

*This newsletter contains information about U.S. Environmental Protection Agency (EPA) activities in the Pocatello and Fort Hall areas and shows how to get involved.*

## FMC Pond 16S Toxic Gases Under Control



*Phosphine Gas Extraction and Treatment System (GETS) at FMC Pond 16S*

In December 2006, EPA issued a Unilateral Administrative Order under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) that required FMC to evaluate high concentrations of toxic gases found at one of its former phosphorus waste ponds (Pond 16S) and to remove and treat these gases before they escape into the environment. The primary contaminant of concern was phosphine gas (PH<sub>3</sub>), a toxic gas.

FMC was required to build a Gas Extraction and Treatment System (termed the GETS) to extract the gases under the Pond 16S cap and treat those gases to safe levels before discharging the treated gases into the air. The GETS design was innovative as a system to safely remove and treat such a large volume and high concentration of phosphine gas.

## *EPA moves ahead to update post closure plan for FMC pond*

EPA is working with FMC, the Shoshone-Bannock Tribes and Idaho Department of Environmental Quality to modify the Post Closure Plans for those closed and capped hazardous waste ponds at the FMC site under EPA jurisdiction. Post Closure Plans are required under the hazardous waste law known as RCRA (the Resource Conservation and Recovery Act).

There were eight ponds at the FMC facility that were subject to the RCRA Consent Decree of 1998. These hazardous waste ponds ranged from 3.2 acres to 12.9 acres in size. Between 1999 and 2005, FMC closed and capped the ponds in accordance with RCRA Closure Plans approved by EPA. Under RCRA, after closure is complete, FMC must manage the ponds in accordance with an EPA approved Post Closure Plan.

Currently, the Post Closure Plan for each pond includes requirements for maintenance of the ponds to prevent damage to the caps, temperature and pressure monitoring as an indicator of possible gas generation from the waste within the ponds, and long-term groundwater monitoring. Modifications are necessary to improve the ability of the monitoring to provide early warning of potential releases to the environment and to eliminate monitoring procedures that have been shown to be ineffective. The Post Closure Plan for Pond 16S will be modified first.

## Ongoing Activities under SEP-14

Supplemental Environmental Projects (SEPs) are environmentally beneficial projects undertaken as part of an enforcement settlement.

As part of the 1998 RCRA Consent Decree, FMC agreed to complete 14 SEPs. All of the SEPs except SEP-14 have been completed, excused by EPA or become inapplicable.

SEP 14 requires FMC to conduct a study of potential human health effects on residents of the Fort Hall Reservation that may have resulted from releases of hazardous substances from the FMC

facility. Work on development of the study plan details is progressing.

The SEP-14 Study Management Team, made up of representatives of both the Shoshone-Bannock Tribes and FMC, will be taking steps to inform the Fort Hall community on the progress of this study.

For information please contact: Liz Davis with FMC, [Lizanne.Davis@FMC.com](mailto:Lizanne.Davis@FMC.com) or Virginia Monsisco with the Tribes at [vmonsisco@sbtribes.com](mailto:vmonsisco@sbtribes.com) or (208) 478-3908.

### ***THE SUMMER OF 2010 NEEDS YOUR PUBLIC INVOLVEMENT – KEY DECISIONS AHEAD***

Considerable work has gone into these technical efforts by EPA, the Shoshone-Bannock Tribes, the Idaho Department of Environmental Protection, FMC and Simplot.

The public meetings planned for this summer are expected to cover the FMC OU ROD Amendment and the RCRA Pond 16S Post Closure Plan modification. These are key decisions for the remediation of the FMC OU under Superfund and for updating the FMC RCRA Pond 16S Post Closure Plan.

