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November 10, 2014

Via Hand Delivery

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

Re: Initial 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 written response ("Response") to EPA's CERCLA Section 104(e) Request for Information ("Request") dated September 3, 2014, which was addressed to Ms. Jean Martin, Esq., Senior Counsel, for BP America, Inc. The correct entity name for the Request and this Response is Atlantic Richfield. On September 18, 2014, Mark Chalfant, EPA Enforcement Attorney, extended the deadline for Atlantic Richfield's Response until November 10, 2014.

Atlantic Richfield has made a thorough effort to collect, review, summarize, and produce documents and information in its possession and control that are responsive to the Request. 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). In providing this Response, Atlantic Richfield reserves and does not waive all claims and defenses available to it under applicable law.

Responsive information and Atlantic Richfield's objections are presented in Attachment A. 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. As explained in Attachment A, EPA will need to enter the following password to access the encrypted information on the DVD: **BB4mJwd9**. The DVD contains the necessary software (XLS_TC_Launcher.exe) and instructions (XLS_Decryption_Instructions.pdf) for decryption. You may also need to download the TrueCrypt setup software from: http://www.truecrypt.org/downloads.

The scope of this Response is limited to some extent by the fact that Atlantic Richfield is not the current owner of the Columbia Falls facility. Many of the documents relating to its past operations remained at the facility and were conveyed to the new owner at the time of the acquisition. We have made substantial progress in completing our review

of records maintained in Atlantic Richfield's archives and identified as having a potential connection to the Columbia Falls facility; and we are today producing an initial set of documents identified thus far as responsive to the Request (Bates range ARCF00000001 – ARCF00002217) . The review process is ongoing, however. Accordingly, Atlantic Richfield will timely supplement this Response by producing additional responsive documents and other information as soon as the review is completed, likely in the next one-to-two weeks.

Questions pertaining to this Response should be directed to Ms. Vilia M. Drazdys, Senior Counsel for BP America, Inc., or to me. Contact information is provided in Response No. 1 in Attachment A.

Sincerely yours,

Adam S. Cohen
for
DAVIS GRAHAM & STUBBS LLP

Enclosures: Attachment A
DVD labeled Columbia Falls Production Wave 001

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

ATTACHMENT A

GENERAL OBJECTIONS

Atlantic Richfield makes the following General Objections to the Request, including the requests for documents contained therein, and incorporates its General Objections into each of the written responses that follow. Without waiving or limiting these objections, Atlantic Richfield has attempted to respond to the Request as completely and accurately as possible.

(1) Atlantic Richfield objects to the Request to the extent it: (a) is overly broad; (b) is unduly burdensome; (c) is unduly time-consuming and contains redundant questions; and (d) seeks information that could be as readily located and identified by the EPA as by Atlantic Richfield, including information that may be derived or ascertained from documents identified and made available by Atlantic Richfield but that is also in the public record.

(2) Atlantic Richfield objects to the Request to the extent it seeks information that is not authorized or required to be furnished under Section 104(e) of CERCLA, and is not relevant to the types of information required to be made available under CERCLA § 104(e)(2)(A)-(C); that is, information relating to: (A) the identification, nature and quantity of materials generated, treated, stored or disposed of at the Site; (B) the nature or extent of any release or threatened release of a hazardous substance at or from the Site; and/or (C) or the ability of any person to pay for or perform a cleanup at the Site. Atlantic Richfield also objects to the Request to the extent it constitutes the functional equivalent of devices used during the discovery phase of a civil action, which are distinct from, and beyond the scope of, an administrative investigation authorized by Section 104(e). *See, e.g.*, Guidance on Use and Enforcement of CERCLA Information Requests and Administrative Subpoenas at 3-4, U.S. Environmental Protection Agency (Aug. 25, 1988).

(3) Atlantic Richfield objects to the Request to the extent it seeks undocumented information, including descriptions of oral communications, discussions, conversations, and agreements, as well as individuals' awareness of events and circumstances, regarding events occurring over an extended period of time and many years ago.

(4) Atlantic Richfield objects to the Request to the extent that it calls for information or documents protected under the attorney-client privilege, the attorney work product doctrine, the joint defense privilege, the self-evaluation privilege, the right of privacy laws, the protection afforded trade secrets and confidential business information, and/or any other applicable privilege.

