Message

From: Hestmark, Martin [Hestmark.Martin@epa.gov]
Sent: 10/24/2018 4:31:53 PM
To: Vranka, Joe [vranka.joe@epa.gov]; Greene, Nikia [Greene.Nikia@epa.gov]; Elsen, Henry [Elsen.Henry@epa.gov]
CC: Benevento, Douglas [benevento.douglas@epa.gov]
Subject: FW: My Suggestions for the Greeley Neighborhood and Superfund--What Needs to be Done Now.

Probably ought to prepare Doug for questions of this type.

From: John Ray [mailto:bodinman2003@yahoo.com]
Sent: Wednesday, October 24, 2018 10:18 AM
To: Commissioners <commissioners@bsb.mt.gov>; Dave Palmer <dpalmer@bsb.mt.gov>; Eric Hassler <ehassler@bsb.mt.gov>; Karen Sullivan <ksullivan@bsb.mt.gov>; Greene, Nikia <Greene.Nikia@epa.gov>; Daryl Reed <dreed@mt.gov>; Vranka, Joe <vranka.joe@epa.gov>; jchambers@mt.gov; Bill Andersen District Ten <woandersen@gmail.com>; Cindi Shaw <wrocshaw@hotmail.com>; Jon Sesso <jsesso@bsb.mt.gov>; Benevento, Douglas <benevento.douglas@epa.gov>; Thomas Stoops <tstoops@mt.gov>
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Subject: My Suggestions for the Greeley Neighborhood and Superfund--What Needs to be Done Now.

Submitted by: Dr. John W. Ray

Due to a previous commitment, I may not be able to attend this evening's Council of Commissioners meeting.

However, I did want to share some thoughts with you.

To the full extent allowed by CERCLA and SARA, the EPA needs to thoroughly and completely investigate the nature, extent of and source of contamination in the Greeley Neighborhood. Obviously, the CERCLA focus must be on the toxics of concern in Butte—arsenic, lead, etc. There are other potential sources of contamination from active mining, etc. that are beyond the purview of CERCLA. Primary responsibility for the non-CERCLA sources of contamination rests with MDEQ and Butte/Silver Bow. MDEQ and the Butte Health Department should be directed to pursue their own investigations of the nature and extent of contamination resulting from active mining, etc. EPA should assist those endeavors. (Dr. Hailer's well-crafted and executed study provides much needed information and should be closely considered.) CERCLA is in place. Its limitation is that it would not get into active mining, etc.

With regard to CERCLA, the Greeley area should have some designation as an OU, maybe as an OU investigation area within the context of an expanded Westside Priority Soils area. (Whether an entirely separate and distinct OU designation is needed is unclear.) As I said, particular attention should be paid to the Greeley Neighborhood area. Here of course we

would run into the problem of how much of this contamination was due to past mining/smelting, current mining or naturally occurring.

But there are things we can do now:

I would argue that RMAP should be expanded to the area south of Front Street immediately and somehow formally. I don't think that we should wait for the whole Superfund process for Westside Soils or whatever it is called to be completed, which would take a long time. At first it may be sufficient to allow people who are concerned to contact RMAP and have their homes sampled and remediated if warranted, as is being done presently. I would ask EPA to add an aggressive and extensive public education program to acquaint residents in the area south of Front Street, particularly the Greeley neighborhood, with the RMAP program and how they can get their residence sampled and remediated if need be and with things they can do as individuals and families to protect themselves.

My understanding is that RMAP has found in the area of the Greeley neighborhood primarily attic contamination with arsenic. This would fall under the purview of CERCLA as the arsenic contamination would likely be largely due to past smelting activity. (It is primarily tri-valent arsenic.) Little yard contamination has been found and, I believe, little indoor dust contamination. (The point being that the area would appear to be somewhat less complex than the Priority Soils OU. There are no tailings piles, waste dumps, etc. to the extent found in BPSOU.)

If investigation by EPA finds a more widespread contamination problem, RMAP cleanup activities could become more aggressive, more formal and more analogous to the activities on the Butte Hill. For example, a systematic analysis and remediation plan could be developed and implemented to reach the whole area as has been done for Priority Soils.

By focusing on what can be done now, we avoid the long and perhaps fruitless process of trying to figure out how much of the contamination in the Greeley area comes from past mining, how much comes from present mining, how much is naturally occurring, etc.

Certainly, MRI's current activities need to be analyzed and, if found to be contributing to adverse health effects, appropriate ameliorative activities can be conducted. Citizen meetings with MRI could certainly be productive. The Council should ask MDEQ to be active in this area. Dr. Hailer's study is a first step. The Health Department can certainly contribute. We can certainly get an answer. But what I am saying is let us not wait to expand RMAP and other CERCLA activities in the area now.

EPA also needs to recognize and address that there is an environmental justice population in the Greeley. Extensive outreach needs to be conducted.

Simply put, while studying the area, there is much that can be done now. Much of what I am suggesting would be done anyway if contamination is found to be a problem. Certainly, comprehensively studying the area is needed. But do what can be done now.

I would also recommend that citizens meet with officials from MRI and BP/ARCO. I have seen a new spirit of cooperation in Butte and I think that much can be done just by talking to each other. Confrontation may come but let us try cooperation first. MRI and ARCO have certainly been forthcoming in the past few months and in several cases done more than required to do by law. EPA is attuned to citizen concerns and wants. Nikia deserves particular praise for his outreach efforts and his willingness to listen to and try to accommodate citizens.