Montana Multi-Site Cooperative Agreement Amendment

Bulk Management Support Agency Assistance

Application– SFY 2016

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Montana Department of Environmental Quality

Remediation Division

Helena Montana

DRAFT FINAL

For the

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Region VIII

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INTRODUCTION

This Multi-Site Cooperative Agreement application requests funding for the Montana Department of Environmental Quality (DEQ) Superfund Program for state participation in the federal Superfund Program authorized in the 1986 Superfund Amendment and Reauthorization Act. Beginning State Fiscal Year 2013, the agencies agreed to request a separate grant for Management Assistance for bulk funded sites and a grant for special account sites. Activities proposed for funding in this MSCA application for bulk funded sites include support agency assistance for federal-lead remedial actions at selected Montana National Priorities List (NPL) sites. This application will fund DEQ's site specific activities for EPA lead NPL sites in Montana for SFY 2015. This grant will be the mechanism through Cooperative Agreement Amendments to provide bulk-funded Management Assistance through June 30, 2015.

SUPPORT AGENCY ACTIVITIES

The Remediation Division manages DEQ's Superfund mission through the Federal Superfund and Construction Bureau and the Hazardous Waste Cleanup Bureau. Staff from both bureaus works on federal Superfund cleanup activities under the CORE cooperative agreement, the Management Assistance Bulk Funding Multi Site Superfund Cooperative Agreement, the Management Assistance Special Account Multi Site Superfund Cooperative Agreement, and Technical Assistance Cooperative Agreement (TACA). DEQ will maintain a support agency role at EPA-lead sites of, Barker/Hughesville Mining District, Basin Mining Area, Carpenter/Snow Creek Mining District, Flat Creek IMM, Lockwood Solvent Groundwater Plume, Mouat, and the Upper Tenmile Creek Mining Area NPL sites, proposed listing for Frenchtown Mill-Smurfit-Stone site, proposed listing for Columbia Fall Aluminum Reduction site and conduct preliminary investigations/site assessment activities. Court-ordered settlements with the responsible parties fund DEQ RD/RA. ACM (Anaconda Copper Mine) Smelter and Libby Groundwater sites were removed from the bulk funded management assisted sites and added to the Special Account funded sites at the request of DEQ. Refinery Court-ordered settlements with the responsible parties' fund the following projects as DEQ lead management are Upper Clark Fork River, Streamside Tailings and Montana Pole projects.

The intent of DEQ in this support agency role is to enhance progress at the sites by providing technical, legal, and managerial resources to the EPA, as well as by articulating issues of state concern, and promoting state and local involvement in the site remediation process.

STATEMENT OF WORK FOR SUPPORT AGENCY ACTIVITIES

Support agency activities are in the following four general components. These represent a set of general commitments that may be appropriate at each site depending on the activities and requirements associated with a particular site. Site-specific narratives describe commitments for each site.

Support Agency Components

A. Remedial Investigation/Feasibility Study (RI/FS) or Engineering Evaluation/Cost Analysis (EE/CA) including Proposed Plans, Records of Decisions, Action Memorandums and Consent Decree negotiations with potentially responsible party (PRPs)

B. Remedial Design (RD)

C. Remedial Action (RA)

D. Quality Assurance/Quality Control Commitment (QA/QC)

E. Site-Specific Work Plans for Support Agency Assistance

Component A commitments apply to all sites that are in the RI/FS stages (most commitments continue through the subsequent superfund process specified in Components B and C) and include review of RODs and negotiation of consent decrees. All Clark Fork River Basin (CFRB) NPL sites are now past the RI/FS stage but many of the Component A commitments remain relevant. Components B and C commitments apply to all sites or operable units (OUs) in the RD and RA phases. Component E commitments only apply to sites requiring site specific work products.

Component A - RI/FS or EE/CA Activities

Commitment 1 - Review RI/FS Documents

Outputs: Review and prepare written comments and recommendations on EPA, EPA contractor, or PRP work products during the RI/FS phase including:

a. Preliminary planning document, including draft SOW (work plans), draft administrative orders, draft quality assurance project plans, draft sampling/analysis plans, and draft health/safety plans;

b. Draft/final RI/FS reports, including draft public health evaluations, endangerment assessments, interim technical memoranda, work amendments, contractor progress reports, data analysis, data evaluation, and public comments on the draft studies; and

c. Draft/final records of decision and action memoranda.

Commitment 2 - Maintain Project Files

Outputs: Review and compile site information from the files of appropriate local, state, and federal agencies, and from PRPs. Update site files as new data, correspondence, and work products become available. Provide access to site files as requested by EPA, their contractors, the public, site owners/operators, legislators, officials and potentially responsible parties, as appropriate. Provide secure storage for confidential files.

