COMMUNICATION STRATEGY
National Priorities List (NPL) Designation for Columbia Falls Aluminum Reduction Plant

Prepared by: Cynthia Peterson, 303-312-6879, March 3, 2015,
Updated April 27, 2015, June 26, 2015, July 6, 2015

Site Information:

Superfund Site Name: Anaconda Aluminum Co Col Fls Red Plt
(Col Fls Red Plt = Columbia Falls Reduction Plant – Named in 1980s)
a/k/a Columbia Falls Reduction Plant and Columbia Falls Aluminum Company Plant
2000 Aluminum Drive, Columbia Falls, MT, 59912

Action: The EPA has proposed that the Columbia Falls Reduction Plant be listed on the Superfund National Priorities List (NPL) in spring or fall 2015.

Communication Goals:

- To communicate next steps concerning site investigation and potential cleanup.
- To continue communicating the rationale for further investigation at the Site.
- To communicate the EPA's processes leading to NPL listing of the Site.
- To communicate the EPA's processes after the Site is proposed for listing

Key Messages Regarding NPL Listing:

- On March 26, 2015, EPA proposed adding the Anaconda Aluminum Co Columbia Falls Reduction Plant (also known as Columbia Falls Aluminum Company Plant), near Columbia Falls, Mont., to the National Priorities List (NPL) making it eligible for additional study and cleanup resources under EPA's Superfund program.
- Following the proposal for listing, there will be a 60-day comment period. All comments will be considered by the agency. The Site will officially be added to the NPL only after the EPA has reviewed and responded to all comments.
- The City of Columbia Falls supports the addition of the Columbia Falls Aluminum Plant site to the NPL and Montana Governor Steve Bullock has concurred. Senator Jon Tester and numerous community organizations have also expressed their support.
- EPA Regional Administrator Shaun McGrath has affirmed the EPA's commitment to:
    - Maintaining the close working relationship that has already been established with the Montana Department of Environmental Quality for this Site;
    - Continuing active community involvement throughout the process;
    - Sampling nearby domestic wells;
    - Ensuring the cleanup addresses human health and environmental concerns while considering the Site owner's and the community's redevelopment interests; and

    - Alerting the community about upcoming contract opportunities and hiring local labor whenever possible.
- Adding the Site to the NPL allows the EPA and the community to access significant technical and financial resources to address the environmental and health risks posed by the Site. These resources can accelerate investigation and cleanup activities and lead more rapidly to productive uses of the Site.

Key Messages Regarding Next Steps:

- On March 26, 2015, EPA proposed adding the Anaconda Aluminum Co Columbia Falls Reduction Plant (also known as Columbia Falls Aluminum Company Plant) to the National Priorities List (NPL).
- There was a public comment period regarding the proposed decision, which ended June 2, 2015. EPA received 72 comments on the proposed decision.
- EPA promulgates updates to the NPL two times, in the spring and fall, each year. Given the comments received, it is anticipated the final decision will come as soon as spring 2016. EPA will create a response to comments document, which will be provided at the time a final decision regarding NPL listing is made.
- The EPA believes there is a need for further sampling at the site due to the known soil and groundwater contamination at the site and the previous detections of contaminants in domestic wells, the Flathead River and Cedar Creek.
- The EPA supports having the current property owner conduct a remedial investigation and feasibility study to determine the nature and extent of contamination.
- The EPA is prepared to move forward using federal authority to ensure all necessary work will occur.
- The EPA plans to work with our State counterparts, local officials and other stakeholders to ensure remedial investigation and, potentially, cleanup are done in an efficient manner.
- The EPA will work closely with the community to discuss potential human health and environmental concerns posed by the site and can support local needs, including the potential redevelopment of this facility.
- Access to safe drinking water for nearby well owners is a priority for the EPA.

Key Messages Regarding Further Investigation at the Site

- Cyanide was detected in two of the five residential wells sampled as part of the September 2013 sampling event. Concentrations of cyanide in both wells were below Safe Drinking Water Act allowable limits (the Maximum Contaminant Level or MCL) but above the conservative EPA Risk-Based Screening Level.
- In April 2014, EPA resampled wells and sampled additional wells in the neighborhood adjacent to and down gradient of the CFAC property in order to determine if other wells were impacted. Results indicated no detections of cyanide in the domestic wells.
- In November 2014, EPA re-sampled domestic wells in the neighborhood adjacent to and down gradient of the CFAC property. Results indicated that none of the wells sampled

had detectable amounts of cyanide.
- Local hydrogeology is likely to be complex and should be investigated to ensure adequate characterization and appropriate remedial decisions are made.

