Site:	**Columbia Falls Aluminum Company (CFAC)** site 2000 Aluminum Drive; Columbia Falls Mt; 406.892.8400
Upcoming Action	**Final NPL Decision**
Anticipated Date	2016.09.09
Local Outreach Partners	Local media, City of Columbia Falls (POC Susan Nicosia), Columbia Falls Community Liaison Panel (POC Mary Green)
Objectives	All key audiences will be aware of the final listing decision for the CFAC site and understand: • EPA's rationale for making the final listing decision • The implications of final listing NPL designation for PRP's, the community, and stakeholder groups • The next steps in the Superfund process and how the public can be involved
Scope	National and Region 8 notification and targeted rollout within the Columbia Falls area and with CFAC/Superfund stakeholders (2-4 weeks).
Rollout Tactics:	• Provide courtesy notifications to Congressional and key partners • Update website and link to FR notice • Issue news release to National, Regional, and Columbia Falls area media and be available for interviews • Distribute site update to local public • Hold public meetings and public availabilities (1 -3 weeks after FR publication) • Update information repositories

Key Audiences (LINK to complete contact list)

Elected Officials • MT U.S. Congressional Delegation • MT Governor's Office and State representatives: • Columbia Falls Mayor and City Council Members	Agencies • City of Columbia Falls • Flathead County and Health Department • MT Fish Wildlife & Parks • Glacier Park
Columbia Falls Area News Media • Hungry Horse News • Flathead Beacon • Daily Interlake	CFAC; Columbia Falls School District; Columbia Falls Chamber of Commerce; Local business; CLP; Adjacent landowners; CIP interviewees

Potential Issues

- Glencore and CFAC do not support listing and requested that EPA postpone placing the site on the final NPL until after the RI/FS are complete and will publically oppose the listing (PR contractor Ann Green Communications).
- Public perception that EPA intervention and final NPL listing will slow the progress to returning the site to conditions suitable for future use.

Broad Messages

- On September 9, 2016, the EPA will add the CFAC site to the NPL. A notice will publish in the Federal Register Sep 9. Link to FR doc:
- The NPL is the list of the national priorities of sites to have known or threatened releases of hazardous substances, pollutants or contaminants throughout the United States and its territories.
- The CFAC site is located two miles northeast of Columbia Falls in Flathead County, Montana and covers the former aluminum facility and approximately 960 acres north of the Flathead River.
- The CFAC plant operated between 1955 and 2009 and created significant quantities of spent potliner material, a federally listed hazardous waste, as a byproduct of the aluminum smelting process. Spent potliner material is known to contain cyanide compounds that can leach into groundwater.
- The final decision was made after first looking at scientific data and considering all public comments received during a 60-day public comment period that followed EPA's proposal to add the site to the NPL in March 2015.
- An RI of the site is underway to determine the nature and extent of the contamination. CFAC, under an AOC signed in 2015, is conducting the work with contractors and EPA oversight. Feb 2020 is the schedule to complete the final RI report.

Outreach Timeline

Date	Action	Materials	Method	Lead	Status
8/18	Current Draft of plan				9/06 draft
8/23	Issue community update	TP	Email	Site Team	Sent 8/25
9/7 **a.m**	Courtesy notifications: U.S. Congressional Hill Regional Congressional City, County, State elected officials – other appropriate parties	News Release (NR) Talking Points (TP) or short email message	Email, telephone	HQ R8, Site Team	Delivered 9/7
9/7 **p.m.**	National public notifications + National webpage updates	NR	Email webpage	HQ	Sent and updated 9/7
	Regional notifications + Region 8 newsroom update	NR	Email Website	R8 Wardel	Sent and updated 9/7
	Issue local notifications Talk with news organizations	NR TP	Email Interview	Site Team	Delivered 9/7
9/9 **FR publish**	FR notice publishes Update CFAC webpage Send Community Update social media	Docket number CEF Update TP	FR notice Webpage email Facebook, Twitter	HQ Moler/Cooper Moler Mylot	
9/?	Publish notice of public meeting	Public notice	Newspaper pub	Site Team	
9/?	Public meeting @ school	PPT Fact sheets	Small group discussion	Site Team	
9/?	Speak with Columbia Falls	PPT	Public delivery	Site Team	

