

## MEMORANDUM TO FILE

**TO:** KMCC File

**FROM:** Brian Rakvica

**DATE:** March 2, 2004

**CC:** Todd Croft, Jennifer Carr, Jeff Johnson  
Jon Palm, Tamara Pelham, Alan Tinney, Leo Drozdoff

**RE:** KM Conference Call

1. In attendance:
  - a. NDEP – Leo Drozdoff, Todd Croft, Tamara Pelham, Brian Rakvica
  - b. KM – Keith Bailey, Susan Crowley
2. Remedial System Update
  - a. Continuous operation continues. Flow is approximately 380-400 gpm at 106 ppm influent concentration. Discharge is still ND (at varying detection limits; 800 ppb-ion specific probe, 20 & 40 ppb – laboratory analyses).
  - b. KM has begun the transition to the ethanol tank today and the use of acetic acid has been shut down.
  - c. Occasional “upset conditions” in the primary reactors have occurred resulting in higher than expected perchlorate concentrations being transmitted to the secondary reactor, however, the perchlorate slug was destroyed in the secondary reactor.
  - d. KM expects to ramp up the flow rate to the FBR; turn off the plant site IX then turn off the seep area IX. Following this, the concentrations to the FBR will be slowly increased by adding pond water.
  - e. KM hopes for a flow rate of 500 gpm by the end of the week.
3. Discussed issues with CC DAQM.
  - a. Air permit received and executed.
4. Discussed Permitting.
  - a. Noted that the final permit contains a discharge limit of 18 ppb with a 9 month schedule of compliance. In the interim, KM will try to achieve 18 ppb or the best achievable concentration.
  - b. It is expected that the permit will be issued tomorrow with an effective date of 3/4/04.
  - c. KM noted the desire to revisit the Attachment A list of analytes before the next permit renewal. NDEP would also like to revisit this.
  - d. KM also noted that the DMR submittal is currently hampered by the time to analyze some of the analytes. This results in addenda to the DMR. NDEP noted that this issue can be looked at in the permit renewal. It was also noted that KM can memorialize this problem in the next DMR submittal if they like.

- e. NDEP noted that they believe the current version of the permit works best for the interests of all parties. KM is still concerned about their ability to maintain permit compliance. NDEP noted that this is an issue that will have to be closely monitored and revisited. NDEP further noted that the effluent limitations may be revised after obtaining 6+ months of data, but that revision will have to take place in a public forum.
- 5. Discussed Other Issues.
    - a. Discussed possible attendees at the 3/11/04 meeting at the KM facility.
    - b. NDEP noted that the perchlorate tour scheduled for 3/31/04 will not include a tour of the FBR system and will be handled by NDEP at the Pabco road erosion control structure.
- 6. Next Meeting: 3/11/04 at the KM Facility.