Next Steps

- Continue to work with local officials, community groups and residents to answer questions and request support for NPL designation of the Site.
- Prepare for an NPL listing.
- Publication of Final Rule in the *Federal Register* and respond to comments

Constraints/Considerations

- County commissioners may not officially support NPL designation.
- Representative Zinke opposes NPL listing.

Coordination

Because both the Site Assessment Program and the Remedial Program are involved with this Site, and both the Denver and the Montana Region 8 Offices are actively engaged, there are many opportunities for confusion when communicating within the Agency and with the community. To minimize internal and external miscommunication, the following guidelines apply:

- Communications related to NPL listing – contact Rob Parker.
- Communications related to site cleanup activities, including reuse and redevelopment – contact Mike Cirian.
- Media inquiries – both Rob Parker and Mike Cirian have developed relationships with the media in the area. Media inquiries should be referred to them, Cynthia Peterson or Rich Mylott.
- Communications with federal elected officials – communication with Senator Tester's office can be handled by Rob Parker or Mike Cirian since they have an established relationship with his staff. For communications with other federal officials, contact Rebecca Russo.
- Communications with state officials – MDEQ may want to handle communications with state elected officials. Contact Cynthia Peterson.
- General communications about the Superfund Program or community involvement – contact Cynthia Peterson.

Activity Timeline:

Date	Activity	Person(s) Responsible	Notes/Follow-up
Ongoing*	Meet with key stakeholders	Rob, Mike, Cynthia	

	(City, County, Flathead Lakers, Flathead Basin Commission, CFAC Community Liaison Panel)		
Ongoing	Maintain an open line of communication with MDEQ and Governor's office	Mike, Mark, Cynthia	Mike will work with Tom Stoops and arrange for a Site tour on July 17, 2015.
Ongoing	Maintain open communication with State Congressionals about Site activities	Mike, Rebecca	Mike will communicate with Congressional staff and update Rebecca.
Ongoing	Prepare informational flyers as needed	Cynthia, Mike, Mark, Scott	Potential subjects: - Site-specific Superfund process - Cyanide/Flouride and metals - Surface and groundwater contamination
Ongoing	Prepare for opportunities to submit letters to the editor in local newspapers	Cynthia, Mike	
Ongoing	Submit informational advertisements in local newspapers	Cynthia, Mike	Q&As, other information.
- Feb./Mar. 2015 - Summer 2015	Meet with Flathead County Board of Health	Rob, Mike	Follow up meeting may be needed Summer 2015.
TBD	MDEQ letter of support to the governor		N/A
TBD	Address any concerns/questions from the governor.		N/A
TBD	Letter of support from the governor		2/18/15
5/12/15	Briefing with RA	Site team	
3/24/15	Contact local officials and stakeholders regarding upcoming listing.	Rob, Mike, Rebecca Russo	Complete.
3/26/15	Notice of proposed listing published in Federal Register	HQ	Complete

3/27/15	Public notice announcing proposed listing in the Federal Register begins the 60-day comment period	Cynthia	Complete
3/24/15	Press release re: proposed listing?	Cynthia/Rich Mylott	Complete
6/2/15	Public comment period ends		
8/5/15	Public meeting	Mike, Cynthia, Mark	
8/5/15	Distribute informational flyer	Cynthia, Mike	Flyer has been prepared. Add information about meeting. Mike will research distribution through the Post Office to all residents.
TBD	Responsiveness summary to comments received prepared		
TBD	Site listed on NPL	HQ	
TBD	Press release/public notice re: listing on NPL	Cynthia/Rich Mylott	HQ may have a press release we can use.
9/30/15	Start community interviews for community involvement plan (CIP)	Cynthia, Mike	
TBD	Establish information repository and publish public notice announcing availability.		
TBD	Establish AR and place in information repository.		
TBD	Public notice of AR availability and public comment	Cynthia	
12/31/15	CIP completion	Cynthia, Mike	
TBD	Start RI/FS		

* EPA will continue to meet with community members throughout this process to give updates, and listen to and respond to concerns.

