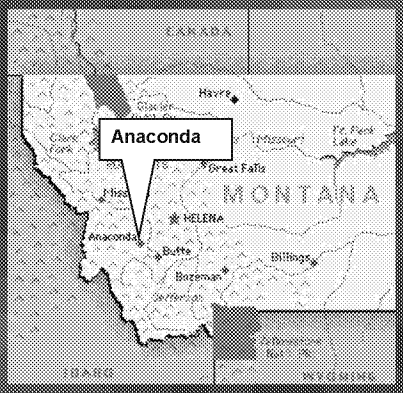
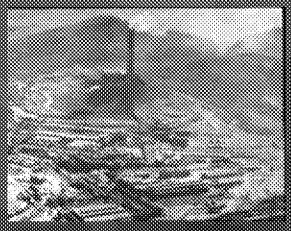
# Anaconda Smelter NPL Site Proposed Plan

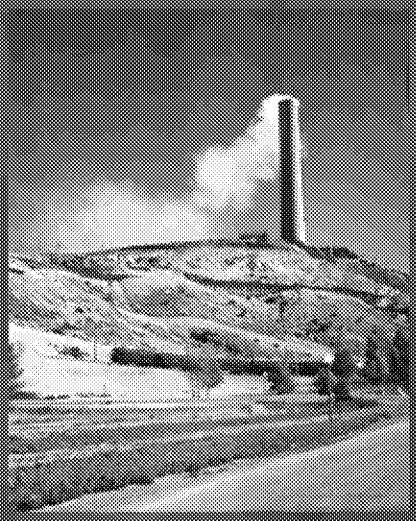
Anaconda Regional Water, Wastes, and Soils OU Proposed Plan for a ROD Amendment



# Site Background and Overview

- The Anaconda Smelter NPL Site contains the former Anaconda Company copper smelters that operated from the 1880s to 1980
- Smelter deposition of contamination over 300 square miles
- Site listed in 1983
- Atlantic Richfield Company (AR) is the primary PRP





# ARWW&S OU Remedy

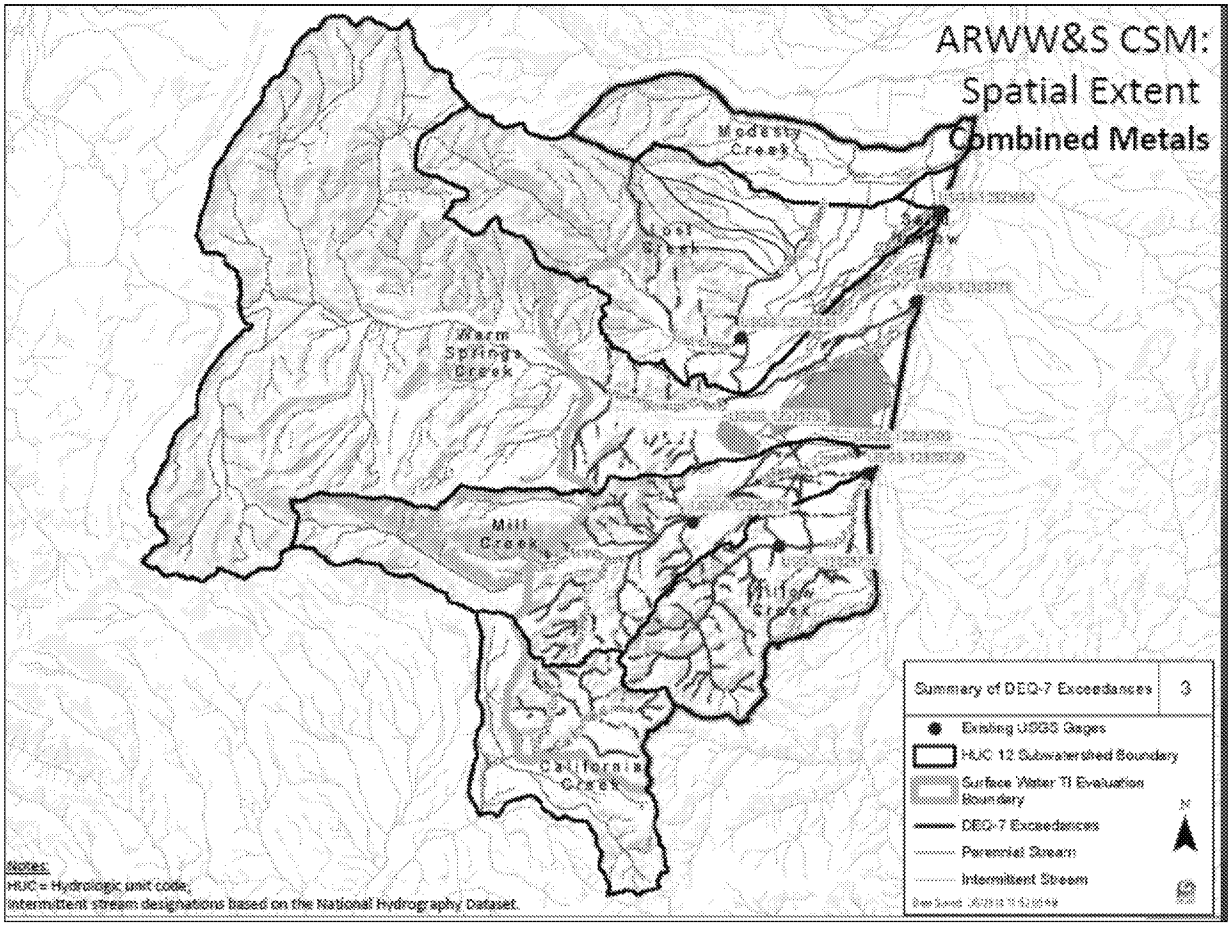
- Anaconda Regional Water, Waste & Soils OU ROD 1998 addressed the major waste disposal areas (tailings, slag), sitewide soils, surface water and groundwater
- Cleanup began in 2000 with over 12,000 acres remediated to date
- ROD amended in 2011 to expand the remedy for soils, ground water and surface water, waived the standard for arsenic
- Remedy included capping wastes, reclaiming soils, and constructing stormwater controls

