DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES

CERTIFIED MAIL

TED SCHWINDEN, GOVERNOR

COGSWELL BUILDING

STATE OF MONTANA

HELENA, MONTANA 59620

June 23, 1986

Mr. Ken Reick
Columbia Falls Aluminum Company
P. O. Box 10
Columbia Falls, Montana 59912

Dear Mr. Reick,

The Water Quality Bureau (WQB) has made a tentative determination that the Montana Ground Water Pollution Control (MGWPCS) Permit No. 0005 for Columbia Falls Aluminum Company (CFAC) should be modified. Please consider this a formal notification in accordance with ARM 16.25.1015. Enclosed is a draft modified MGWPCS permit for CFAC. Results of the Department's analysis of sample splits collected March 13, 1986 are also attached. Analysis for benzo(a)pyrene was not completed because of laboratory contamination problems with hexane.

The differences between the modified permit and original permit are obvious. Most of the changes are in line with what was discussed at the November 8, 1985 meeting and during my March 13, 1986 sampling visit. You will note monitoring wells downgradient of the sludge pond and north percolation ponds (NPP) were added to the monitoring requirements in #2 under Section A of the modified permit. Expansion of the ground water monitoring network into these areas is needed because of the following reasons.

1. During the November meeting you informed us that liquid from leachate collection ponds was treated and discharged to the sludge pond on at least two occasions since construction of the ponds in 1980. These discharges were conducted without prior approval from the Department. Discharges of this nature are beyond the scope of the present permit, create the potential for ground water pollution and should be addressed in a modified permit.

2. The quality and quantity of liquid discharged to the sludge pond is not known. The chemical and physical characteristics of the sludge and its ability to attenuate leachate migration is not known.

3. The hydrogeology and quality of ground water immediately downgradient of the sludge pond is unknown. Monitoring wells TW1 and TW2 are generally downgradient of the sludge pond but are nearly one-half mile away. Reliance on these two wells as indicators of pollution from the sludge pond is speculative. Monitoring wells TW3 and TW8 are adjacent to the sludge pond but are not downgradient.

MC: L.W. Smith
JF Payne
DF Ryan