Site Contacts:

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Senator Steve Daines		202-225-3211 (current)	steve.daines@mail.house.gov
Randy Vogel	State Director Congressman Ryan Zinke Billings Office 222 N. 32nd St., Ste. 900, Billings, MT 59101	406-969-1736	Info@ryankzinke.com
Alex Sterhan	District Director Congressman Ryan Zinke Billings Office	same	same
Jeremy Carpenter	Deputy State Director, Congressman Ryan Zinke Helena Office 910 N. Last Chance Gulch, Suite B., Helena, MT 59601	(406) 502-1435	same
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Gary D. Krueger	Flathead County Commission		gkrueger@flathead.mt.gov
Donald W. Barnhart (12/31/2017)	Mayor City of Columbia Falls City Hall 130 6th St West Columbia Falls, Montana 59912	406-892-4391	
Darin Fisher (12/31/2015)	Columbia Falls City Council	406-892-4391	
Doug Karper (12/31/2015)	Columbia Falls City Council	406-892-4391	
Jenny Lovering (12/31/2017)	Columbia Falls City Council	406-892-4391	
Dave Petersen (12/31/2017)	Columbia Falls City Council	406-892-4391	
Julie Plevel (12/31/2015)	Columbia Falls City Council	406-892-4391	
Mike Shepard (12/31/2017)	Columbia Falls City Council	406-892-4391	
Susan M. Nicosia	Columbia Falls City Manager	406-892-4391	
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	Columbia Falls, Montana 59912		
Caryn Miske	Executive Director Flathead Basin Commission 655 Timberwolf Pkwy Kalispell, MT 59901	406-240-3453	cmiske@mt.gov
Robin Steinkraus	Executive Director Flathead Lakers P.O. Box 70 Polson, MT 59860	406-883-1346	lakers@flatheadlakers.org

Potential Meeting Locations:

Council Chambers at City Hall
130 6th St.
West Columbia Falls, MT 59912
406-892-4391

Columbia Falls Fire Dept.
624 1st Ave W,
Columbia Falls, MT 59912 ·
406-892-3911

Local Media:

Hungry Horse News
Richard Hanners, editor
926 Nucleus Ave
P.O. Box 189
Columbia Falls, MT 59912
406-892-2151
http://www.flatheadnewsgroup.com/hungryhorsenews/

Flathead Beacon
Kellyn Brown, editor
17 Main Street
Kalispell, MT 59901
406-257-9220
http://www.flatheadbeacon.com/about_us/

The Daily Inter Lake
Frank Miele, Editor
727 East Idaho
P.O. Box 7610
Kalispell MT 59901

406-755-7000
http://www.dailyinterlake.com/contact_us/contact_us.html

AM radio

- KERR 750, Anderson Radio Broadcasting, Inc.
- KJJR 880, Bee Broadcasting, Inc.
- KOFI 1180, KOFI, Inc.
- KSAM 1240, Bee Broadcasting, Inc.
- KQJZ 1340, Anderson Radio Broadcasting, Inc.

FM radio

- KUKL-FM 90.1, University of Montana-Missoula
- KQRK 92.3, Anderson Radio Broadcasting, Inc.
- KHNK 95.9, Bee Broadcasting, Inc.
- KALS 97.1, Kalispell Christian Radio Fellowship
- KBBZ 98.5, Bee Broadcasting, Inc.
- KKMT 99.7, Anderson Radio Broadcasting, Inc.
- KIBG 100.7, Anderson Radio Broadcasting, Inc.
- KXZI-LP 101.9, Scott Johnston
- KANB-LP 102.3, Flathead Adventist Radio
- KRVO 103.1, Bee Broadcasting, Inc.
- KQJZ 103.5, Anderson Radio Broadcasting, Inc.
- KZMN 103.9, KOFI, Inc.
- KWOL-FM 105.1, Bee Broadcasting, Inc.
- KDBR 106.3, Bee Broadcasting, Inc.

Television

- KCFW (NBC), Channel 9
- KAJJ-CD (CBS), Channel 39
- K26DD (TBN), Channel 26
- K29AA-D (PBS), Channel 29
- KEXI-LD (PBS, Channel 35
- KCFW-DT (NBC), Channel 38
- KTMF-LD (ABC), Channel 42

FAQs

1. How did the EPA recently get involved at this site?

In March 2013, Senators Max Baucus and Jon Tester expressed concerns that environmental contamination could restrict future economic use of the property and cause

environmental impacts to human health and/or the environment. The Senators requested that the EPA conduct an environmental assessment to determine if the site is eligible for the National Priorities List.

2. What is the NPL?

The NPL is the list of national priorities among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States. It is used to guide the EPA in determining which sites warrant further investigation.

Placing a site on the NPL does not assign liability to any particular party; nor does it mean that any remedial or removal action will necessarily be taken.

3. In his letter of support, Governor Bullock asked the EPA to continue periodic residential well sampling. What are the EPA's plans for additional sampling?

EPA has completed three rounds of testing and found no contaminants during the last two rounds which took place during the high flow season and low flow season. Since groundwater at the Site is significantly impacted EPA will continue sampling groundwater and domestic wells during the remedial investigation.

