DEQ
Montana Department of Environmental Quality

EPA
United States Environmental Protection Agency

Community Involvement Plan

Montana Pole and Treating Plant Superfund Site

Butte, Montana

February 2017

Purpose

The U.S. Environmental Protection Agency's (EPA) Superfund Community Involvement Program is committed to promoting communication between the community and the agencies. Active community involvement is crucial to the success of any public project. For the Montana Pole and Treating Plant (Montana Pole) Superfund Site, the Montana Department of Environmental Quality (MDEQ, formerly MDHES) is the lead agency and has responsibility for site management and community relations activities. The community involvement activities at the Montana Pole site are designed to:

- Inform the public of the nature of environmental issues associated with the site
- Involve the public in Superfund decisions that will affect them
- Involve the public in program responses under consideration
- Inform the public of progress being made to implement cleanup remedies

The purpose of the Superfund Community Involvement Plan (CIP) is to summarize public concerns about the site and outline how people can engage throughout the Superfund process.

The CIP synthesizes and presents information from meetings and interviews with members of the Butte community. MDEQ interviewed a range of private citizens, local government officials, and representatives from businesses and community organizations.

As the lead agency, MDEQ is responsible for implementing the community involvement program outlined in this CIP. The plan will be adapted as necessary to meet changing needs as site activities progress. To provide feedback or recommendations about this plan, please contact the DEQ Waste Management and Remediation Division at 406-444-6444.

Table of Contents

Purpose 2
Background 4
Community Involvement 4
Community Concerns 5
Communication Preferences 6
Community Involvement Framework 9
Site History 14
The Superfund Process 19
Community Profile 20

List of Appendices:

Appendix A: List of Contacts

Appendix B: Document Repository and Administrative Record

Appendix C: Meeting Rooms

Appendix D: Local Schools

Appendix E: Superfund Milestones and Outreach Timeline

Appendix F: Site Map

Appendix G: Interview Questions

Background

Beginning in April 1947, creosote and pentachlorophenol (PCP) were used at this location to preserve wood. Montana Pole was added to the National Priority List (NPL) in November 1986. There are three different contaminants that are being cleaned up at the Montana Pole site: pentachlorophenol (PCP), dioxins/furans, and polycyclic aromatic hydrocarbons (PAH).

Community Involvement

Community involvement is the process of engaging in dialogue and collaboration with community members. The goal is to advocate and strengthen meaningful community participation during Superfund cleanups. MDEQ values fair and meaningful public involvement so that all people enjoy equal access to the decision making process and the same degree of protection from environmental and health hazards regardless of race, color, national origin, or income level.

Environmental Justice

EPA defines environmental justice as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to development, implementation and enforcement of environmental laws, regulations, and policies. The goal of Environmental Justice is to provide an environment where all people enjoy the same degree of protection from environmental and health hazards, and equal access to the decision-making process to maintain a healthy environment in which to live, learn, and work.

Community Interviews

As a part of developing and updating the CIP, MDEQ conducts interviews with people to identify community concerns about the Montana Pole site and effective methods of engaging the community in the Superfund process. In summer 2016, MDEQ conducted 13 community interviews with local residents, community advisory group members, business owners, adjacent landowners, and others interested in the site. Additionally, MDEQ sent postcards to 78 recipients of the two neighborhoods around the Montana Pole site, offering to interview interested parties. No responses were received from this solicitation. The questionnaire used for this community involvement plan can be found in Appendix G. Interviews were conducted anonymously, and the results of those interviews are contained herein.

Community Concerns

Throughout the interview process, it was apparent that there exists significant confusion regarding the agencies' (EPA, MDEQ, and Butte Silver Bow County [BSB]) various roles at the Montana Pole plant. Nearly all interviewees conveyed that they wish they were better informed as to the duties and roles of each agency, as that would empower them to direct their questions and concerns to the appropriate entity. There was also significant feedback that there should be better coordination between MDEQ, EPA, and BSB, to ensure that state, federal, and local needs are all being met.

A small minority of interviewees had little to no knowledge of the Montana Pole site and the ongoing remediation; with a majority of those interviewed possessing both site history knowledge and remedial action knowledge. Many interviewees expressed a desire to be more informed with respect to any changes that may have been made since the Record of Decision (ROD) was signed, as well as feeling as though there was inadequate opportunity to provide input on future site use/development. It was suggested that the site would greatly benefit from the presence of interpretive signage, conveying the history of the property through remediation, to future use.

Several interviewees shared their belief that the ongoing remedial actions are being undertaken without adequate justification for changes to the remedial plan, which were agreed to within the ROD. There was also a sentiment of feeling uninformed regarding any remedial action updates that are occurring, owing to new environmental regulations or screening levels; however, the majority of those interviewed openly expressed an appreciation for more recent efforts by MDEQ to be involved within the community and to inform stakeholders of project activities.

Human Health

Some interviewees did express feedback regarding the levels of dioxins that are to be left in place, questioning whether that undertaking would be a protective remedial action. A minority of interviewees shared their concerns that their own health issues, as well as those of their neighbors, may have resulted from the years they lived within proximity to the Montana Pole site, both during its operation and during periods of remedial action. Verifiable or not, these statements were consistently followed by sentiments wishing to ensure that the current remedial actions being undertaken by MDEQ will remove any potential association of the Montana Pole site with the deleterious health effects resulting from environmental exposure.

Trust in Government

A majority of those interviewed expressed a frustration with historic remedial actions combined with a lack of communication, and consequent mistrust, of "the government" - specifically during periods when airborne soils and associated odors were claimed to have adversely impacted adjacent neighborhoods. Consequent to this belief was a frequently-shared sentiment that "the government" was non-responsive in addressing community concerns in a timely manner, and that timelines provided to stakeholders were

often not adhered to. Several interviewees shared their belief that this lack of communication, or lack of being informed, was resultant from the Montana Pole site not being in a high visibility area. When pressed further, the majority of interviewees openly shared that the roles and responsibilities of the various government agencies at Montana Pole were unclear to them, with many wrongly conveying an understanding that EPA was the lead agency on site activities. Owing to a lack of distinction regarding said roles and responsibilities at Montana Pole, many interviewees opted for a blanket position, stating a complete inability to trust "the government." Several interviewees also shared statements expressing their unwillingness to trust MDEQ, as EPA, a separate government agency, has historically not supported the community of Butte in its efforts at other impacted properties. Several interviewees declared that both MDEQ and EPA have openly provided stakeholders with little or even false information since Montana Pole's designation as a NPL site.

MDEQ is reviewing its approach to leaving dioxin-impacted soils in place, beneath a protective cap, and intends to present the findings of this review to the community. Several interviewees, however, feel as though the discussions regarding this proposed change in remedial action from the ROD's directives excluded community input, and consequently these interviewees are unwilling to believe this action would be in their best interest. Additionally, leaving the dioxin-impacted soils in place was expressed by several interviewees as a perfect example of how the minimum cleanup standards are not being met at the Montana Pole site, and that the city of Butte is once again being "forced to accept a subpar remedial solution."

Economic

A minority of interviewees expressed a concern with a decrease in adjacent property values, and the stigma that a "Superfund" designation inherently implies.

A majority of interviewees expressed a lack of knowledge regarding the Montana Pole site boundaries, with several stating that they were unaware of its listing as an NPL site independent of the other NPL sites in the area.

