Columbia Falls Aluminum Company
2000 Aluminum Drive
Columbia Falls, Montana 59912
(406) 892-8211
(406) 892-8238 fax
swright@cfaluminum.com

August 22, 2018

Via email to cirian.mike@epa.gov

Mike Cirian, Remedial Project Manager
Anaconda Aluminum Co. Columbia Falls Reduction Plant

RE: Reduction in Financial Assurance for the above referenced site.

Dear Mike,

Columbia Falls Aluminum Co LLC ("Respondent") entered into that certain Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study with the United States Environmental Protection Agency with an Effective Date of November 30, 2015 ("Consent Agreement"). Capitalized terms not defined herein shall have the meaning given to them in the Consent Agreement.

Under paragraph 107 of the Consent Agreement, Respondent agreed to provide financial assurance to cover the cost of the Work under the Consent Agreement in the amount of four million dollars for the benefit of EPA using one of the mechanisms listed in Section 107.

To comply with Section 107 of the Consent Agreement, Glencore LTD provided to EPA an irrevocable standby letter of credit from ABN Amro Capital USA LLC dated November 23, 2015 in the amount of four million dollars to the benefit of EPA Region 8 with document number USA0005015 and an expiration date of November 23, 2016 ("Original LOC"). This letter of credit has been automatically renewed on November 23 of each year since issuance with a current expiration date of November 23, 2018 when it will automatically renew again.

Pursuant to Section 110 of the Consent Agreement, CFAC hereby requests that EPA agree to reduce the amount of the financial assurance required to be provided under the Consent Agreement from four million dollars to two million dollars as of the anniversary of the Effective Date of the Consent Agreement of November 30, 2018 or such earlier date as CFAC and EPA may agree.

To support CFAC's request, attached as Appendix A hereto, please find estimates prepared by CFAC's contractor, Roux Associates, of the costs to be incurred by CFAC under the Consent Agreement from November 30, 2018 until the completion of the Work required by CFAC under the Consent Agreement.

Please contact me if you have any questions or would like to discuss CFAC's request. Pursuant to Consent Agreement paragraphs 33 and 107, please provide written approval to me of CFAC's request at swright@cfaluminum.com.

Very Truly Yours

Steve Wright, Project Coordinator

Attachment

cc:

Cheryl Driscoll CFAC
John Stroiazzo, CFAC
Andrew Otis, Locke Lord