

EMRRR 25.2 V1 *IDD 9518*
EMCSF 25.2 V15 *FF17a*
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January 19, 2000

Ms. Linda Meyer
WCM-121
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Subject: Pond 9E Closure Plan, Replacement Pages for Final Revision
FMC Corporation, EPA ID No. IDD 07092 9518

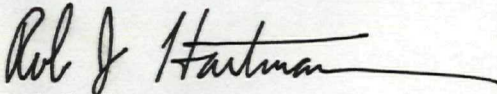
Dear Ms. Meyer:

Enclosed please find three (3) copies of the replacement pages for the final revision of the Pond 9E closure plan. As we discussed on January 7, the replacement pages are for substitution into the June 1999 Pond 9E closure plan. A page replacement guide is included with the revision packages.

These replacement pages for the Pond 9E closure plan incorporate revisions in response to EPA comments dated July 12, 1999. A summary of the EPA comments and corresponding resolution/revision is enclosed as Attachment 1 to this letter. In addition, FMC identified five minor revisions that are primarily necessary to make the Pond 9E closure plan consistent with the Pond 8S closure plan. A summary of the FMC revisions is enclosed as Attachment 2 to this letter.

FMC is currently proceeding to finalize planning/procurement for closure of Pond 9E during the 2000 construction season, pending EPA approval of the closure plan. Please feel free to contact me at (208) 236-8658 should you have questions regarding this information.

Very truly yours,


Rob J. Hartman
FMC Corporation

Enclosures



Attachment # 1

FMC's Response to EPA's July 12, 1999 Comments on Pond 9E Closure Plan

GENERAL COMMENTS

Section 4 of the construction quality assurance (CQA) plan indicates that earthwork testing and sampling must conform to Specification S-14, Subsection 3.9.1. The specification requires earthwork testing and sampling only for trench backfill, not for other earthwork. If other materials are to be tested (such as the initial slag fill, the sand filter layer, and the liner foundation material), the specification should clearly identify the testing requirements.

Response: No change needed per FMC/EPA agreement. Existing Pond 9E closure plan and specifications are consistent with the approved Pond 8S closure plan. Testing is the same as 8S.

The drawings do not depict the boot seal detail that has been added to other, recent closure plan submittals. For consistency, the detail should be added to the drawings.

Response: No change needed per FMC/EPA agreement. The boot seal detail is shown on detail 1, drawing 230-C-206. The detail is consistent with the Pond 8S closure plan.

SPECIFIC COMMENTS

Section 10.3, page 10-7, Figure 10-2. The figure provides an inspection/condition checklist. For consistency in identifying failing conditions, the second subitem of the fifth item should be revised to "No evidence of rodent or insect intrusion."

Response: Consistent with the comment, Figure 10-2 has been revised to read "No evidence of rodent or insect intrusion".

Section 10.8, page 10-12, first paragraph. that would result in corrective action at the ponds. In general, the plan is consistent with FMC's commitment in that regard. However, this paragraph states that corrective actions may be based on trends. For consistency, this paragraph should be revised to correctly reflect the position that gas collection is not necessary unless temperature or pressure within the cap exceed the appropriate set points.

Response: No change needed per FMC/EPA agreement. The paragraph does state the triggers and corrective action.

Calculation 9Ecalc1, Section 1, Sheet 4 of 13, first paragraph. The text indicates that cap subareas designated as 1 and 4 drain to the south perimeter drain. However, Figure 1 clearly shows that cap subarea 1 drains to the south perimeter drain, while cap subarea 4 drains to the east perimeter drain. The text should be corrected to reflect the data depicted on Figure 1.

Response: Consistent with the comment, the calculation has been revised.

Calculation 9Ecalc1, Section 3.2, Sheet 9 of 13, Table 2. The table shows the time of concentration (t_c) for perimeter drain sections 1 and 2. The text should clearly correlate perimeter drain sections 1 and 2 with the appropriate cap subareas 1 and 4.

Response: Consistent with the comment, the calculation has been revised.

Construction Quality Assurance Plan, Section 3, page 8, second bullet, first item. The text should be revised to state "Visually inspect FML for damage upon delivery to the site."

Response: Consistent with the comment, the Construction Quality Assurance Plan has been revised.

Specification 9E-S-16, Section 3.4.2.b. The text refers to specification Section 3.4.3.a, which is not contained within the specification. The section should be revised to correctly refer to the correct section.

Response: Consistent with the comment, Specification 9E-S-16 has been revised to reference Section 3.4.2a.

Specification 9E-S-18, Section 1.6. The specification refers to Section 3.1 for a discussion of the criteria by which vegetation is to be considered established. However, Section 3.1 does not refer to these criteria. The specification should be revised to correctly refer to Section 3.7.

Response: No change needed per FMC/EPA agreement. Specification 9E-S-18, Section 1.6 references protection requirements of the surface until hydroseeding and is not referencing acceptance criteria for vegetation.

Instrument Data Sheet DS-J-03. The instrument data sheet indicates that 4 to 20 milliamp transmitter signal correlates to atmospheric pressures of 25 to 35 inches of mercury (HgA). However, the quality assurance project plan for temperature and pressure monitoring (located at Attachment 10-2a of the closure plan) indicates that the signal correlates to pressures of 25.1 to 35.4 HgA. Although the difference is slight, the presentation in Instrument Data Sheet DS-J-03 and Attachment 10-2a should be revised to be consistent.

Response: Consistent with the comment, Attachment 10-2a of the closure plan has been revised to read "...25 to 35 inches..."

Attachment # 2

FMC initiated revisions to the specifications and drawing as noted below:

1. Specification 9E-S-17, Section 3.2a is revised to clarify that the alternative overlap requirement of 4 inches for sewing of geotextile in accordance with industry standards is allowed. This change was made to explicitly state that either an 18" overlap for non-sewn seams or a 4" overlap for sewn seams are acceptable consistent with the Pond 8S closure plan.
2. Specification 9E-S-18, Section 2.2.7b is revised from the previous specified product, "Desert Bloom", to an equivalent product, "Kiwi Power", as "Desert Bloom" is no longer being manufactured.
3. Specification 9E-S-19, Section 1.2 is revised from disposal of soil cuttings to an on-site landfill to "...cuttings shall be placed as subsoil within the limit of final cover of Pond 9E. If soil cuttings are encountered that contain elemental phosphorus, as evidenced by smoking or burning, the cuttings will be containerized and disposed at a permitted off-site facility." This change was made to be consistent with Pond 8S closure plan.
4. Specification 9E-S-19, Section 2.3 is revised from the previous specified filter pack sand material, "Morie #00" sand, to an equivalent material, "Colorado Silica Sand 20-40", as "Morie #00" sand is no longer being manufactured.
5. Drawing 230-C-205, Detail 1 is revised to a double boot seal for the FML and GCL penetration for the pipe of the survey monument in lieu of sandwiching the geosynthetic materials between two steel plates. The revised detail is similar to the existing penetration detail for the temperature monitoring well installation as shown on Drawing 230-C-206, Detail 1.