Project Team and Regulatory Oversight

The EPA oversees the project in consultation with the Montana Department of Environmental Quality (DEQ) and must review and approve all portions of the RI/FS work. The agencies will have a role in remedial design, action, and operations and maintenance after the remedy is implemented.

Reports and Resources

<u>EPA Website and Contact</u> www.epa.gov/superfund/columbia-falls Ken Champagne, champagne.kenneth@epa.gov

Beth Archer, archer.elizabeth@epa.gov <u>MDEQ Website Contact</u>

http://deq.mt.gov/DEQAdmin/cfac Dick Sloan, rsloan@mt.gov Phone: 406-444-6454

<u>CFAC Community Liaison Panel Website</u> and Project Contact: http://www.cfacproject.com Mary Green, mgreen@magc.info Phone: 304-932-7673

<u>Columbia Falls Branch of</u> <u>Flathead County Library</u> 130 6th Street West, Columbia Falls, MT. Phone: 406-892-5919 Library visitors interested in reviewing the material should ask for assistance. Columbia Falls Aluminum Company 2000 Aluminum Drive Columbia Falls, MT 59912

Community involvement and planning for a site's redevelopment are integral to the entire process



Community Liaison Panel, contact Mary Green at 304-932-7673.

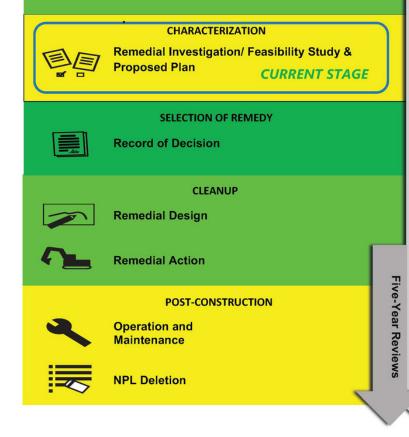
For more information about the

This newsletter is part of CFAC's ongoing commitment to working with the community and to keeping you informed.

	THE SUPERFUND REMEDIAL PROCESS
	ASSESSMENT
•	Discovery of Contamination
Ē	Preliminary Assessment
Q	Site Inspection
	National Priorities List (NPL) Site Listing

EPA Superfund Process and RI/FS Timeline for CFAC Project

Complete?	Remedial Investigation/Feasibility Study	Schedule
	Recent and Upcoming Task Schedule	*Subject to EPA/DEQ Review
\checkmark	Draft Phase I Site Characterization Data Summary Report	February 2017
\checkmark	Draft Screening Level Ecological Risk Assessment Report	February 2017
~	2017 Remedial Investigation Field Activities	Summer 2017
\checkmark	Final Phase I Site Characterization Data Summary Report	September 2017
\checkmark	Final Screening Level Ecological Risk Assessment Report	September 2017
✓	Groundwater and Surface Water Data Summary Report	November 2017
~	Draft Baseline Human Health Risk Assessment Work Plan	November 2017
\checkmark	Draft Baseline Ecological Risk Assessment Work Plan	November 2017
\checkmark	Draft Phase II Sampling and Analysis Plan	February 2017
 Image: A start of the start of	Phase II Remedial Investigation Field Program	April 2018 – October 2018
 	Draft Phase II Site Characterization Data Summary Report	March 2019
~	Draft Baseline Risk Assessments	March 2019
 	Final Phase II Site Characterization Data Summary Report	July 2019
 	Final Baseline Risk Assessments	July 2019
/	Draft Remedial Investigation Report	3rd Quarter 2019
/	Draft Feasibility Study Work Plan	4th Quarter 2019
/	Final Remedial Investigation Report	February 2020
/	Final Feasibility Study Work Plan	April 2020
	Draft Feasibility Study Report	October 2020
	Final Feasibility Study Report	2021



Site History and Project Overview

Columbia Falls Aluminum Company, LLC (CFAC) purchased the Anaconda Aluminum Smelter in 1999 after 44 years of operation by Atlantic Richfield, its predecessors and other parties. The Anaconda Aluminum Smelter ceased operations in 2009.

