Montana Multi-Site Cooperative Agreement

Support Agency Assistance

New Cooperative Agreement

BULK Management Assistance Application – SFY 2018

July 1, 2017 – June 30, 2018

Montana Department of Environmental Quality

Waste Management and Remediation Division

Helena Montana

For the

U.S. Environmental Protection Agency

Region VIII

Denver, Colorado

April 14, 2017

INTRODUCTION 3
SUPPORT AGENCY ACTIVITIES 3
STATEMENT OF WORK FOR SUPPORT AGENCY ACTIVITIES 3
Component A - RI/FS or EE/CA Activities 4
Component B - RD Activities 6
Component C - RA Activities 6
Component D - Quality Assurance/Quality Control 7
Component E - SITE-SPECIFIC WORK PLANS FOR SUPPORT AGENCY ASSISTANCE 8
BARKER HUGHESVILLE MINING DISTRICT 8
BASIN MINING AREA 8
CARPENTER SNOW CREEK MINING DISTRICT 10
FLAT CREEK/IMM 12
MOUAT 13
UPPER TEN MILE CREEK MINING AREA 14
PRELIMINARY SITE ASSESSMENT PROGRAM 15

INTRODUCTION

This Multi-Site Cooperative Agreement application requests funding for the Montana Department of Environmental Quality (DEQ) Superfund Program for state participation in the federal Superfund Program authorized in the 1986 Superfund Amendment and Reauthorization Act. Beginning State Fiscal Year 2013, the agencies agreed to request a separate grant for Management Assistance for BULK funded sites and a grant for special account sites. Activities proposed for funding in this MSCA application for bulk funded sites include support agency assistance for federal-lead remedial actions at selected Montana National Priorities List (NPL) sites.

- This application will fund DEQ's site specific activities for EPA lead NPL sites in Montana for SFY 2018
- This grant will be the mechanism through Cooperative Agreement to provide bulk-funded Management Assistance through June 30, 2018

SUPPORT AGENCY ACTIVITIES

The Waste Management and Remediation Division manages DEQ's Superfund mission through the Federal Superfund and Construction Bureau and the Contaminated Site Cleanup Bureau. Staff from both bureaus works on federal Superfund cleanup activities under the CORE cooperative agreement, the Management Assistance Bulk Funding Multi Site Superfund Cooperative Agreement, the Management Assistance Special Account Multi Site Superfund Cooperative Agreement, and Technical Assistance Cooperative Agreements (TACA). DEQ will maintain a support agency role at EPA-lead sites of, Barker/Hughesville Mining District, Basin Mining Area, Carpenter/Snow Creek Mining District, Flat Creek IMM, Mouat, and the Upper Tenmile Creek Mining Area NPL sites. Anaconda Aluminum Co Columbia Fall Reduction Plant site was removed from the bulk funded sites and added to the Special Account funded sites with agreement of the EPA. Court-ordered settlements with responsible parties' fund the following projects as DEQ lead management sites and they are Upper Clark Fork River, Streamside Tailings and Montana Pole projects.

The intent of DEQ in this support agency role is to enhance progress at the sites by providing technical, legal, and managerial resources to the EPA, as well as by articulating issues of state concern, and promoting state and local involvement in the site remediation process.

STATEMENT OF WORK FOR SUPPORT AGENCY ACTIVITIES

Support agency activities are in the following four general components. These represent a set of general commitments that may be appropriate at each site depending on the activities and requirements associated with a particular site. Site-specific narratives describe commitments for each site.

<u>Support Agency Components</u>

A. Remedial Investigation/Feasibility Study (RI/FS) or Engineering Evaluation/Cost Analysis (EE/CA) including Proposed Plans, Records of Decisions, Action Memorandums and Consent Decree negotiations with potentially responsible party (PRPs)

B. Remedial Design (RD)

C. Remedial Action (RA)

D. Quality Assurance/Quality Control Commitment (QA/QC)

E. Site-Specific Work Plans for Support Agency Assistance

Component A commitments apply to all sites that are in the RI/FS stages (most commitments continue through the subsequent superfund process specified in Components B and C) and include review of RODs and negotiation of consent decrees. All Clark Fork River Basin (CFRB) NPL sites are now past the RI/FS stage but many parts of Component A commitments remain relevant. Components B and C commitments apply to all sites or operable units (OUs) in the RD and RA phases. Component E commitments only apply to sites requiring site specific work products.