### ***\*\*\*EPA ENCOURAGES YOU TO PARTICIPATE IN THESE VERY IMPORTANT PROCESSES THIS SUMMER\*\*\****

Individuals or groups interested in having EPA representatives schedule a time to talk with you or your organizations about cleanup activities at the EMF site may contact Kira Lynch at (206) 553-2144 or [lynch.kira@epa.gov](mailto:lynch.kira@epa.gov)

For information about the Pond 16S Post Closure Plan modification, contact Carla Fisher at (206) 553-1756 or [fisher.carla@epa.gov](mailto:fisher.carla@epa.gov)

## Pond 16S

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This is the first type of this system in the nation. FMC completed construction of the GETS in April 2008 and the GETS started operating in May 2008. The GETS has been running effectively since November 2008.

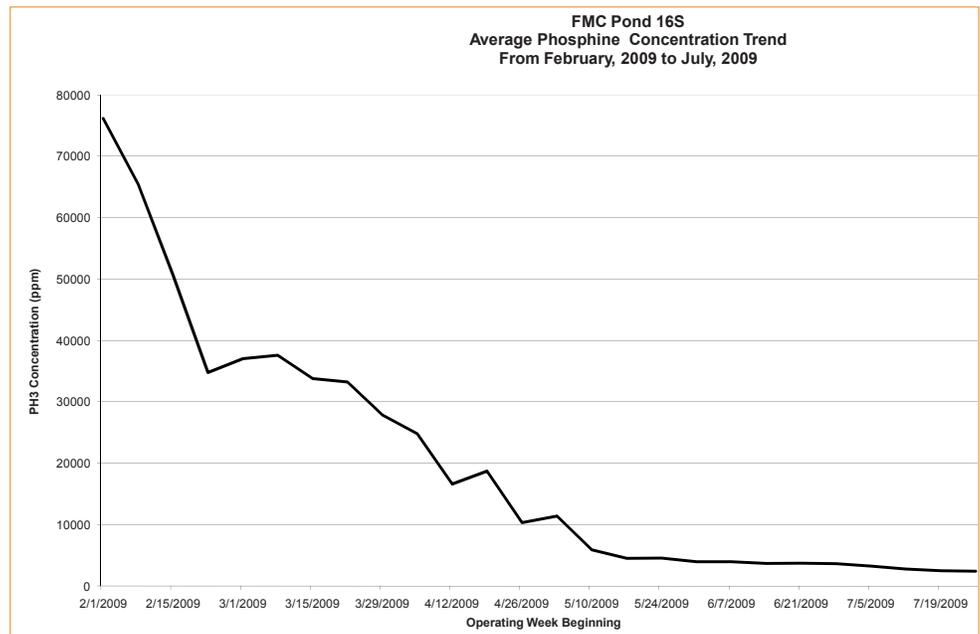
The concentration of phosphine gas under the cap at Pond 16S has been reduced by more than 99 percent since 2007.

### Current Status

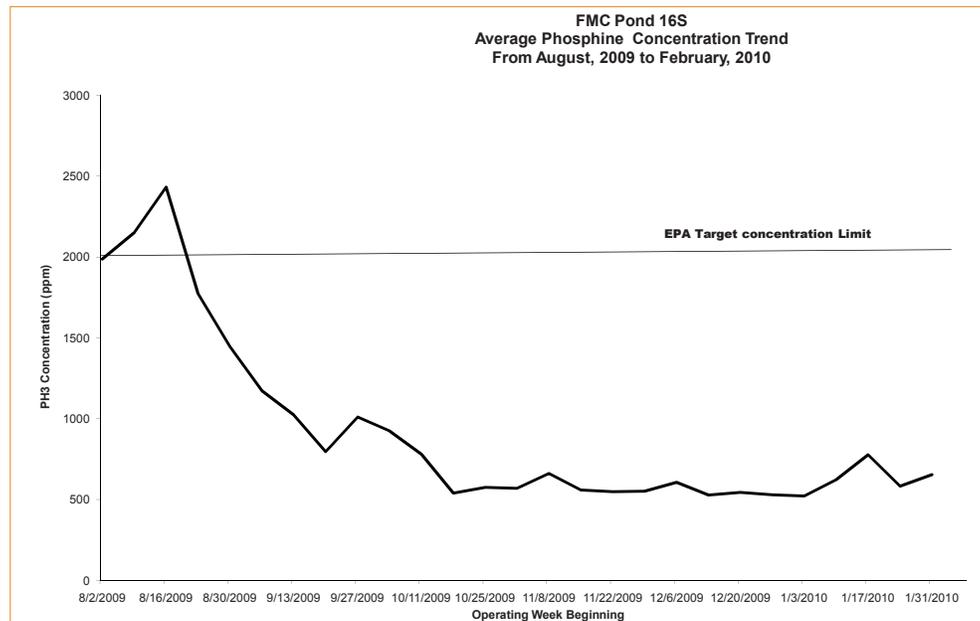
FMC achieved the phosphine gas target concentration under the Order in November 2009. EPA's Order requires FMC to periodically monitor 8 different sampling points for phosphine gas concentrations under the cap and stay below the target concentration limit of 2000 parts per million (ppm) over an entire year.