	Chamber POC Stacey Schnebel,				
10/?	Public engagement exercise - Draft CIP released/ public feedback received/revisions made	Draft CIP	workshop	Site Team, Skeo	
11/?	Final draft CIP available	CIP	Email, website	Site Team Skeo	

Tasks and Materials

Task	Lead/support	deadline	status
Develop ComStrat and manage updates	Moler/Cirian	None	Current draft: 9/7
Finalize NR	R8/Moler/Mylott	9/2	Final draft:9/7
Distribute community updates	Moler	8/23 & 9/8	-Distributed 8/28 -Next update drafted 9/6
Develop Talking Points	Moler	9/88	Current draft 9/7
Develop PPT	Moler/Cirian	9/9	Current draft 3/
Publish public notice for upcoming community meeting	Clevenger/Moler/Cirian	9/8	
Facilitate public meeting	Cirian/Moler	?	Coordinate with City Manager and School district
deliver presentation to CF COC	Moler/? CFAC	10/11	set 8/17 for 10/11 luncheon
Finalize CIP	Moler/Skeo	12/20	Second TASC order initiated July 2016 to finalize CIP

Talking Points/Q&A:

Listing Decision

Comments received during the comment period provided good feedback and did not provide substantial new information to support a decision contrary to what was in the proposal to list the site in 2015. A summary of EPA's responses to public comments can be found at https://www.epa.gov/superfund/superfund-national-priorities-list-npl

limited messaging

- No PRP has agreed to implement a remedy or provide financial assurance to cover cleanup costs
- EPA has a current AOC in place with CFAC to conduct the RI/FS but not the cleanup work.
- CFAC as a business entity may not have resources sufficient to cover the costs of cleanup; Glencore provided limited financial assurances for the RI/FS but is not legally bound to perform the RI/FS work and, additional information is needed to determine Glencore's liability at this site.
- ARCO is a PRP that is not currently engaged in the process but that could be brought to the table if needed.).

Senator Tester, Governor Bullock, and the City of Columbia Falls support placing the site on the NPL. Congressman Zinke does not support NPL designation for this site.

Adding the Site to the NPL allows the EPA and the community to access significant technical and financial resources to address the environmental and health risks posed by the Site. These resources can accelerate investigation and cleanup activities and lead more rapidly to productive uses of the Site.

EPA, CFAC and the community of Columbia Falls are working together to ensure the site is investigated in the short term so that we can work together to clean up the site for reuse in the long them. We have regular meetings and work is on schedule.

EPA recognizes the progress CFAC has made in the initial stages of the RI/FS. This is often when much of the footwork and heavy drilling occurs. CFAC has been steadfast in their commitment to investigate the site for contamination.

(only if asked) Procedurally, legal challenges to the listing can be filed within 90 days of the decision. If this were to happen, work could continue to occur until a court decision.

Superfund Alternative Approach - Decision

The Superfund Alternative (SA) approach was requested by the Glencore/CFAC and the EPA seriously considered the SA approach for the site. However, the EPA chose not to pursue the SA approach because of the scientific data comments received during the comment period as well as the City of Columbia Falls, the Governor's office and Senator Tester's office supported full listing.

Listing implications

The site is now eligible for additional resources to investigate and cleanup the site under EPA's Superfund Remedial program and supports communities impacted by the contamination on site.

EPA will identify and work with potentially responsible parties (PRP) to ensure the cleanup process proceeds with financial assurances.

Next Steps

On November 30, 2015, EPA announced a final agreement to investigate contamination at the CFAC site and an RI is underway to determine the nature and extent of contamination as a result of operations from 1955 - 2009.

Under the terms of the agreement CFAC will conduct a comprehensive investigation of soils, river sediments, and ground and surface water to determine the nature and extent of contamination at the site.

Drilling and the last round of surveying is expected to be finished before the end of August. Surface and ground water sampling is scheduled to start in September.

When completed the RI will identify the nature and extent of contamination and potential risks to human health and the environment. That information will provide the framework for any necessary cleanup. The RI will take place over the next few years and a final report is expected by February 2020.

A feasibility study (FS) identifies and evaluates options for addressing risks identified in the RI. The final FS is planned to be completed by December 30, 2020.

Based on the FS, the EPA will publish a proposed plan identifying alternatives and a preferred approach to addressing site risks and take public comments on the proposed plan. EPA would then evaluate all comments on the proposed plan before issuing a Record of Decision (ROD) to identify the selected cleanup approach.