Component A - RI/FS or EE/CA Activities

Commitment 1 - Review RI/FS Documents

Outputs: Review and prepare written comments and recommendations on EPA, EPA contractor, or PRP work products during the RI/FS phase including:

a. Preliminary planning document, including draft SOW (work plans), draft administrative orders, draft quality assurance project plans, draft sampling/analysis plans, and draft health/safety plans;

b. Draft/final RI/FS reports, including draft public health evaluations, endangerment assessments, interim technical memoranda, work amendments, contractor progress reports, data analysis, data evaluation, and public comments on the draft studies; and

c. Draft/final records of decision and action memoranda.

Commitment 2 - Maintain Project Files

Outputs: Review and compile site information from the files of appropriate local, state, and federal agencies, and from PRPs. Update site files as new data, correspondence, and work products become available. Provide access to site files as requested by EPA, their contractors, the public, site owners/operators, legislators, officials and potentially responsible parties, as appropriate. Provide secure storage for confidential files.

Commitment 3 - State Legal Requirements

Outputs: Provide written summaries identifying state applicable or relevant and appropriate requirements (ARARs) specifying state environmental statutes and regulations for each response action. Review EPA's federal ARARs designations and discuss the integration of state ARARS into remedial decision requirements.

Commitment 4 - Community Relations

Outputs: Review and prepare written comments on EPA or PRP community relations work products, including draft community relations plans, draft fact sheets and draft press releases. Prepare verbal or written responses to requests for site information from the public, legislators/officials, site owners/operators, contractors, and PRPs. Provide state assistance in the preparation or revision of site community relations plans. Attend public meetings and briefings to discuss draft RI/FS studies, site information, progress, and policies, as appropriate.

Commitment 5 – Quarterly Progress Reports

Outputs: Develop and submit to EPA progress reports of site specific expenditures and activities.

Commitment 6 - Site Visits

Outputs: Conduct site visits during periods of RI/FS field activities. Participate in periodic site inspections during RIs to observe trial runs of equipment, contractor progress, and aspects that affect project acceptance. Prepare written summaries of observed activities, comparing them to final preliminary planning outputs, site management plans, construction plans and specifications, and work completion schedules.

Commitment 7 - Consultation and Meetings

Outputs: Consult and meet with State staff, EPA, and EPA contractors, to discuss State comments on work products, State requirements, and RI/FS progress, including preliminary planning discussions, Proposed Plan and ROD development, technology transfer, interim design, contractor selection, preconstruction activities, and project pre-acceptance issues. Prepare and distribute written summaries of these meetings as appropriate.

Commitment 8 - PRP Discussions

Outputs: Participate with EPA in the development of PRP enforcement strategy. Review and prepare written comments on enforcement work products, enforcement activity, and the RI/FS processes. Prepare and distribute written summaries of these meetings.

Commitment 9 - Access

Outputs: Assist EPA in gaining access to sites to perform RI/FS activities, by helping to negotiate easements and access agreements with site owners/operators.

Commitment 10 - Training

Outputs: Receive EPA authorized training or required training for site-specific activities (e.g. risk assessment, lead in soils/wastes workshops, soils reclamation of mining/smelting sites, stream bank reconstruction, etc.).

Commitment 11 - Project Administration

Outputs: Provide daily project management, fiscal accounting, cost-recovery documentation, legal research, outreach to local and federal agencies, general administration and clerical support.

Commitment 12 – ATSDR

Outputs: Coordinate and communicate with the Agency for Toxic Substances and Disease Registry on reviews of their public health evaluation activities and reports.

Commitment 13 – Other

Outputs: Complete other activities as identified by the state and EPA that are critical to the project.

Outcome: Ensure state involvement in the conduct of Superfund RI/FSs or EE/CAs.

