

SWMU 14 - Roaster Solids Area

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5.5.14 SWMU 14 – Roaster Solids Area

The location of Solid Waste Management Unit (SWMU) 14 is shown on Figure 5.5.14-1a and SWMU 14 monitoring stations and sample locations are provided on Figure 5.5.14-1b. SWMU 14, the Roaster Solids Area, is located on the east side of the property just north of the Granulated Slag Pile, (SWMU13), south of the Raw Materials Area (SWMU 6) and east of the Coarse Slag Pile (SWMU 12). There is a small pile of coke dust fines located on the north end of the Roaster Solids Pile. Roaster solids are the solid material by-product from the Roaster Operation, in which crude phosphorus sludge from the 100 foot clarifier or phosphorus handling operation was mixed with kiln nodule fines and heated to vaporize the phosphorus from the sludge material. Crude phosphorus material and kiln nodule fines were metered into the externally heated rotary kiln where the elemental phosphorus was vaporized. The vaporized phosphorus was then condensed and stored in P4 storage tanks. The remaining solid material, the roaster solids, were discharged at the end of the rotary kiln and stockpiled at the present location.

The Roaster solids were recycled in the roaster process, or recycled to the kiln as a raw material. Roaster solids are a sand-like material that were always stockpiled in an area north of the Granulated Slag Pile (SWMU 13). The stockpile is approximately 450 feet by 260 feet by 20 feet high and is estimated to contain 75,000 cubic yards of roaster solids.

Tests of this material show that it is about 40 percent CaO (lime), 30 percent P₂O₅ (phosphate), 15 percent SiO₂ (silica), 2 to 3 percent F (Fluoride), 1 to 2 percent Fe₂O₃ (iron oxide), and the balance (about 10 percent) is water. Like slag, roaster solids have been subjected to high heat, but unlike slag, roaster solids have not been melted and reconstituted as rock.

5.5.14.1 Prior Investigation

Information, evaluations, and data regarding the roaster solids are reported in the following documents:

- Current Conditions/Release Assessment Report, Corrective Action Order on Consent, Docket No. RCRA-08-2004-0001, Rhodia Silver Bow Plant, Butte, Montana, prepared by Barr Engineering, dated February 9, 2006 (CCRA) (*see* Section 2.7.2.2.6 of the CCRA).

Available analytical data for roaster solids include:

- Toxicity characteristic leaching procedure (TCLP) and extraction procedure toxicity method (EPTOX)– metals

- General and Site-specific parameters (total and ASTM water leach)
- Metals (total and ASTM water leach)
- Radionuclides (total and ASTM water leach)
- Volatile organic compounds (VOCs) and semivolatile organic compounds (SVOCs)

Roaster solids data from SWMU 14 were compared to the background/reference area concentrations. Concentrations above the 95% upper confidence limit of the mean background/reference area concentrations are highlighted on the constituent delineation figures presented in this section. Where a 95% upper limit could not be calculated, the maximum detected concentration or the maximum detection limit was selected.

Constituent concentrations are described in this report as above background/reference area concentrations if the mean and maximum concentrations of the SWMU data exceed both of the mean and maximum background/reference area values. All data will be retained for evaluation in the human health and ecological risk assessments. The definitive background comparison will be conducted in the risk assessment using a statistical approach consistent with EPA guidance (U.S. EPA 2002).

Low concentrations of metals were reported in EPTOX and TCLP tests at concentrations below hazardous waste levels (*see* Table 5.5.14-1). VOCs and SVOCs were not detected in the roaster solids samples (*see* Table 5.5.14-5 and 5.5.14-6, respectively). Several metals were detected in the ASTM D3987 leach test (*see* Table 5.5.14-7). Fluoride, calcium, magnesium, potassium, sodium, phosphorus, and sulfate were detected in the ASTM leachate. Radionuclides were not detected in the ASTM leach.

5.5.14.2 RFI Investigation Activities

To further characterize the leaching potential of the roaster solids, leachate analyses was conducted on two composite roaster solids samples using EPA Method 1312 – Synthetic Precipitation Leaching Procedure (SPLP). Each composite sample was composed of five subsamples that were collected as described in the Field Sampling Plan. The centroid location of each subsample is shown on Figure 5.5.14-1b. The resulting leachate from the composite samples was analyzed for site-specific parameters, general parameters, metals, and radionuclides.

Three composite samples were collected in October 2012 to further characterize the roaster solids. Each composite sample was composed of five subsamples that were collected as described in the

Field Sampling Plan. The location of each subsample and the centroid location of the subsamples are shown on Figure 5.5.14-1b. The samples were analyzed for site-specific parameters, general parameters, metals, and radionuclides.

5.5.14.3 RFI Investigation Results

The analytical results for the roaster solids samples for the general and site-specific parameters, radionuclides and metals are summarized in Tables 5.5.14-2, 5.5.14-4, and 5.5.14-3, respectively, and presented on Figures 5.5.14-2, 5.5.14-3 and 5.5.14-4, respectively.

Fluoride, orthophosphate as P, and total phosphorus were detected in the solids samples (*see* Table 5.5.14-2). Fluoride concentrations are elevated compared to background soil concentrations.

Elemental phosphorus was not detected (DL = 0000015 mg/kg) in the roaster solids samples.

The metals concentrations in the roaster solids samples are generally consistent between the 1992, 1997, 2003 and 2012 sample results (*see* Table 5.5.14-3). The following metals have elevated concentrations compared to background soil concentrations: antimony, beryllium, cadmium, calcium, lead, nickel, selenium, silver, sodium, thallium, uranium, vanadium, and zinc.

The radionuclide results for the 2012 samples are generally similar to the 2003 sample results (*see* Table 5.5.14-4). The radionuclide concentrations are elevated compared to background soil concentrations.

The metals and radionuclide concentrations in the roaster solids may not preclude their use as a phosphorus-rich fertilizer or soil amendment. The corrective measures study should address potential uses of the phosphorus-rich material.