Commitment 3 - State Legal Requirements

Outputs: Provide written summaries identifying state applicable or relevant and appropriate requirements (ARARs) specifying state environmental statutes and regulations for each response action. Review EPA's federal ARARs designations and discuss the integration of state ARARS into remedial decision requirements.

Commitment 4 - Community Relations

Outputs: Review and prepare written comments on EPA or PRP community relations work products, including draft community relations plans, draft fact sheets and draft press releases. Prepare verbal or written responses to requests for site information from the public, legislators/officials, site owners/operators, contractors, and PRPs. Provide state assistance in the preparation or revision of site community relations plans. Attend public meetings and briefings to discuss draft RI/FS studies, site information, progress, and policies, as appropriate.

Commitment 5 – Quarterly Progress Reports

Outputs: Develop and submit to EPA progress reports of site specific expenditures and activities.

Commitment 6 - Site Visits

Outputs: Conduct site visits during periods of RI/FS field activities. Participate in periodic site inspections during RIs to observe trial runs of equipment, contractor progress, and aspects that affect project acceptance. Prepare written summaries of observed activities, comparing them to final preliminary planning outputs, site management plans, construction plans and specifications, and work completion schedules.

Commitment 7 - Consultation and Meetings

Outputs: Consult and meet with State staff, EPA, and EPA contractors, to discuss State comments on work products, State requirements, and RI/FS progress, including preliminary planning discussions, Proposed Plan and ROD development, technology transfer, interim design, contractor selection, preconstruction activities, and project pre-acceptance issues. Prepare and distribute written summaries of these meetings as appropriate.

Commitment 8 - PRP Discussions

Outputs: Participate with EPA in the development of PRP enforcement strategy. Review and prepare written comments on enforcement work products, enforcement activity, and the RI/FS processes. Prepare and distribute written summaries of these meetings.

Commitment 9 - Access

Outputs: Assist EPA in gaining access to sites to perform RI/FS activities, by helping to negotiate easements and access agreements with site owners/operators.

Commitment 10 - Training

Outputs: Receive EPA authorized training or required training for site-specific activities (e.g. risk assessment, lead in soils/wastes workshops, soils reclamation of mining/smelting sites, stream bank reconstruction, etc).

Commitment 11 - Project Administration

Outputs: Provide daily project management, fiscal accounting, cost-recovery documentation, legal research, outreach to local and federal agencies, general administration and clerical support.

Commitment 12 – ATSDR

Outputs: Coordinate and communicate with the Agency for Toxic Substances and Disease Registry on reviews of their public health evaluation activities and reports.

Commitment 13 – Other

Outputs: Complete other activities as identified by the state and EPA that are critical to the project.

Outcome: Ensure state involvement in the conduct of Superfund RI/FSs or EE/CAs.

Component B - RD Activities

Commitment 1 - Cooperative Agreements or State Superfund Contract (SSC)

Outputs: Negotiate and sign cooperative agreements or SSCs identifying agreed upon requirements for determining EPA RA costs and the State's required matching share.

Commitment 2 - Review RD Documents

Outputs:-Review and prepare written comments and recommendations on EPA or PRP work products during the RD phase including:

a. RD work plans and sampling plans;

b. Review data summary reports and date analysis/evaluation reports or technical memorandums;

c. The preliminary (30 percent complete), intermediate (60 percent complete), pre-final (95 percent complete), and final RDs;

d. Contractor progress reports;

e. Draft construction specifications;

f. Value engineering screening submittal;

g. Draft operations and maintenance plans; and

h. Draft bid request documents.

Commitment 3 - Project Administration

Outputs: Provide daily project management, fiscal accounting, cost recovery documentation, legal research, and liaison with local and federal agencies, general administration and clerical support.

Commitment 4 - Other

Outputs: Complete other activities as identified by the state and EPA that are critical to the project.

Outcome: Ensure state involvement in the development of Superfund Remedial Designs.

Component C - RA Activities

Commitment 1 - Review RA Documents

Outputs - Review and prepare written comments and recommendations on EPA or PRP work products during the RA phase including:

a. Contractors' bid responses;

b. Construction status and planning meetings;

c. Construction oversight, progress reports, proposed change orders and claims;

d. Pre-final and final inspection reports;

e. Construction completion documentation; and

f. Draft delisting documents (for site removal from the NPL).

Commitment 2 - Conduct Field Inspections

Outputs: Make field visits to support oversight of progress on implementation of remedial action measures to ensure compliance with decision documents, design requirements, and as necessary, appropriateness for state assumption of O&M responsibilities.

Commitment 3 - Project Administration

Outputs: Provide daily project management, fiscal accounting, cost recovery documentation, legal research, and liaison with local and federal agencies, general administration, and clerical support.

