

MEMORANDUM TO FILE

TO: KMCC File

FROM: Brian A. Rakvica

DATE: September 10, 2003

CC:

RE: Meeting with Susan Crowley of KMCC

1. Met at the KMCC Administration Building at 8:00 AM.
2. Susan provided a general overview of the site and the project development. There is an April 2001 Supplemental Phase II ECA that Brian does not have a complete copy of. Susan to provide a copy to Brian.
3. Discussed documents that still require NDEP action.
 - a. Review of April 2001 Supplemental Phase II ECA
 - b. Update and re-issuance of the Chromium Mitigation Consent Agreement.
 - c. Update and re-issuance of the UIC Permit.
 - d. Possible review of the Vern Vohls Lease Area Phase I ECI. Susan was not sure on this one.
4. Noted that Susan has been submitting documents to Vern. Susan needs notification that documents should be sent to Jon Palm.
5. Discussed the monitoring of GW in the vicinity of the hazardous waste landfill (post-closure requirement). Susan noted that this information has been going to BWPC. Brian to get information from BWPC. Susan noted that a summary document for the GW monitoring in the vicinity of the landfill was submitted to Vern in 2001 or 2002. Brian needs to get a copy of this as well.
6. Brian reminded Susan about the quarterly progress reporting requirements. Susan will start doing this again. Perhaps she will combine this with her quarterly reporting for the perchlorate project. Susan to review with counsel.
7. Susan knows of no outstanding issue with regard to their ZDP.
8. Susan believes there are very few LOU areas that still require action. Brian noted that it is important that NDEP and KMCC are on the same page with this. If KMCC believes that a LOU area has attained No Further Action (NFA) status, NDEP must also concur and issue a written acknowledgement of this. Brian stated that it might be worthwhile for Susan to review her file and verify that all the areas that she believes are NFA have been acknowledged by NDEP.
9. Discussed the Chromium Mitigation Consent Agreement.
 - a. Brian explained that this agreement and the corresponding UIC permit are out of date and do not match the Federal MCL for total chromium of 0.1 ppm.

- b. Susan explained that since they are discharging to an on-site pond this is not an issue. Brian responded that it would become an issue once they begin to discharge from the pond or decide to start using the UIC system again.
 - c. Susan stated that BWPC indicated that they did not want to renew the UIC permit until the federal MCL for perchlorate was developed. Brian to follow up with BWPC.
 - d. Susan also stated that the Consent Agreement was developed by Cathy Poole with BWPC and the justification for the limitations on the chromium were developed by her.
10. Brian and Susan had a brief tour of the site.
- a. The only active process currently is the boron trichloride production process. The manganese dioxide process is on furlough until at least January 2004.
 - b. Susan noted that the processes are currently for sale and there are several interested buyers including the American Pacific Corporation.
 - c. Construction is on going by US filter for the ex-situ bioremediation project. Parts of the site have been fenced and turned over to US Filter.