4. When can the community become involved in reuse/redevelopment decisions?

This is a Site-specific issue. A Reuse Assessment is part of the RI/FS process. This is typically the time when communities provide input into the potential reuse/redevelopment options.

5. What can the EPA do to help communities facilitate reuse/redevelopment at Superfund sites?

Under the Superfund Redevelopment Initiative (SRI), the EPA can fund activities that facilitate reuse, as long as those activities are designed to project the future land use. Anticipating the probable future use of a Superfund site after it has been cleaned up is of key importance in selecting and designing a remedy that will be consistent with that use. Keeping in mind that the Site is privately owned, activities that may be appropriate for funding under the SRI include the following:

- Community needs assessments that identify major issues, needs and desires of the local officials and the community related to the anticipated future use;
- Analyses that identify area market conditions and trends to provide a realistic understanding of the uses and activities that could occur on-site;
- Physical site evaluation to determine assets and constraints of the site and available infrastructure (e.g., transportation, utilities);
- Stakeholder and community outreach on reuse options; and

- Preparation of reports documenting the results of the analyses and describing anticipated future uses, and coordination of the reuse planning activities with the Superfund response process.

6. What redevelopment options are available during cleanup?

This is a site-specific issue. Knowing that redevelopment is important to community members, local government and state officials, the Site team can begin working with stakeholders, including the property owners, early in the process to see how and what redevelopment can be safely started while investigation and cleanup are occurring. We have many examples of sites where this has been successfully done.

7. Would local contractors be used as part of the cleanup efforts?

The EPA typically uses a pre-placed contract for the investigation efforts and then advertises and awards a contract for the cleanup work. Even if a non-local firm is awarded the cleanup contract, the firm frequently hires local workers, and this can be encouraged.

An additional option if the cleanup is going to use a larger number of workers is the Superfund Job Training Initiative, which is an environmental remediation job readiness program that provides free training and employment opportunities for citizens living in communities affected by Superfund sites. This option can be explored further once the likely cleanup needed is known.

8. What are some of the benefits of a site being placed on the NPL?

- Allows the EPA, MDEQ and the community to access significant technical and financial resources to address the environmental and health risks posed by the site.
- More funding over the long-term.
- Requires local community involvement.
- Potential specialized training and job training grants.
- Potential economic benefits of increased jobs related to clean up.
- Potential local technical assistance grant money for Technical Assistance Grants (TAGS), and Technical Assistance Services for Communities (TASC).
- TAGs up to $50,000 are available to incorporated nonprofit organizations of community members affected by the site and can be used for hiring a technical advisor, attending approved training, and obtaining relevant supplies and equipment.
- TASC is a resource that EPA provides to communities in order to provide assistance interpreting data, facilitating discussions and other site-related activities. TASC differs from the TAG grants described above in that TASC assistance is provided on an issue-specific basis and requires less administrative work to secure and utilize.
- Resolution of existing environmental liability and contamination questions.

9. What are some of the concerns of being placed on the NPL?

- Requires the community's and local officials' time and patience.
  - Takes time for thorough sampling and risk evaluation to take place.
  - Takes time for the final cleanup option(s) to be selected. However, they are reviewed with and by community members to make sure they work for the community.
- Sites compete with each other for funding, this happens in all our programs and Superfund listed sites are prioritized for funding.
- Perceived stigma. Some believe other businesses may not invest in the Superfund site areas, but EPA does not have proof that this happens. In fact, as the questions get answered around contamination levels and cleanup needs, some communities see a rise in redevelopment and investment. Typically, local economic conditions have a greater impact on redevelopment than a Superfund designation.

10. Has the EPA investigated the site previously?

The EPA previously conducted a preliminary assessment (PA) in 1986 looking at existing information, and a site inspection (SI), including limited environmental data collection, was completed in 1988. The investigations found polycyclic aromatic hydrocarbons (PAHs) associated with plant processes in soils, sediments and on-site surface water, including the percolation ponds. PAHs were detected above background conditions in Cedar Creek, but as stated in the 1988 report, organic compounds, including PAHs, were not detected in the Flathead River. Cyanide was detected in groundwater at the site, but it was noted that the Columbia Falls backup municipal supply well, located two miles southwest of the site, does not contain contamination from the CFAC facility.

11. Why does the EPA want to investigate the site again?

The previous EPA investigation concluded in 1988. The facility continued to operate through 2009. Site conditions have likely changed since the conclusion of the 1988 SI.