Commitment 4 - Community Relations

Outputs: Review and prepare written comments on EPA or PRP community relations work products, including draft fact sheets and draft press releases. Prepare verbal or written responses to requests for site information from the public, legislators/officials, site owners/operators, contractors, and PRPs. Attend public meetings and briefings to discuss RA status, site information, progress, and policies, as appropriate.

Commitment 5 - Other

Outputs: Complete other activities as identified by the state and EPA that are critical to the project.

Outcome: Ensure state involvement in the development of Superfund Remedial Actions.

Component D - Quality Assurance/Quality Control

Commitment 1 – Follow EPA Quality Management Procedures

Output 1: For DEQ lead sampling investigations, DEQ will use EPA-approved Quality Assurance guidance.

Commitment 2 – Develop Quality Assurance Project Plans

Outputs: DEQ will develop QAPPs as specified in EPA QA/R-5, EPA Requirements for Quality Assurance Project Plans (QAPP) for Environmental Data Operations. DEQ will establish Data Quality Objectives to clarify the study objectives, define the most appropriate types of data to collect, determine the most appropriate conditions under which to collect the data, and specify the level of uncertainty that is acceptable as the basis for establishing the quantity and quality of

data needed. The EPA must approve and sign all QAPPs before data collection. DEQ will provide thirty days for EPA to review and comment upon the QAPP unless the agencies agree to a different review period.

Outcome: Define state adherence to established and defined quality assurance processes for Superfund RI/FS and RD/RA.

Component E - SITE-SPECIFIC WORK PLANS FOR SUPPORT AGENCY ASSISTANCE

BARKER HUGHESVILLE MINING DISTRICT

On September 13, 2001, EPA added the Barker Hughesville Mining District to the Superfund NPL. The Barker Hughesville Mining District is located approximately ten miles east of the town of Monarch between Judith Basin County and Cascade County, south of Great Falls and northeast of Helena in the Little Belt Mountains. The site is an historic mining area with mining activities dating from 1879 through 1945.

DEQ commitments including consultation with EPA concerning sampling and analysis for the RI/FS effort, accrued leave expenses, file maintenance, community relations, and quarterly report preparation. Management and technical assistance will be directed towards the remedial investigation report and the feasibility study, and the preparation of a proposed plan and ROD. Milestone meetings for the RI/FS are anticipated to occur during SFY 2016 and continued remedial discussions, decisions, and remedial activities will also continue.

Site-Specific Activities

DEQ activities include Component A, B, C and D.

1. Oversee and monitor field work and site visits, review progress reports, and track schedules.
2. Review and comment on sampling and data collection plans.
3. Review, comment, and assist in conducting community relations, participate in public meetings, and assist in the preparation of fact sheets.
4. Review work and sampling plans for source control.
5. Participate in FS milestone meetings
6. Provide legal review including:
    a. Review legal adequacy of the RI and FS;
    b. Identify preliminary state ARARs;
    c. Provide cost recovery and administrative record duties for state activities in support of EPA's cost recovery responsibilities; and
    d. Assist EPA in the planning and preparation of the FS

Travel

Travel estimates for the remedial activities and to monitor annual sampling events will total 12 trips for site visits at approximately 320 miles per trip.

BASIN MINING AREA

The Basin Mining Area is located in Jefferson County, Montana. The site includes the drainage of Basin and Cataract Creeks, the Town of Basin, and metal-contaminated sediments in the nearby reaches of the Boulder River. EPA listed the Basin Mining Area site on the NPL on October 22, 1999, and established two operable units (OUs) for the site, the Town of Basin OU and the Basin Watershed OU. EPA plans to continue remedial investigation activities for the watershed OU in SFY 2015 and explore source control strategies. DEQ's estimated budget includes site specific project hours, accrued leave expenses, file maintenance, quarterly report preparation, and brief EPA consultation. DEQ activities include Components A, B, C and D.

Town of Basin OU-1

The EPA issued the Town of Basin OU ROD in March 2002 and completed remedial action in 2005. DEQ will provide limited management assistance during SFY 2016. The 2nd 5-year review of the OU1 Remedial Action was completed in 2014. This review noted that the necessary and appropriate institutional controls (ICs) were not, as yet, in-place to insure that the remedy for OU1 remains protective of the public health and the environment. The EPA, the DEQ, and the DNRC need to work with Jefferson County to implement the necessary institutional controls for residential soil and for ground water. EPA and DEQ will review the ground water monitoring data in the vicinity of the Basin mill in order to determine the long-term monitoring requirements. Design and implementation of the ICs and the long-term O&M program will require several interagency meetings and follow-up in 2016; specific legal and technical input will be required. DEQ activities include Component A and D.

Travel

Travel estimates include two trips for a site visit at approximately 80 miles. DEQ does not anticipate any out-of state trips.