The most consistent feedback received from interviewees expressed a belief that the site reuse would not meet the needs of the community, and the decision would be made at the federal or state level regarding future development possibilities. It was encouraged that agency officials conduct outreach to the local residents, asking what they would prefer for site reuse.

Communication Preferences

Throughout the Superfund process, MDEQ is making a concerted effort to engage with an informed and involved public, contacting residents, business owners, stakeholder groups, and elected officials. MDEQ recognizes that, once informed, these persons can serve as valuable resources to disseminate accurate information about the project.

During community interviews, MDEQ solicited information on how best to engage and inform community members, with what frequency community members would like to receive updates on the Montana Pole site, and if there were any outstanding or unresolved questions about the Montana Pole site that the community would still like answered.

MDEQ is supportive of strong and proactive community involvement. For this reason, MDEQ has engaged the public in conversations about how to best communicate site information. Most interviewees expressed a strong desire to receive site-relevant correspondence at least semi-annually, in addition to when project milestones are achieved. MDEQ will work to provide semi-annual updates either in the form of an updated Fact Sheet or in the form of a newsletter (both digital and physical), that will express current and upcoming site activity. During periods where no new activities have occurred, MDEQ will still provide semi-annual correspondence to ensure that community members have the opportunity to stay informed and engaged with the Montana Pole site.

Locally elected officials

Several interviewees responded that they rely on their local elected officials to be well-informed, so that they can then be used as informational resources and points-of-contact for the community.

Engage news media

The vast majority of respondents identified three media outlets that would best serve to accomplish the above: the BSB Facebook page, the local radio station (KOPR 94.1 FM), and the local newspaper (the Montana Standard). As MDEQ updates the community on site work and progress, information will be shared with the appropriate news sources. MDEQ will also make a concerted effort to utilize the media outlets that a preponderance of interviewees suggested would be most beneficial (i.e. The Montana Standard, the BSB Facebook page, and the local radio station [KOPR 94.1 FM]).

Provide Regular Project Updates

An overwhelming number of interviewees expressed desire to receive updates at project milestones, or at least semi-annually, whichever came first. This frequency was expressed by many to be often enough to maintain involvement, while avoiding the potential for the unnecessary information saturation that occurs when following a strict, more rigid, outreach protocol. A minority of interviewees expressed a desire to receive physical brochures or fact sheets, either mailed to their homes or provided at informational meetings, as it serves as a conversation piece when they have visitors to their homes or offices. A separate minority also wished to receive informational brochures/fact sheets via an email listserv, so that they would always be able to locate it for further reference.

Several interviewees asked if there would be opportunity to have progress reports or sampling results presented to them or citizen groups for discussion and explanation, prior to their finalization and public dissemination. When asked about how responsive MDEQ has been at communicating information about the Montana Pole site, all interviewees expressed that historic communications have been sporadic, or absent, with several interviewees feeling that they were not heard by MDEQ and were never responded

to regarding their questions/concerns. Several respondents felt that their requests for information or updates had historically been ignored, and that MDEQ was often culpable of providing false timelines for project evolution. These respondents stated that this led directly to their mistrust of the agency. However, within the recent past, many felt that communications from MDEQ have improved. Many respondents tied this improved communication directly to MDEQ's presence within the community, at various community meetings.

Attend/hold community meetings and engagements sessions

The most frequent feedback regarding informing the public at large, was that site tours should be held in conjunction with community meetings, such that participants are able to observe the specific areas and remedial actions discussed. Additional ideas were to encourage community members who had worked at the plant to share their stories, such that the history and tradition of the site plays a role (e.g. Montana Pole at one time sponsored a Little League team). This opportunity could remove the site from being reduced to "just another Superfund site." One interviewee expressed that for the community to be invested in the remediation of the property, citizens need to know how the site came into existence and impacted Butte. Additional ideas for education and community outreach were to use the boundary fence as a conversation/informational opportunity in addition to a property delineation.

Most interviewees shared that the formal meeting setting they preferred were to avoid MDEQ stand-alone meetings and to focus MDEQ resources on presenting Montana Pole-relevant information with other meetings. The meeting style most preferred for community meetings was that meetings commence with a presentation format, followed by an attendee question-and-answer session. To encourage attendance and participation, it was consistently recommended by a majority that these meetings be held as part of a larger community meeting, such as the Council of Commissioners' meetings, the Restore Our Creek meetings, local Rotary meetings, the Butte Natural Resource Council meetings, the Restoration Alliance meetings, or the Citizens Technical Environmental Committee meetings, as well as potentially holding short information sessions at the Knights of Columbus' weekly Bingo events. A minority of interviewees also suggested that presentation of the Montana Pole materials could be conducted by local citizens, so as to better showcase community involvement.

It was additionally proposed that educational items, such as updates on dioxin mobility or site reuse options, could be video recorded by local community group members and shown at the aforementioned meetings. It should be noted, however, that there was a minority of interviewees who expressed concern that some of the citizen groups and community advisory groups are not representative of the community and their interests, which has resulted in fewer attendees at various community meetings. A minority of interviewees also expressed that they were unaware of the community advisory groups and their role in the Montana Pole project.

Several respondents expressed that meetings should continue to be held in the Boulevard neighborhood Fire Hall, while others suggested that this venue was remote and did not promote attendance. Additional venues that were suggested were the Butte Silver Bow Health Department and the Council of

Commissioners' meetings. No interviewee identified days of the week or times that would encourage greater meeting attendance; however, some interviewees suggested that more than one meeting should be held to discuss specific topics, on various days and at different times, so that prospective attendees would not be unable to attend owing to consistent work or familial obligations.

Several interviewees suggested MDEQ could better educate and inform the community by having an informational kiosk at the weekly Farmer's Market or during large community events, such as the Montana Folk Festival or Evel Knievel Days, as attendance at these types of events would provide the greatest return on the investment of resources.

One-one-one/Small group Discussions

One-on-one contact can be effective for those not comfortable in a public meeting setting, or for updates or issues specific to a particular group or individual. These meetings can be arranged with leaders of public interest groups, local government officials, community leaders, Congressional aides, members of the public, etc. It was also proposed by several interviewees that the MDEQ Project Manager could be available for one-on-one discussions at consistent pre-determined times, and locations (specifically, the CTEC office was mentioned), so that community members know when and where they could go to ask questions outside of a larger group setting (e.g. the first Tuesday of every month from 10:00-12:00).

Youth outreach and education

A minority of interviewees expressed a desire to better educate and focus resources on informing younger Butte residents (including school-aged children). Use of the Science Mine educational center was proposed as perfect venue to undertake these educational opportunities for youths. Additional educational opportunities may arise via coordination with the Clark Fork Watershed Education Program or local schools.

Community Involvement Framework

MDEQ and EPA are committed to continuing and expanding community involvement work throughout the Superfund process at Montana Pole in partnership with the community and other agencies, groups, and organizations. MDEQ is making a concerted effort to respond to community concerns and questions in a timely manner by being more present within the community and engaging local resources, such as community groups and local government entities, so that community members can feel empowered and informed.

Information Distribution

The majority of residents shared that they rely on the BSB Facebook page to access information about community concerns and events. MDEQ will develop social media messages about site related activities to share on the BSB Facebook page.

A majority of interviewees also shared that MDEQ's presence with an informational kiosk at local events, such as the Farmer's Market or annual events (Montana Folk Festival or Evel Knievel Days) would be a positive method with which to engage the community and provide relevant site information.

