Communication Strategy – 20170427 DRAFT

Site	**Anaconda Smelter** Anaconda Montana
Upcoming Actions	• 2017 Site Update • Explanation of Significant Differences (ESD) for OU 16 Community Soils (CSOU) • Proposed Plan (PP) and Record of Decision (ROD) Amendment for OU 4 Anaconda Regional Water, Waste and Soils • Update Community Involvement Plan (CIP)
Anticipated Date	May – June 2017
Outreach Partners	Montana Department of Environmental Quality (DEQ), Anaconda Deer Lodge County (Carl Nyman); Arrowhead Foundation (Technical Assistance Grant recipient)
Goals	Key audiences will be aware of the 2017 Site Update and: • Know about the 2017 ESD and upcoming work in the Anaconda community (yard/home sampling and removal) over the next several years. • Understand the 2017 PP and know how to submit comments during the 45-day public comment period. • Identify how to be involved in the Superfund process.
Scope	Short term (2 month) focused roll out in Anaconda and adjacent area for the ESD and PP.
Strategy	Provide a comprehensive Site Update that highlights the 2017 actions (ESD, PP, and ROD modification, and the CIP).
Rollout Tactics	• Update EPA website and post ESD, PP, and the Remedial Action (RA) work plan. • Provide courtesy notifications to key partners when the ESD and PP are available. • Provide briefings to U.S. Congressional Offices. • Open a 45-day public comment period for the proposed plan. Hold a public meeting at least 2 weeks before the end of the comment period and publish notice of the meeting in the local newspaper. • Deliver public presentations for the Community Soils OU (includes ESD) during meetings of local groups. • Develop and distribute written/visual materials and distribute through the local newspaper and during public engagements. Respond to media inquiries. • Update information repositories.

Key Audiences:

Elected Officials • County CEO (Bill Everett) and Council of Commissioners • Office of Montana Governor Bullock • Offices of U.S. Senators Tester and Daines • Senate District 039 - Gene Vuckovich • House District 078 - Gordon Pierson • House District 077 - Kathy Swanson	Anaconda Area News Media • Anaconda Leader newspaper • Montana Standard newspaper • KXLF TV news; KOPR 94 radio Business • Anaconda Local Development Corps • Anaconda Chamber of Commerce • Anaconda Relators Association
Agencies • Local - Anaconda City and County departments of health and planning. • State – DEQ, FWP, NRDP • Federal – USFWS, BLM	Community/ Public • Arrowhead Foundation • Rotary Club of Anaconda • Anaconda Kiwanis Club • Audubon Society, Trout Unlimited
Specific for proposed plan • Clark Fork Coalition • Anaconda Sportsman and Angler groups	Specific for ESD • Neighborhoods where home/yard work will occur • OCEP

Potential Issues:

- PP for OU 4 - Waiving surface water standards may not be supported by env. groups and angler community
- ESD for OU 16 – People may have public safety concerns about increased traffic in their neighborhood.

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Broad Messages:

- The 300-square-mile Anaconda Co. Smelter site is located at the southern end of the Deer Lodge Valley in Montana, at and near the location of the former Anaconda Copper Mining Company.
- As a result of ore processing operations, wastes contaminated soil groundwater and surface water with hazardous chemicals.
- The contaminants of concern at the Site are arsenic, copper, cadmium, lead and zinc.
- EPA placed the Anaconda Co. Smelter site on Superfund Program's National Priorities List (NPL) in September 1983.
- Cleanup is complete at several areas within the site and operation and maintenance activities are ongoing at these areas. cleanup activities are underway at the remaining areas.
- EPA has just completed the fifth five-year review (255 pp, 63.5 MB, About PDF) of cleanup actions at the Anaconda Smelter site.
- The ESD, PP, RA work plan, and other Site documents and information can be found on the EPA webpage under Reports and Documents or at an information repository for the Site:

Arrowhead Foundation Library 118 East Seventh Street Anaconda, MT 59711 406-563-5538	EPA Superfund Records Center Montana Office; 10 West 15th Street, Suite 3200; Helena, MT 59626 406-457-5046; 866-457-2690 (toll free)

- A 45-day public comment period will be opened for the proposed plan. A public meeting will be held on . . . . A notice for the meeting will be published in the Anaconda Leader Newspaper.

Outreach Timeline:

Date	Action	Materials	Method	Lead	Status
2/15	Send courtesy copies of PP and ESD to DEQ and ADL County	PP ESD	Email	Coleman	Sent 2/15
4/10	Provide updates to US Congressional Offices	Draft fact sheets	Teleconference	Moler, Vranka, Coleman; Ostendorf	Held 4/10
5/5	Interview with MT Standard NP	TP	interview	Coleman, Moler	
5/tbd	Update webpage Make courtesy notifications Update information repositories	CEF PP PDF ESD PDF RA work plan CSOU fact sheet Site update fact sheet	Webpage Email/phone	Moler, Coleman, Cooper	
5/TBD	Distribute ESD and fact sheet to stakeholders	ESD, fact sheet	email	Coleman	
5/10?	Present CSOU Update during Arrowhead meeting	PPT Site Update fact sheet CSOU Fact Sheet	Public presentation & discussion	Arrowhead & EPA coordinate	
5/tbd	Distribute PP to stakeholders	PP	Email	Coleman	
5/tbd	Publish CSOU fact sheet in Anaconda Leader	CSOU Fact sheet	Newspaper insert	Arrowhead	
tbd	PP availability and public meeting notice published (Start of 45 Day public comment period for PP)	PP Public Notice	Newspaper ad/ insert	CDM;	