Fluoride and total phosphorus are the only general and site-specific parameters detected in the leachate generated by the synthetic precipitation leaching procedure (SPLP) (Table 5.5.14-8). Elemental phosphorus was not detected (DL = 0.000023 ug/L) in the SPLP leachate. The metals detected in the SPLP leachate were arsenic, beryllium, cadmium, calcium, chromium, iron, lead, magnesium, manganese, nickel, potassium, selenium, silver, sodium, uranium and vanadium (*see* Table 5.5.14-9). Although radium 226 is present at about 18 to 35 pCi/g in the solids (*see* Table 5.5.14-4), it was only detected in the leachate of one SPLP sample at 1.2 pCi/L. Gross alpha and gross beta were detected in both SPLP samples (*see* Table 5.5.14-10).

5.5.14.4 Conclusions

Roaster solids are a sand-like material that remains after the crude phosphorus is roasted. The roaster solids were stockpiled separately onsite for reuse in the roasting process, or recycled to the kiln as a raw material. Roaster solids are stockpiled in an area north of the granulated slag pile (*see Figure 5.5.14-1b*). The stockpile is approximately 450 feet by 260 feet by 20 feet high and is estimated to contain 75,000 cubic yards of roaster solids.

Certain metals and radionuclides are present in the roaster solids at concentrations above the background/reference area concentrations. However, the metals and radionuclide concentrations may not preclude the roaster solids from being used as a phosphorus-rich fertilizer or soil amendment.

Cadmium and gross alpha are the only parameters detected in the SPLP leachate at a concentration above its maximum contaminant level for drinking water.

There is sufficient information to conduct the risk assessment for this SWMU. The risk assessment will identify which parameters, if any, are present at concentrations that warrant corrective measures. The dataset would be reviewed at that time and additional sampling may be necessary to inform the corrective measures study or later during the corrective measures design phase.

5.5.14.5 References

- U.S. EPA. 2002. Guidance for Comparing Background and Chemical Concentrations in Soil for CERCLA Sites. U.S. Environmental Protection Agency. EPA 540-R-01-003. OSWER 9285.7-41. September 2002.

Tables

Table 5.5.14-1

Roaster Solids Data - TCLP and EPTOX Metals
Rhodia Silver Bow Plant

Station ID	Roaster Solids	Roaster Solids	Roaster Solids	Roaster Solids
Sample Date	11/14/1989	1/22/1992	12/15/1992	8/24/1993
Sample ID	Roaster Residue	Roaster Residue	Roaster Residue	#6-Roaster Res.
Lab Name		Century	Century	Century
Lab ID	100858	8880-2	10534-2	10534-2
Report	Material Charac	Material Charac	Material Charac	Material Charac
Arsenic, TCLP		0.015 U mg/l	0.021 U mg/l	0.33 U mg/l
Barium, TCLP		0.068 mg/l	0.06 U mg/l	1.5 mg/l
Cadmium, TCLP		0.167 mg/l	0.046 mg/l	0.1 mg/l
Chromium, TCLP		0.041 mg/l	0.128 mg/l	0.32 U mg/l
Lead, TCLP		0.04 U mg/l	0.052 mg/l	0.1 mg/l
Mercury, TCLP		0.0003 U mg/l	0.0003 U mg/l	0.0005 U mg/l
Selenium, TCLP		0.02 U mg/l	0.618 mg/l	0.05 U mg/l
Silver, TCLP		0.006 U mg/l	0.003 U mg/l	1.2 U mg/l
Arsenic, EPTOX	0.006 mg/l			
Barium, EPTOX	0.1 U mg/l			
Cadmium, EPTOX	0.181 mg/l			
Chromium, EPTOX	0.2 mg/l			
Lead, EPTOX	0.18 mg/l			
Mercury, EPTOX	0.001 U mg/l			
Selenium, EPTOX	0.005 U mg/l			
Silver, EPTOX	0.02 U mg/l			

Table 5.5.14-2
Roaster Solids Data - General and Site-Specific Parameters
SWMU 14
Rhodia Silver Bow Plant
[concentrations in mg/kg]

Chemical Name			Fluoride	Orthophosphate as P	Phosphorus, elemental (white)	Phosphorus, total
Background Mean, Exceedances Bold			4.1			
Background Maximum, Exceedances <u>Underline</u>			37			
Background 95% UCL, Exceedances <i>Italic</i>			7.6			
Location ID	Sample Date	Depth	Sample Type			
ESI-RSP-1	07/21/2003		N	53	210	--
ESI-SSS-1	07/21/2003	0 - 2 in	N	17	27	--
RS-03-COMP	10/04/2012		N	123 R	--	< 0.000015 J
			FD	4.31 R	--	< 0.000015 J
RS-04-COMP	10/04/2012		N	9.35	--	< 0.000015 J
RS-05-COMP	10/04/2012		N	4.51	--	< 0.000015 J

Table 5.5.14-3
Roaster Solids Data - Metals
SWMU 14
Rhodia Silver Bow Plant
[concentrations in mg/kg]