Basin Watershed OU-2

The Basin Watershed (OU2) consists of numerous abandoned mines which are sources of contamination to the Basin watershed. The Bullion mine (OU5) and the Crystal mine (OU6) are two of the major sources of contamination to the Basin watershed. The agencies completed the RI/FS for these two OUs in 2013, and the agencies started the development of two proposed interim RODs for these two OUs in 2014. DEQ will participate in the completion of the RI/FS for the Bullion and Crystal mines and a Proposed Plan and Interim Record of Decision for the remedy of solid material at the Crystal Mine in 2015. DEQ will assist EPA in conducting work plan development and source control evaluation. Milestone meetings for the RI/FS for the Bullion and Crystal Mines occurred during SFY 2014 and SFY 2015. Milestone meetings for the Proposed Plan and draft interim ROD for the Crystal Mine and the Bullion Mine are anticipated to occur during SFY 2016. Removal actions at both Crystal and Bullion and passive treatment pilot testing at Crystal are scheduled to occur during SFY 2016.

Dewatering/treatment and adit rehabilitation will be done at the Bullion during the 2015 field season (June-October, 2015). AMD tracer studies will be done (April-September, 2015) to better define and control AMD sources at the Bullion and the Crystal. Remedial design will proceed for both the Crystal and the Bullion after the interim RODs are signed; the design phase will require specific technical and legal input from the DEQ to insure the optimum basis for the long-term O&M; this input will address such issues as ARARs, field access, safety, winter operations, routine operations, routine maintenance, routine logistics, preventative maintenance, process cycling, major equipment repair/replacement, process waste handling, etc. DEQ input will be required to initiate evaluation of other significant sources of contamination to the Basin watershed.

Site-Specific Activities

DEQ activities include Component A, B, C and D.

1. Oversee and monitor field work and site visits, review progress reports, and track schedules.
2. Review and comment on sampling and data collection plans.
3. Review, comment, and assist in conducting community relations, participate in public meetings, and assist in the preparation of fact sheets.
4. Assist in procuring mining technical assistance if needed.
5. Review work and sampling plans for source control.
6. Participate in Milestone meetings for the Bullion and Crystal interim RODs.
7. Coordinate with activities at the Basin Creek Mining Properties for remedial support of OU remedial activities.
8. Provide legal review including:
    a. Review legal adequacy of the Proposed Plan;
    b. Identify preliminary state ARARs;
    c. Provide cost recovery and administrative record duties for state activities in support of EPA's cost recovery responsibilities; and
    d. Assist EPA in the planning and preparation of the proposed interim RODs.

Travel

Travel estimates include approximately 14 trips for site visits, technical, oversight, project coordination, and public meetings at approximately 100 miles per trip. DEQ does not anticipate any out-of state trips.

CARPENTER SNOW CREEK MINING DISTRICT

On September 13, 2001, EPA added the Carpenter Snow Creek Mining District to the Superfund National Priorities List (NPL). The Carpenter Snow Creek Mining District is located at and adjacent to the town of Neihart, in the Little Belt Mountains in Cascade County. Mines associated with this NPL site are proximate to Belt Creek and two tributaries: Carpenter Creek and Snow Creek. Milestone meetings for the RI/FS are anticipated to occur during SFY 2016. DEQ's SFY 2016

activities will focus on the RD/RA for Neihart OU-1 and RI/FS activities for both the Watershed OU-2 and Silver Dyke Mine OU-3.

Neihart OU-1

EPA's contractor is drafting the remedial design report for OU-1 at this time and should have a draft design package including a RA cost estimate ready for agency review in April 2015. EPA and DEQ will prepare a State Superfund Contract in SFY 2016. DEQ will assist EPA in preparing a Nation Priority Panel presentation by September 2015.

Site-Specific Activities

DEQ activities include Component A, B, C and D.

1. Provide support agency assistance to EPA for RD/RA activities, including site visits, review of progress reports and other documents, plans, and reports, and tracking schedules.
2. Review and comment on deliverables including the RD Work Plans and Institutional Controls Work Plans.
3. Attend technical, legal, and public meetings.
4. Conduct community involvement activities including review of fact sheets and other informational materials, and respond to public inquires.
5. Provide legal review including:
    a. Review legal adequacy of RD/RA statement of work, and subsequent work plans/design reports;
    b. Provide cost recovery and administrative record duties for state activities in support of EPA's cost recovery responsibilities;
    c. Review RD documents and reports.
    d. Develop the State Superfund Contract with EPA.

Watershed OU-2

DEQ assisted EPA with RI activities in SFY 2015 and will continue providing assistance into SFY 2016. The RI report should be completed in SFY 2016. The FS for OU-2 will begin after the FS for OU-3 is completed or nearly completed.

Site-Specific Activities

DEQ activities include Component A and D.

