



J.R. Simplot Company
Simplot Headquarters
1099 W. Front Street
Boise, Idaho 83702
P.O. Box 27
Boise, Idaho 83707

July 19, 2022

SENT VIA EMAIL TO: Eescdcopy.enrd@usdoj.gov

David Rosskam
U.S. Department of Justice
Ben Franklin Station
PO Box 7611
Washington, DC 20044-7611

RE: J.R. Simplot Rock Springs Consent Decree Quarterly (Periodic) Report

Dear Mr. Rosskam:

Pursuant to the Consent Decree (U.S. v J.R. Simplot Company), paragraph 42, attached is the Quarterly Periodic Report No. 8 for April through June 2022. Please contact me at (208) 780-7365 if there are any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan L. Prouty".

Alan L. Prouty
Vice President, Environmental & Regulatory Affairs

Enclosure

CC: EES Case Management Unit Environmental and Natural Resources
Division by mail
Linda Jacobson, RCRA Enforcement Branch, Enforcement and
Compliance Assurance Division, US EPA Region 8 by mail
Thomas Perry, J.R. Simplot Company



**Consent Decree Quarterly (Periodic) Report
April-June 2022
Periodic Report No. 008**

Rock Springs, WY

July 19, 2022

Table of Contents

Table of Contents

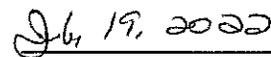
Certification Statement.....	3
Introduction.....	4
(i) Status of Construction or Compliance Measures	4
(ii) Completion of Milestones	4
(iii) Problems Encountered or Anticipated, Together with Implemented or Proposed Solutions	5
(iv) Status of Permit Applications	5
(v) Status of Plans for Closure and Long-Term Care; and Status of Permit Application, as Applicable, for Closure or Long-Term Care	5
(vi) Operation and Maintenance Difficulties or Concerns	5
(vii) Status of Financial Assurance	5
(viii) Reports to State Agencies Concerning Matters Enumerated	5
(ix) Description of any Violation of the Requirements of this Consent Decree Reported under Paragraph 41 and an Explanation of the Likely Cause of such Violation and the Remedial Steps Taken, or to be Taken, to Prevent or Minimize Such Violation	6
(x) Identification of any Confirmed "Critical Condition" as Defined and Reported to EPA Pursuant to Appendix 1.D (Critical Conditions and Temporary Measures)	6

Certification Statement**RE: April 1, 2022 through June 30, 2022****Quarterly (Periodic) Progress Report No. 008****Rock Springs, Wyoming**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties of submitting false information, including the possibility of fine and imprisonment for knowing violations.



Alan L. Prouty
Vice President, Environmental & Regulatory Affairs



Date

Introduction

J.R. Simplot Company (Simplot) has prepared this quarterly progress report for the Rock Springs Facility consistent with Section VII, Paragraph 42 on page 34 of the Consent Decree (CD), *U.S. v. J.R. Simplot Company, et al.*, 20-cv-00125-NDF (D. Wyo.). This quarterly progress report presents actions taken to comply with the CD between the dates of April 1, 2022 to June 30, 2022. This is report number 008.

i. Status of Construction or Compliance Measures

Construction of the replacement for T-104 Sulfuric Acid Storage tank, the first phase project for Bevill Recovery projects started in May 2022. At the completion of the quarter the new ring wall foundation for the tank had been poured. Next quarter, the foundation construction and paving of portions of the surrounding areas of the tank will be completed. Erection of the tank vessel will begin in August 2022 and the entire project is slated to be completed and commissioned in late-2022.

The detailed engineering phase of the capital design and construction process which started in October 2021 has continued throughout the quarter.

The second semi-annual groundwater monitoring report for the second half of 2021 was officially submitted to the EPA for review in April 2022. Groundwater sampling for the first half of 2022 was conducted in mid-June and the results report will be submitted in the second half of 2022.

An official letter requesting to remove automated caustic wash from the recovery projects engineering scope was submitted and approved by EPA in April 2022.

The site Sump and Pad Management Program implementation has continued. The sixth quarterly sump inspections under this program were completed in June 2022.

This is the eighth required quarterly report.

ii. Completion of Milestones

The first official Bevill performance criteria review was conducted in June 2022. The review validated compliance with the performance criteria established during the review period in 2021 and early 2022. The review did find some minor areas for improvement and action items were developed to address all discovered issues. The official criteria write-up has been drafted and will be finalized and officially filed for record-keeping in the first half of July 2022.

iii. Problems Encountered or Anticipated, Together with Implemented or Proposed Solutions

Sump and pad inspections in 3rd quarter 2021 revealed that the secondary containment of J-6401, D/E Evaporator Sump, was found to contain low pH liquid. This finding was again duplicated in both 4th Quarter 2021 and 1st Quarter 2022. This sump was fully replaced during turnaround in May 2022 and was again inspected during sump and pad inspections in June 2022. The newly replaced sump was dry in the secondary containment and weekly inspections have now been terminated.

Sump and pad inspections in 2nd Quarter 2022 revealed found low pH and high P₂O₅ liquid in the secondary containment of GS-2787 Repulp Sump. This sump was inspected and repaired during turnaround in May 2022. However, this finding seemed to indicate that the attempted repairs during turnaround were not sufficient. Several subsequent attempts were made to flush out the secondary containment and re-sample to verify that the primary sump liner is in fact leaking. These attempts showed that, despite trying to flush, this material does appear to be infiltrating from the sump primary containment. As a result of these findings and in accordance with the site's Sump and Pad management program, the decision was made to initiate weekly inspections of the sump starting the week of July 11th, 2022. There is no evidence that any material has escaped the secondary liner of the sump. This sump is now planned for repair or replacement with a target date of turnaround in Spring 2023 or sooner if feasible.

iv. Status of Permit Applications

No permit applications to note for this time period.

v. Status of Plans for Closure and Long-Term Care; and Status of Permit Application, as Applicable, for Closure or Long-Term Care

No plans for closure or long-term care.

vi. Operation and Maintenance Difficulties or Concerns

No major operations or maintenance difficulties or concerns were identified during the last quarter.

vii. Status of Financial Assurance

Financial assurance in place per requirements in the CD and Appendix 2.

viii. Reports to State Agencies Concerning Matters Enumerated

No reports were submitted to state agencies were submitted during the last quarter.

ix. Description of any Violation of the Requirements of this Consent Decree Reported under Paragraph 41 and an Explanation of the Likely Cause of Such Violation and the Remedial Steps Taken, or to be Taken, to Prevent or Minimize such Violation

No Consent Decree Paragraph 41 violations occurred during the last quarter.

x. Identification of any Confirmed "Critical Condition" as Defined and Reported to EPA Pursuant to Appendix 1.D (Critical Conditions and Temporary Measures)

No critical conditions were identified during the previous quarter.

The Phosphogypsum Stack Operations Manual and Interim Stack System Management Plan updates along with water balance information reviewed by the Engineer of Record are currently being finalized and will be submitted to the EPA during 3rd Quarter 2022.