(5) Atlantic Richfield objects to the Request to the extent it seeks to impose on Atlantic Richfield an obligation to obtain information or documents from third persons or in the public record, or which otherwise are not in Atlantic Richfield' custody or control.

OBJECTIONS TO THE INSTRUCTIONS AND DEFINITIONS

Without waiving or limiting its General Objections, which apply to all of the questions below, Atlantic Richfield makes the following objections to the Instructions and Definitions and

to all questions and requests for copies of documents that purport to use these Instructions and Definitions. In addition, and without any waiver of its General Objections, specific objections to individual questions in the Request are stated in response to that particular question. Without waiving or limiting its Objections to the Instructions and Definitions, Atlantic Richfield has attempted to respond to the Request as completely and accurately as possible.

Atlantic Richfield objects to Instruction No. 1 on the basis that some of the questions are overlapping and redundant, such that a separate "answer to each and every question and subpart of a question" would be unduly burdensome and unnecessary.

Atlantic Richfield objects to Instruction No. 3 to the extent that is seeks to impose continuing obligations upon Atlantic Richfield other than and outside the scope of those authorized pursuant to CERCLA § 104(e).

Atlantic Richfield objects to Definition No. 3 on the grounds that the definition of "document" and "documents" is overbroad, unduly burdensome, and includes information that is protected under the attorney-client privilege, the attorney work product doctrine, joint defense privilege, the self-evaluation privilege, the right of privacy laws, the protection afforded trade secrets, and any other applicable privilege.

Atlantic Richfield objects to Definitions No. 7 and 8 of the term "identify" as unduly burdensome, since these definitions require extensive information beyond what is customarily and reasonably needed or acceptable to identify a corporation, document, or person.

Atlantic Richfield objects to Definition No. 16 of "you," and "Respondent," insofar as this definition includes successors, parent companies, and subsidiary companies, on the grounds that it is overly broad and that to respond to any request using this definition would be impracticable, beyond the scope of Atlantic Richfield's obligations under Section 104(e) of CERCLA, unduly burdensome, prohibitively time-consuming, and expensive.

RESPONSES TO QUESTIONS

Each response that follows is subject to Atlantic Richfield's foregoing General Objections and, where applicable, the specific Objections to the Instructions and Definitions set forth above and objections directed to specific questions set forth below. Atlantic Richfield's failure to incorporate these objections by reference in any specific response should not be regarded as a waiver of any objection.

1. Identify the person(s) answering these questions by providing their name, address, and telephone number.

This Response has been prepared for Atlantic Richfield by its counsel and attorneys:

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Vilia M. Drazdys, Esq.
BP America Inc.
150 W. Warrenville Road
Building 200-1W
Naperville, Illinois 60563
630-420-5919
Vilia.Drazdys@bp.com

Adam S. Cohen, Esq.
Davis Graham & Stubbs LLP
1550 Seventeenth Street, Suite 500
Denver, Colorado 80202
303-892-7321
adam.cohen@dgslaw.com

2. Identify the person(s) whom you wish to receive all further communications from the EPA related to the Site.

Vilia M. Drazdys, Esq.
BP America Inc.
150 W. Warrenville Road
Building 200-1W
Naperville, Illinois 60563
630-420-5919
Vilia.Drazdys@bp.com

Adam S. Cohen, Esq.
Davis Graham & Stubbs LLP
1550 Seventeenth Street, Suite 500
Denver, Colorado 80202
303-892-7321
adam.cohen@dgslaw.com

3. For each and every question contained herein, identify all persons consulted in preparation of the answer.

Response: The information contained in this Response is based primarily on the review of historical records. Except for persons who assisted in locating and reviewing potentially responsive documents, no persons other than those listed in Response No. 1 were consulted in the preparation of this Response.

4. For each and every question contained herein, identify documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the question and provide accurate copies of all such documents.