1. Provide support agency management and technical assistance to EPA for RI activities, including site visits, sampling and construction oversight, review of progress reports and other documents, repository designs, plans, reports, and tracking schedules.
2. Review and comment on deliverables including the RI work plans and reports.
3. Attend technical, legal, and public meetings.
4. Attend Milestone meetings for the RI.

5. Conduct community involvement activities including review of fact sheets and other informational materials, and respond to public inquires.
6. Provide legal review including:
   a. Review legal adequacy of RI statement of work, and subsequent work plans/design reports;
   b. Provide cost recovery and administrative record duties for state activities in support of EPA's cost recovery responsibilities;
   c. Review RI documents and reports.

Silver Dyke Mine OU-3

DEQ assisted EPA with RI/FS activities in SFY 2015 and will continue providing assistance into SFY 2016. The RI report should be completed in SFY 2016. The FS effort for OU-3 started in SFY 2015 and will continue into SFY 2016. The FS should be completed by 2017.

Site-Specific Activities

DEQ activities include Component A and D.

1. Provide support agency management and technical assistance to EPA for RI/FS activities, including site visits, sampling and construction oversight, review of progress reports and other documents, repository designs, plans, reports, and tracking schedules.
2. Review and comment on deliverables including the RI/FS work plans and reports.
3. Attend technical, legal, and public meetings.
4. Attend Milestone meetings for the RI/FS.
5. Conduct community involvement activities including review of fact sheets and other informational materials, and respond to public inquires.
6. Provide legal review including:
   a. Review legal adequacy of RI/FS statement of work, and subsequent work plans/design reports;
   b. Provide cost recovery and administrative record duties for state activities in support of EPA's cost recovery responsibilities;
   c. Review RI/FS documents and reports.

Travel

Travel estimates include approximately 12 trips for OU1, 4 trips for OU2, and 8 trips for OU-3 for site visits for technical, coordination, and public meetings at approximately 320 miles per trip (16 trips total). DEQ anticipates at least four over-night trips but does not anticipate any out-of state trips.

COLUMBIA FALLS ALUMINUM REDUCTION PLANT

This site was proposed for NPL listing in March 2015 and while the known concentrations of contaminants may not necessitate an emergency response at this time, further investigations and meetings with EPA and the PRPs is necessary prior to determining if the site should be listed on the NPL. During SFY 2015, PA/SI funding was being used to fund DEQ's staff time and travel while working on the site and the State of Montana does support NPL listing for this site.

Hazardous wastes produced at the facility include halogenated and non-halogenated solvents, fluoride, cyanide and some heavy metals. Shallow groundwater sampled at the site had elevated concentrations of fluoride and cyanide and these contaminates may be migrating into the Flathead River. DEQ will provide management assistance support for Components A and B. If the site is listed then the DEQ level of effort on this project will have to increase to assist EPA with the RI/FS activities.

DEQ is now requesting site-specific funding for staff hours, travel expenses, and that cost recovery documentation may begin at the site in SFY 2016.

Site-Specific Activities

DEQ will provide management assistance support to EPA for Components A and D.

1. Provide support agency management assistance to EPA for RI/FS activities, including site visits, sampling oversight, review of progress reports, plans, and other documents and tracking schedules.
2. Review and comment on deliverables including the RI/FS work plans and reports.
3. Attend technical, legal, and public meetings.
4. Attend Milestone meetings for the RI/FS.
5. Participate in community involvement activities including review of fact sheets and other informational materials, and respond to public inquires.
6. Provide legal review including:
    a. Review legal adequacy of RI/FS statement of work, and subsequent work plan reports;
    b. Provide cost recovery and administrative record duties for state activities in support of EPA's cost recovery responsibilities;
    c. Review RI/FS draft documents and reports.

Travel

Travel estimates include approximately four trips for three DEQ staff for site visits, technical, coordinating, and public meetings at approximately 500 miles per trip. DEQ does not anticipate any out-of state trips.

FLAT CREEK/IMM

The Iron Mountain Mine, located about four miles north of Superior, MT produced silver, gold, copper and lead for several decades in the early 20th century, and left behind about 61,000 square feet of tailings, up to 7 feet deep in some places. In 1993, Montana Department of State Lands abandoned mines inspectors documented the Flat Creek tailings. ASARCO conducted limited remediation work in 1998. That same year, traces of antimony were detected in Superior's drinking water. In 2002, the EPA conducted a removal action at the high school track and half a dozen areas of known contamination where residents had used the tailings as fill material. Flat Creek/IMM was listed as an NPL site in September 2009.

Superior OU-1

RD/RA activities were completed for OU-1 in early SFY 2015. EPA, DEQ and the USFS continue to monitor OU-1 on an annual basis and develop the Institutional Controls. Because DEQ staff spends very little time on OU-1, all staff hours and travel for OU-1 is rolled up and report in the budget estimate for OU-2.