12. What are the risks of adults, children and pets using a swimming hole in Cedar Creek during the summer?

As a general rule cyanide in surface water is in the form of free cyanide compounds (hydrogen cyanide and cyanide ions). Assuming that a child plays in the river 50 times/year for 1.5 hours/event and incidentally ingests the river water, the non-cancer risk to that child would be a hazard index of 0.02 (a hazard index greater than 1 would suggest a health concern). Although cyanide in surface water will volatilize, it will do so into an infinite space and be dissipated by wind. Therefore, the ingestion pathway will dominate exposure and risk for this scenario. [From Susan Griffin email 12/15/14]

13. When will the EPA list the site on the NPL?

The site was proposed for listing on the NPL on March 26, 2015. This begins a 60-day public comment period. From there the decision could become final and the site be place on the NPL as soon as spring 2016.

14. Can EPA oversee and ensure that cleanup occurs outside of the NPL process?

Yes, particularly when there is a viable party responsible for the contamination at the site. EPA can reach a legally enforceable agreement with this party or parties to conduct a remedial investigation and cleanup.

15. What contaminants have been found at the site?

The Site Reassessment Report ("Report") dated April, 2014, documents that there have been releases or threatened releases of hazardous substances at the Site from historical industrial activities at the plant, and that the disposal of hazardous substances at the Site have affected soil, sediment, groundwater and/or surface water with concentrations of heavy metals, including arsenic, cadmium, chromium, lead, manganese, nickel, selenium and zinc, cyanide, fluoride, volatile organic compounds, semi-volatile organic compounds, polycyclic aromatic hydrocarbons, polychlorinated biphenyl compounds, and pesticides. (From settlement agreement)

16. Does an emergency situation exist?

No. While documented while there have been documented releases or threatened releases of hazardous substances at the Site, sampling data does not indicate that an emergency situation currently exists.

17. Is drinking water safe?

XX

18. Are fish caught in river safe to eat?

XX

19. Is private well water safe to drink?

XX

20. Are there any indoor air concerns at this site?

XX

21. Is Flathead Lake contaminated?

XX

22. Who will pay for the cleanup?

The EPA adheres to the polluter-pays principal. The EPA looks for potentially responsible parties to assist or pay for the investigation and cleanup of the environmental problems they have caused.

23. How much will cleanup cost?

At this point, we have no way of knowing as we only have limited Site data. Full Site characterization is necessary prior to considering cleanup options and associated costs.

24. Has EPA determined who is responsible for the contamination?

The EPA adheres to the polluter-pays principal. The EPA looks for PRPs to assist or pay for the investigation and cleanup of the environmental problems they have caused.

25. How long will it take to clean up the site under Superfund?

The length of the cleanup will be dependent on many factors, including the types of contaminants found and the extent of contamination, etc. These factors have not been fully defined, which further work would accomplish.

26. Who decides how the site is cleaned up?

The federal government and states have the authority under the Superfund law to make the final cleanup decisions. However, the Superfund law also requires that the community be given every opportunity to have meaningful input on how the cleanup is completed. Both EPA and MDEQ are committed to involving any interested citizens or groups along with local government throughout the decisions process.

27. If I don't support placement of this site on the NPL, to whom can I speak?

The EPA and MDEQ have websites or other sources of information with contact information included. You may call any one or all of these people to express your opinion and concerns. When the sites is proposed for NPL listing, a public notice will be placed in a local newspaper (Hungry Horse News and/or Flathead Beacon) announcing the proposal, along with instruction on how and where to submit comments.

28. What voice does the community have after a site is listed?

The EPA works very closely with communities and states during the cleanup process. Some communities choose to be very involved and form a community advisory group (CAG), while others do not. The EPA welcomes input and involvement from all stakeholders.

Technical assistance grants (TAGs) and other financial resources are available to communities to encourage and facilitate meaningful involvement. For more information about community involvement at Superfund sites, visit www.epa.gov/superfund/community.

29. How are site boundaries determined in the NPL process?

Superfund designation includes the source of the contamination as well as areas where contamination may have spread and poses a threat to human health and the environment. When the site is proposed, a basic area is described in the listing package, which is a report prepared and sent to EPA headquarters supporting why the site qualifies for placement on the NPL. Boundaries are not determined until after the remedial investigation and feasibility study (RI/FS) are complete. If more contamination is found later in the cleanup process, the boundaries may be changed to include the new area. If less contamination is found than suspected, the boundaries may be changed to reflect the smaller size.

30. Where can I find the results from sampling and other information?

The Columbia Falls Site Reassessment Report is available on the EPA Superfund Website at http://www2.epa.gov/region8/columbia-falls-site-reassessment-report.