Component B - RD Activities

Commitment 1 - Cooperative Agreements or State Superfund Contract (SSC)

Outputs: Negotiate and sign cooperative agreements or SSCs identifying agreed upon requirements for determining EPA RA costs and the State's required matching share.

Commitment 2 - Review RD Documents

Outputs: Review and prepare written comments and recommendations on EPA or PRP work products during the RD phase including:

a. RD work plans and sampling plans;

b. Review data summary reports and date analysis/evaluation reports or technical memorandums;

c. The preliminary (30 percent complete), intermediate (60 percent complete), pre-final (95 percent complete), and final RDs;

d. Contractor progress reports;

e. Draft construction specifications;

f. Value engineering screening submittal;

g. Draft operations and maintenance plans; and

h. Draft bid request documents.

Commitment 3 - Project Administration

Outputs: Provide daily project management, fiscal accounting, cost recovery documentation, legal research, and liaison with local and federal agencies, general administration and clerical support.

Commitment 4 - Other

Outputs: Complete other activities as identified by the state and EPA that are critical to the project.

Outcome: Ensure state involvement in the development of Superfund Remedial Designs.

Component C - RA Activities

Commitment 1 - Review RA Documents

Outputs - Review and prepare written comments and recommendations on EPA or PRP work products during the RA phase including:

a. Contractors' bid responses;

b. Construction status and planning meetings;

c. Construction oversight, progress reports, proposed change orders and claims;

d. Pre-final and final inspection reports;

e. Construction completion documentation; and

f. Draft delisting documents (for site removal from the NPL).

Commitment 2 - Conduct Field Inspections

Outputs: Make field visits to support oversight of progress on implementation of remedial action measures to ensure compliance with decision documents, design requirements, and as necessary, appropriateness for state assumption of O&M responsibilities.

Commitment 3 - Project Administration

Outputs: Provide daily project management, fiscal accounting, cost recovery documentation, legal research, and liaison with local and federal agencies, general administration, and clerical support.

Commitment 4 - Community Relations

Outputs: Review and prepare written comments on EPA or PRP community relations work products, including draft fact sheets and draft press releases. Prepare verbal or written responses to requests for site information from the public, legislators/officials, site owners/operators, contractors, and PRPs. Attend public meetings and briefings to discuss RA status, site information, progress, and policies, as appropriate.

Commitment 5 - Other

Outputs: Complete other activities as identified by the state and EPA that are critical to the project.

Outcome: Ensure state involvement in the development of Superfund Remedial Actions.

Component D - Quality Assurance/Quality Control

Commitment 1 – Follow EPA Quality Management Procedures

Output 1: For DEQ lead sampling investigations, DEQ will use EPA-approved Quality Assurance guidance.

Commitment 2 – Develop Quality Assurance Project Plans

Outputs: DEQ will develop QAPPs as specified in EPA QA/R-5, EPA Requirements for Quality Assurance Project Plans (QAPP) for Environmental Data Operations. DEQ will establish Data Quality Objectives to clarify the study objectives, define the most appropriate types of data to collect, determine the most appropriate conditions under which to collect the data, and specify the level of uncertainty that is acceptable as the basis for establishing the quantity and quality of data needed. The EPA must approve and sign all QAPPs before data collection. DEQ will provide thirty days for EPA to review and comment upon the QAPP unless the agencies agree to a different review period.

Outcome: Define state adherence to established and defined quality assurance processes for Superfund RI/FS and RD/RA.

Component E - SITE-SPECIFIC WORK PLANS FOR SUPPORT AGENCY ASSISTANCE

BARKER HUGHESVILLE MINING DISTRICT

On September 13, 2001, EPA added the Barker Hughesville Mining District to the Superfund NPL. The Barker Hughesville Mining District is located approximately ten miles east of the town of Monarch. The site is located in both Judith Basin County and Cascade County, south of Great Falls and northeast of Helena in the Little Belt Mountains. The site is an historic mining area with mining activities dating from 1879 through 1945.