FMC started that one year period in November 2009. FMC has now completed 5 months of monitoring and the phosphine concentration has remained well below the 2000 ppm concentration limit.

EPA is presently working to revise the long-term Post Closure Plan monitoring requirements to ensure that, even after FMC has met the requirements in the Order, pond gas concentrations remain below the target concentration and do not present a threat to public health or the environment.



Long term phosphine (PH3) gas concentration trend – average from 8 monitoring points



Short term phosphine (PH3) gas concentration trend – average from 8 monitoring points

## Updating Post Closure Plan

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The public should expect a Post Closure Plan modification for Pond 16S this summer with public meetings and a public comment period.

It is EPA's intent to have the Post Closure Plan modification approved by the fall. Look for local newspaper notices and post cards this summer for details on the comment period and public meetings.

If you are not on EPA's mailing list, please contact EPA to be added to it. (See Information Box on [Back Page](#))

# Eastern Michaud Flats Superfund Update

**M**uch work has been underway since the original 1998 Record of Decision (ROD) for the Eastern Michaud Flats (EMF) Superfund Site. Under that ROD the Site was divided into three areas known as the FMC Operable Unit (OU), the Simplot Operable Unit (OU) and the Off-Plant Area Operable Unit (OU).

## *The Simplot OU*

On January 20, 2010, EPA issued a decision for the Simplot OU called an Interim Record of Decision Amendment. This Interim ROD Amendment determined that a reduction of pollution sources from the Simplot plant facilities would greatly reduce phosphorus entering the Portneuf River through contaminated groundwater.

EPA is negotiating the legal document called a consent decree that will require Simplot to do the work called for in the Interim ROD Amendment.

Under a process called Remedial Design and Remedial Action, a series of monitoring wells and extraction wells have been installed by Simplot, as required by the 2002 consent decree.

Extraction wells have been installed to pump out contaminated groundwater for recycling in the plant's fertilizer and other production processes. These well installations have been phased in over the past seven years and modified based on data from monitoring wells and performance of extraction wells.

Plans this summer include installation of an engineered liner on the lower gypstack, installation of additional monitoring wells and control of sources to groundwater contamination from the plant facilities.

EPA will evaluate and approve these project plans before the work is performed. For more information, visit our local information repositories (see information box) or go to our EMF website <http://go.usa.gov/iTC>

## **SAVE THE DATE: MAY 4 TWO PUBLIC OPEN HOUSES PLANNED**

**May 4 11:30 a.m. to 1:30 p.m.**

at Pocatello City Hall Chambers

**4:30 p.m. to 6:30 p.m.**

at Fort Hall Tribal Business Center  
Dome Room

Experts on the cleanup of FMC and Simplot will be there to answer questions. For information contact: Sue Skinner at (208) 282-4326 or [skinner.susan@epa.gov](mailto:skinner.susan@epa.gov)

## *The FMC OU*

Throughout 2008 and 2009, a great amount of field work was conducted to investigate contamination left after the closing of the FMC production facilities in December of 2001. In the 1998 ROD, EPA assumed the FMC plant would continue operating into the foreseeable future, and that the plant's operating health and safety plan would enable FMC to manage interior areas of the plant.

