Davis Graham & Stubbs LLP

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November 17, 2014

Via Hand Delivery

U.S. Environmental Protection Agency
Region 8
Attn: Scott Wilder (8ENF-RC)
1595 Wynkoop Street
Denver, Colorado 80202-1129

Re: First Supplemental Response of Atlantic Richfield Company to Request for Information Pursuant to Section 104(e) of CERCLA – Anaconda Aluminum Company Site, Flathead County, MT, SSID #A8-82

Dear Mr. Wilder:

Atlantic Richfield Company ("Atlantic Richfield") provides this first supplemental response to EPA's CERCLA Section 104(e) Request for Information ("Request") dated September 3, 2014 relating to the Anaconda Aluminum Company Site. Atlantic Richfield restates and incorporates herein by reference all of the general and specific objections set forth in Attachment A to its initial response. Atlantic Richfield also reserves and does not waive all claims and defenses available to it under applicable law.

Since submitting its initial response on November 10, 2014, Atlantic Richfield has continued to review records maintained in its archives and identified as having a potential connection to the Columbia Falls facility. As with the initial response, this effort was conducted to enable Atlantic Richfield to respond accurately, in good faith, and to the best of its knowledge, consistent with its obligations under CERCLA section 104(e), 42 U.S.C. § 9604(e). Additional non-privileged, responsive documents are provided as pdf images on the enclosed DVD, organized by electronic folders, which correspond to the questions in the Request. Documents are Bates labeled ARCF00002218 – ARCF00004457. EPA will need to enter the following password to access the encrypted information on the enclosed DVD: **Nx94Asb7**.

Atlantic Richfield has not identified any information that would require it to change the responses set forth in Attachment A to the initial response. For Question 5, in addition to the information provided in our initial response, the document—ARCO Metals Company Facilities Manual, ARCO Aluminum, Columbia Falls Reduction Facility (ca. 1983) (ARCF00002402)—also includes a facility history timeline and narrative summary, a listing of facility dimensions, organization charts, process descriptions, equipment inventories, a listing of environmental control equipment, photographs, and site drawings.

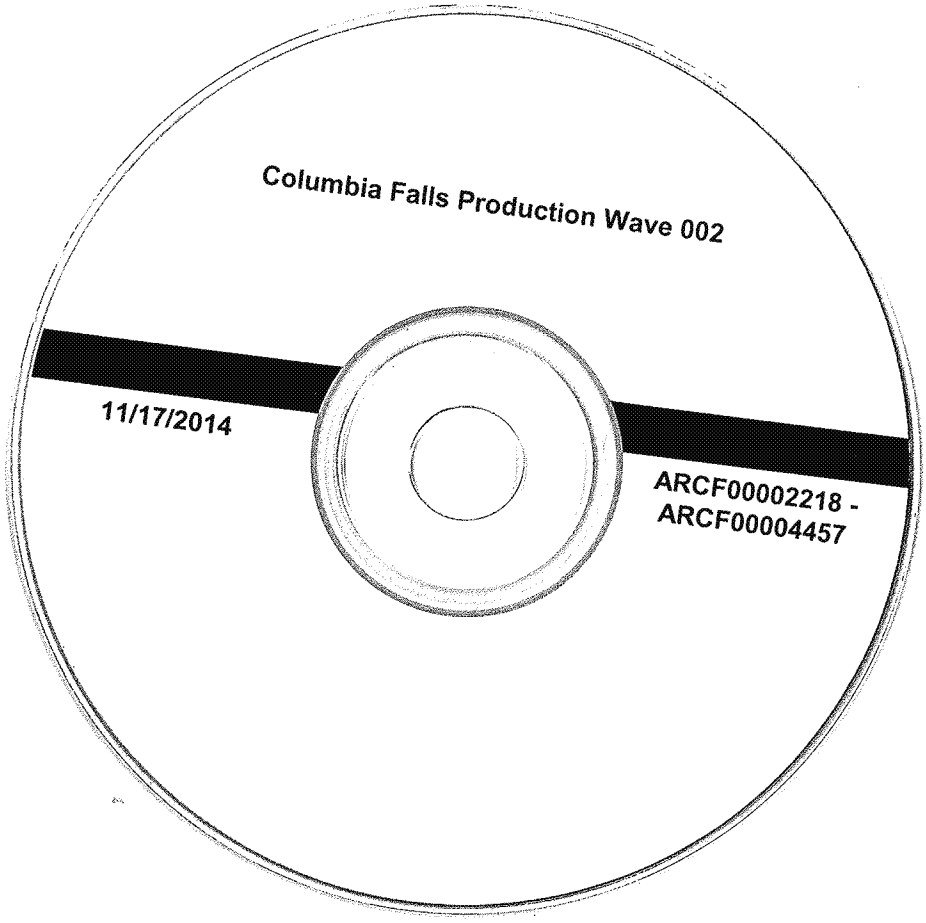
Atlantic Richfield will further supplement its response if additional responsive documents or other information are identified in the future. Please contact me with any related questions.

Sincerely yours,

Adam S. Cohen
for
DAVIS GRAHAM & STUBBS LLP

Enclosures: Attachment A
DVD labeled Columbia Falls Production Wave 002

cc: Vilia M. Drazdys, Esq.
Cord Harris
Mark Chalfant, Esq., EPA (via email, excluding DVD)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