Wayne

Columbia Falls Aluminum Company Internal Correspondence

Date: December 21st, 1987

Subject: Plant Visit by EPA Personnel

From: Ken Reick

To: Don Ryan

On December 17, Tom Harris of the EPA Region VIII Office in Helena, and Steve Yarbrough and Robert Eddy of Ecology and Environment, Inc. (an EPA contracting firm), performed an on-site inspection (preliminary Site Investigation) of our closed solid waste landfills. The purpose of the inspection was to gather more information so that a determination can be made on whether the closed sites should receive further investigation under the Superfund Act (CERCLA).

Once the EPA becomes aware of the presence of a closed or abandoned disposal site a series of investigative steps must be followed. The ultimate purpose of these investigations is to determine whether the sites have the potential to release hazardous wastes or their constituents beyond property limits and present a hazard to nearby populations.

In our case, this Site Discovery "triggering mechanism" was the knowledge of an Agency official (Ms. Sara Weinstock) of our closed SPL waste piles. Ms. Weinstock had previously worked for the Montana Solid Waste Bureau and is familiar with our disposal practices.

Following the SD a Preliminary Assessment (PA) is performed. This step is usually a paper chase. All relevant information is gathered and a report is written. The PA was performed by the SWB. They concluded that the data on our closed sites was not adequate. John Arrigo of the Water Quality Bureau became involved. He supplied information on our ground water situation and volunteered his concern that there are "gaps" (not enough wells) in the information we submit to the Bureau.

Thus, the EPA decided to perform the preliminary Site Investigation. Generally, an SI is conducted only after the PA indicates further action is warranted. In our case however, the Agency wanted to look at the site and gather more information--particularly on the SPL generating process and past disposal practices. They spent about two hours at the plant.

Early next year, the EPA will decide whether to drop the investigation or conduct a full scale SI. The latter coarse of action would involve 3 to 5 Agency (or contractor) people on the plant site gathering samples (soil, water, sediment, etc.) for one to two weeks. This would be done next summer. Based on what they found, they would again have to decide whether to drop the investigation or go to the next step--assign the plant a score on the Hazard Ranking System model and schedule remedial action. This decision would be made by December 1988.

Ken Reick

mc: L. W. Smith
T. F. Payne