Interviewees were split in their opinions on how they prefer to receive informational newsletters/fact sheets, with some preferring to receive physical copies in the U.S. Mail, and others preferring a digital copy that can always be located within their email account. Sending messages summarizing public meeting discussions to people signed up for the email List Service was also recommended in the interview process. MDEQ will develop informational newsletters/fact sheets that can be distributed via email and also printed and mailed to interested members of the community.

Web Page

EPA and MDEQ have established Web pages dedicated to the Montana Pole and Treating Plant Superfund site:

- EPA: https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0800378
- MDEQ: http://deq.mt.gov/Land/fedsuperfund/mtpole

MDEQ will keep its Web page updated with the latest project and contact information. Fact sheets and certain publicly available site documents published after the 1993 ROD will be available for viewing and download from the webpage.

Public Meetings

MDEQ will hold public meetings at various milestones throughout the Superfund process. These meetings are organized to convey site information by having presentations, discussions, and to answer questions from the general public. Different types of meetings will be utilized to best suit the needs of the public, and may be held in conjunction with other community meetings. Meeting types may include the following:

- Public meetings
- Site tours
- Workshops
- Open houses
- Expert panels
- Q&A sessions
- Neighborhood group meetings

MDEQ will continue to hold public meetings for significant updates and announcements and coordinate with others to present information during meetings of other community groups, when appropriate. MDEQ will work with the Butte-Silver Bow Council of Commissioners' and coordinate appropriate times to present information during Council meetings that are streamed live. These meetings will also be

recorded and can later be listened to online at the MDEQ Web site. Additional meeting locations within the community are identified in Appendix C.

MDEQ may hold informal, small group meetings when project managers need to update smaller groups of citizens. This kind of meeting provides people with a good opportunity to ask questions and voice concerns that might not be possible at larger public meetings. Small group meetings can also be used to meet with Congressional aides, local government officials, etc.

As resources and feasibility permit, notices for public meetings will be posted in local media outlets such as the Montana Standard, announced on various Radio stations, and detailed on the BSB Facebook page. If possible, future meeting dates and times will also appear in the Montana Pole newsletters. MDEQ may also inform area residents with door hangars that provide information on meeting location dates and times.

MDEQ welcomes feedback on community meeting locations, day of the week preferences, and time of day preferences.

Other Public Events

MDEQ will interact with the community to help inform local residents of Montana Pole activities at events such as the weekly Farmer's Market and festivals.

News Media

MDEQ commits to proactively keeping media representatives informed of site progress as a means of keeping the community-at-large informed. Media tools include the following:

- Press releases
- Feature stories
- Op-ed pieces
- Reporter roundtables
- Editorial board meetings
- Press conferences
- Television, radio, and newspaper interviews

MDEQ will be available for interviews with news media organizations and will work with them to develop stories about the site for the community. MDEQ will issue press releases and public notices to Butte area media when substantial project events or milestones occur. Meeting and event announcements will be placed in the Montana Standard, the daily newspaper that serves Butte, and the Butte News, Butte's weekly free newspaper.

MDEQ will reach out to local television and radio organizations to deliver and broadcast information to reach residents with site updates and developments. MDEQ will work with local CBS affiliate, KXLF, and other TV stations to coordinate interviews and develop news stories about the site for broadcast.

MDEQ recognizes that radio communication may be an effective way to reach residents to announce meetings, events, or have public service announcements to educate the community about the site. MDEQ will provide meeting announcements, or panel discussions, to discuss Montana Pole site information. These announcements will be provided to: KAPC (91.3 FM), KOPR (94.1 FM), KBMF (102.5 FM), and KBOW (101.5 FM). Additionally, there are specific programs held on KOPR and KBMF that address community issues, where informational Montana Pole panel discussions could occur. MDEQ will also work with Montana Public Radio (KAPC) to announce milestone achievements at the Montana Pole site.

Appendix A provides a list of news media organizations that MDEQ will engage in Butte.

Mailing List

MDEQ maintains a regular U.S. Post mailing list for the Montana Pole site for distribution of fact sheets, meeting notices, and other information spreading needs. To be added or deleted from the mailing list, please contact MDEQ administrative staff at 406-444-6795.

Email Notification

MDEQ is committed to directly emailing individual stakeholders updates on site activities and significant developments at the Montana Pole site. MDEQ maintains an email list in addition to the regular U.S. Mail list. To sign-up for email updates, go to this link http://svc.mt.gov/deq/ListServe/MTPoleStep1.asp and enter your name and email address.

Printed Information Materials: Fact Sheets, Newsletters, and Brochures

MDEQ uses printed informational materials as a fundamental mechanism to provide site-related information to the public. They are short documents (2-4 pages), written in non-technical language, and are intended to describe current events, cleanup progress, or announce upcoming events at the site. MDEQ will post these materials on the webpage and send them via email to recipients of the email list. In an effort to increase education about the project's progress, MDEQ will also send out hard copies to those on the regular mailing list.

MDEQ intends to create a newsletter twice per year and/or as project milestones are achieved. MDEQ will also make an effort in these newsletters to respond to community requests for specific information.

Advertisements, Public Notices, Display Ads, Flyers

A public notice or display ad will be used by MDEQ to advertise community meetings, decisions, comment periods, and other site specific information, so that the public may be informed and engaged. These advertisements will appear primarily in the Montana Standard. In some cases, MDEQ may distribute flyers in local newsletters, bulletins, utility bills, or other types of mailings, as appropriate. Methods to distribute information widely and to targeted segments of the community will continue to be explored.

Community Advisory Group

The Citizens Technical Environmental Committee (CTEC) was officially formed in 1991. This group is an independent, non-partisan group consisting of members representing diverse interests, all of whom have been affected by and are concerned with the site and the cleanup process. This group is funded through an EPA grant.

Currently, CTEC meetings are typically held once a month from 6:00 – 8:00 p.m. at varying locations. To find out the location of an upcoming meeting, please call 406-723-6247 or email buttectec@hotmail.com.

The mission of CTEC is to help people living in the Butte-Silver Bow Creek area better understand and respond to complex technical information related to the area's environmental problems. This effort is being made so that residents are better able to participate in a meaningful manner in local, state, federal, and industrial deliberations regarding solutions to environmental concerns.

CTEC's vision is of a clean and healthy environment in Butte, achieved by informed and engaged citizens and public servants.

CTEC's goals are:

- To educate the general population through the assembly, analysis, interpretation, translation and dissemination of environmental information to those people in the area, and to collect their questions, fears, needs, desires and opinions.
- To develop and effectively convey community-based recommendations, advice and criticism, independent of government or industry-based special interests, to include both consensus and dissenting views about particular issues.
- To assure the sustainability of CTEC, to fulfill its mission to foster meaningful, informed public discourse about issues of environmental concern in the community, now and in the future.

More information can be found at www.buttectec.org.

One-on-One Contact with Public

For those not comfortable in a public meeting setting, or for updates or issues specific to a particular group or individual, MDEQ will arrange meetings with leaders of public interest groups, local government officials, community leaders, Congressional aides, members of the public, etc.

Community Interviews

MDEQ conducted one-on-one interviews with stakeholders and interested community members to help develop this CIP. MDEQ will conduct these interviews each time the CIP is updated, but may conduct interviews more frequently as issues and actions warrant.