31. Can private investment and redevelopment occur during the site reassessment and cleanup?

Yes. In fact, the EPA Superfund Redevelopment Initiative was developed for just this purpose, and it has been highly successful. Available tools and resources, as well as several case studies, can be viewed at:
http://www.epa.gov/superfund/programs/recycle/index.html

32. Can the property be transferred or leased during the site reassessment or cleanup?

The Superfund program has many examples where property is transferred or leased during investigation and cleanup. It is important that this is done thoughtfully so new owners/renters do not inadvertently become liable for contamination they did not cause. The EPA is willing to work with the current owners as well as potential purchasers/renters in this situation.

33. Will investigation prevent redevelopment from occurring until the work is done?

No, it will not. The EPA encourages redevelopment of potentially contaminated lands. The EPA believes it is the stigma of contamination that leads to a slow redevelopment, and addressing contamination will lead to further redevelopment. If redevelopment occurs, the EPA is able to work with the current owners and redevelopers to ensure an adequate investigation occurs while working around redevelopment projects as we investigate the site. After the site reassessment is completed, the EPA will work with MDEQ, local officials and other stakeholders to determine the best remedial approach.

34. Can a redeveloper buy contaminated property without becoming CERCLA/Superfund liable?

Yes. Beginning in 2002, a bona fide prospective purchaser (BFPP) may buy property with knowledge of contamination and maintain their protection from liability provided they conduct All Appropriate Inquires (AAI), comply with continuing obligations and can demonstrate no affiliation with a liable party. http://www.epa.gov/compliance/cleanup/revitalization/bfpp.html

35. What does all appropriate inquires mean?

All appropriate inquiries or AAI is the process of conducting due diligence or a phase I environmental site assessment to determine prior uses and ownership of a property and to assess conditions at the property that may be indicative of releases or threatened releases of hazardous substances. For liability purposes, a purchaser must conduct AAI prior to acquisition. http://www.epa.gov/brownfields/aai/index.htm

36. What are continuing obligations?

In order to maintain their protection from liability, a new owner of a contaminated property must comply with the following continuing obligations: (1) comply with any land use restrictions and institutional controls; (2) take reasonable steps with respect to hazardous substance releases; (3) provide full cooperation, assistance, and access to persons that are authorized to conduct response actions or natural resource restoration; (4) comply with information requests and administrative subpoenas; and (5) provide legally required notices.

37. Would local contractors be used as part of the cleanup effort?

The EPA typically uses a pre-placed contract for the investigation efforts and then advertises and awards a contract for the cleanup work. Even if a non-local firm is awarded the cleanup contract, the firm frequently hires local workers and this can be encouraged. If a responsible party or parties conduct the cleanup under a legal agreement with the EPA, local involvement can still be encouraged.

If the cleanup is going to use a larger number of workers, an additional option is the Superfund Job Training Initiative. This environmental remediation, job-readiness program provides free training and employment opportunities for citizens living in communities affected by Superfund sites. This option can be explored further once the likely cleanup needed is known.

38. Why is a RI/FS Necessary?

EPA has potential human health and environmental concerns related to groundwater

contamination. Sampling has shown cyanide, fluoride and metals in groundwater at the site at levels above Safe Drinking Water Act allowable limits known as Maximum Contamination Levels. These are the regulatory standards for municipal water systems. The concern is that contaminated groundwater has the potential to flow from the site to areas currently used as private drinking water sources and to the Flathead River and Cedar Creek. The RI/FS will determine the nature and extent of contamination at the site, which will inform EPA's selection of a cleanup remedy at the site.

39. What communications have EPA had with the PRPs?

EPA has had initial communication with the PRPs (CFAC, ARCO). The agency has recently notified these PRPs of their potential liability under the federal Superfund law, and EPA has initiated the negotiation process with the PRPs to enter into a legally binding agreement to perform the RI and FS to address EPA's human health and environmental concerns in connection with the site.

40. How is EPA responding to the CFAC RI/FS Work Plan?

EPA has provided a proposed administrative settlement agreement and scope of work, which sets out the agency's expectations for how the RI and FS will be performed by the PRPs. EPA will not be commenting on CFAC's draft RI/FS work plan. EPA is hopeful that the PRPs will submit a work plan that meets the agency's expectations as outlined in the draft AOC and SOW.

41. What are EPA's plans for community involvement?

EPA understands that one of the PRPs, CFAC, is convening a series of community meetings regarding the site. EPA is interested in learning more about this effort. However, the agency has an established process of engaging communities at cleanup sites and will be following that process at this site.