Site-Specific Activities

DEQ activities include Component A, B, C and D.

1. Provide support agency assistance for site visits, review progress reports and other documents, plans, and track schedules.
2. Review and comment on deliverables including the Institutional Controls Work Plans.
3. Attend technical, legal, and public meetings with EPA.
4. Conduct community involvement activities including review of fact sheets and other informational materials, and respond to public inquiries.

Flat Creek Watershed OU-2

EPA, DEQ and the USFS completed the site characterization at OU-2 in 2014. DEQ will assist the USFS with developing an EE/CA in SFY 2016 and help plan and coordinate the future Non-Time Critical Removal Action.

Site-Specific Activities

DEQ activities include Component A, B, C and D.

1. Provide support agency assistance to EPA and US Forest Service (USFS) for Removal Action activities, including site visits, sampling and construction oversight, review of progress reports and other documents, plans and reports, and tracking schedules.
2. Assist USFS and their contractor in characterizing tailings and mine waste in the upper reach of Flat Creek on land administered by the Montana Environmental Custodial Trust.
3. Oversee and monitor field work and site visits, review progress reports, and track schedules.
4. Review and comment on sampling and data collection plans.
5. Assist USFS and their contractor on developing plans and specifications that will be included in bid packages for removal actions.

6. Review, comment, and assist in conducting community relations, participate in public meetings, and assist in the preparation of fact sheets.
7. Assist in procuring source control and/or mining technical assistance if needed.
8. Provide legal review including:
    a. Review legal adequacy and assist in preparation and review of project planning, removal action process documentation, inter-agency coordination and contracting efforts;
    b. Coordinate legal, budget, and other issues with the Montana Environmental Custodial Trust to support proposed site investigation and other activities;
    c. Identify preliminary state ARARs;
    d. Provide documentation and administrative record duties for state activities in support of EPA's administrative process; and
    e. Assist EPA in planning, preparation, and comment on removal action documents and process.

Travel

Travel estimates include approximately two trips for OU-1 and six trips for OU2 site visits for technical, coordination, and public meetings at approximately 375 miles per trip. Each trip requires two days and overnight lodging for one DEQ staff member. DEQ does not anticipate any out-of state trips.

FRENCHTOWN MILL

The Frenchtown Mill Site formerly the Smurfit-Stone Mill was a large integrated pulp and paper mill that operated from late 1957 through early 2010. The former mill is located 11 miles northwest of the city of Missoula, in Missoula County, Montana, and covers approximately 3,200 acres. The mill is located approximately three miles south of the town of Frenchtown and, therefore, has often been referred to as the Frenchtown Mill.

The EPA completed a site assessment at the Frenchtown Mill in Missoula County in November 2012. The assessment revealed elevated levels of dioxins, furans and metals, including manganese, arsenic, lead, barium and cadmium in a series of soil samples collected from sludge ponds and wastewater holding ponds. Low level PCBs were also detected in some of the soil samples.

Analytical results indicate dioxins and furans and possibly PCBs have migrated to the sediment of the Clark Fork River. Shallow groundwater sampled at the site had elevated concentrations of dioxin and furan congeners, and metals including manganese and arsenic. In 2013 the State issued a fish consumption advisory for the Clark Fork River near the site after elevated levels of dioxins and PCBs were detected in fish tissue. While the concentrations of contaminants do not necessitate an emergency response, further investigation is necessary prior to determining if, and what type of cleanup is needed. DEQ will provide management assistance support for

Components A and B. If the site is listed then the DEQ level of effort on this project will have to increase to assist EPA with the RI/FS activities.

In SFY 2016 the project will transition from PA/SI to initiation of the CERCLA RI/FS project. DEQ will be the support agency to EPA and the new work will include project scoping, work plan development, development of Remedial Investigation SAP, FSP, QAPP, HSP, Community Involvement Plans, Risk Assessments and other required RI supplemental reports. Field activities are anticipated in the summer of 2015 with the onset of new work plans and PRP identification. Additional hours are included for Division Administrator, Bureau Chief and Legal Manager and DEQ support staff.

Site-Specific Activities

DEQ activities include Component A and D.

1. Provide support agency assistance for RI/FS activities, including site visits, review progress reports and other documents, plans, and reports, and track schedules.
2. Review and comment on RI/FS documents including draft and revised sampling and analysis plans, correspondence, activities, and documents.
3. Review Quality Assurance and Quality Control plans.
4. Attend technical, legal and public meeting.
5. Participate in community involvement activities including review of fact sheets and other information material, and respond to public inquiries.