DEQ commitments including consultation with EPA concerning draft report review for the RI/FS work effort, accrued leave expenses, file maintenance, community relations, and quarterly report preparation. Management and technical assistance will be directed towards the finishing remedial investigation report and the feasibility study this year (2017), and the preparation of a proposed plan in late 2017 and the ROD in 2018. Milestone meetings for the RI/FS are anticipated to occur during SFY 2018 and continued remedial discussions, decisions, and remedial activities will also continue into SFY 2018. The work effort for the Purposed Plan and ROD should also begin in SFY 2018.

Site-Specific Activities

DEQ activities include Component A, B, C and D.

1. Oversee and monitor field work and site visits, review progress reports, and track schedules.
2. Review and comment on sampling and data collection plans.
3. Review, comment, and assist in conducting community relations, participate in public meetings, and assist in the preparation of fact sheets.
4. Review work and sampling plans for source control.
5. Participate in FS milestone meetings
6. Provide legal review including:
    a. Review legal adequacy of the RI and FS;
    b. Review legal adequacy of the Purposed Plan and ROD;
    c. Provide cost recovery and administrative record duties for state activities in support of EPA's cost recovery responsibilities; and
    d. Assist EPA in the planning and preparation of the FS, proposed plan and ROD.

Travel

Travel estimates for the remedial activities and to monitor annual sampling events will total 12 trips for site visits at approximately 320 miles per trip. DEQ does not anticipate any out-of-state trips.

BASIN MINING AREA

The Basin Mining Area is located in Jefferson County, Montana. The site includes the drainage of Basin and Cataract Creeks, the Town of Basin, and metal-contaminated sediments in the nearby reaches of the Boulder River. EPA listed the Basin Mining Area site on the NPL on October 22, 1999, and established two operable units (OUs) for the site, the Town of Basin OU1 and the Basin Watershed OU2. DEQ's estimated budget includes site specific project hours, oversight of site activities, participation in development of the next five year review, data and design reviews, accrued leave expenses, file maintenance, monthly and quarterly report preparation, and regular EPA consultation. DEQ activities include Components A, B, C and D.

Town of Basin OU-1

The EPA issued the Town of Basin OU1 ROD in March 2002 and completed remedial action in 2005. DEQ will provide limited management assistance during SFY 2016. The 2nd Five Year Review report (2014) noted that the necessary and appropriate institutional controls (ICs) were not, as yet, in-place to insure that the remedy for OU1 remains protective of the public health and the environment.

DEQ will coordinate development of institutional controls with EPA, include yet to be planned stakeholder activities.

Site-Specific Activities

DEQ activities will include components A, B, C, and D

1. Provide support agency assistance for site visits, review progress reports and other documents, plans, and track schedules, such as the upcoming 5 year review.
2. Review and comment on deliverables including the Institutional Controls Work Plans.
3. Attend technical, legal, and public meetings with EPA.
4. Conduct community involvement activities including review of fact sheets and other informational materials, and respond to public inquiries.

Basin Watershed OU-2

The Basin Watershed (OU2) consists of numerous abandoned mines which are sources of contamination to the Basin watershed. The Bullion mine (OU5) and the Crystal mine (OU6) are two of the major sources of contamination to the Basin watershed. The agencies completed the RI/FS for these two OUs in 2013, and the agencies completed interim RODs for both OU-5 and OU-6 in 2015.

If remedial action funding is awarded, DEQ will provide support agency input to EPA during the RA phase. The remedial action phase will require specific technical and legal input from the DEQ to insure the optimum basis for the Long Term Remedial Action (LTRA) and for the long-term O&M; this input will address such issues as ARARs, field access, safety, winter operations, routine operations, routine maintenance, routine logistics, preventative maintenance, process cycling, major equipment repair/replacement, process waste handling, etc.

Site-Specific Activities
DEQ activities include Component A, B, C and D.

1. Oversee and monitor field work and site visits, review progress reports, and track schedules.
2. Assist EPA with other activities, as requested, such as revision and update of the State Superfund Contract, and development of the next five year review.
3. Supervise MBMG task order to monitor the flow and quality of the Bullion Mine and the Crystal Mine AMD.