Public Comment Periods

Public comment periods allow MDEQ and EPA to accept comments from the public on proposed actions and decisions. They further enable the public to participate in the administrative decision making process, while empowering the community to have ownership of certain actions. Public comment periods will be announced in several ways including the use of public notices, fact sheets, and announcements at community advisory group and public meetings, as well as via U.S. mail and email. Not all actions require that a public comment period be provided; however, MDEQ will make a concerted effort to receive community feedback on a case-by-case basis, even if it is not required.

Technical Assistance Grant (TAG)

Grants of up to $50,000 are available to incorporated, nonprofit organizations composed of community members affected by the site. Technical Assistance Grants can be used for hiring a technical advisor, attending approved training, and obtaining relevant supplies and equipment. A technical advisor is an independent expert who can explain technical information and help articulate the public's concerns to MDEQ and EPA. An initial grant of $50,000 was awarded for a Butte TAG in September 1991.

Technical Assistance Services for Communities and other resources (TASC)

Technical Assistance Services for Communities is a resource that EPA provides to communities to offer assistance interpreting data, facilitating discussions, and assisting with other site-related activities. This resource differs from Technical Assistance Grants (described above) in that Technical Assistance Services for Communities is provided on an issue-specific basis by MDEQ, EPA, or their contractors, and requires less recipient and MDEQ/EPA administrative work to secure and utilize.

Site History

Pre-National Priorities List

Torger L. Oaas began construction of a pole treating plant in July 1946 in a previously undeveloped area, now known as the Montana Pole and Treatment Plant (Montana Pole) site near Butte, Montana. Pole treatment at the site, using creosote and pentachlorophenol (PCP) to preserve the wood, began when the first shipment of product was made in April 1947. A full line of wood products were treated at the plant, including utility power and transmission poles, bridge foundation pilings, planking, ties, timbers, and fence and guard rail posts.

Oaas entered into a 10-year lease for the property with the Anaconda Company in 1946, and beginning in 1955 bought portions of the land. Oaas transferred ownership of most of his property to Montana Pole following its incorporation in 1956. Montana Pole purchased or leased additional property as necessary to accommodate its operations during its years of operation.

During initial construction of the plant, Oaas installed a pole peeling machine, two butt-treating vats, a boiler, and other related equipment. The operation at that time, which used only a butt-treating process, employed five to six workers.

In August of 1951, Oaas installed a retort to pressure-treat wood, thus enhancing the quality of treatment. Oaas added a second retort in 1958.

On May 5, 1969, there was a fire at Montana Pole. A watchman reported creosote (a wood preservative used at the plant for a short period of time) burning on the ground. The fire, fueled by both creosote and treated lumber, spread through buildings and seared a storage tank containing an estimated 10,000 gallons of heavy fuel oil, causing the tank to rupture and burst into flames. Before the fire was brought under control, much of the wood treatment equipment was severely damaged and several buildings were destroyed, along with a large quantity of lumber. It was also reported that there was spillage from a butt-treating vat and both retorts. The fire caused the release of PCP and creosote.

Oaas rebuilt the plant and had it operating again by December 1969. The remodeled facility did not use the butt-treatment process. After the plant was back in operation, only PCP was used to treat lumber.

By 1974, Montana Pole, including its logging operation, operated with approximately 25 employees in the off-season and 40 employees at peak operations during summer months. The company cut approximately 3.4 million board feet of lumber per year, most of which was taken from U.S. Forest Service lands.

In 1976, Montana Pole acquired new wood peeling equipment to nearly double the plant's peeling capacity. In 1978, Oaas invested in a sawmill that began operations in 1980.

To eliminate the drainage of waste process water, Montana Pole implemented a completely closed process water system in 1980. The new process involved recycling process water, while excess water evaporated through the use of aeration sprays.

In March 1983, a private citizen complained about oil seeping into Silver Bow Creek. The Montana Pole facility is located approximately 200 yards south and upgradient from Silver Bow Creek. The Montana Department of Health and Environmental Sciences (MDHES, now MDEQ) investigated the complaint and discovered an oil seep on the south side of Silver Bow Creek. This oil seep resulted in a portion of the creek's bank being saturated with oil. An investigation of the area revealed the Montana Pole facility had discharged waste fluids from its pole treatment operation, into a ditch adjacent to the plant. Oil staining was evident on the upper portion of the ditch but decreased in the lower portion. On March 7, 1983, MDHES personnel observed and collected samples of a petroleum product discharging into Silver Bow Creek directly downgradient from the Montana Pole facility. Laboratory analysis of the samples revealed the presence of PCP at levels that were above allowable limits to protect human health and the environment.

On July 27, 1983, MDHES again took groundwater samples from monitoring wells located downgradient from Montana Pole, near Silver Bow Creek. The analysis showed PCP exceeding allowable limits for groundwater.

Wood treatment operations continued at the facility during these sampling events. High interest rates and a weak lumber market caused severe financial hardship for the plant in the early 1980s. There were significant efforts to sell the company in 1983, but no sale could be made. Business at Montana Pole ceased in 1984 because of continued financial loss.

On May 7, 1984, MDHES issued Montana Pole a Notice of Violation and an Order to take Corrective Action. The Order cited contamination of soils, groundwater, and surface water with hazardous wastes, and required submission of a compliance plan to achieve cleanup of the site. In June 1984, Montana Pole informed MDHES they had turned over all their property to Miners Bank of Montana and would be unable to comply with the order.

Later that month, Miners Bank of Montana notified MDHES of their intent to auction the property and equipment from the facility. The District Court denied an injunction by the State of Montana against the auction, but ordered that Miners Bank of Montana take certain precautions to assure that purchasers at the auction were aware of potential hazardous waste problems with the equipment being sold. The auction was held June 19, 1984, and yielded $200,000.

