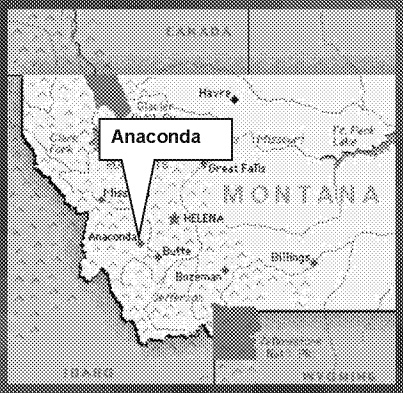
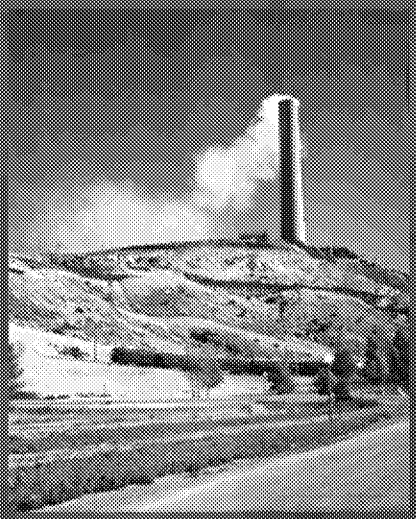
Anaconda Smelter NPL Site Proposed Plan

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

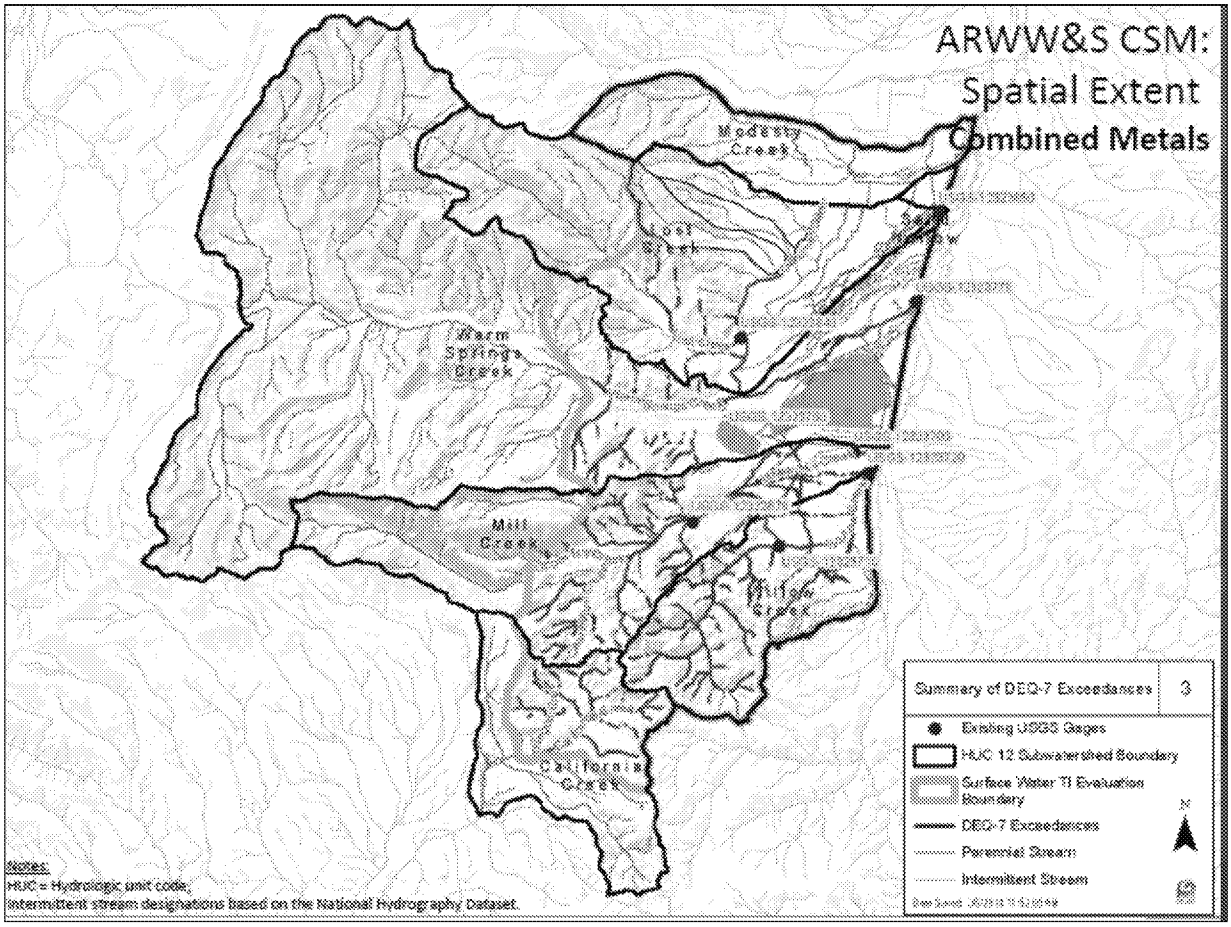
- Anaconda Regional Water, Waste & Soils OU ROD 1998 addressed the major waste disposal areas (tailings, slag), sitewide soils, surface water and groundwater
- Cleanup began in 2000 with over 12,000 acres remediated to date
- ROD amended in 2011 to expand the remedy for soils, ground water and surface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