Travel
Travel estimates include 4 trips for site visits at approximately 80 miles for OU-1 and approximately 4 trips for site visits, technical, oversight, project coordination, and public meetings at approximately 100 miles per trip for OU-2. DEQ does not anticipate any out-of-state trips.

CARPENTER SNOW CREEK MINING DISTRICT

On September 13, 2001, EPA added the Carpenter Snow Creek Mining District to the Superfund National Priorities List (NPL). The Carpenter Snow Creek Mining District is located at and adjacent to the town of Neihart, in the Little Belt Mountains in Cascade County. Mines associated with this NPL site are proximate to Belt Creek and two tributaries: Carpenter Creek and Snow Creek. Milestone meetings for the RI/FS are anticipated to occur during SFY 2017. DEQ's SFY 2018 activities will focus on the RD/RA for Neihart OU-1 and complete the RI activities for both the Watershed OU-2 and Silver Dyke Mine OU-3. Start the OU3 Purposed Plan and ROD work efforts in SFY 2018. DEQ staff manages the technical assistance grant funding for EPA at OU2/3.

Neihart OU-1

The project remains in Remedial Design (RD) as funding was not approved for the Remedial Action. The completion of the Basis of Design for the entire Remedial Action proposed is subject to the addition of properties defined as requiring Remedial Action until the bid cost package is developed (requires National Priority Panel Approval and Funding Obligation). The focus for the remainder of SFY 2017 and SFY 2018 will be to support the Property Owners Soil Management program (POSM), develop the State Superfund Contract with EPA, and coordinate with EPA and MDT to develop a plan for drainage under US-89 (problematic flooding issues must be addressed to controlled/manage water in order for the Remedial Action to begin).

Site-Specific Activities
DEQ activities include Component A, B, C and D.

1. Provide support agency assistance to EPA for RD/RA activities, including site visits, review of progress reports and other documents, plans, and reports, and tracking schedules.
2. Review and comment on deliverables including the RD Work Plans and Institutional Controls Work Plans.
3. Attend technical, legal, and public meetings.
4. Conduct community involvement activities including review of fact sheets and other informational materials, and respond to public inquires.

5. The DEQ legal team will provide legal review including:
    a. Review technical and legal adequacy of RD/RA statement of work, and subsequent work plans/design reports;
    b. Provide cost recovery and administrative record duties for state activities in support of EPA's cost recovery responsibilities;
    c. Review RD work plan draft documents and reports.
    d. Assist in the development of the State Superfund Contract with EPA.

Watershed OU-2

DEQ assisted EPA with RI/FS activities in SFY 2015, SFY 2016 and SFY 2017 and will continue providing assistance into SFY 2018. The RI report will be completed in 2017. The FS work effort for OU-2 will begin after the FS for OU-3 is completed or nearly completed in late 2017.

Site-Specific Activities

DEQ activities include Component A and D.

1. Provide support agency management and technical assistance to EPA for RI/FS activities, including site visits, review sampling plans, review of progress reports and other related documents, any other OU2 draft reports, and tracking schedules.
2. Review and comment on deliverables such as work plans and reports as needed.
3. Attend technical, legal, and public meetings.
4. Conduct community involvement activities including review of fact sheets and other informational materials, and respond to public inquires.
5. Provide legal review including:
    a. Review legal adequacy of draft reports;
    b. Provide cost recovery and administrative record duties for state activities in support of EPA's cost recovery responsibilities;

Silver Dyke Mine OU-3

DEQ assisted EPA with RI/FS activities in SFY 2015, SFY 2016 and SFY 2017 and will continue providing assistance into SFY 2018. The RI report will be completed in 2017. The FS work effort for OU-3 started in 2015 and should be completed in 2017. The OU3 Purposed Plan and ROD work effort will begin in SFY 2018.

Site-Specific Activities

DEQ activities include Component A and D.