# Proposed Changes to the ARWW&S Remedy

- Expand and enhance the current soil remedy to minimize contamination to surface waters
  - Additional stormwater controls and BMPs
  - Enhanced steep slope reclamation
- Provide a process to waive State of Montana acute and chronic water quality standards for copper, cadmium, lead and zinc, if necessary after remedy construction, and
- Replace State standards with Federal aquatic water quality standards

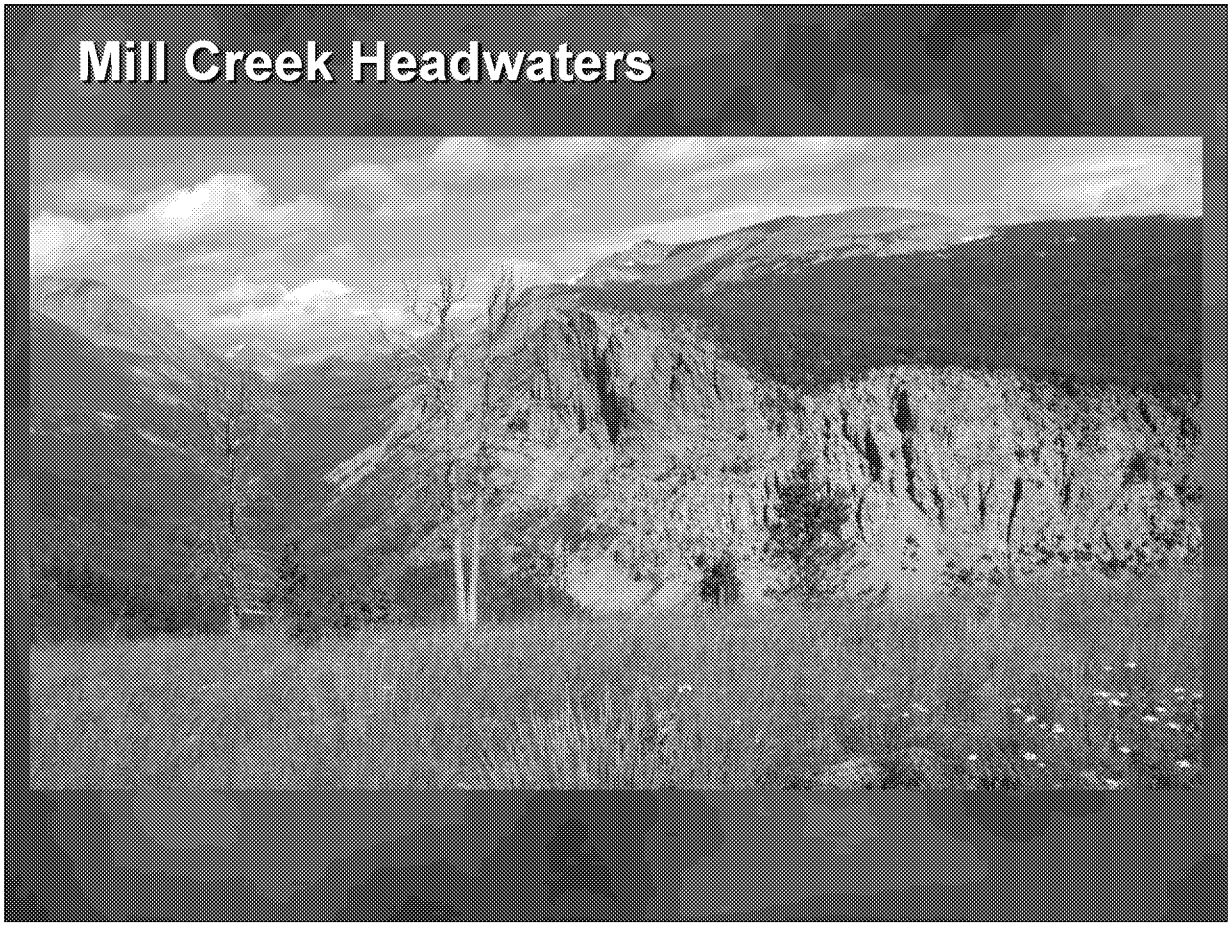
## Why Changes are Needed

- Data show frequent exceedances of State water quality criteria, especially during high flow (storm) events
- Based on the data, EPA questioned whether planned response actions would meet State of Montana total recoverable metals surface water performance standards
- With oversight from EPA and Montana DEQ, Atlantic Richfield Company conducted a technical impracticability evaluation
- Region 8 coordinated with EPA Headquarters on the evaluation


ARWW&S CSM:
Spatial Extent
Combined Metals
Modesty Creek
Lost Creek
Warm Springs Creek
Mill Creek
California Creek
Summary of DEQ-7 Exceedances
3
Existing USGS Gages
HUC 12 Subwatershed Boundary
Surface Water TI Evaluation Boundary
DEQ-7 Exceedances
Perennial Stream
Intermittent Stream
Notes:
HUC = Hydrologic unit code;
Intermittent stream designations based on the National Hydrography Dataset.