Travel

Travel estimates include approximately four trips for two DEQ staff for site visits, technical, coordinating, and public meetings at approximately 250 miles per trip. Plus 4 overnight trips for one staff for sampling oversight, plus 8 more single day trips for one staff for meetings. DEQ does not anticipate any out-of state trips.

LOCKWOOD SOLVENT GROUNDWATER PLUME SITE OU-1

Significant groundwater contamination was discovered below the community of Lockwood, Montana, in 1998. Subsequent investigations have identified large groundwater plume(s) of chlorinated solvents that present significant threats to human health and the environment. The Lockwood Solvent Groundwater Plume Site (LSGPS) was proposed for placement on the NPL in the Federal Register in May 2000 and final listing occurred in December 2000. The LSGPS site has two PRPs. The PRP for the Beall Source Area or OU-1 is bankrupt and that portion of the site has become fund lead. On October 3, 2011 the US District Court approved a RD/RA consent decree for Soco West, Inc. or OU-2.

Through this grant application, DEQ is requesting funding to participate in management assistance for the bulk-funded OU1 Beall Source Area. This application identifies the commitments and activities that the DEQ will continue to perform. Those include: conduct groundwater monitoring and sampling; coordinate activities with EPA and the Lockwood Sewer and Water Board; provide

bottled water to impacted residents; and provide legal and technical support to the EPA and the US Department of Justice.

DEQ will review soil analytical data to define the source area, including the extent of the chlorinated DNAPL. DEQ will review the soil vapor extraction pilot test work plan for the former steam bay source area and determine the extent of the dissolved chlorinated plume which requires remedial action to allow for effective natural attenuation of the extended plume. EPA and DEQ will operate the soil vapor extraction pilot test long enough to determine the radius of influence of the injection wells and the effectiveness in remediating the source area. EPA and DEQ will develop State Superfund Agreement for OU-1 and develop long-term O&M plan, including soil and ground water ICs. DEQ work tasks will be to review soil and ground water status, review soil vapor extraction work plan, review treatability studies, support field oversight, develop State Superfund Contract and develop long-term O&M plan.

Other Site-Specific Activities

DEQ activities include those in Components A and D.

1. Provide support agency assistance for PRP activities, including site visits, review progress reports and other documents, plans, and reports, and track schedules.
2. Review and comment on RD/RA documents.
3. Attend technical, legal, and public meetings including meetings with Yellowstone County.
4. Review fact sheets and other informational materials, and respond to public inquiries.
5. Conduct semi-annual groundwater monitoring and sampling.
6. Provide bottled water to those residents whose drinking water supply is adversely impacted by the LSGPS at contaminant concentrations close to and approaching EPA's maximum contaminant level.
7. Provide legal review of PRP deliverables. Specific activities include:
    a. Review documents planning and technical reports;
    b. Provide cost recovery and administrative record duties for state activities in support of EPA's cost recovery responsibilities;
    c. Interpret state ARARs for the Lockwood site; and
    d. Review and comment on Lockwood Institutional Controls, including coordination with local governments.

Travel

Travel estimates include approximately two trips to the site for technical, coordinating, and public meetings at approximately 500 miles per trip and staying overnight. DEQ does not anticipate out of state travel.

MOUAT

In 1986, the EPA listed the Mouat Site, in Columbus, Montana, on the NPL. The EPA Emergency Response Branch conducted an emergency removal action at the site beginning in the summer of

1991 in cooperation with potentially responsible parties. The removal action included excavation, treatment, and on-site burial of some contaminated soils, and removal of some contaminated soils to offsite repository. ARCO conducted an EE/CA for groundwater and remaining surface contamination and conducted groundwater monitoring from 1996 to 2003. Partial delisting of the soil portion of the site occurred in May 2009.

Site-Specific Activities

DEQ activities include those in Components A, B, C and D.

1. Provide support agency assistance for post-removal activities, including site visits, review progress reports, and other documents, plans, and reports, and track schedules.
2. Conduct groundwater monitoring, preparation, review and distribution of groundwater monitoring reports.
3. Attend technical, legal, and public meetings.
4. Conduct community involvement activities including review of fact sheets and other informational materials, and respond to public inquires.
5. Manage a task order with MBMG for groundwater monitoring.
6. Provide legal review including:
    a. Review compliance of removal action objectives and goals, and evaluate adherence to state ARARs, and
    b. Prepare contracts and task orders with MBMG.

Travel

Travel estimates include approximately two trips for site visit, groundwater monitoring, technical, coordinating, and public meetings at approximately 400 miles per trip. DEQ does not anticipate any out-of state trips.

