EPA comments on the revised Groundwater and Surface Water Data Summary Report
Columbia Falls Aluminum Company
Columbia Falls, Montana
Prepared for Columbia Falls Aluminum Company, LLC by Roux Associates, Inc.
Dated February 9, 2018

General Comments

Overall, EPA comments on the Groundwater and Surface Water Data Summary Report (GW-SW Report) were satisfactorily addressed. Specific comments follow. Roux responses provided in blue.

Specific Comments

Section 4.1 (Pages 29, 1st paragraph, last sentence) – Please remove the sentence. The table of vertical gradients indicates that the gradient is upward in most well clusters. This is adequately explained in the text following the table of vertical gradients.

The last sentence regarding the downward vertical gradient will be removed from this paragraph in Section 4.1.

Plate 10, September 2016 – Please revise the 3000 micrograms per liter (µg/L) contour around wells CFMW-031 (2440 µg/L) and CFMW-028a (1020 µg/L).

Plate 10 will be revised as noted above.

Plates 11 and 12 – Please change the legend to indicate that the dots refer to hydraulic conductivity data and not concentrations. Please also add the units (ft/day) to the notes or in the legend descriptions.

The legends of Plates 11 and 12 will be revised as noted above.