will need to be kept free of dust by using water, dust suppressant or road cover material such as gravel will be required on all roads.

The methodology for water application will need to be provided.

The materials used for dust suppression will need to be provided as well as rates and frequency of application.

3. Stormwater from the site will be infiltrated. Is there any issue associated with the locations of the infiltration and the design of the groundwater treatment system and its extraction wells?

4. EPA RCRA personnel have requested that the slag sump pit and surrounding area be left "untouched" as long as possible. This issue needs to be discussed with EPA to see how best to address it.

Specific Comments

1. <u>Section 3.1.5, page 3-5. Excavation.</u> The characterization of soil mixed through "normal" excavation processes is acceptable for determining disposal options. However, mixing through this means, will not provide a homogeneous concentration that would be needed for capping, and mixing for the purpose of reducing concentrations is not permitted. Therefore this material may not be used for capping purposes.
2. Post excavation gamma measurements are needed. This issue needs to be discussed with EPA.
3. 3.2.2, page 3-8, gas monitoring. The gas monitoring program will need to be coordinated with the RCRA program to ensure consistency of the approaches.
4. 4.1, page 4-1 and 4-1, Site Clearance. Any of the materials removed during the CERCLA remediation will need to be managed as CERCLA wastes.

5. 4-1, Table 4.1. Note on the table whether these materials are only solid waste or whether they meet any hazardous waste designations.
6. 4.1, page 4-4. How will boundaries between ET caps and gamma caps be determined in the field?
7. BOOZ QUESTION – page 4-5, is what is provided OK for RA?
8. 4-6, page 4-6. Areas were slag is used as the break under the ET cap will require post remediation gamma survey. The frequency and locations need to be discussed with EPA.
9. 5.3 page 5-6, provide cite for the original vegetation mix rather than just that it is what was used for the RCRA caps.
10. 6.4, page 6-2 Health and Safety Plan. The contractors H&S plan will require a significant amount of information related to performing remedial action including setting up decontamination areas, exclusion zones, ingress/egress to exclusion zones etc.
11. Section 2160, Sediment and Erosion Control. The contractor is required to prepare the SWPPP, and then implement the BMP described here. The contractor is also required to provide locations for SWPPP and then implement them. Should FMC provide guidance for where these are likely to be required?

Sitewide Stormwater Management Design Report:

Provide a figure showing drainage basins, locations of proposed stormwater conveyance and locations for infiltration galleries. This should also be included in the other design documents. The figure can be a new one, or use Sheet 44.