1. Provide support agency management and technical assistance to EPA for RI/FS activities, including site visits, sampling and construction oversight, review of progress reports and other documents, repository designs, plans, reports, and tracking schedules.
2. Review and comment on deliverables including the RI report and OU3 FS work plans and draft reports.
3. Attend technical, legal, and public meetings.
4. Attend Milestone meetings for the RI/FS work effort.
5. Begin the OU3 Purposed Plan and ROD work effort.

6. Conduct community involvement activities including review of fact sheets and other informational materials, and respond to public inquires.
7. Provide legal review including:
    a. Review legal adequacy of RI/FS statement of work, and subsequent work plans/design reports;
    b. Provide cost recovery and administrative record duties for state activities in support of EPA's cost recovery responsibilities;
    c. Review RI/FS documents and reports.

Travel
Travel estimates include approximately 12 trips for OU1, 4 trips for OU2, and 12 trips for OU-3 for site visits for technical, coordination, and public meetings at approximately 320 miles per trip (28 trips total). DEQ anticipates at least four over-night trips but does not anticipate any out-of-state trips.

FLAT CREEK/IMM

The Iron Mountain Mine, located about four miles north of Superior, MT produced silver, gold, copper and lead for several decades in the early 20th century, and left behind about 61,000 square feet of tailings, up to 7 feet deep in some places. In 1993, Montana Department of State Lands abandoned mines inspectors documented the Flat Creek tailings. ASARCO conducted limited remediation work in 1998. That same year, traces of antimony were detected in Superior's drinking water. In 2002, the EPA conducted a removal action at the high school track and half a dozen areas of known contamination where residents had used the tailings as fill material. Flat Creek/IMM was listed as an NPL site in September 2009.

Superior OU-1

RD/RA activities were completed for OU-1 in early SFY 2015. EPA, DEQ and the USFS continue to monitor OU-1 on an annual basis and have implemented Institutional Controls. Because DEQ staff spends minimal time on OU-1, all staff hours and travel for OU-1 is reported inclusively with the budget estimate for OU-2.

Site-Specific Activities
DEQ activities include Component A, B, C and D.

1. Provide support agency assistance for site visits, review progress reports and other documents, plans, and track schedules.
2. Attend technical, legal, and public meetings with EPA.
3. Conduct community involvement activities including review of fact sheets and other informational materials, and respond to public inquiries.

Flat Creek Watershed OU-2

EPA, DEQ and the USFS completed the site characterization report at OU-2 in 2014. DEQ developed an EE/CA for OU-2 in SFY 2016. In late SFY 2016 and early SFY 2017 DEQ in

cooperation of with the United States Forest Service further characterized the site and developed all documentation necessary to conduct a Non-Time Critical Removal Action, implemented by the Custodial Trust previously established through the bankruptcy consent decree. The work began in SFY 2017, funded by the bankruptcy consent decree, and will be completed by mid SFY 2018. In SFY 2018 DEQ will support development of the next five year review.

Site-Specific Activities

DEQ activities include Component A, B, C and D.

1. Coordinate with EPA for the development of the next five year reviews, along with other plans and reports, including legal review as needed.
2. Conduct site visits, review progress reports, and track schedules.
3. Review and comment on sampling and data collection plans, and participate in EPA lead sampling activities.
4. Review, comment, and assist in conducting community relations, participate in public meetings, and assist in the preparation of fact sheets.

Travel

Travel estimates include approximately 2 trips for OU-1 and 2 trips for OU-2 site visits for technical, coordination, and public meetings at approximately 375 miles per trip. Each trip requires two days and overnight lodging for each DEQ staff member. DEQ does not anticipate any out-of-state trips.

MOUAT

In 1986, the EPA listed the Mouat Site, in Columbus, Montana, on the NPL. The EPA Emergency Response Branch conducted an emergency removal action at the site beginning in the summer of 1991 in cooperation with potentially responsible parties. The removal action included excavation, treatment, and on-site burial of some contaminated soils, and removal of some contaminated soils to offsite repository. ARCO conducted an EE/CA for groundwater and remaining surface contamination and conducted groundwater monitoring from 1996 to 2003. RA work was completed between 2004 and 2008. Partial delisting of the soil portion of the site occurred in May 2009. The remainder of the site is now in post RA O&M. In SFY 2018 DEQ will assist EPA with on-going O&M activities at the site, and participate in development of the next five year review.