UPPER TENMILE CREEK MINING AREA

The Upper TenMile Creek superfund site is located Southwest of Helena, MT, in Lewis and Clark County. The site includes over 170 abandoned mine sites, the communities of Rimini and Landmark, and the TenMile Creek watershed. EPA listed the Upper TenMile site on the NPL on October 22, 1999. The ROD with State concurrence was issued in June, 2002. An amended ROD was issued in September 2008; this amendment proposed to construct a community water system and halt construction of a community waste water system for Rimini. From 2003 through 2012 remedial efforts focused on residential areas and on the major sources of mining impacted material. Remedial efforts in 2013 to the present focused on mining impacted properties which are significant sources of contaminant loading to the TenMile Creek watershed.

DEQ SFY 2016 activities include those in Components A, B, C and D.

DEQ's SFY 2016 (July 2015-June 2016) Planned Activities:

1. Complete National Extension removal and reclamation; haul 8,000 cubic yards of waste material to Luttrell; complete design of passive bio treatment system for the residual AMD; start construction of the treatment system.
2. Excavate and backfill and vegetate 11 mine sites; transport approximately 22,000 cubic yards of waste to the Luttrell Pit.
3. Excavate and reclaim property in the Landmark Sub-division and haul 6,000 cuic yards of waste to the Luttrell Pit.
4. Complete design of the Minnihaha watershed arsenic and metal loading reductions.
5. Design a removal action for Monitor Creek tailings and design a passive bio treatment system for the Monitor Creek impacted water.
6. Evaluate source control options for Lee Mt, Susie, Red Water, and Little lily.
7. EPA, DEQ, DNRC, L&C County to develop soil and ground water institutional controls for Rimini and Landmark.
8. EPA, USFS, and DEQ will also develop an interagency agreement concerning the operation, remediation and long-term operation and maintenance of Luttrell, the Basin mine, and Pauper's Pit.

Site-wide 2015-2019 overall project plan:

1. National Extension treatability study and passive treatment system design. Design and construct the passive treatment system in the 2015 and 2016 field seasons.
2. Design removal action for Monitor Creek tailings and design a passive treatment system for the monitor Creek impacted water in the 2015-2016.
3. Design Minnihaha watershed arsenic and metal loading reductions in 2015-2016 and implement in 2016-2017.
4. Rimini area adit source control and treatment - mass balance and geochemical modeling in 2015; field feasibility studies in 2015-2016; evaluate source control options for Lee Mt, Susie, Red Water, and Little Lily mines 2015-2017; design the source control and AMD treatment systems in 2016-2017; construct the source control and AMD treatment systems in 2017-2018.
5. Evaluate water treatment needs at the Basin Mine (both Luttrell leachate and Leach pad 1 & 2 leachate) in 2015-2016; develop options for a single leachate treatment system at the Basin mine in 2016; design a single leachate treatment system in 2017-2018; construct the single leachate treatment system in 2018-2019.

Travel

Travel estimates include approximately 39 trips for site visit, weekly construction meetings with EPA, CDM, USFS, and contractor; field oversight; field testing and design reviews at approximately 60 miles per trip. DEQ does not anticipate any out-of state trips.

SITE ASSESSMENT PROGRAM

DEQ is requesting additional funding to conduct Preliminary Assessment/Site Inspection (PA/SI) activities and management assistance for SFY 2015.

PA/SI Budget Request - $25,000.00

Management assistance and potential technical assistance will be needed in SFY 2015. There are on-going projects such as Eureka Solvent in Eureka, MT; Philipsburg/Flint Creek/Fred Burr Creek near Philipsburg, MT; and Forsyth Main Street Chlorinated Solvents in Forsyth, MT. There is a need for DEQ resources regarding PA/SI related projects and provide staff time to review and coordinate activities with EPA Region 8.

Yet to be defined site(s)

EPA plans to conduct a review of previous No Further Remedial Action Planned (NFRAP) sites in Montana in 2015 and 2016, and some additional NFRAP sites in Montana may require technical management assistance from DEQ during SFY 2016.

Travel

Travel estimates include 6 overnight trips at 600 miles per trip by two DEQ staff and for site visits, technical, coordinating, and public meetings and potential one out-of state trips for training to build staff resources.

- **Site Assessment Program, page 20 –** Update narrative section to state that we have reduced the amount of funding from last grant cycle for PA/SI activities. I think it could be in the range of $20,000 - $25,000. Number of potential sites is reduced, and not a lot on the radar. We may use some of the funding for minor investigation money in support of the SB 96 orphan share efforts.
    - Need to discuss long term request for Devin's effort in P-burg area. I believe she is assisting in Fred Burr, but had a meeting recently with EPA PA/SI contact folks (Rob and Victor) on efforts for Douglas Creek. We could add language that if extra funding is available for PA/SI related efforts or if we could get a separate funding source from EPA then we would use it in this area. Maybe add more language to the narrative regarding the P-burg area efforts.
    - Travel could be reduced for PA/SI – I would say about four. Leave the potential one out-of state trip.