Chemical Name Analysis Location				Aluminum Lab	Antimony Lab	Arsenic Lab	Barium Lab	Beryllium Lab	Cadmium Lab	Calcium Lab	Chromium Lab	Cobalt Lab	Copper Lab	Iron Lab	Lead Lab	Magnesium Lab	Manganese Lab	Mercury Lab	Nickel Lab	Potassium Lab	Selenium Lab	Silver Lab	Sodium Lab	Thallium Lab	Uranium Lab	Vanadium Lab	Zinc Lab
Background Mean, Exceedances Bold				0.50	23	150	0.51	1.6	3900	11	5.9	35	19600	17	3500	540	0.021	5.3	3000	0.41	0.73 (1)	140	0.35	1.8	41	59	
Background Maximum, Exceedances <u>Underline</u>				<u>3.9</u>	120	290	1.3	<u>8.9</u>	<u>14000</u>	<u>48</u>	9.5	300	35300	190	5700	1100	0.20	<u>21</u>	5300	<u>0.70</u>	<u>1.7 (1)</u>	<u>620</u>	<u>1.0</u>	4.1	<u>83</u>	<u>380</u>	
Background 95% UCL, Exceedances <i>Italic</i>				1	40	170	0.55	1.1	4500	12	6.1	64	20600	35	3700	570	0.038	6	3200	<i>0.47</i>	<i>0.35 (1)</i>	220	0.46	2.0	43	98	
Location ID	Sample Date	Depth	Sample Type																								
WF134	10/1/1992		N	--	< 3	< 2	62.5	<u>2.1</u>	7.6	114000	431	4.5	36.5	4340	13	964	63.1	--	2420	2840	< 3	3.3	866000	178	--	493	318
RR001-97	2/11/1997		N	--	--	< 5	39	--	20	--	250	--	--	65	--	--	--	--	--	--	<u>31</u>	--	--	--	--	--	
RR002-97	2/11/1997		N	--	--	< 5	42	--	<u>21</u>	--	270	--	--	70	--	--	--	--	--	--	<u>5</u>	<u>34</u>	--	--	--	--	
ESI-RSP-1	07/21/2003		N	7170	10.5 J	10.9	62.7	0.97 J	40.6	274000	429	2.3 J	113	4940	296	1960	78.9	< 0.096	65.0	2950	1.8 J	124 J	1490	1.5 J	--	537	4040
ESI-SSS-1	07/21/2003	0 - 2 in	N	5350	<u>6.7 J</u>	8.2	54.4	<u>0.79 J</u>	<u>31.8</u>	<u>264000</u>	<u>358</u>	1.9 J	97.8	4150	173	2590	64.4	< 0.10	<u>71.5</u>	2390	<u>0.96 J</u>	<u>110 J</u>	<u>2030</u>	< 5.0	--	<u>488</u>	<u>4200</u>
RS-03-COMP	10/04/2012		N	--	<u>4.22</u>	1.93	55.3	<u>0.84 J</u>	32.74 R	<u>293000</u>	<u>388</u>	1.19 J	72.3 J	4760	108 J	2040	60.3	< 0.002	<u>97.8</u>	1930 J	<u>4.5</u>	<u>45.2</u>	<u>1110 J</u>	<u>6.960 J</u>	<u>113 J</u>	<u>571</u>	<u>3540</u>
			FD	--	<u>4.27</u>	1.85	54.5	<u>0.86 J</u>	36.73 R	<u>281000</u>	<u>369</u>	1.91 J	69.8 J	4620	110 J	1780	66.4	0.004 J	<u>90.0</u>	2040 J	<u>3.6</u>	<u>48.2</u>	<u>1080 J</u>	<u>7.470 J</u>	<u>116 J</u>	<u>546</u>	<u>3920</u>
RS-04-COMP	10/04/2012		N	--	<u>4.88</u>	3.17	55.4	<u>1.00 J</u>	31.36 R	<u>293000</u>	<u>381</u>	1.54 J	79.5 J	4930	134 J	2490	66.4	0.007 J	<u>103</u>	2320 J	<u>4.2</u>	<u>50.2</u>	<u>1140 J</u>	<u>8.500 J</u>	<u>124 J</u>	<u>686</u>	<u>5130</u>
RS-05-COMP	10/04/2012		N	--	<u>3.50</u>	2.27	49.1	<u>0.86 J</u>	25.01 R	<u>283000</u>	<u>327</u>	1.00 J	65.7 J	4100	81.1 J	2420	46.6	0.004 J	<u>95.8</u>	1880 J	<u>2.4</u>	<u>37.4</u>	<u>1040 J</u>	<u>4.610 J</u>	<u>126 J</u>	<u>590</u>	<u>5080</u>

Table 5.5.14-4
Roaster Solids Data - Radionuclides
SWMU 14
Rhodia Silver Bow Plant
 [concentrations in pCi/g]

Chemical Name			Bismuth 214	Cesium 137	Gross Alpha (radiation)	Gross Beta (radiation)	Lead 210	Lead 212	Lead 214	Potassium 40	Protactinium-234	Radium 223	Radium 226	Thorium 227	Thorium 230	Thorium 232	Thorium 234	Uranium 234	Uranium 235	Uranium 238
Background Mean, Exceedances Bold													3.6		0.96			0.73		0.78
Background Maximum, Exceedances <u>Underline</u>													12		3.4			2.8		2.7
Background 95% UCL, Exceedances <i>Italic</i>													5.0		1.7			1.6		1.6
Location ID	Sample Type	Depth	Sample Type	--	--	--	--	--	--	--	--	--	1.6 +/- 0.22	--	--	0.16 +/- 0.33	--	--	--	< 6.7
RRE	01/01/1999		N	--	--	--	--	--	--	--	--	--	1.2 +/- 0.27	--	--	0.51 +/- 0.41	--	--	--	8.3 +/- 15.00
RRW	01/01/1999		N	--	--	--	--	--	--	--	--	--								
ESI-RSP-1	07/21/2003		N	39.3 +/- 3.14	< 0.174	168 +/- 13.0 J	116 +/- 10.6 J	31.0 +/- 5.56	--	41.3 +/- 4.07	7.56 +/- 1.28	53.4 +/- 13.3	3.72 +/- 1.15	30.7 +/- 1.70	--	--	36.2 +/- 4.20	--	3.24 +/- 1.12	--
ESI-SSS-1	07/21/2003	0 - 2 in	N	38.0 +/- 3.07	< 0.00136	179 +/- 13.0 J	160 +/- 11.6 J	27.0 +/- 5.12	0.491 +/- 0.185	42.0 +/- 4.14	6.10 +/- 1.32	49.0 +/- 13.2	--	36.2 +/- 1.88	3.66 +/- 1.56	--	35.0 +/- 4.15	--	3.82 +/- 1.27	--
RS-03-COMP	10/04/2012		N	--	--	--	--	65 +/- 6	--	--	--	--	22 +/- 1.4	--	37 +/- 2.9	--	--	33 +/- 2.7	0.44 +/- 0.68	31.1 +/- 2.6
			FD	--	--	--	--	59 +/- 5.5	--	--	--	--	21 +/- 1.5	--	36 +/- 2.9	--	--	32 +/- 2.7	1.8 +/- 0.73	31.4 +/- 2.6
RS-04-COMP	10/04/2012		N	--	--	--	--	53 +/- 47	--	--	--	--	18 +/- 1.1	--	34 +/- 2.4	--	--	35 +/- 2.4	1.3 +/- 0.65	33.4 +/- 2.3
RS-05-COMP	10/04/2012		N	--	--	--	--	44 +/- 5	--	--	--	--	22 +/- 1.6	--	39 +/- 3.2	--	--	38 +/- 3.4 J	1.3 +/- 0.76	37.6 +/- 3.4