The EPA would then work with the State and PRPs to design technical specifications for the remedy during the Remedial Design phase.

Actual construction or implementation of the cleanup occurs during the Remedial Design phase. No date projected.

Community Involvement

EPA will continue to work with the community, CFAC, and local, state and other federal to ensure they understand the Superfund process and the milestones ahead.

EPA will hold a public meeting in Columbia Falls to discuss the next steps and outline how the public can engage in the Superfund process moving forward.

EPA is currently developing a Community Involvement Plan (CIP) to identify community engagement strategies that are tailored for the CFAC site.

> As a part of the effort, EPA staff and contractors visited Columbia Fall June 14 – 17, 2016 to conduct an initial round of community interviews as part of a broader effort to develop a CIP.
> We will follow up with additional research and hope to have a draft CIP ready for public review and feedback later this year.

If you can recommend people that you think would be good for EPA to talk with about community outreach associated with the CFAC site, please contact Robert Moler @ moler.robert@epa.gov; 406.457.5032

The last public meeting was held Tuesday, 5 April 2016, 6 – 8 p.m. with ATSDR at the Columbia Falls City Council Chambers.

EPA will continue to hold public meetings, send updates, conduct interviews, work with the news media, and employ other methods in order to effectively engage the public over time.

Recent actions:

- 9/9/16: Community update
- 8/23/16: Community update
- 6/16: Community interviews
- 4/16: Public Meeting held with ATSDR at City Council Chambers

Reuse

EPA is committed to ensuring that the former aluminum plant and surrounding area are returned to conditions that are safe for human health and the environment and compatible for Reuse.

We are now in the process of conducing a remedial investigation to identify the nature and extent of contamination at the site that will help us determine potential clean up actions required to make the site viable for future economic benefit.

The CFAC site is privately owned and Glencore has no immediate plans for redevelopment.

Demolition Project:

Calbag purchased the physical aluminum plant infrastructure from CFAC in 2015 and work has started to dismantle the structures.

This work is separate from the work that EPA is conducting and the agencies are working closely to ensure coordination.

Removal of hazardous waste and abatement of asbestos from above ground structures prior to demolition is being overseen by MT DEQ.

Recent Milestones and Timeline (reverse chronology):
9/9/16: Federal Register notice of Final listing
9/30/16: AOC signed by EPA and CFAC for RI/FS work
3/26/15: Proposed listing
2014: EPA completed a site reassessment to ID types and hazards and document observed releases.
2009: CFAC stopped operations and permanently closed in 2015.
1988: EPA requested a site investigation that revealed soil, water, and sediment contamination had occurred at the site.
1984: A preliminary assessment identified hazardous wastes on site.

Communication Measures and Metrics
All key audiences will be aware of the final listing decision for the CFAC site and understand:
- EPA's rationale for making the final listing decision
- The implications of final listing NPL designation for PRP's, the community, and stakeholder groups
- The next steps in the Superfund process and how the public can be involved

People have access to accurate information
- # of people reached with webpage, NR, email, and other notification tools
- # of people demonstrating understanding of key issues and milestones
- # of people reached through public meetings, presentations, and engagements

People are engaged
- # of public comments/feedback
- # of people attending public meetings and engagements
- # of media outlets tracking
- Active CAG

Engagement is sustained
- # of people with recurrent contact
- Population at public and community events are sustained/griw over time
- Distribution list grows

Project Background and History:
Background:
The Anaconda Company Aluminum Smelter was located near the Hungry Horse Dam at Columbia Falls, Montana. Today the facility (the Site) is known as Columbia Falls Aluminum Company and is owned by a Swiss company called Glencore. The Hungry Horse Dam was the first dam built by the federal government after World War II. It was completed in 1953, and soon after, the Harvey Aluminum Company (HAC) opened an aluminum plant on a 1,000-acre plot north of Kalispell at Rose Crossing. HAC was unable to obtain financing to build the plant, but Anaconda Copper Mining Company (ACMC) purchased HAC on November 6, 1951. In 1977, ACMC was acquired by Atlantic Richfield Company (ARCO), which is now owned by BP America. In December 1983, ARCO announced it would sell its brass and aluminum operations (including

the Columbia Falls plant) in September 1985.