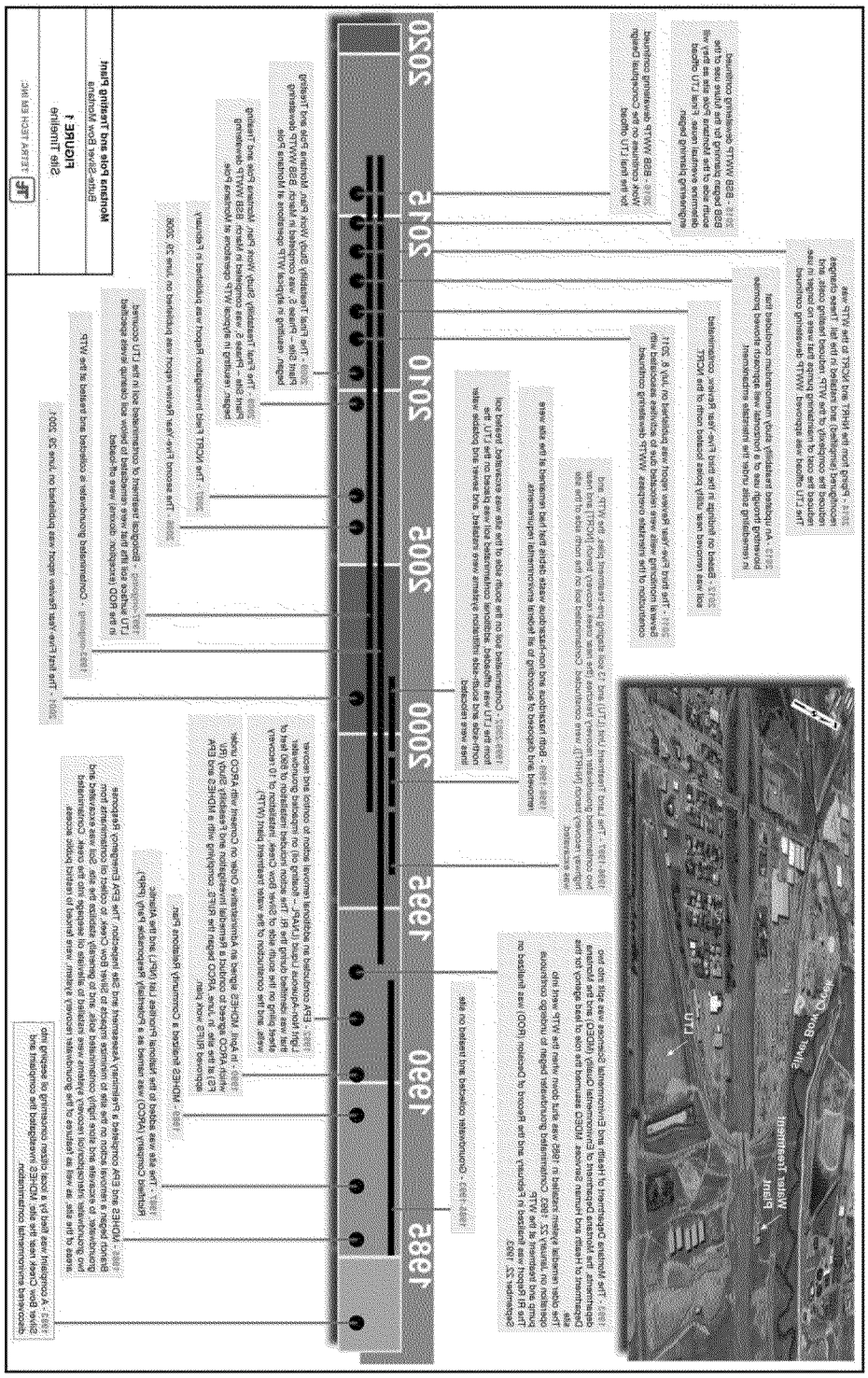
National Priorities List and Beyond

Montana Pole was added to the National Priority List (NPL) of Superfund sites in November 1986. It sits adjacent to the Silver Bow Creek Superfund site and is one of four sites that comprise the Clark Fork Basin group of Superfund sites. Contamination at the other Clark Fork Basin Superfund sites is primarily from mining and smelting wastes accumulated from more than 100 years of mining and processing activities conducted in the area.

Samples of tank liquid, sludge, soil, surface water, and groundwater were collected by MDHES in 1984-85, revealing concentrations of PCP up to 19,000 ppm (2016 EPA Screening levels are 1 ppm). Dioxins were also detected in soil and oil samples. MDHES and EPA completed the Preliminary Assessment and Site Investigation in July 1985. As a result of the investigation, the EPA Emergency Response Branch began a Removal Action at the Montana Pole site in July 1985. These actions were intended to alleviate seepage into Silver Bow Creek, to collect oil contaminants from groundwater, to excavate and store highly contaminated soils, and to generally stabilize the site.

In October 1988, MDHES assumed responsibility for the operation and maintenance of the existing recovery and infiltration system in an effort to prevent contaminant movement into Silver Bow Creek. Oil separators were used to recover oil product from pumped groundwater prior to discharge into infiltration galleries. The oil product is stored on-site, in above-ground tanks. One of these tanks failed and was replaced in January 1988.

Montana Pole and Treatment Plant Timeline



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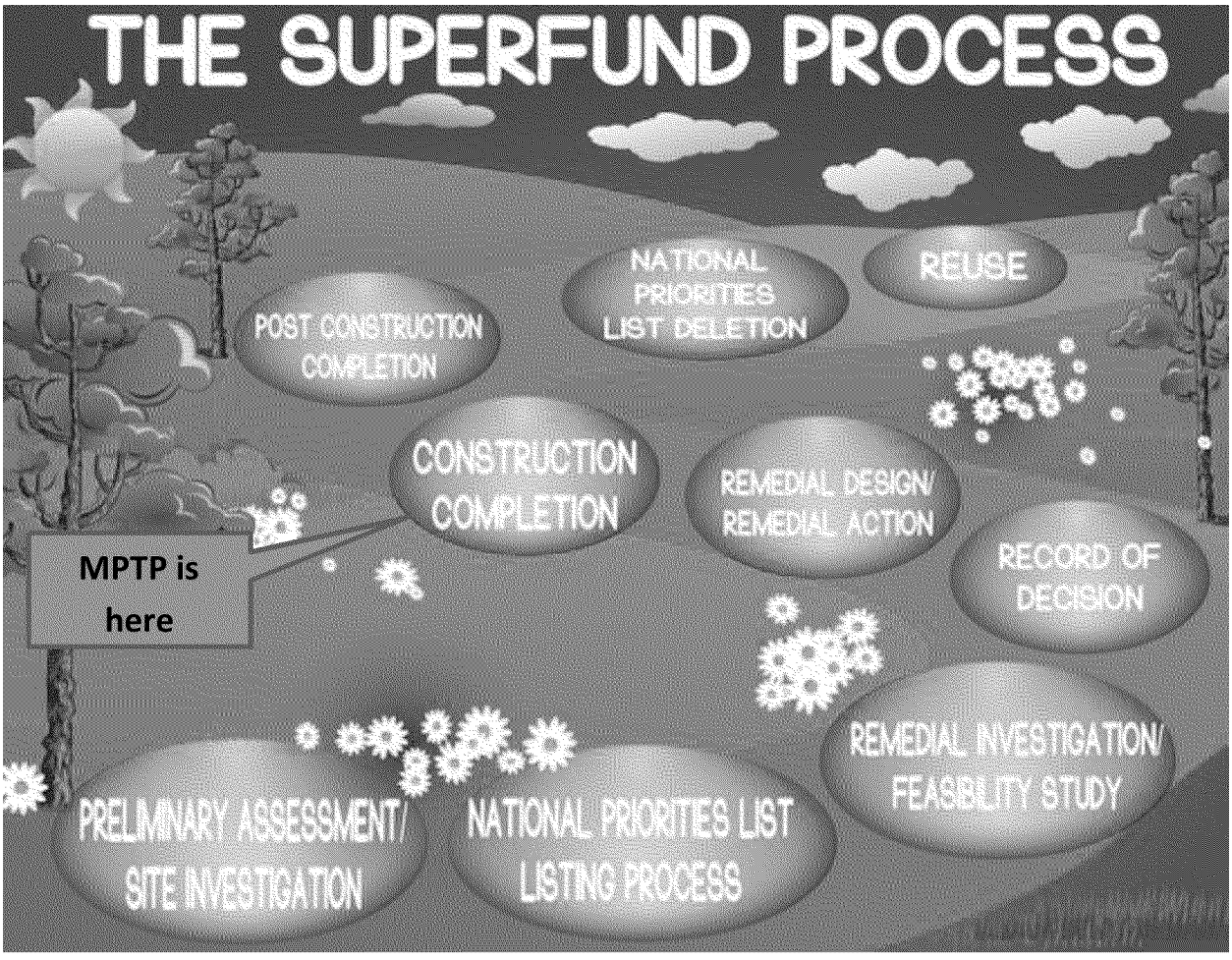
The Superfund Process

The graphic below provides a general outline of the steps within the Superfund process from the initial investigations through the removal of a site from the National Priorities List. These Superfund milestones are the points along the process when public input can often have the most impact on decision-making.