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Objection: Atlantic Richfield objects to this question to the extent it seeks identification or repeated identification of documents that: (i) were examined in connection with the preparation of this Response but which do not contain responsive information; (ii) are protected by one of the privileges described in General Objection 4 above; (iii) are responsive to more than one question; and/or (iv) were prepared by or for EPA or that could be as readily located and identified by EPA as by Atlantic Richfield, including documents in the public record.

Response: Without waiver, and subject to the foregoing specific and general objections, Atlantic Richfield has made a reasonable, good faith effort to identify and re-produce copies of non-privileged documents that contain information responsive to the questions set forth in the Request. Responsive documents are identified in the respective responses below, and pdf copies of responsive documents, bearing Bates Range ARCF00000001 through ARCF00002217, are being provided on the enclosed DVD.

EPA will need to enter the following password to access the encrypted information on the DVD: **BB4mJwd9**. The DVD contains the necessary software (XLS_TC_Launcher.exe) and instructions (XLS_Decryption_Instructions.pdf) for decryption. You may also need to download the TrueCrypt setup software from: http://www.truecrypt.org/downloads.

Responsive documents on the enclosed DVD are organized by electronic folders, which correspond to the questions in the Request (Q#5, Q#7, Q#8, Q#10, Q#11, and Q#12). The same document may be included in more than one electronic folder if it is responsive to more than one question in the Request.

As of the date of this Response, Atlantic Richfield is producing a total of 714 documents containing information responsive to the Request. Atlantic Richfield is continuing to review documents in its possession and control relating to the Site. Additional documents identified through this review process as containing responsive information will be produced as part of one or more supplemental responses.

On or about September 17, 1985, Atlantic Richfield transferred the assets associated with the Columbia Falls aluminum smelter facility business to Columbia Falls Aluminum Company and transferred all of the authorized capital stock of Columbia Falls Aluminum Company to Montana Aluminum Investors Corp. Although Atlantic Richfield retained some documents relating to the Site and Site operations after this transaction, on information and belief, the majority of such documents remained at the facility and were conveyed to the new owner at the time of the acquisition; and, consequently, they are not currently in Atlantic Richfield's possession or control.

5. Describe Respondent's activities at the Site including the following and provide copies of all documents relating to such activities:

a. The date Respondent acquired any portion of the Site;
b. The entity from which Respondent acquired any portion of the Site;
c. A description of Respondent's operations at the Site;

d. Any changes Respondent made to the Site including any demolition or improvement;
e. The activities taken upon cessation of operations at the Site.

Objection: Atlantic Richfield objects to this question because it is overbroad, and it seeks information beyond the scope of a respondent's obligations under Section 104(e) of CERCLA.

Response: Without waiver, and subject to the foregoing specific and general objections, multiple documents provided on the enclosed DVD contain responsive information describing the past activities of Atlantic Richfield and its predecessors at the Site, including those contained in Folder: Q #5. Atlantic Richfield does not own and is not currently conducting any activities at the Site. Upon information and belief, Atlantic Richfield has not conducted operations at the Site since approximately September 1985. Any changes made to the Site since 1985, including any improvements and demolition, would have been made by the subsequent owner/operator(s).

The document—Columbia Falls Reduction Plant Information Manual (ca. 1982) (ARCF00002121) (hereinafter, the "Information Manual")—includes a detailed summary of the Columbia Falls facility history, production process, physical assets, and environmental conditions existing as of approximately 1982. According to that document, on November 6, 1951, the Anaconda Copper Mining Company announced that it had acquired 95 percent of the interests of the Harvey Machine Company to 1,000 acres of land six miles north of Kalispell, Montana for purposes of constructing an aluminum reduction plant. As further stated in the Information Manual:

> On August 30, 1952, C.F. Kelly, Chairman of the Board, Anaconda Copper Mining Company announced that Anaconda would build an aluminum reduction plant two miles northeast of Columbia Falls near Teakettle Mountain. Site clearing started on September 16, 1952, and the first aluminum was produced on August 12, 1955. This initial construction consisted of two pot lines with an annual production capacity of 67,500 tons.
>
> Ten years later, in 1965, a third pot line was added, increasing production capacity to 100,000 tons. Fourth and fifth pot lines were added in 1968, bringing production capacity up to its current level of 180,000 tons per year.
>
> In 1977 construction began on a $42 million project to modernize Columbia Falls with technology licensed from Sumitomo Aluminium [sic]. By 1981 conversion was completed on all 600 cells at Columbia Falls. Through the use of hooded reduction cells and other equipment to provide tighter control of the reduction process, the Sumitomo process has substantially reduced emissions and power consumption while improving materials handling and

> working conditions. Today, Columbia Falls is the only Sumitomo licensee in the world that has successfully converted an entire plant to Sumitomo technology.