The plant was sold to the Montana Aluminum Investors Corporation and began operations under the Columbia Falls Aluminum Company (CFAC). In 1999, a privately owned Swiss corporation called Glencore AG acquired CFAC.
The plant began producing aluminum in 1955, with production reaching 180,000 tons by 1968. At its height, the plant employed 1,500 people and was central to the area's economy. When it shut down at the end of October 2009, the closure forced the layoff of nearly 90 workers as high energy prices and poor market conditions made operations unprofitable.

As a result of operations from 1955 to 2009, CFAC created significant quantities of spent potliner material, a federally listed hazardous waste, as a byproduct of the aluminum smelting process. Spent potliner material is known to contain cyanide compounds that can leach into groundwater. A preliminary assessment (PA) of the CFAC site was performed on March 5, 1984, by Montana Department of Health and Sciences. The PA concluded that hazardous wastes generated onsite were spent halogenated and non-halogenated solvents. Solid wastes included spent potliners, basement sweepings and air-pollution-control dusts. A site investigation (SI) by Ecology and Environment, Inc. was conducted in 1988 at the request of the EPA. The results of the SI indicated that high concentrations of polycyclic aromatic hydrocarbons occurred primarily in soils and sediments and that a release to groundwater and surface water of cyanide had occurred – both of which were attributable to plant processes.

On March 26, 2015, EPA proposed adding the CFAC site to the National Priorities List and the proposal was made final on September 9, 2016.

- March 5, 1984 - A preliminary assessment (PA) was performed by Montana Department of Health and Sciences (MDHES).
- 1988 - A site investigation (SI) by Ecology and Environment, Inc. was conducted in 1988 at the request of the EPA.
- March 11, 2013 - Senators Max Baucus and Jon Tester asked the EPA to work with the Montana Department of Environmental Quality (MDEQ) to determine if the 120-acre site should be declared a Superfund site.
- June 2014 - The EPA visited the facility and met with local stakeholders (City Manager of Columbia Falls, County Commissioner, Sen. Tester's and Sen. Baucus' staffs)
- September 2013 - The EPA conducted a sampling event in late September. Sixty-eight environmental samples were collected as part of the sampling event.
- April 2014 - EPA conducted a second round of sampling for residential wells in response to the cyanide detection in a residential well in the neighborhood adjacent to and down-gradient of the CFAC property
- April 15, 2014 - The EPA held a public meeting to discuss results from the site reassessment as well as potential next steps at the site.
- July 8, 2014 - The EPA and MDEQ met with Glencore and CFAC to discuss their intentions with the site. After this meeting, it was decided that the best next step would be for MDEQ to work with Glencore and CFAC to complete a Remedial Investigation.
- September 3, 2014 - The EPA sent 104(e) information requests to CFAC and BP America (Anaconda/Arco).
- November 2014 - the EPA resampled domestic wells in the neighborhood adjacent to and down-gradient of the CFAC. Sample results indicated that none of the wells sampled had detectable amounts of cyanide in the samples.
- Dec. 9, 2014 - CFAC sent a letter to MDEQ announcing that it was ending negotiations regarding how to proceed with assessing and cleaning up the site.
- Dec. 11, 2014 - a public meeting was convened by MDEQ to provide an update to the community. The results of the November 2014 sampling event were discussed. The EPA presented information about the NPL listing process as

well as the need for community support for such a designation (in the form of a letter from the governor) in order to move forward.

- Dec. 12, 2014 - CFAC sent a letter to the governor opposing the listing of the Site.
- Dec. 15, 2015 - the mayor of Columbia Falls sent a letter to the governor supporting the listing of the Site.
- Jan. 8, 2015 - Senator Tester sent a letter to Administrator McCarthy supporting the listing of the Site.
- Feb. 17, 2015 - Governor Bullock sent a letter to Administrator McCarthy supporting the listing of the Site.
- Mar. 2015 – EPA proposes to list the CFAC to the NPL. Opens 60 day public comment period. 77 comments received.
- Nov. 2015 – EPA signed an AOC with CFAC for RI/FS work.
- April 5, 2016 – EPA held a community meeting with ATSDR to update the public at the Columbia Falls City Council Chambers.
- June 2016 – EPA conducted an initial round of community interviews as a part of the development process for a Community Involvement Plan.
- Jun 2016 - EPA received a letter from CFACs legal representation requesting that EPA postpone placing the site on the final NPL until after completion of the activities required under the current AOC.