Table 5.14-5
Roaster Solids Data - VOCs
Rhodia Silver Bow Plant

Station ID	Roaster Solids	
Sample Date	3/22/1999	
Sample ID	RSP-1	
Lab Name	Energy	
Lab ID	002-99-50887	
Report	Material Charac	
Acetone	10 U	mg/Kg
Acrolein	4 U	mg/Kg
Acrylonitrile	4 U	mg/Kg
Benzene	0.2 U	mg/Kg
Bromobenzene	0.2 U	mg/Kg
Bromochloromethane	0.2 U	mg/Kg
Bromodichloromethane	0.2 U	mg/Kg
Bromoform	0.2 U	mg/Kg
Butyl benzene	0.2 U	mg/Kg
Butylbenzene, sec-	0.2 U	mg/Kg
Butylbenzene, tert-	0.2 U	mg/Kg
Carbon disulfide	0.2 U	mg/Kg
Carbon tetrachloride	0.2 U	mg/Kg
Chlorobenzene	0.2 U	mg/Kg
Chloroethane	0.2 U	mg/Kg
Chloroform	0.2 U	mg/Kg
Chlorodibromomethane	0.2 U	mg/Kg
2-Chloroethylvinyl ether	0.2 U	mg/Kg
Chlorotoluene, o-	0.2 U	mg/Kg
Chlorotoluene, p-	0.2 U	mg/Kg
Cumene (isopropyl benzene)	0.2 U	mg/Kg
Cymene, p-	0.2 U	mg/Kg
1,2-Dibromo-3-chloropropane	0.2 U	mg/Kg
1,2-Dibromoethane	0.2 U	mg/Kg
Dibromomethane	0.2 U	mg/Kg
1,2-Dichlorobenzene	0.2 U	mg/Kg
1,3-Dichlorobenzene	0.2 U	mg/Kg
1,4-Dichlorobenzene	0.2 U	mg/Kg
Dichlorodifluoromethane	0.2 U	mg/Kg
1,1-Dichloroethane	0.2 U	mg/Kg
1,2-Dichloroethane	0.2 U	mg/Kg
1,1-Dichloroethylene	0.2 U	mg/Kg
1,2-Dichloroethylene, cis-	0.2 U	mg/Kg
1,2-Dichloroethylene, trans-	0.2 U	mg/Kg
1,1-Dichloropropane		
1,2-Dichloropropane	0.2 U	mg/Kg
1,3-Dichloropropane	0.2 U	mg/Kg
2,2-Dichloropropane	0.2 U	mg/Kg
1,1-Dichloro-1-propene	0.2 U	mg/Kg
1,3-Dichloro-1-propene, cis-	0.2 U	mg/Kg
1,3-Dichloro-1-propene, trans-	0.2 U	mg/Kg
Ethyl benzene	0.2 U	mg/Kg
2-Hexanone	4 U	mg/Kg
Hexachlorobutadiene		
Bromomethane	0.2 U	mg/Kg
Chloromethane	0.2 U	mg/Kg
Methylene chloride	0.2 U	mg/Kg
Methyl ethyl ketone	4 U	mg/Kg
Methyl tertiary butyl ether	0.2 U	mg/Kg
Iodomethane	0.2 U	mg/Kg

Table 5.14-5

Roaster Solids Data - VOCs
Rhodia Silver Bow Plant

Station ID	Roaster Solids	
Sample Date	3/22/1999	
Sample ID	RSP-1	
Lab Name	Energy	
Lab ID	002-99-50887	
Report	Material Charac	
Methyl isobutyl ketone	4 U	mg/Kg
Naphthalene	0.2 U	mg/Kg
Propylbenzene	0.2 U	mg/Kg
Styrene	0.2 U	mg/Kg
1,1,1,2-Tetrachloroethane	0.2 U	mg/Kg
1,1,2,2-Tetrachloroethane	0.2 U	mg/Kg
Tetrachloroethylene	0.2 U	mg/Kg
Toluene	0.2 U	mg/Kg
1,2,3-Trichlorobenzene	0.2 U	mg/Kg
1,2,4-Trichlorobenzene	0.2 U	mg/Kg
1,1,2-Trichloroethane	0.2 U	mg/Kg
Trichloroethylene	0.2 U	mg/Kg
Trichlorofluoromethane	0.2 U	mg/Kg
1,2,3-Trichloropropane	0.2 U	mg/Kg
1,2,4-Trimethylbenzene	0.2 U	mg/Kg
1,3,5-Trimethylbenzene	0.2 U	mg/Kg
Vinyl acetate	0.2 U	mg/Kg
Vinyl chloride	0.2 U	mg/Kg
Xylenes, Total	0.2 U	mg/Kg