42. What have been the economic impacts of NPL listing on nearby communities at other sites?

At more than 850 Superfund sites, EPA's engagement has facilitated their productive reuse. The new, continued or planned reuse at these sites has benefited communities through local job creation, green space preservation, property value increases, local tax base enhancement and quality of life improvements. Additionally, data collected in 2014 for 450 of the 850 sites where reuse is occurring indicate that site cleanups can be a significant economic driver. Those sites now have approximately 3,470 operating businesses that generate annual sales over $65.1 billion and employ over 89,000 people, who earn a combined income of $6.0 billion.

A peer-reviewed study found that residential property values within three miles of Superfund sites increased 18.6- 24.5 percent when sites were cleaned up and deleted

from the NPL.

(From http://www2.epa.gov/sites/production/files/2015-02/documents/epa_fy_2016_congressional_justification.pdf pgs 684-685)

43. Does CFAC's AOC with the State cover all hazardous waste cleanup at the Site?

MDEQ, CFAC and Calbag Resources LLC (Calbg), Site demolition contractors, entered into an Administrative Order on Consent (AOC) on June 15, 2105. This AOC only addresses the management of hazardous waste derived from spent potliner materials in the Pot Room Building at the Site, including the need for a hazardous waste management permit to store the material on-site for more than 90 days and the potential that CFAC and/or Calbag may violate hazardous waste accumulation and storage time limits.

The AOC does not address the release of Superfund hazardous substances at the Site. The U.S. Environmental Protection Agency will work in close consultation with MDEQ through a separate process to ensure a protective cleanup of the Site under the federal Superfund program.

The MDEQ Asbestos Control Program has been providing direct compliance assistance and regulatory permitting for demolition of the facility.

Background:

The Anaconda Company Aluminum Smelter was located on the Hungry Horse Dam at Columbia Falls, Montana. Today the facility (the Site) is known as Columbia Falls Aluminum Company and is owned by a Swiss company called Glencore.

The Hungry Horse Dam was the first damn built by the federal government after World War II. It was completed in 1953, and soon after, the Harvey Aluminum Company (HAC) opened an aluminum plant on a 1,000-acre plot north of Kalispell at Rose Crossing. HAC was unable to obtain financing to build the plant, but Anaconda Copper Mining Company (ACMC) purchased HAC on November 6, 1951. In 1977, ACMC was acquired by Atlantic Richfield Company (ARCO), which is now owned by BP America. In December 1983, ARCO announced it would sell its brass and aluminum operations (including the Columbia Falls plant) in September 1985.

The plant was sold to the Montana Aluminum Investors Corporation and began operations under the Columbia Falls Aluminum Company (CFAC). In 1999, a privately owned Swiss corporation called Glencore AG acquired CFAC.

The plant began producing aluminum in 1955, with production reaching 180,000 tons by 1968. At its height, the plant employed 1,500 people and was central to the area's economy. When it shut down at the end of October 2009, the closure forced the layoff of nearly 90 workers as high-energy prices and poor market conditions made operations unprofitable.

Prior Actions:

A preliminary assessment (PA) was performed on March 5, 1984, by Montana Department of Health and Sciences (MDHES). The PA concluded that hazardous wastes generated onsite were spent halogenated and non-halogenated solvents. Solid wastes included spent potliners, basement sweepings and air-pollution-control dusts.

A site investigation (SI) by Ecology and Environment, Inc. was conducted in 1988 at the request of the EPA. The results of its investigation indicated that high concentrations of polycyclic aromatic hydrocarbons (PAHs) occurred primarily in soils and sediments and that a release to groundwater and surface water of cyanide had occurred – both of which were attributable to plant processes. No release of organic compounds from the Site to surface water or groundwater, including the Columbia Falls backup municipal supply well, had occurred. Following this investigation, the EPA classified the site as No Further Remedial Action Planned (NFRAP). [SITE REASSESSMENT REPORT, April 2014]

On March 11, 2013, Senators Max Baucus and Jon Tester asked the EPA to work with the Montana Department of Environmental Quality (MDEQ) to determine if the 120-acre site should be declared a Superfund site. The designation could create cleanup jobs and open the possibility of new business interests. The senators also called on the EPA to study the plant's solvent landfills and wastewater ponds and determine the risks posed by cyanide, zinc and other contaminants.

The EPA visited the facility and met with local stakeholders (City Manager of Columbia Falls, County Commissioner, Sen. Tester's and Sen. Baucus' staffs) in June 2014.

The EPA conducted a sampling event in late September 2013. Sixty-eight environmental samples were collected as part of the sampling event. The objectives of the sampling event included: characterizing the hydrogeological conditions at the site; determining if potential sources of contamination at the site are releasing contaminants to the surrounding environment; and identifying if potential receptors are currently impacted.