After the plant closing and demolition, a study of these former interior areas was required. It was called a Supplemental Remedial Investigation (SRI)/Supplemental Feasibility Study (SFS). The SRI/SFS builds upon information from the original Remedial Investigation/Feasibility Study (RI/FS) performed in the 1990s on which the 1998 ROD was based.

This additional SRI data collection and screening, along with the RI data, will determine which parts of the FMC OU have soil or groundwater contamination requiring cleanup. Alternatives to address parts of the OU needing cleanup will be evaluated under the next SFS phase. All of the FMC OU, including the Northern Properties and some portions for which remedies were selected in the original ROD, will be analyzed in the SFS.

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# Eastern Michaud Flats Superfund Update

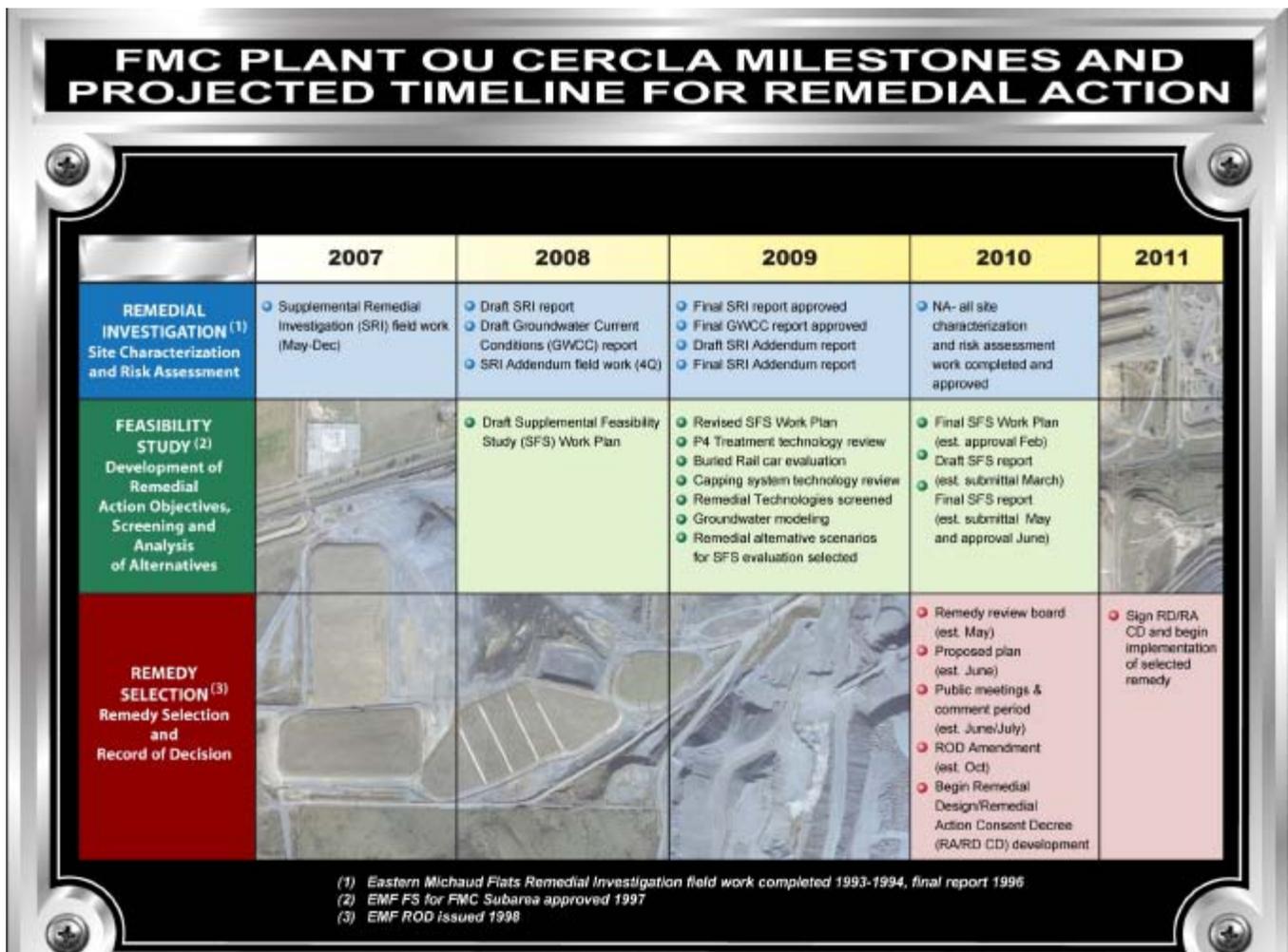
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As data was collected, three important FMC OU reports, which document the OU investigation, were required from FMC: the Supplemental Remedial Investigation Report, the Supplemental Remedial Investigation Addendum Report and the Groundwater Current Conditions Report. The public is encouraged to become familiar with these reports. These reports are available at local repositories (see information box) or on the EMF website at: <http://go.usa.gov/iTC>