Montana Pole has six distinct phases of cleanup and is currently designing actions to complete the treated soils offload component. Design is also underway for Phase 5, which addresses the contaminated soils beneath the Interstate. Phase 6 will consist of removal and disposal of the soil treatment facilities on the south side of the Site, final engineering controls (soil cover, storm water management), re-vegetation of all disturbed areas, and implementation of appropriate institutional controls to maintain protectiveness of the remedy and ensure public safety.

2018-003543-0918

Community Profile

From the early 1870s to the late 1970s, Butte had the reputation for being one of the world's most productive mining districts because of rich copper deposits beneath the city and surrounding area. The Butte Hill has been called "the richest hill on earth," and at one time the Berkeley Pit, at the edge of Butte, was the largest open pit truck mine in the world. In addition to the open mines, it is estimated that there are approximately 4,500 miles of mining tunnels underlying the city.

From the late 1800s to the early 1900s, seventeen active smelters and more than 100 different mines operated in the area. After the Anaconda Smelter was constructed in 1917, all smelting took place in Anaconda. The builder of this smelter, Anaconda Company, eventually emerged as the major employer in the area and a major mining company in the country.

Butte was a large town during the height of mining activity. Butte's population at the turn of the 20th century was approximately 150,000. This large population was comprised of many nationalities, but most notably present were Irish, Italian, and Chinese. Local newspapers of the day reported frequent crimes often involving partners in mining operations.

By the middle of the 1900s, Butte settled into a town dependent on mining and on one main employer, the Anaconda Company. The digging of the Berkeley Pit began in the section of town once known as Meaderville. The pit was in operation until 1981 when all mining was shut down, putting approximately 2,500 people out of work. Butte then began an economic decline from which it has not yet fully recovered.

While the city still bears many prominent visual remnants of mining, the environmental effects are being actively remediated and restored through the federal Superfund program and a unique State of Montana lawsuit against the responsible companies. The net result is over $1 billion dollars to be put toward environmental restoration in the Butte area. These activities began in the 1990s and continue. While the results of these cleanup efforts are massive and widespread, they are perhaps most notable on Silver Bow Creek, west of the city. Formerly an industrial sewer, a restored Silver Bow Creek now boasts a health population of Montana's rare native cutthroat trout (http://www.co.silverbow.mt.us/481/History-Culture).

Population

The official April 2010 US Census for all of Butte-Silver Bow County was 33,525 persons (16,595 Females, 16,930 Males); the US Census estimate for July 2015 is 33,922 (no gender breakdown available for estimated figures). The median age is 41.6 years (Montana DPHHS 2011 Report). The largest Butte-Silver Bow racial/ethnic groups are White (94.4%), followed by Hispanic (3.7%), two or more races (2.1%), American Indian and Native Alaskan (1.9%), Asian (0.5%), and Black or African American (.03%), and Native Hawaiian (0.1%).

Income

The median household income in Butte-Silver Bow is $37,654 and the per capita income is $23,848. 20.3% percent of residents live below the poverty line (2014 American Community Survey, accepted by US Census Bureau). The unemployment rate of Silver Bow County, Montana is 4.1% (Montana Department of Labor and Industry).

Education

Of people age 25 years and older in Butte-Silver Bow, 91.4% of individuals have a high school degree or higher and 23.6% have a bachelor's degree or higher.

Government Structure

Butte and Silver Bow County are merged into one governmental body. This consolidated unit of local government has the status of a county and an incorporated municipality.

There is a Council of Commissioners of the City-County composed of twelve members, at least six (6) of whom shall be elected every two (2) years. A Chief Executive is nominated and elected at-large by voters. In addition to the Chief Executive, the executive branch includes the following officers: (a) County Attorney, (b) Clerk and Recorder, (c) Clerk of the District Court, (d) Superintendent of Schools, (e) Sheriff, (f) Assessor, (g) Coroner, (h) Public Administrator, (i) Treasurer, and (j) Auditor. Each of these are nominated and elected at-large through local elections.

The Council of Commissioners establishes Justice Courts. Justices of the Peace shall be elected as provided by state law.

The powers and duties of the City-County shall be distributed among departments, agencies, and offices and are under the ordinance of the Council of Commissioners. Departments include: Public Works, Fire, Land Records, Finance and Budget, Human Resources, and Animal Services.

Appendix A: Contacts

Montana Department of Environmental Quality

Name/Title	Address	Contact Information
David Bowers State Project Officer	1225 Cedar St. P.O. Box 200901 Helena, MT 59620-0901	dbowers@mt.gov Office: (406) 444-6335 Cell: (406) 438-1171
Lisa DeWitt State Project Officer	1225 Cedar St. P.O. Box 200901 Helena, MT 59620-0901	lidewitt@mt.gov Office: (406) 444-6420 Cell: (406) 431-1408
Jenny Chambers Waste Management and Remediation Division Administrator	1225 Cedar St. P.O. Box 200901 Helena, MT 59620-0901	jchambers@mt.gov Office: (406) 444-6383
Tom Livers Director	1520 E. Sixth Avenue P.O. Box 200901 Helena, MT 59620-0901	tlivers@mt.gov Office: (406) 444-2544
Jeni Flatow Public Information Officer	1225 Cedar St. P.O. Box 200901 Helena, MT 59620-0901	jflatow@mt.gov Office: (406) 444-6469 Cell: (406) 437-1627

Environmental Protection Agency

Name/Title	Address	Contact Information
Nikia Greene Superfund Project Manager	EPA Region 8 Montana Office US Federal Building 10 W 15th St., Suite 3200 Helena, MT 59626	greene.nikia@epa.gov Office: (406) 457-5019 Toll Free: (866) 457-2690
Joe Vranka Superfund Branch Chief	EPA Region 8 Montana Office US Federal Building 10 W 15th St., Suite 3200 Helena, MT 59626	vranka.joe@epa.gov Office: (406) 457-5039
Robert Moler Community Involvement Coordinator	EPA Region 8 Montana Office US Federal Building 10 W 15th St., Suite 3200 Helena, MT 59626	moler.robert@epa.gov Office: (406) 457-5032

2018-003543-0918

Butte-Silver Bow Government

Name/Title	Address	Contact Information
Jon Sesso Planning Director	Courthouse, Room 108 155 W. Granite Street Butte, MT 59701	jsesso@bsb.mt.gov Office: (406) 497-6250
Karen Sullivan Health Officer	25 W. Front Street Butte, MT 59701	ksullivan@bsb.mt.gov Office: (406) 497-5020
Dave Palmer Chief Executive	Courthouse, Room 106 155 W. Granite Street Butte, MT 59701	chiefexec@bsb.mt.gov Office: (406) 497-6200
Jeremy Gatz-Miller Public Information Officer	Courthouse, Room 108 155 W. Granite Street Butte, MT 59701	jgatzmiller@bsb.mt.gov Office: (406) 497-6221

