1. **This is the last OU to be created in Butte under Superfund. Delisting will occur soon. If the Greeley Neighborhood and Flat Area are not included as part of the Westside Soils OU, how can the extent of contamination in these areas be systematically and thoroughly investigated and remediated? What assurances does the public have that these areas will be systematically and thoroughly investigated and remediated.**

Beginning in late spring of 2019 and continuing into 2020, EPA will begin fieldwork in support of a remedial investigation/feasibility (RI/FS) study for the West Side Soils Operable Unit (WSSOU) as part of its cleanup efforts at the Silver Bow Creek/Butte Area Superfund site. The WSSOU is generally north and west of the Butte Priority Soils Operable Unit (BPSOU), but the boundary of the WSSOU is currently undetermined. It includes mining-impacted areas not addressed by actions at other parts of the Superfund site. We do know that in the area generally north and west of the BPSOU, the WSSOU contains several hundred mine claims with smaller disturbances associated with exploration, as well as several larger abandoned mines, therefore the main study area is located there. There is existing data on the Flats and the Greeley Neighborhood which will be evaluated and supplemented with additional data collection so that we can understand the nature and extent of historical mine waste contamination in those areas. The public is assured that this RI/FS process will include the Greeley Neighborhood and the Flats.

2. **If the area south of Continental Drive including the Greeley Neighborhood is not part of an established legally constituted Operable Unit under Superfund, does the EPA have an enforcement mechanism under Superfund to use to remediate the area? If not part of a designated OU does the area south of Continental Drive qualify for remediation under Superfund?**

The RI/FS will determine the nature and extent of historical mine waste contamination. Typically, if an area or neighborhood is not included in an official Superfund boundary after an RI/FS has been completed, it has been determined that contamination from past mining activities do not pose a threat to human health or the environment in that area. EPA's enforcement mechanisms can be used any time it makes a decision that a response action is needed in a given area.

3. **Does EPA agree that the arsenic contaminated dust that has been found in some attics in the Greeley Neighborhood is smelter dust and therefore considered as mine waste from past mining activity and due remediation under Superfund as has occurred in the BPSOU and Anaconda?**

In 2011, attic dust sampling and abatement within the RMAP was expanded to include areas outside of BPSOU, by homeowner request, for homes built before 1980. This expanded attic dust area includes the Greeley Neighborhood and the Flats. In addition, EPA is working with DEQ and the BPSOU responsible parties to extend the RMAP for soils and other elements of the program, to an area that would include the Greeley Neighborhood. If that expansion occurs, homeowners can request an evaluation of their property under the RMAP. The RMAP would then remediate the property if action levels are exceeded and there is a pathway of exposure.

4. **If a formal RI/FS process is not conducted for the Greeley Neighborhood and the Flat, how can residents have any confidence that the full extent of contamination in the area has been determined?**

EPA's RI/FS process will determine if there is historic mining waste and contamination that needs to be remediated. This RI/FS will be conducted for the WSSOU. The WSSOU boundary is undetermined at this time. EPA will continue to engage with and inform the community throughout this process.

5. **What provisions are being made for addressing the environmental justice community in the Greeley Neighborhood?**

EPA has recently engaged with the Greeley Neighborhood Association, specifically Ed Banderob, to determine their communication and EJ needs. We will continue those efforts. Mr. Banderob has proposed the formation of a focus group for agencies of different authority to coordinate on activities and concerns involving the Greeley Neighborhood. EPA supports, and will participate in, this focus group.

6. **When will the public know as to whether or not the RMAP program has been "officially" extended to the Greeley Neighborhood and the Flat?**

The RMAP has been proposed to be expanded to a large section of Butte Silver-Bow County. This proposal will be discussed in the upcoming release of the Proposed Plan for the BPSOU ROD Amendment. Once the Record of Decision Amendment and Consent Decree are final, the RMAP will be officially extended to the Greeley Neighborhood and Flat.

7. **If there is no PRP for the Greeley Neighborhood and the Flat, from where will the necessary cleanup funds for the area be derived? Who will pay? Wil there be enough money for a systematic cleanup?**

The EPA is investigating whether there are any remaining viable PRPs for the WSSOU. If there are no viable PRPs for the Site, funding is available through congressional appropriations, which is based on the risk to human health or the environment. Sites compete with each other for such funding. This happens in all our programs and Superfund listed sites are prioritized for funding.

8. **If there is no RI/FS, how can the public be assured that sufficient data is available to completely assess the extent of contamination in the Greeley/Flat area?**

EPA has been investigating the nature and extend of contamination from past mining activities within the Silver Bow Creek/Butte area since 1983. Those investigations have included data collection in the Greeley Neighborhood and Flats area. As noted above, that data will be evaluated and additional data will be collected. These investigations have been assessing the

nature and extent of contamination, and this will continue with the upcoming RI/FS for the WSSOU.

9. **If not part of an official Superfund OU, what assurances can the residents of the area have that they will not become simply a Superfund afterthought?**

EPA's mission is to protect human health and the environment. Through our past, current and future remediation efforts we are required under CERCLA, i.e. Superfund, to investigate and address contamination from past mining activities which could impact human health. The residents of the Greeley neighborhood, and all neighborhoods in Butte, will not become an afterthought in the cleanup process. We will continue to actively engage with these community members and groups to provide information on our work, along with education and outreach materials so that they are able to be engaged throughout the Superfund process.

10. **Will the current Superfund Health Study be extended to the Greeley Neighborhood and the Flat?**

The RMAP plan identifies that Butte-Silver Bow will periodically evaluate medical monitoring (i.e., "biomonitoring") data approaches and data compiled under the RMAP every 5 years for a period of 30 years. The first of these studies was completed and approved by EPA in 2014. We are in the second study that is due in July of this year. The requirement is a check and balance to ensure that the RMAP continues to be effective and based on the periodic evaluation gives opportunity to make improvements if needed. Now, if the evaluation determined that the RMAP was not effective then we would look at other remedial options. But so far, our studies tell us it is working as blood lead levels here in Butte are trending down faster than comparative communities with the difference attributed to RMAP. This study looks at data throughout Butte-Silver Bow including the Greeley Neighborhood.

11. **What community involvement activities will be directed to the Greeley Neighborhood and Flat if these areas are not part of an official OU?**

Community involvement activities will continue in all parts of Butte to inform and engage the public throughout the Superfund process. These will include public meetings, one on one meetings, drafting informational material such as fact sheets and flyers as needed, and working with all elected officials to inform the community of our work and progress. A community involvement plan will be developed for the WSSOU work. Your support and input in this process are appreciated.