Next steps in the Superfund process for the FMC OU will be the SFS. From the SFS, EPA will prepare a Proposed Plan with a preferred cleanup alternative for public review and comment.

Sometime this summer EPA expects to host public meetings and invite public input and comments. Read your local newspaper or contact EPA to be on our mailing list for notification of these meetings. (See Information Box on [Back Page](#)). After EPA has carefully evaluated public comment on its Proposed Plan, EPA will issue a ROD Amendment for the FMC OU, including responses to public comments.

Negotiation of a consent decree for FMC's implementation of the FMC OU ROD Amendment is expected to follow. Public comments on consent decrees or their amendments may be addressed to the Idaho Federal District Court during publicly announced comment periods.



## The Off-Plant OU

The Off-Plant OU, defined in the 1998 ROD, includes all areas outside the Simplot and FMC facility boundaries where contamination may have come to be located from either or both plants. EPA

is in the process of reviewing soil, plant, and animal data to determine the next steps to assure long term protection of human health and the environment in this OU. EPA expects to announce next steps for the Off-Plant OU this summer.



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## **SE IDAHO UPDATE**

*Information about U.S. Environmental Protection Agency (EPA) activities in the Pocatello and Fort Hall areas. Key Decisions in 2010—Public Involvement Needed.*

**READ INSIDE FOR DETAILS**

## **WHERE TO GET MORE INFORMATION**

Idaho State University Library  
Government Documents  
850 South 9th Ave  
Pocatello, ID 83209

Shoshone-Bannock Library  
Tribal Business Center  
Pima Drive and Bannock Ave.  
Fort Hall, ID 83202  
Virginia Monsisco  
(208) 478-3908

(New) American Falls Library  
308 Roosevelt Street  
American Falls, Idaho 83211

Our EPA website is:  
<http://go.usa.gov/iTC>

For technical questions, please contact the Remedial Project Manager, Kira Lynch at:  
[lynch.kira@epa.gov](mailto:lynch.kira@epa.gov) or (206)553-2144.

For additional information or to be added to our mailing list, please contact the Community Involvement Coordinator, Sue Skinner at:  
[skinner.susan@epa.gov](mailto:skinner.susan@epa.gov) or (208) 282-4326.

EPA welcomes feedback from our readers on our newsletter. Contact Sue Skinner  
(208) 282-4326



*Alternative formats are available.  
For reasonable accommodation, please call Sue Skinner  
(208) 282-4326 TTY users, please call the  
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