UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-2466
Phone 800-227-8917
http://www.epa.gov/region08

Ref: 8EPR-SR

June 7, 2017

ROUX ASSOCIATES INC
Michael Ritorto
Principal Hydrogeologist/RI Manager
209 Shafter Street
Islandia, New York 11749

Re: CFAC Main Plant Building Pot Room #1- Crushed Concrete Backfill Approval Request
Columbia Falls Aluminum Company, Columbia Falls, Montana

Dear Mr. Ritorto:

Upon review of your request, the U.S. Environmental Protection Agency (EPA) has no objection under the CERCLA provisions to using the ground floor and structural concrete from Pot Room #1 for use as subgrade fill material as part of the ongoing site demolition activities being performed by Calbag. However, we recommend that after the existing waste materials are removed in the basement of Pot Room #1, and prior to removal and crushing activities, pressure washing must occur for any concrete to be re-used. In addition, the floor will need to be cleaned using a mechanical floor scrubber prior to the concrete being removed, crushed and replaced in the Pot Room #1 basement.

Please note: Although the EPA has no objection to your request to use the crushed concrete for backfill, the final approval must be coordinated with the Montana Department of Environmental Quality (MDEQ) per the Final Waste Management Plan and Schedule for Columbia Falls Aluminum Company Building 1 as required per the Administrative Order on Consent [FID 2386]. In addition, it is necessary that you coordinate with MDEQ's Solid Waste Program for their determination for use and placement of this material under the Montana Solid Waste Management Act.

Sincerely,

Mike Cirian, P.E.
EPA- Remedial Project Manager

cc: John Stroiazzo, Glencore
Steve Wright, Columbia Falls Aluminum Company
Lisa DeWitt, Montana Department of Environmental Quality
Cory Mikita, Montana Department of Environmental Quality
Andrew Baris, Roux Associates