State Elected Officials

Name/Title	Address	Contact Information
Governor Steve Bullock	Office of the Governor PO Box 200801 Helena, MT 59620-0801	http://governor.mt.gov/contact.aspx Office: (406) 444-3111 Toll Free: (855) 318-1330
Lieutenant Governor Mike Cooney	Office of the Governor PO Box 200801 Helena, MT 59620-0801	http://governor.mt.gov/contact.aspx Office: (406) 444-3111 Toll Free: (855) 318-1330
Jon Sesso (D) Senate District 37 Silver Bow County	811 W. Galena St. Butte, MT 59701-1540	(406) 490-7405
Edith McClafferty (D) Senate District 38 Silver Bow County	1311 Stuart Ave Butte, MT 59701-5527	ediemcclafferty@gmail.com
Jim Keane (D) House District 73 Silver Bow County	2131 Wall St. Butte, MT 59701-5014	(406)723-8378
Amanda Curtis (D) House District 74 Silver Bow County	1117 N Emmett Ave Butte, MT 59701-8514	(406) 782-4149
Kirk Wagoner (R) House District 75 Silver Bow County	1 Jackson Creek Rd., #2347 Montana City, MT 59634-9714	kirk@kirkbwagoner.org (406) 465-8291 (406) 782-2700
Ryan Lynch (D) House District 76 Silver Bow County	PO Box 934 Butte, MT 59703-0934	Rep.ryan.lynch@mt.gov (406) 498-6625

2018-003543-0918

Federal Elected Officials

Name/Title	Address	Contact Information
Senator Jon Tester US Senator	724 Hart Senate Office Building Washington DC 20510-2604	www.tester.senate.gov/Contact/index.cfm (202) 224-2644 Toll Free: (866) 544-4403
Senator Jon Tester Butte Office	Silver Bow Center 125 W Granite, Suite 200 Butte, MT 59701	(406) 723-3277
Senator Steve Daines US Senator	320 Hart Senate Office Building Washington DC 20510	http://www.daines.senate.gov/connect/email-steve (202) 224-2651
Senator Steve Daines Butte Office	245 E. Park St. Butte, MT 59701	(406) 782-8700
Congressman Ryan Zinke US Representative	113 Cannon House Office Building Washington DC 20515	https://zinke.house.gov/contact/email (202) 225-3211
Congressman Ryan Zinke Helena Office	910 N. Last Chance Gulch Suite B Helena, MT 59601	(406) 502-1435

Public Interest Groups

Name/Title	Address	Contact Information
Citizens Technical Environmental Committee (CTEC)	27 W. Park Street PO Box 0593 Butte, MT 59701	buttectec@hotmail.com (406) 723-6247

Media

Name/Title	Address	Contact Information
The Montana Standard Daily Newspaper	Butte Office 25 W. Granite Street Butte, MT 59701	editor@mtstandard.com (406) 496-5500 Toll Free: (800) 877-1074
Butte Weekly Weekly Newspaper	32 South Main Butte, MT 59701	butteweekly@onewest.net (406) 782-3820
KXLF (CBS) Television Station	KXLF-Butte 1003 S. Montana St. Butte, MT 59701	newstips@kxlf.com (406) 496-8400
KTVM (NBC) Television Station	KTVM-TV Butte 750 Dewey Blvd. Butte, MT 59701	news@ktvm.com (406) 755-5239
KWYB (ABC) Television Station	KWYB Butte 3825 Harrison Ave.	maureenl@maxmontana.com (406) 782-7185

2018-003543-0918

Name/Title	Address	Contact Information
	Butte, MT 59701	
KBOW and KOPR Radio Stations	660 Dewey Blvd. Butte, MT 59701	(406) 494-7500
KMBR, KXTL, and KAAR Radio Stations	750 Dewey Blvd. Suite 1 Butte, MT 59701	(406) 494-6020
KBMF Radio Station	156 W. Granite Butte, MT 59701	gm@butteamericaradio.org
KAPC Radio Station	32 Campus Drive Missoula, MT 59812	(406)243-4931

Appendix B: Document Repository and Administrative Record

Name/Purpose	Address	Contact Information
Montana DEQ Waste Management and Remediation Division Information Repository/Administrative Record	1225 Cedar Street Helena, MT 59601	(406) 444-6444
EPA Records Center Information Repository	10 W. 15th Street, Suite 3200 Helena, MT 59626	(406) 457-5046
Montana Tech Library Information Repository/Administrative Record	1300 W. Park Butte, MT 59701	(406) 496-4281

Appendix C: Meeting Rooms

Name	Address	Contact Information
Montana Tech Library Auditorium Meeting Room	1300 West Park Butte, MT 59701	(800) 445-8324
Butte-Silver Bow Public Archives Meeting Room	17 West Quartz St. Butte, MT 59701	(406) 782-3280
Butte-Silver Bow Fire Training Center Meeting Room	850 Josette St. Butte, MT 597001	(406) 491-9902

Appendix D: Local Schools

Name/Type of School	Address	Contact Information
Butte High School High School	401 S. Wyoming Butte, MT 59701	(406) 533-2200
Capstone Christian Academy High School, Middle School, and Elementary School	1485 Continental Ave. Butte, MT 59701	(406) 782-7777
East Middle School Middle School	2600 Grand Butte, MT 59701	(406) 533-2600
Butte Central Junior High School High School, Middle School, and Elementary School	9 South Idaho Butte, MT 59701	(406) 782-6761
Emerson Elementary Elementary School	1924 Phillips Butte, MT 59701	(406) 533-2800
Hillcrest Elementary Elementary School	3000 Continental Dr. Butte, MT 59701	(406) 533-2850
Kennedy Elementary Elementary School	1101 N. Emmet Butte, MT 59701	(406) 533-2450
Margaret Leary Elementary Elementary School	34 ½ Mile Vue Butte, MT 59701	(406) 533-2550
West Elementary Elementary School	800 S. Emmet Butte, MT 59701	(406) 533-2700
Whittier Elementary Elementary School	2500 Sherman Street	(406) 533-2890
Silver Bow Montessori Elementary School	1800 Sunset Road Butte, MT 59701	(406) 494-1033
Webster Garfield Complex Elementary School	1050 S. Montana Street Butte, MT 59701	(406) 533-2990

Appendix E: Superfund Milestones and Outreach Timeline

- **Preliminary Assessment/Site Investigation:** Preliminary Assessment/Site Investigation activities occurred at Montana Pole in 1985.
- **National Priorities Listing Process:** On July 22, 1987, the Montana Pole and Treating Plant was added to the National Priority List of Superfund Sites (published to Fed. Reg. Vol. 52, 140 Pg. 17623).
- **Remedial Investigation/Feasibility Study:** In May 1990, MDHES began oversight of the RI/FS. A public review period was held on the RI/FS Administrative Order on Consent in 1990. Additionally, public comment was solicited in 1991 on the Preliminary Endangerment Assessment, which outlined the plan for conducting the risk assessment portion of the RI/FS. A 45-day public comment period on the risk assessment was held from August 15 to September 30, 1992.
- **Community Involvement Requirements:** In 1989, MDHES conducted interviews to solicit community concerns, to identify information needs, and to learn how and when people would like to be involved in the Superfund process. The interviews resulted in the original Community Relations Plan, published in 1989. A document repository and administrative record were established in 1990. Please see Appendix B for current locations.
- **Technical Assistance Grant (TAG) Notification:** An initial grant of $50,000 was awarded for a Butte TAG in September 1991.
- **Administrative Record:** MDHES established the administrative record for Montana Pole in 1990, and then accepted public comment from July 9 through August 9, 1990, accepting comments on such things as completeness, record location, availability, content, and organization. Please see Appendix B for the location of the administrative record. A press release was distributed on June 27, 1990, and a public notice was printed in the July 14, 1990 edition of the Montana Standard.
- **Proposed Plan:** The Proposed Plan for the Montana Pole site was released for public comment on May 5, 1993. The Proposed Plan was made available to the public in both the administrative record, located at the Montana Tech Library in Butte, and at the MDHES (now MDEQ) offices in Helena. It was also available at the Butte Public Library, the Butte EPA Office, and the State Library in Helena. Additionally, it was distributed to the Montana Pole U.S. Mail mailing list. The notice of availability of the Proposed Plan was published in the Montana Standard newspaper on May 7, 1993. A public hearing about the Proposed Plan was held in Butte on May 27, 1993. A court reporter transcribed the entire hearing, and the transcript it was placed in the administrative record. A response to the comments received during the public comment period is included in the Responsiveness Summary, which is part of the Record of Decision.
- **Record of Decision:** The Record of Decision for Montana Pole was finalized in September 1993. The lead agency is required to publish a public notice, which informs the public that the Record of Decision has been signed and announces the availability of the remedial action plan selected.