See ARCF00002121 at 2126.

As noted, additional information regarding Site activities, including property acquisitions, operations, and improvements, is provided in documents provided on the enclosed DVD in Folder Q #5.

7.[1] Provide copies of all documents regarding environmental conditions at the Site including, but not limited to, any sampling information, solid and hazardous waste management plans, and any known releases of hazardous substances.

Objection: Atlantic Richfield objects to the phrase "all documents regarding environmental conditions at the Site" on the grounds that the term "environmental conditions" is not defined, the phrase is vague and overly broad, and to respond to this question would be impracticable, beyond the scope of Atlantic Richfield's obligations under Section 104(e) of CERCLA, unduly burdensome, and time consuming.

Response: Without waiver, and subject to the foregoing specific and general objections, Atlantic Richfield has made a reasonable, good faith effort to identify and re-produce copies of non-privileged documents that contain information responsive to this question. Responsive documents, to the extent any were retained by Atlantic Richfield, are provided on the enclosed DVD in Folder: Q #7.

8. Describe all waste materials that resulted from activities at the Site. Describe the location and method of storing waste on site. Identify the amount of each waste left on the Site. Identify any hazardous substances contained in such wastes and provide copies of any and all documents that describe any analysis of such wastes and the results of the analysis.

Objection: Atlantic Richfield objects to this question to the extent it seeks to impose on Atlantic Richfield an obligation to obtain information or documents from third persons or in the public record, or which otherwise are not in Atlantic Richfield's custody or control. Atlantic Richfield further objects to the phrase "all documents that describe any analysis of such wastes and the results of the analysis" on the grounds that the term "wastes" is not defined, the phrase is vague and overly broad, and to respond to this question would be impracticable, beyond the scope of Atlantic Richfield's obligations under Section 104(e) of CERCLA, unduly burdensome, and time consuming.

Response: Without waiver, and subject to the foregoing specific and general objections, Atlantic Richfield has made a reasonable, good faith effort to identify and re-produce copies of non-privileged documents that contain information responsive to this question.

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[1] The Request does not include a Question No. 6.

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Responsive documents are provided on the enclosed DVD in Folder: Q #8. Documents reviewed in preparing this Response describe a number of waste materials resulting from activities at the Site prior to September 17, 1985. These include, without limitation: spent potliners (cathodes), potline waste, floor sweepings, solvents, PCBs, sanitary wastes, lube oil, hydraulic fluids, soluble oil, contaminated fuel, lab wastes, paste plant cooling water, powerhouse condensate, casting cooling water, sewage treatment plant effluent, stormwater, petroleum wastes, and baghouse dust.

As stated in the Information Manual:

> Spent potliners were initially classified as a hazardous waste and we constructed a prescribed disposal area for them. Since the original EPA listing, potliners have been removed. However, it is felt that in the future they will be relisted. In the meantime, we dispose of them as hazardous wastes and the landfill will be used up in 1984 or 1985. Construction of a new disposal site will depend upon whether they are relisted as a hazardous waste by EPA.

See ARCF00002121 at 2128.

> Land – Monitoring Systems
> Nine groundwater wells are in place throughout the plantsite. Four of these are production wells and five are for monitoring purposes. The monitoring wells will be sampled on a quarterly basis for cyanide, fluoride, and heavy metals in addition to basic parameters such as pH, solids and conductance.
> ...
> Water – Control Systems
> All plant waste water is discharged into two evaporation ponds. The ponds north of the plant receive paste plant cooling water and powerhouse condensate. Casting cooling water and sewage treatment plant effluent is discharged to the pond system adjacent to the Flathead River. Storm drainages also discharge into both ponding systems.
>
> Water-Monitoring Systems
>
> 1. Water discharges to the south holding pond are sampled and analyzed every two weeks for BOD, pH and solids. On a quarterly basis the pond and the Flathead River above and below the pond is analyzed for bacteria.
> 2. Both pond systems are sampled and analyzed for fluoride. By October 1981, these ponds will also be routinely analyzed for cyanide and heavy metals.