Table 5.5.14-6

Roaster Solids Data - SVOCs
Rhodia Silver Bow Plant

Station ID	Roaster Solids	
Sample Date	3/22/1999	
Sample ID	RSP-1	
Lab Name	Energy	
Lab ID	002-99-50887	
Report	Material Charac	
Acenaphthene	0.33 U	mg/Kg
Acenaphthylene	0.33 U	mg/Kg
Anthracene	0.33 U	mg/Kg
Azobenzene	0.33 U	mg/Kg
Benzidine	0.67 U	mg/Kg
Benzo(a)anthracene	0.33 U	mg/Kg
Benzo(b)fluoranthene	0.33 U	mg/Kg
Benzo(k)fluoranthene	0.33 U	mg/Kg
Benzo(g,h,i)perylene	0.33 U	mg/Kg
Benzo(a)pyrene	0.33 U	mg/Kg
Biphenyl		
Bis(2-chloroethoxy)methane	0.33 U	mg/Kg
Bis(2-chloroethyl)ether	0.33 U	mg/Kg
Bis(2-chloroisopropyl)ether	0.33 U	mg/Kg
Bis(2-ethylhexyl)phthalate	0.33 U	mg/Kg
4-Bromophenyl phenyl ether	0.33 U	mg/Kg
Butyl benzyl phthalate	0.33 U	mg/Kg
4-Chloro-3-methylphenol	0.33 U	mg/Kg
2-Chloronaphthalene	0.33 U	mg/Kg
2-Chlorophenol	0.33 U	mg/Kg
4-Chlorophenol	0.33 U	mg/Kg
4-Chlorophenyl phenyl ether	0.33 U	mg/Kg
Chrysene	0.33 U	mg/Kg
p- & m-Cresol	0.33 U	mg/Kg
o-Cresol	0.33 U	mg/Kg
Dibenz(a,h)anthracene	0.33 U	mg/Kg
Di-n-butyl phthalate	0.33 U	mg/Kg
1,2-Dichlorobenzene	0.33 U	mg/Kg
1,3-Dichlorobenzene	0.33 U	mg/Kg
1,4-Dichlorobenzene	0.33 U	mg/Kg
3,3'-Dichlorobenzidine	0.33 U	mg/Kg
2,4-Dichlorophenol	0.33 U	mg/Kg
Diethyl phthalate	0.33 U	mg/Kg
2,4-Dimethylphenol	0.33 U	mg/Kg
Dimethyl phthalate	0.33 U	mg/Kg
2-Methyl-4,6-dinitrophenol	1.7 U	mg/Kg
2,4-Dinitrophenol	1.7 U	mg/Kg
2,4-Dinitrotoluene	0.33 U	mg/Kg
2,6-Dinitrotoluene	0.33 U	mg/Kg
Di-n-octyl phthalate	0.33 U	mg/Kg
Fluoranthene	0.33 U	mg/Kg
Fluorene	0.33 U	mg/Kg
Hexachlorobenzene	0.33 U	mg/Kg
Hexachlorobutadiene	0.33 U	mg/Kg
Hexachlorocyclopentadiene	0.33 U	mg/Kg
Hexachloroethane	0.33 U	mg/Kg
Indeno(1,2,3-cd)pyrene	0.33 U	mg/Kg
Isophorone	0.33 U	mg/Kg
1-Methylnaphthalene	0.33 U	mg/Kg
2-Methylnaphthalene	0.33 U	mg/Kg

Table 5.5.14-6

**Roaster Solids Data - SVOCs
Rhodia Silver Bow Plant**

Station ID	Roaster Solids	
Sample Date	3/22/1999	
Sample ID	RSP-1	
Lab Name	Energy	
Lab ID	002-99-50887	
Report	Material Charac	
Naphthalene	0.33 U	mg/Kg
Nitrobenzene	0.33 U	mg/Kg
2-Nitrophenol	0.33 U	mg/Kg
4-Nitrophenol	1.7 U	mg/Kg
N-Nitrosodimethylamine	0.33 U	mg/Kg
N-Nitrosodiphenylamine	0.33 U	mg/Kg
N-Nitrosodi-n-propylamine	0.33 U	mg/Kg
N-Nitrosopyrrolidine		
Pentachlorobenzene		
Pentachlorophenol	1.7 U	mg/Kg
Phenanthrene	0.33 U	mg/Kg
Phenol	0.33 U	mg/Kg
Pyrene	0.33 U	mg/Kg
Pyridine	0.33 U	mg/Kg
1,2,4,5-Tetrachlorobenzene		
1,2,4-Trichlorobenzene		
2,4,5-Trichlorophenol	0.33 U	mg/Kg
2,4,6-Trichlorophenol	0.33 U	mg/Kg

Table 5.5.14-7

**Roaster Solids Data - ASTM Leachate
Rhodia Silver Bow Plant**

Station ID	Roaster-1	
Sample Date	10/14/1997	
Sample ID	Roaster-1	
Lab Name	Energy	
Lab ID	97-63416	
Report	Voluntary Clean	
Aluminum, ASTM	1.6	mg/l
Antimony, ASTM	0.05 U	mg/l
Arsenic, ASTM	0.006	mg/l
Barium, ASTM	0.1 U	mg/l
Beryllium, ASTM	0.001 U	mg/l
Cadmium, ASTM	0.022	mg/l
Chromium, ASTM	0.04	mg/l
Cobalt, ASTM	0.01 U	mg/l
Copper, ASTM	0.1	mg/l
Iron, ASTM	1.24	mg/l
Lead, ASTM	0.01 U	mg/l
Manganese, ASTM	0.02	mg/l
Mercury, ASTM	0.001 U	mg/l
Nickel, ASTM	0.22	mg/l
Selenium, ASTM	0.014	mg/l
Silver, ASTM	0.005 U	mg/l
Thallium, ASTM	0.1 U	mg/l
Vanadium, ASTM	0.2	mg/l
Zinc, ASTM	5.48	mg/l
Calcium, ASTM	12	mg/l
Magnesium, ASTM	2	mg/l
Sodium, ASTM	6	mg/l
Potassium, ASTM	3	mg/l
Chloride, ASTM	1	mg/l
Fluoride, ASTM	0.72	mg/l
Phosphorus, ASTM	23.2	mg/l
Sulfate, ASTM	15	mg/l
Gross Alpha, ASTM	1 U	pCi/l
Radium-226, ASTM	0.2 U	pCi/l
Radium-228, ASTM	1 U	pCi/l
Uranium, ASTM	0.005	mg/l
Strontium, ASTM	2 U	pCi/l
Alkalinity, Total, ASTM	11	mg/l
Nitrate, ASTM	0.05 U	mg/l
Nitrite, ASTM	0.05 U	mg/l
Total Dissolved Solids, ASTM	171	mg/l

Table 5.5.14-8
Roaster Solids Data - SPLP General and Site-Specific Parameters
SWMU 14
Rhodia Silver Bow Plant
[concentrations in mg/l]

Chemical Name			Fluoride	Phosphorus, elemental (white)	Phosphorus, total
Location ID	Sample Date	Sample Type			
RS-01	05/28/2009	N	1.2	< 0.000023	9.35
RS-02	05/28/2009	N	1.1	< 0.000023	7.87