TBD	Public notice for public meeting for PP published in Anaconda Leader	Public Notice	Newspaper publication		
6/TBD	Hold public meeting for the PP Venue?	Site Update fact sheet Copies of PP PPT	Public presentation & discussion	CDM – logistics Coleman, Moler - delivery	
TBD	Presentations to community groups				
TBD	Public comment period ends				
2016 – 2020?	Publish community updates about the yard sampling/cleanup process	Ads/inserts	Local newspaper	Arrowhead	

Tasks/Materials

Task	Lead/support	Deadline	status
Develop Site Update Package – fact sheet, PPT	CDM, Coleman, Moler		drafted
Develop CSOU fact sheet (includes ESD)	CDM, Coleman, Moler		drafted
Develop PP fact sheet			
Coordinate with Arrowhead for public presentation	Coleman, Arrowhead		Tentative 5/10
Update CEF – update Anaconda webpage	Moler, Cooper, Coleman		Strikeout draft 4/27
Develop and publish public notices in Anaconda Leader: 1. PP & ESD availability, 2. PP public meeting notice	CDM		
Prepare public meeting kit Agenda, comment card, sign in sheet, fact sheets, maps, etc	Moler, Coleman		
Update CIP, community interviews, email distribution list	CDM, Moler, Coleman		

Talking Points/Q&A

For the ESD

- The ESD is for the Community Soils OU 16 that includes removal of arsenic-contaminated soils and replacement with clean soil. The remedy was selected in the 1996 ROD and amended in 2013.
- The ESD makes changes to the 2013 ROD amendment as a result of the development of the 2015 RA work plan. The ESD describes two changes to the remedy:
  1. Exclusion of living space dust and addressing only accessible attic dust - EPA is requiring that only accessible attics be sampled for dust
  2. Modifying the sample depth intervals used to make remedial decisions for arsenic and lead in yard soils –
     - EPA is changing the criteria for vegetable from a removal/replacement depth of 18 inches for soils.
     - EPA is changing the criteria for vegetable gardens to a depth of removal/replacement to 24 inches for both arsenic and lead concentrations that exceed the 250 and 44 mg/kg action levels.

For the RA work Plan – Community Work

- Goal is to sample and clean up yards over 5 years.
- Initial yards to be sampled were previously sampled (roughly 2,000) for the arsenic cleanup
  - The target is to sample approx. 500 yards per year.
  - The action levels are 250 mg/kg for arsenic and 400 mg/kg for lead.
  - Sampling began in 2016. Approximately 500 yards/homes were sampled.

- Yards that were sampled in 2016 and identified to exceed action levels will be clean up in 2017.
- Concurrent with the 2017 clean up, approx. 500 more yards will be sampled. This pattern will continue through at least 2020.
- Most of these yards are primarily E. of main street
- 40 yards have been cleanup in 2016

- Residents can request to have their yards sampled,
    - Homes with children may be prioritized.
    - To request sampling of your yard and home, please contact . . .
- A copy of the RA work plan can be found on the EPA webpage provide link

For the PP:

- The PP is for the Anaconda Regional Water, Waste and Soils OU 4 that includes the consolidation of waste materials and placement of covers over waste management areas, treatment of contaminated soils, and implementation of storm water and institutional controls. The remedy was selected in 1998 ROD and modified in 2011.
- The PP proposes to waive the Montana acute and aquatic life surface water criteria for cadmium, copper, lead and zinc for upper Willow Creek and it tributaries.
- The 1998 ROD objectives have been revised to:
    - Minimize source contamination to surface waters that would result in exceedances of water quality standards (State and Federal depending on stream reach)
    - Require additional actions to reduce loading of contaminants of concerns to area streams and return surface water to its beneficial use.
- A 45-day public comment period is open for the proposed plan and EPA encourages people to read the plan and submit comments to:
    - Charlie Coleman, EPA Remedial Project Manager
    - Coleman.charles@epa.gov
    - 10 West 15th Street; Suite 3200; Helena MT 59626

Recent Actions

In 2015, EPA completed the fifth five-year review (PDF) (255 pp, 63.5 MB, About PDF) of cleanup actions at the Anaconda Smelter site. A fact sheet (PDF) (2 pp, 1.2 MB, About PDF) is available that provides an overview of the five-year review.

Communication Measures and Metrics

Timeliness of webpage update and document availability. . .
# of ads/public notices/ timeliness of publication
# of comments received on the proposed plan; substantial new information received leading to changes; no request to extend the comment period
# of groups reached; # of people reached during outreach
elected officials briefed
of news articles carrying accurate talking points