DEQ
Montana Department
of Environmental Quality

October 13, 2016

Michael Ritorto
ROUX ASSOCIATES, INC.
209 Shafter Street
Islandia, New York 11749

RE: DEQ review of Roux Associates, Inc. August 31, 2016 letter re Concrete Sampling Analysis Plan (SAP)

Mr. Ritorto,

Both the DEQ Hazardous Waste Program and the DEQ Remediation Division have reviewed the letter from Roux Associates Inc. dated August 31, 2016 RE: Concrete sample analysis plan (SAP).

The SAP summary submitted by Roux is consistent with the Columbia Falls Aluminum Company (CFAC) Waste Management Plan (WMP) June 9, 2016. The WMP identifies 8 RCRA metals, Total Fluoride, Total Cyanide, and Polychlorinated Biphenyls be sampled. Roux has proposed additional sampling for volatile organic compounds and semi-volatile organic compounds. Building 1 has been identified as a containment building. Building 1 must meet the requirements in 40 CFR §264 Subpart DD containment building standards. The SAP along with the Quality Assurance Project Plan is to be used to assist the generator in making a hazardous waste determination on the remaining concrete from the floors, walls, and structural supports. DEQ Hazardous Waste Program requested that the results from this SAP be shared with DEQ Remediation and U.S. EPA representatives which may assist with backfill material approval and other remedial actions. The WMP states that approval for the fracturing of the foundation, and backfill material use must be coordinated with DEQ Remediation, and U.S. EPA, and that these agencies may require additional sampling or analytical results to meet their needs. Sample results may be below the hazardous waste identification thresholds but may be above remedial cleanup standards. CFAC's intention is to rubblize the concrete from the walls, floors, and structural supports as backfill to be used in the foundation of the potlines.

DEQ's Remediation Division has also reviewed the August 31, 2016 letter from Roux Associates. DEQ Remediation Division requests that the sampling results be compared to EPA residential and industrial Regional Screening Levels, and that the specific levels against which the results will be compared be included in the Sampling and Analysis Plan.

Thank you for the opportunity to review this Concrete Sampling Plan. If you have questions, please feel free to contact us at DEQ.

Lisa M. DeWitt
DEQ Remediation Division

Cory Mikita
DEQ Hazardous Waste Program

Cc: Colleen Owen, DEQ
Mike Cirian, EPA
Mark Hall, DEQ
John Stroiazzo, Glencore