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See ARCF00002121 at 2194 to 2195.

Atlantic Richfield has not been able to identify the amount of waste left on the Site as of September 17, 1985, or the amount of waste generated at the Site since that time by the subsequent owner/operator(s).

Other wastes and waste streams generated at the Site are described in the April 2014 report—Site Reassessment for Columbia Falls Aluminum Company Aluminum Smelter Facility, prepared by Weston Solutions, Inc., for EPA Region 8 (the "Site Reassessment Report").

9. Describe the construction methods used for any waste management units (landfills, impoundments, etc.). Describe any unremediated or uncapped landfills on the Site.

Objection: Atlantic Richfield objects to this question to the extent it seeks to impose on Atlantic Richfield an obligation to obtain information or documents from third persons or in the public record, or which otherwise are not in Atlantic Richfield's custody or control.

Response: Without waiver, and subject to the foregoing specific and general objections, Atlantic Richfield has made a reasonable, good faith effort to identify and re-produce copies of non-privileged documents that contain information responsive to this question. Responsive documents are provided on the enclosed DVD in Folder: Q #9. Documents reviewed in preparing this Response describe a number of waste management units at the Site including a hazardous waste landfill, sanitary landfill, drum storage area, evaporation ponds, sludge pond, and holding ponds.

The Information Manual describes the construction of the hazardous waste landfill and sanitary landfill as follows:

> 1. Hazardous Waste Landfill
>
> This landfill consists of a compacted impermeable clay base covered with 4 inches of gravel. The pad is contoured and shaped such that liquids percolating through the waste will encounter the clay and drain through the gravel to one corner of the pad. A piping system drains the leachate to a holding pond lined with an impermeable synthetic material. When closed the landfill will be capped with a clay liner, topsoil added and then revegetated.
>
> 2. Sanitary Landfill
>
> This landfill is constructed on earthen materials meeting State regulatory requirements. Due to the inert nature of the waste disposed of at this site, an impermeable liner is not required. Cover material is applied daily. Upon closure this landfill will also be capped with clay and revegetated.

See ARCF00002121 at 2194.

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Other information about landfills and impoundments at the Site is provided in the Site Reassessment Report. Atlantic Richfield is not aware of the presence of any "unremediated or uncapped landfills on the Site."

10. Describe any information on all seeps, unpermitted, and permitted discharge points.

Objection: Atlantic Richfield objects to this question to the extent it seeks to impose on Atlantic Richfield an obligation to obtain information or documents from third persons or in the public record, or which otherwise are not in Atlantic Richfield's custody or control. Atlantic Richfield further objects to the phrase "all seeps, unpermitted, and permitted discharge points" on the grounds it contains undefined terms, the phrase is vague and overly broad, and to respond to this question would be impracticable, beyond the scope of Atlantic Richfield's obligations under Section 104(e) of CERCLA, unduly burdensome, and time consuming.

Response: Without waiver, and subject to the foregoing specific and general objections, Atlantic Richfield has made a reasonable, good faith effort to identify and re-produce copies of non-privileged documents that contain information responsive to this question. Responsive documents are provided on the enclosed DVD in Folder: Q #10.

According to the Information Manual:

> Columbia Falls requires no discharge permits and has no related environmental problems. Recently adopted groundwater rules by the state will require permitting and monitoring but we don't anticipate any problems.

See ARCF00002121 at 2188.

Other information about discharges at the Site is provided in the Site Reassessment Report.

11. Describe any wastes shipped off site including quantities.

Objection: Atlantic Richfield objects to this question to the extent it seeks to impose on Atlantic Richfield an obligation to obtain information or documents from third persons or in the public record, or which otherwise are not in Atlantic Richfield's custody or control. Atlantic Richfield further objects to the phrase "any wastes shipped off site" on the grounds that the phrase is vague and overly broad, it seeks information unrelated to the Site, and to respond to this question would be impracticable, beyond the scope of Atlantic Richfield's obligations under Section 104(e) of CERCLA, unduly burdensome, and time consuming.