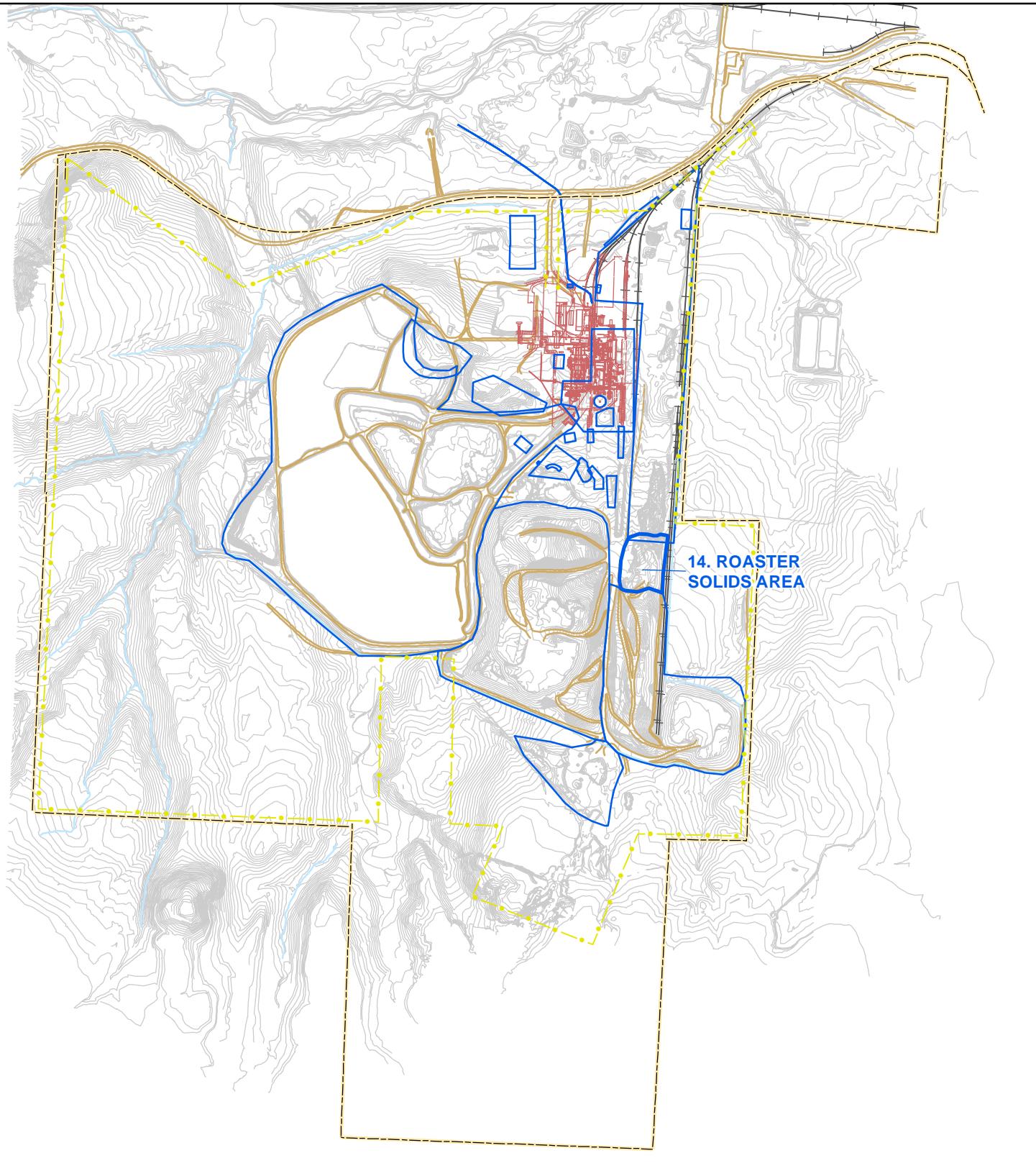
Table 5.5.14-9
Roaster Solids Data - SPLP Metals
SWMU 14
Rhodia Silver Bow Plant
[concentrations in mg/l]

Chemical Name Analysis Location			Antimony Lab	Arsenic Lab	Barium Lab	Beryllium Lab	Cadmium Lab	Calcium Lab	Chromium Lab	Cobalt Lab	Copper Lab	Iron Lab	Lead Lab	Magnesium Lab	Manganese Lab	Mercury Lab	Nickel Lab	Potassium Lab	Selenium Lab	Silver Lab	Sodium Lab	Thallium Lab	Uranium Lab	Vanadium Lab
Location ID	Sample Date	Sample Type																						
RS-01	05/28/2009	N	< 0.010	0.0009	< 0.082	0.0002	0.0223	13.4	0.032	< 0.0010	< 0.040	0.56	0.07	0.896	0.0117	< 0.0010	0.048	1.9	< 0.0010	0.028	3.44	< 0.010	0.00457	0.150
RS-02	05/28/2009	N	< 0.010	0.0007	< 0.067	< 0.0002	0.0279	12.1	0.039	< 0.0010	< 0.037	0.74	0.09	0.772	0.0131	< 0.0010	0.045	1.5	0.0010	0.030	3.68	< 0.010	0.00379	0.144

Table 5.5.14-10
Roaster Solids Data - SPLP Radionuclides
SWMU 14
Rhodia Silver Bow Plant
 [concentrations in pCi/l]

Chemical Name			Gross Alpha (radiation)	Gross Beta (radiation)	Radium 226	Radium 228
Location ID	Sample Date	Sample Type				
RS-01	05/28/2009	N	13 +/- 3.3	14 +/- 3.3	< 1.1	< 3
RS-02	05/28/2009	N	17 +/- 3.7	25 +/- 4.1	1.2 +/- 0.42	< 3

Figures



- SWMU 14
- Other SWMUs
- Elevation Contour
- Drainage
- Railroad
- Road
- Former Plant Structures