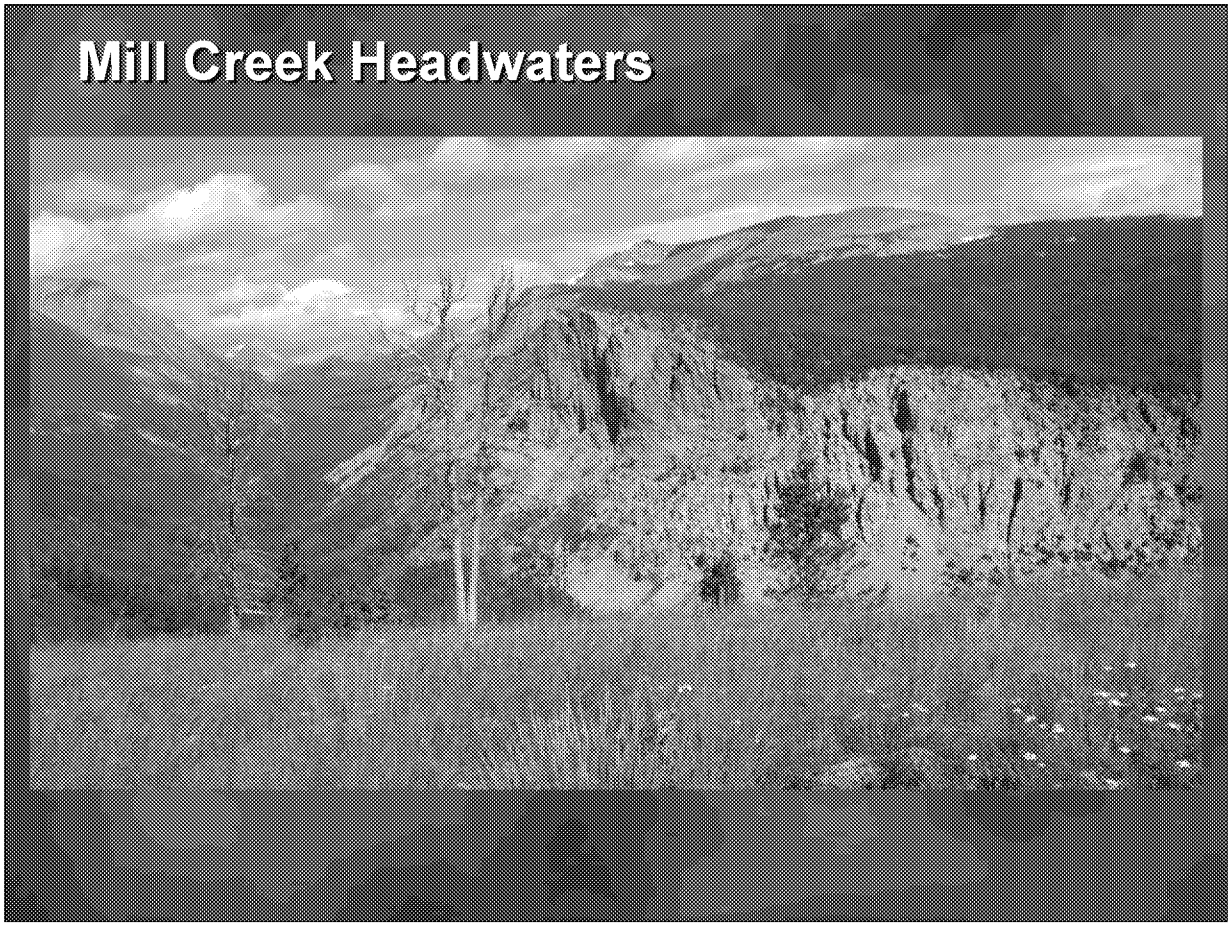
Why Changes are Needed

- 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

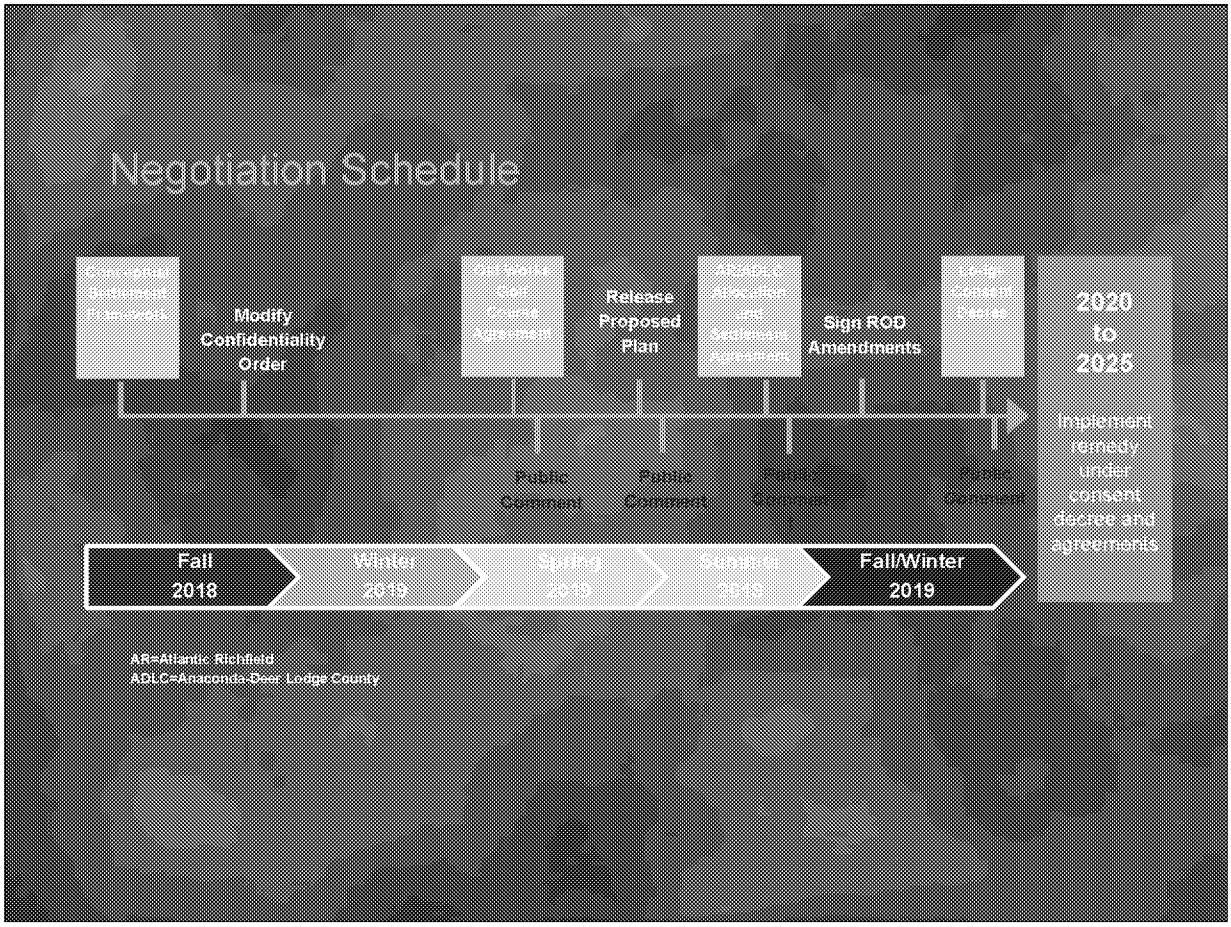

Mill Creek Headwaters

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
Release Proposed Plan
Sign ROD Amendments
2020 to 2025
Implement remedy under consent decree and agreements
Public Comment
Public Comment
Public Comment
Fall 2018
Winter 2019
Spring 2019
Summer 2019
Fall/Winter 2019
AR=Atlantic Richfield
ADLC=Anaconda-Deer Lodge County

Questions?