Three main potential sources were identified and sampled: the landfill and sludge pond area, containing spent potliner waste and sludge from the wet scrubbers; the north percolation ponds; and the south percolation ponds containing process wastewater. Other sources are likely to exist, but they were not sampled as part of this screening effort.

Samples from groundwater monitoring wells at the site down gradient of sources had contaminants above Maximum Contaminant Levels (MCL) including cyanide, fluoride, arsenic, chromium, lead and selenium. Groundwater on site is not consumed, so MCL comparison is for illustrative and comparison purposes only. Although groundwater on site is not consumed, the contaminants in the groundwater would have potential to migrate.

Five residential wells were sampled to determine if groundwater near the neighborhood adjacent

to and down gradient of the CFAC property has been impacted. Cyanide was detected in one well within neighborhood and one well to the north of the facility. The detection of cyanide was below the EPA's maximum contaminant levels (MCL) and the State of Montana's numeric water-quality standards. When compared to the EPA's risk-based screening levels, however, the concentrations of cyanide in both water samples were higher than the EPA risk-based screening level for tapwater. The screening concentration is a conservative value that EPA considers protective for humans over a lifetime. Exceeding these values does not necessarily indicate that a health affect will occur, but that a more detailed assessment may be warranted. No other contaminants were detected above the regulatory or risk-based screening levels.

Sampling results indicate Flathead River and Cedar Creek have been impacted by cyanide and metals, including manganese. This stretch of the Flathead River is believed to be used by anglers. Due to the screening nature of this site reassessment, fish tissue samples were not collected; therefore, it is unknown if bioaccumulation of these contaminants is a concern.

In response to the cyanide detection in a residential well in the neighborhood adjacent to and down gradient of the CFAC property, the EPA conducted a second round of sampling for residential wells located within that neighborhood. The purpose of this sampling event was to gather more detailed data about groundwater quality in the area. The sampling occurred the week of April 7, 2014. Sample results indicated that none of the wells sampled had detectable amounts of cyanide in the samples.

The EPA held a public meeting on Tuesday, April 15, 2014, to discuss results from the site reassessment as well as potential next steps at the site. The EPA and MDEQ discussed their respective environmental programs that may be applicable at this site. Generally, the sentiment from the audience was that the EPA and MDEQ should proceed as quickly as possible in getting the site investigated and remediated. There didn't appear to be much trust between the active community and Glencore/CFAC.

The EPA and MDEQ met with Glencore and CFAC on July 8, 2014, to discuss their intentions with the site. After this meeting, it was decided that the best next step would be for MDEQ to work with Glencore and CFAC to complete a Remedial Investigation. In the event DEQ is unable to reach an agreement with Glencore/CFAC, the EPA will be ready to move forward with the NPL process.

The EPA sent 104(e) information requests to CFAC and BP America (Anaconda/Arco) on September 3, 2014. Information obtained from these responses will assist with the Remedial Investigation.

In November 2014, the EPA resampled domestic wells in the neighborhood adjacent to and down gradient of the CFAC. Sample results indicated that none of the wells sampled had detectable amounts of cyanide in the samples.

On Dec. 9, 2014, CFAC sent a letter to MDEQ announcing that it was ending negotiations regarding how to proceed with assessing and cleaning up the site.

On Dec. 11, 2014, a public meeting was convened by MDEQ to provide an update to the community. The results of the November 2014 sampling event were discussed. The EPA presented information about the NPL listing process as well as the need for community support for such a designation (in the form of a letter from the governor) in order to move forward.

On Dec. 12, 2014, CFAC sent a letter to the governor opposing the listing of the Site.

On Dec. 15, 2015, the mayor of Columbia Falls sent a letter to the governor supporting the listing of the Site.

On Jan. 8, 2015, Senator Tester sent a letter to Administrator McCarthy supporting the listing of the Site.

On Feb. 17, 2015, Governor Bullock sent a letter to Administrator McCarthy supporting the listing of the Site.

On March 4, 2015, EPA Regional Administrator Shaun McGrath responded to Montana Governor Bullock's February 17, 2015 letter supporting placement of the Site on the National Priorities List (NPL) for investigation and cleanup.

On March 26, 2015, EPA proposed adding the Anaconda Aluminum Co Columbia Falls Reduction Plant (also known as Columbia Falls Aluminum Company Plant) to the National Priorities List (NPL).

There was a public comment period regarding the proposed decision, which ended June 2, 2015. EPA received 72 comments on the proposed decision.

EPA promulgates updates to the NPL two times, in the spring and fall, each year. Given the comments received, it is anticipated the final decision will come as soon as spring 2016. EPA will create a response to comments document, which will be provided at the time a final decision regarding NPL listing is made.