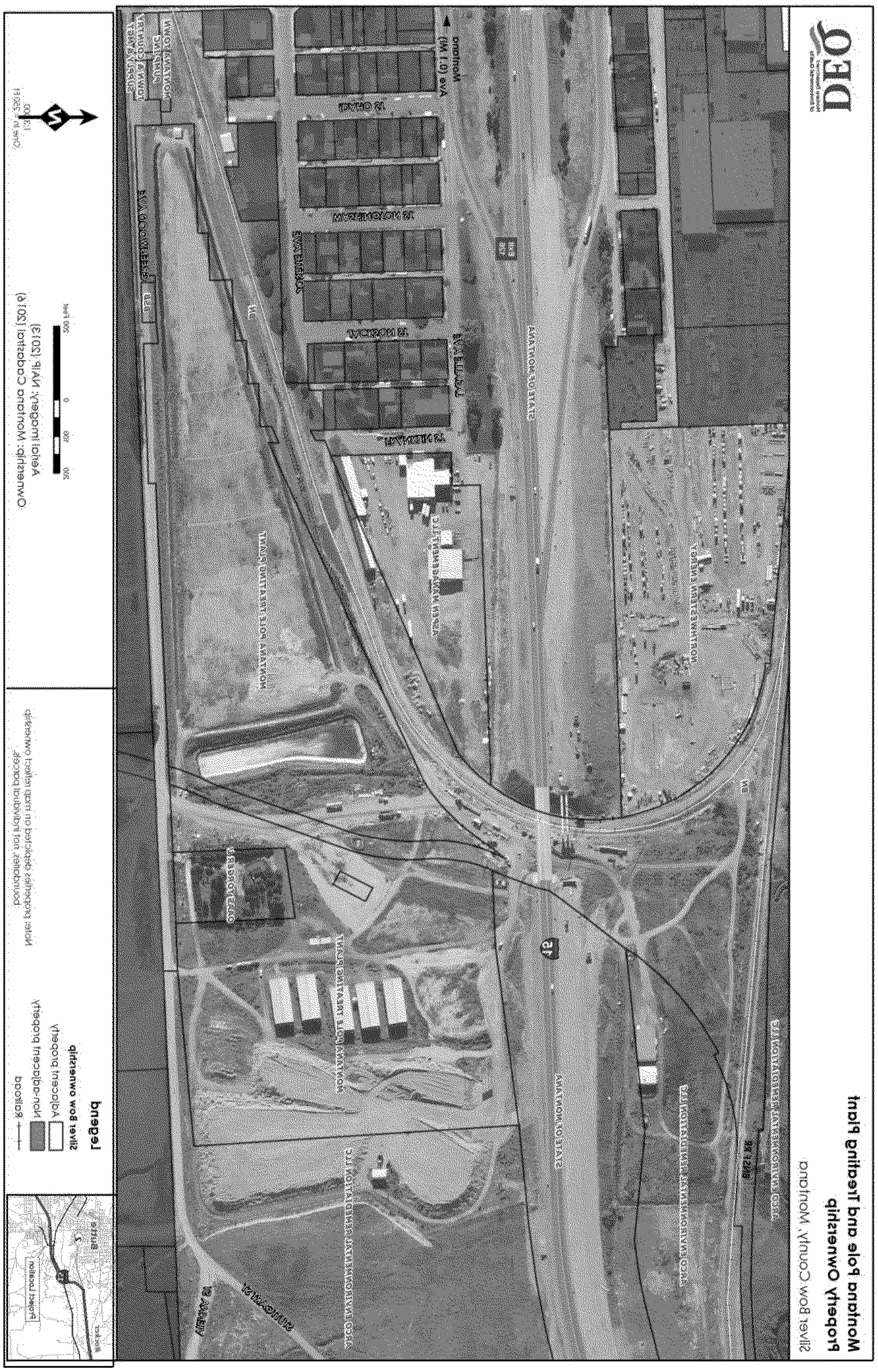
2018-003543-0918

Notices of the Record of Decision were placed in the Montana Standard November 6, 8 and 9, 1993. A public meeting was held on November 9, 1993.

- **Remedial Design/Remedial Action:** The Remedial Design for Montana Pole was completed in March 1996. Remedial Action began in June 1996.
- **Five Year Reviews/Post Construction Completion:** Four five-year reviews have been conducted, in 2001, 2006, 2011, and 2016.
- **Deletion from the National Priorities List:** When all cleanup phases have been completed, all cleanup goals have been achieved, the remedy is determined to be protective, and MDEQ has submitted a concurrence letter to EPA, the site may be deleted from the NPL.

2018-003543-0918

Appendix F: Site Map



2018-003543-0918

Appendix G: Interview Questions

1. Please tell us a little about how long you have lived here and what your impressions have been about the project.
2. Do you feel informed as to what is happening at the Montana Pole site? If so, how are you getting your information? If not, how could DEQ help to inform you about the actions being taken and the progress being made?
3. Have you previously received information regarding the Montana Pole and Treatment Plant Superfund site? If so, via what method? What information did you receive and were you able to understand it?
4. What is your preferred method of receiving information (the newspaper, U.S. Mail, email updates, newsletters, Internet, or other)? What specific news outlets do you read/watch/listen to?
5. Have you ever attended a meeting where DEQ staff was present to discuss the Montana Pole site? If so, when was the meeting held, and where? Also, if you attended a meeting, what were your thoughts regarding the meeting's contents and DEQ's presentation? If you have not attended any informational meetings, is there a reason you have not, and do you have any suggestions as to how DEQ could improve attendance at these meetings?
6. How frequently do you think DEQ should hold informational meetings regarding the Montana Pole site? What format do you think is best for these informational meetings (open house, presentation with Q&A, etc.)?
7. How involved have you been in communicating with DEQ about the Montana Pole site, either formally or informally? If you have communicated with DEQ about the Montana Pole site, what methods have you used to do so?
8. Have you ever contacted DEQ about the Montana Pole site, and if so, do you feel that DEQ was responsive when you contacted them? If not, how could DEQ have been more responsive?
9. With what frequency would you like to receive updates on the Montana Pole site (quarterly, semi-annually, annually, only when a milestone is reached, etc.)?
10. DEQ wishes to encourage an informed and involved public. Are there any other communication methods or items of specific interest about the Montana Pole site that you would like to know more about? Do you have suggestions for how DEQ can better inform and involve the public?
11. Who else in the community do you think could provide valuable feedback to DEQ regarding communication methods and frequency at the Montana Pole site?