ENVIRONMENTAL CONSULTING & MANAGEMENT
ROUX ASSOCIATES INC
209 SHAFTER STREET
ISLANDIA, NEW YORK 11749 TEL 631-232-2600 FAX 631-232-9898

October 23, 2017

Mike Cirian, P.E.
USEPA
108 East 9th Street
Libby, Montana 59923

Re: Modification to Table 3 in CFAC RI/FS Work Plan
Columbia Falls Aluminum Company, Columbia Falls, Montana

Dear Mr. Cirian:

As discussed during the project meeting at CFAC on Thursday, October 5, 2017, CFAC and Roux Associates are requesting a modification to Table 3 in the CFAC RI/FS Work Plan titled "RI/FS Schedule of Deliverables and Activities". The schedule provided in Table 3 indicates that the *Draft Candidate Technologies and Remedial Alternatives Memorandum* deliverable is scheduled to be submitted 90 days from submittal of the Final Phase I Sampling and Data Evaluation Summary Report. As discussed during the project meeting, CFAC and Roux Associates believe that modifying this deliverable submittal date to after completion of the Baseline Risk Assessment is better aligned with the project goals and objectives. As such, Roux Associates, on behalf of CFAC, is requesting to modify the scheduled submittal date to be 90 days from submittal of the Final Baseline Risk Assessment, as noted in the revised Table 3 attached to this letter.

The RI/FS Work Plan and thus the RI/FS Schedule in Table 3 is included as part of the Administrative Settlement Agreement and Order on Consent (AOC) between the USEPA and CFAC dated November 30, 2015. Therefore, CFAC views this proposed modification as a modification to the AOC. In accordance with Section XXIX of the AOC (i.e., EFFECTIVE DATE AND SUBSEQUENT MODIFICATION), Roux Associates, on behalf of CFAC, kindly requests that the USEPA respond with their approval of the proposed amendment in writing by the Regional Administrator or his/her delegate.

Please contact me if you have any questions or would like to discuss this request in more detail. Thank you.

Sincerely,

ROUX ASSOCIATES, INC.

Michael Ritorto
Principal Hydrogeologist
RI Manager

Andrew Baris
Principal Hydrogeologist/Vice President
RI/FS Manager

Attachment: Table 3 – RI/FS Schedule of Deliverables and Activities

cc: John Stroiazzo, Glencore
Andrew Otis, Curtis, Mallet-Prevost, Colt & Mosle LLP
Steve Wright, CFAC
Lisa DeWitt, Montana Department of Environmental Quality
Richard Sloan, Montana Department of Environmental Quality

2476.0001Y.187/LR

Table 3. Schedule of Deliverables and Activities
Columbia Falls Aluminum Company, Columbia Falls, Montana

The Respondents shall deliver documents and perform activities described in this RI/FS Work Plan in accordance with the following schedule:

RI/FS Work Plan Section Reference	Paper Copies Required	Deliverable or Activity	Schedule* *"Day" or "day" shall mean a calendar day in accordance with Section IV (Definitions) of the Settlement Agreement*
Section 10.2		Notification of Field Work for Each Investigative Phase of Remedial Investigation	30 days prior to field work
Section 10.2		Notification of Completion of Field Activities for Each Investigative Phase of Remedial Investigation	30 days after completion of field activities
Section 10.2	X	Quarterly / Monthly progress reports for all RI/FS Work	30 days after the close of the quarter/month covered by the progress report
Section 8.2		Project Database Setup	Not later than 30 days after Effective Date of Settlement Agreement
Section 8.2		Project Database Updates	On a quarterly basis by the 30th day of the month following the end of the quarter
Section 5.8	X	Health and Safety Plan (HASP), including for Phase 1 SAP Activities	30 days after Effective Date of Settlement Agreement
Section 5.2.5	X	Draft Phase I Sampling and Analysis Plan (SAP) Addendum	30 days from completion of Pre-Intrusive activities
	X	Final Phase I Sampling and Analysis (SAP) Addendum	30 days from receipt of EPA's comments on Draft SAP Addendum
Section 9.0	X	Draft Phase-Specific SAPs with updated HASPs (excluding for Phase 1 SAP)	90 days prior to anticipated start of field work
	X	Final Phase Specific SAPs with updated HASPs (excluding for Phase 1 SAP)	30 days from receipt of EPA's comments on Draft SAP
Section 9.0	X	Draft Field Sampling and Data Evaluation Summary Report for each investigative phase of RI	Date specified in EPA-approved final SAP for each phase
	X	Final Field Sampling and Data Evaluation Summary Report for each investigative phase of RI	Date specified in EPA-approved final SAP for each phase
Section 6.2	X	Draft Screening Level Ecological Risk (SLERA) Assessment Summary Report	60 days from submittal of the Final Phase I Sampling and Data Evaluation Summary Report
	X	Final Screening Level Ecological Risk (SLERA) Assessment Summary Report	30 days from receipt of EPA's comments on Draft SLERA Report

Table 3. Schedule of Deliverables and Activities
Columbia Falls Aluminum Company, Columbia Falls, Montana

RI/FS Work Plan Section Reference	Paper Copies Required	Deliverable or Activity	Schedule* *"Day" or "day" shall mean a calendar day in accordance with Section IV (Definitions) of the Settlement Agreement*
Section 6.3	X	Draft Baseline Risk Assessment Work Plan	60 days from submittal of the Final SLERA Report
	X	Final Baseline Risk Assessment Work Plan	30 days from receipt of EPA's comments on Draft Baseline Risk Assessment Work Plan
Section 6.3	X	Draft Baseline Risk Assessment	3/1/2019
	X	Final Baseline Risk Assessment	7/29/2019
Section 7.1	X	Draft Candidate Technologies and Remedial Alternatives Memorandum	90 days from submittal of the Final Baseline Risk Assessment
		Final Candidate Technologies and Remedial Alternatives Memorandum	30 days from receipt of EPA's comments on Draft Candidate Technologies and Remedial Alternatives Memorandum
Section 9.7	X	Draft Remedial Investigation Report	9/27/2019
	X	Final Remedial Investigation Report	2/24/2020
Section 7.2	X	Draft Feasibility Study Work Plan (FSWP)	To be determined by the parties following receipt of EPA's comments on the Final Remedial Investigation Report
	X	Final Feasibility Study Work Plan (FSWP)	To be determined by the parties following receipt of EPA's comments on the Draft FSWP
Section 7.2	X	Draft Treatability Studies Work Plan	90 days after EPA approval of FSWP if the final FSWP specifies that treatability studies are required
	X	Final Treatability Studies Work Plan	30 days following receipt of EPA's comments on the Treatability Studies Work Plan
Section 7.2	X	Draft Treatability Studies Technical Report	Date specified in EPA-approved Final Treatability Studies Work Plan
	X	Final Treatability Studies Technical Report	To be determined by the parties following receipt of EPA's comments on the Draft Treatability Studies Technical Report
Section 7.3	X	Draft Feasibility Study Report	10/12/2020
	X	Final Feasibility Study Report	3/12/2021

Note: Shaded cells indicate major deliverables