Site-Specific Activities

DEQ activities include those in Components A, B, C and D.

1. Provide support agency assistance for post-removal activities, including site visits, review progress reports, and other documents, plans, and reports, and track schedules.
2. Attend technical, legal, and public meetings.
3. Conduct community involvement activities including review of fact sheets and other informational materials, and respond to public inquires.

Travel

Travel estimates include approximately 2 trips for site visit, , technical, coordinating, and public meetings at approximately 400 miles per trip. DEQ does not anticipate any out-of-state trips.

UPPER TEN MILE CREEK MINING AREA

The Upper Ten Mile Creek superfund site is located Southwest of Helena, MT, in Lewis and Clark County. The site includes the upper portions of the Tenmile Creek drainage basin. Tenmile Creek is one of two sources of drinking water for the City of Helena. EPA listed the Upper Ten Mile site on the NPL on October 22, 1999. The ROD with State concurrence was issued in June, 2002. An amended ROD without State concurrence was issued in September 2008; this amendment proposed to construct a community water system and halt construction of a community waste water system for Rimini. From 2003 through 2012 remedial efforts focused on residential areas and on the major sources of mining impacted material. Remedial efforts in 2013 to 2016 focused on completing the residential removals and on mining impacted properties which are significant sources of contaminant loading to the Ten Mile Creek watershed.

Site-Specific Activities

DEQ SFY 2018 activities include those in Components A, B, C and D.

1. Provide support agency assistance for post-removal activities, including site visits, review progress reports, and other documents, plans, and reports, and track schedules.
2. Conduct groundwater monitoring, preparation, review and distribution of groundwater monitoring reports.
3. Attend technical, legal, and public meetings.
4. Conduct community involvement activities including review of fact sheets and other informational materials, and respond to public inquires.
5. Manage a task order with USGS for surface water monitoring.
6. Review compliance of removal action objectives and goals, and evaluate adherence to state ARARs, and

Site-wide 2017-2020 overall project plan; DEQ will provide support agency assistance to EPA on the following activities:

1. National Extension treatability study and passive treatment system design. (RD activity awaiting EPA funding)
2. Luttrell Repository Treatment system design and transition to final treatment type ("on-going RA 2017-2018)
3. Rimini Area Source Adit Discharges Control/Treatment (Susie, Lee Mountain/Little Lilly, Red Water planned for 2018-2021)
4. Bunker Hill Area Source Adit Discharge Control/Treatment
5. Paupers Pit and Monitor Creek Priority Mine Group & Tailings; solid media removal and AMD treatment.
6. Minnehaha Priority Mine Group and Mine influenced ground water interception/treatment.

Travel

Travel estimates include approximately 6 trips for site visit at approximately 60 miles per trip. DEQ does not anticipate any out-of-state trips.

PRELIMINARY SITE ASSESSMENT PROGRAM

DEQ is requesting funding to continue to conduct Preliminary Assessment/Site Inspection (PA/SI) activities and management assistance for SFY 2018. DEQ's PA/SI Budget Request.

Management assistance and potential technical assistance will be needed in SFY 2018. The on-going Flint Creek/Fred Burr Creek near Philipsburg, MT project includes a DEQ-led data collection effort; DEQ will continue its local coordination efforts, participation in meetings, and oversight of data collection.

EPA completed its review of No Further Remedial Action Planned (NFRAP) sites in Montana in late 2016, and anticipates reassessments will be needed at the Miles City Livestock Center in Miles City, the Milwaukee Road in Haugan, and Pacific Hide & Fur in Billings. DEQ will provide management assistance and document reviews, as needed, for the reassessments.

Additional DEQ resources may be needed for review and coordination of other PA/SI-related projects on an as needed basis or as requested by EPA.

<u>Travel</u>
Travel estimates include 6 trips at 600 miles per trip by 2 DEQ staff and for site visits, technical, coordinating, and public meetings and potential two out-of-state trips for training to help build staff resources.