Property Boundary

Fence Line

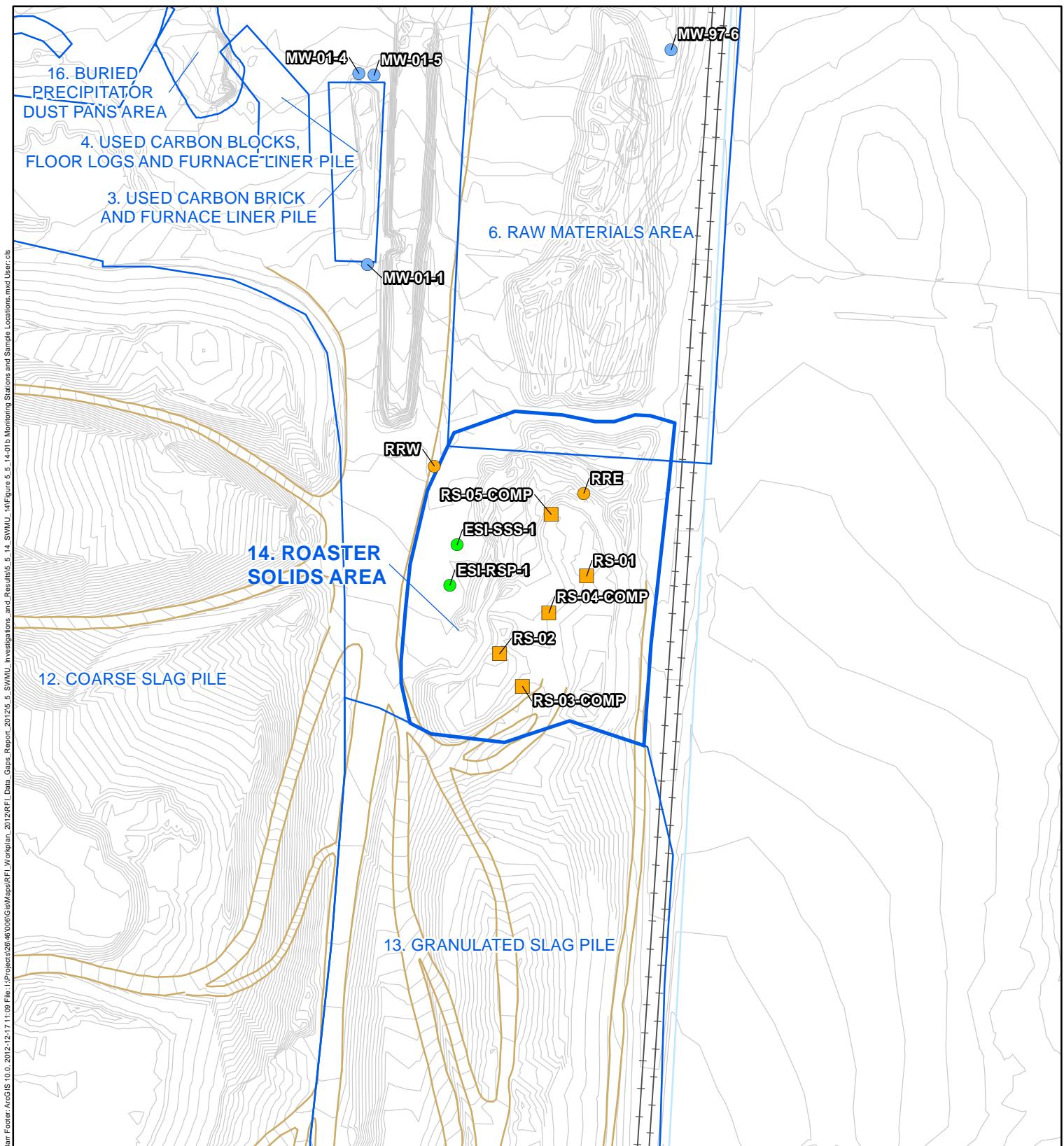


Feet

1,000 0 1,000

Figure 5.5.14-1a

SWMU 14 LOCATION
Rhodia Silver Bow Plant
Montana



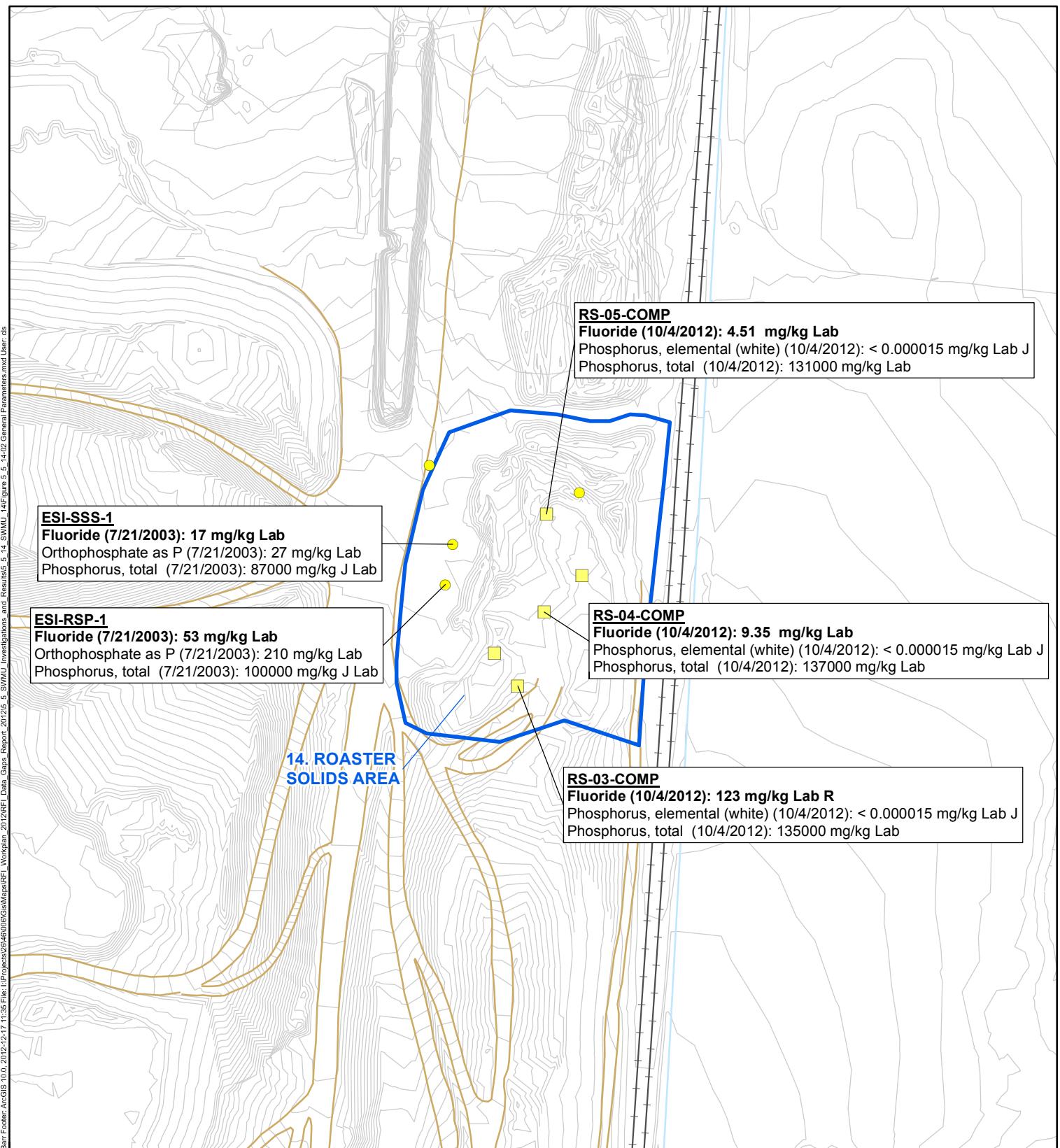
- Composite Sample
 - Centroid Location
 - Monitoring Well
 - Roaster Solids Sample
 - Soil Sample
 - SWMU 14
 - Other SWMUs
- Elevation Contour
 - Drainage
 - Railroad
 - Road
 - Former Plant Structures