# Surface Water TI Evaluation Analysis

- Surface water treatment not technically practicable (2011 evaluation)
- Removal of soil in well-vegetated areas was eliminated due to the potential for creating greater erosion problems
- Remaining practicable work elements determined to be stormwater engineered controls, BMPs, and steep slope reclamation


Mill Creek Headwaters

# Public Input

- Original Proposed Plan was released in 2017
- To be revised based on public comments received:
  - No waivers until all work is complete
  - Need to evaluate impacts to endangered species (i.e., bull trout)
- Revised Draft Proposed Plan for internal review expected May 2019

# Consent Decree Negotiations Overview

- October 11, 2018 - Conceptual Settlement Framework for final Anaconda Smelter CD
- June 2019 - Proposed Plan to be issued
- December 2019 – Final CD to be lodged
- Goal is to complete remedial action and begin deletion of the site by 2025

# Negotiation Schedule

Modify Confidentiality Order

Public Comment

Release Proposed Plan

Public Comment

Sign ROD Amendments

Public Comment

2020 to 2025

Implement remedy under consent decree and agreements

Fall 2018 | Winter 2019 | Spring 2019 | Summer 2019 | Fall/Winter 2019

AR=Atlantic Richfield
ADLC=Anaconda-Deer Lodge County

# Questions?