Response: Without waiver, and subject to the foregoing specific and general objections, Atlantic Richfield has made a reasonable, good faith effort to identify and re-produce copies of non-privileged documents that contain information responsive to this question. Responsive documents are provided on the enclosed DVD in Folder: Q #11.

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According to the Information Manual:

> We also have a small amount of hazardous waste in liquid form; primarily solvents, which have to be reported and disposed of. We handle this by contracting for off-site disposal.

See ARCF00002121 at 2188.

On information and belief, wastes shipped off site prior to September 17, 1985 include, without limitation, gasoline, diesel fuel, paint thinners, halogenated solvents, crankcase oil, hydraulic fluids, and PCB-containing wastes.

12. Identify all persons who on behalf of the Respondent exercised control or had the authority to control activities at the Site. Provide copies of documents and permits related to hazardous waste and/or decisions about compliance with environmental regulations at the Site.

Objection: Atlantic Richfield objects to the phrase "exercised control or had the authority to control activities at the Site" on the grounds that it contains undefined terms, is vague and overly broad, and to respond to this question would be impracticable, beyond the scope of Atlantic Richfield's obligations under Section 104(e) of CERCLA, unduly burdensome, and time consuming.

Response: Without waiver, and subject to the foregoing specific and general objections, Atlantic Richfield has made a reasonable, good faith effort to identify and re-produce copies of non-privileged documents that contain information responsive to this question. Responsive documents are provided on the enclosed DVD in Folder: Q #12.

Documents reviewed in preparing this Response identify a number of persons who, on behalf of Anaconda Aluminum Company, may have exercised control or had the authority to control activities at the Site relating to hazardous waste or decisions about compliance with environmental regulations. These persons include, without limitation:

E.F. Darling
Reduction Engineering, Environmental Control Foreman (1981)
2000 Aluminum Drive
Columbia Falls, Montana 59912
(406) 892-3261

Donald A. Doyle
Safety and Security Coordinator (1984)
2000 Aluminum Drive
Columbia Falls, Montana 59912
(406) 892-3261

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Clifford J. Kracher
Industrial Hygiene Supervisor (1984)
2000 Aluminum Drive
Columbia Falls, Montana 59912
(406) 892-3261

Thomas F. Payne
Technical Manager (1984)
2000 Aluminum Drive
Columbia Falls, Montana 59912
(406) 892-3261

Kenneth G. Reick
Environmental Supervisor (1984)
2000 Aluminum Drive
Columbia Falls, Montana 59912
(406) 892-3261

Donald F. Ryan
Technical Superintendent (1984)
2000 Aluminum Drive
Columbia Falls, Montana 59912
(406) 892-3261

H.G. Satterthwaite
Plant Manager (1955-1958)
2000 Aluminum Drive
Columbia Falls, Montana 59912

R. Walter Simmons
Manager, Environment (1981)
P.O. Box 32860
Louisville, KY 40232
(502) 566-5864

James F. Smith
Plant Manager (1958-1966)
2000 Aluminum Drive
Columbia Falls, Montana 59912

R.A. Sneddon
Columbia Falls Plant Manager (1978-1985)
2000 Aluminum Drive
Columbia Falls, Montana 59912
(406) 892-3261

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Charles E. Taylor
Plant Manager (1970-1972)
2000 Aluminum Drive
Columbia Falls, Montana 59912

Edwin O. Woster
Plant Manager (1966-1970, 1972-1978)
2000 Aluminum Drive
Columbia Falls, Montana 59912

James L. Yeager
Manager, Environmental, Safety & Health (1981)
P.O. Box 32860
Louisville, KY 40232
(502) 566-5889

See, e.g., ARCF00000642, ARCF00001117, ARCF00001152, ARCF00001313,

Atlantic Richfield has not identified any permits related to hazardous waste that were in effect prior to September 17, 1985.

13. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

Response: The current facility owner likely possesses documents and other information responsive to this Request and may be able to provide more detailed or complete responses to questions 7 through 11 in this Request.

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