200 Feet 0 200

Figure 5.5.14-1b

SWMU 14
MONITORING STATIONS
AND SAMPLE LOCATIONS
Rhodia Silver Bow Plant
Montana



■ Composite Sample
 ■ Centroid Location
 ● Sample Location
■ SWMU 14
 — Elevation Contour

— Drainage
 — Railroad
 — Road
 — Former Plant Structures

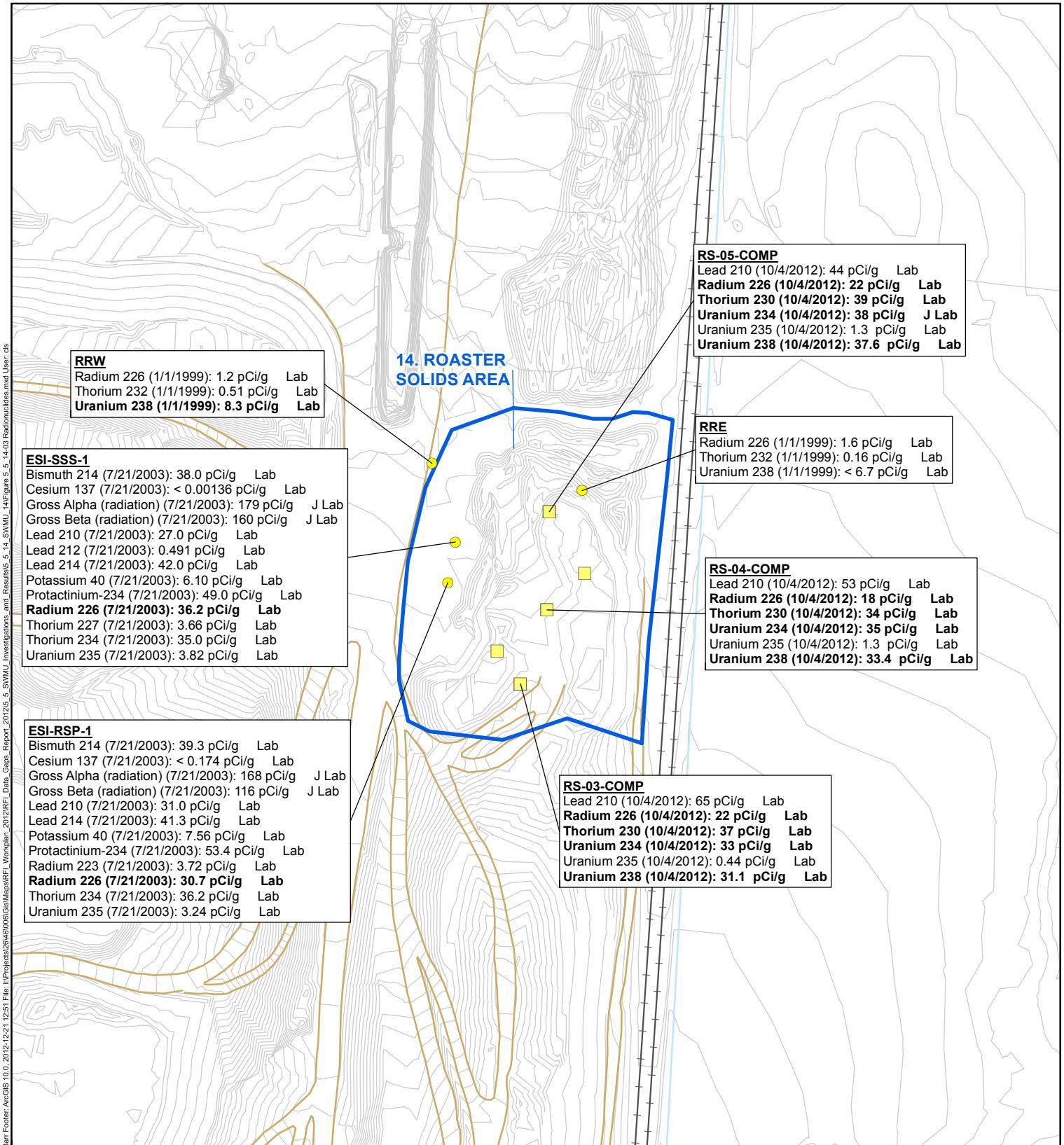
Bold font indicates that sample concentration is greater than the 95% UPL Reference Area Concentration.

200 Feet 0 200



Figure 5.5.14-2

SWMU 14
GENERAL PARAMETERS
Rhodia Silver Bow Plant
Montana



■ Composite Sample — Drainage
 Centroid Location + Railroad
 ● Sample Location — Road
 SWMU 14 — Former Plant Structures
 — Elevation Contour



Feet

200 0 200

Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.

Figure 5.5.14-3

SWMU 14
RADIONUCLIDES
Rhodia Silver Bow Plant
Montana

