CDM Smith

Memorandum

To: *Mike Cirian, USEPA*

From: *Sean Coan, P.G; Damon Repine, CSP*

Date: *February 25, 2015*

Subject: *Draft Comments – Investigation-Derived Waste Management Plan, Columbia Falls Aluminum Company, Columbia Falls, Montana*

CDM Federal Programs Corporation (CDM Smith) at the request of the United States Environmental Protection Agency (USEPA), has reviewed the *Investigation-Derived Waste Management Plan*, dated February 2, 2016, prepared by Roux Associates, Inc. (Roux) on behalf of the Columbia Falls Aluminum Company LLC (CFAC) for the Former Primary Aluminum Reduction Facility (Site), located in Columbia Falls, Montana. Specific Comments reference page numbers and sections of the document.

Specific Comments

1) Section 5.2, page 10, 1st paragraph – Please provide a detailed discussion of the soil stockpile construction details, on-site soil transport, and soil handling procedures. The paragraph states that, "soil cuttings… will be containerized and transported to a… soil stockpile…" Please specify the containers that will be used (e.g., 55-gallon drums? Roll-off bins), as well as the mode of transport (e.g., forklift? Front loader?). Please describe how soil will be transferred from containers to the stockpiles. Please discuss controls for limiting incidental contamination (e.g., geosynthetic liners on top and bottom of pile).

2) Section 5.2, page 11, 1st full paragraph, 4th sentence – Please provide discussion of how soil stockpile construction will be modified depending on its location, whether inside the warehouse, or outside.