In November 2015, CFAC and the Environmental Protection Agency (EPA) entered into an Administrative Settlement Agreement and Order on Consent (AOC), which specified CFAC's responsibilities associated with the completion of a Remedial Investigation and Feasibility Study (RI/FS) for the Anaconda Aluminum Co. Columbia Falls Aluminum Reduction Superfund Site (site). The EPA formally added the site to the National Priorities List on September 9, 2016.

The Remedial Investigation/Feasibility Study (See Superfund Flow Chart and RI/FS Timeline.)

The EPA's established two-part Remedial Investigation/Feasibility Study portion of the Superfund process is used to develop a comprehensive understanding of site conditions, identify issues requiring remedies and alternatives for addressing such issues. The Remedial Investigation serves as the mechanism to determine the nature and extent of potential contamination and to assess potential risk to human health and the environment.

The Feasibility Study, the second step, uses the data gathered during the Remedial Investigation to screen and evaluate various remedial actions. Both steps are critical to determine what must be done to ensure the protection of human health and the environment.

The Feasibility Study Report will be finalized in the coming week, in accordance with the EPA's established timeline.

The Remedial Investigation Findings at CFAC

The Remedial Investigation Report was submitted to regulators in early 2020 and contained results from three years of on-site testing and an analysis of data. It was approved by the EPA on February 27, 2020. The comprehensive analysis showed there is no off-site risk to human health or the environment, including Aluminum City or the main stem of the Flathead River. However, there are chemicals and metals at levels in groundwater and soil onsite that could pose a theoretical risk if left unaddressed.

The Feasibility Study and Its Purpose

Using the data from the more than 1,800 groundwater, surface water, sediment and soil samples gathered as part of the Remedial Investigation, the project team carried out an examination of alternatives to address site conditions to meet required health and environmental standards. The process was conducted under EPA supervision and with MDEQ input, following very specific criteria outlined in federal regulations that require alternatives to be compared to each other.

The Feasibility Study alternative ranking process, prepared by CFAC, followed a numerical ranking system that compared the performance of site alternatives against the federally required criteria. Each alternative is first evaluated with respect to Threshold Criteria:

- Overall Protection of Human Health and the Environment
- Compliance with All Applicable Federal and State Regulations

This primary screening with Threshold Criteria ensures all resulting alternatives, with the exception of the "no remedial action" that is required by Superfund law to be included as an alternative, will be protective of human health and the environment.

Next, each alternative that meets the Threshold Criteria is evaluated on its implementability and effectivenes by using federally required Balancing Criteria:

- Long-Term Effectiveness and Permanence
- Reduction of Toxicity, Mobility, and Volume Through Treatment
- Short-term Effectiveness
- Implementability of the Alternative
- Cost of the Alternative

After the Feasibility Study is finalized and approved by the EPA, the agency will prepare a Proposed Plan with its preferred alternative. The EPA will share the document with the public and host a Proposed Plan public meeting to receive comments as part of the public comment period.

After the alternatives were evaluated, they were compared to one another to see which alternative maximizes performance under the Superfund mandated criteria. The Feasibility Study includes a numerical scoring system that ranks each alternative on a scale of 0-20 for each of the balancing criteria. All of the balancing criteria are of equal weight.

The evaluation of alternatives and ranking, which are included in the draft feasibility study, are under review by the EPA and MDEQ.

The draft Feasibility Study was submitted to the regulatory agency in October 2020. The team expects to submit the finalized report to the agencies by May 31, 2021.

After the Feasibility Study is finalized and approved by the EPA, the agency will prepare a Proposed Plan with its Preferred Alternative that will be open for public comment.

Once an alternative is selected and implemented, the Superfund process requires the EPA to perform a comprehensive review every five years to ensure the implemented remedy continues to protect human health and the environment and is in compliance with all applicable laws.

To learn more about the draft Feasibility Study and to review alternative rankings in detail, visit project website at www.cfacproject.com.

Early Action Implemented at Site

In July 2020, CFAC entered into an Administrative Settlement Agreement and Order on Consent (ASAOC) with the EPA to take early action at the site to remove sediments from the South Percolation Ponds and to return the flow of the Flathead River to its northern channel. That work began in 2020 and was completed in March 2021.

Path Forward

The Feasibility Study Report is scheduled to be completed May 31, 2021. The project schedule indicates the agency's proposed plan with the preferred alternative is schedule to be completed and the Record of Decision issued in eight to twelve months after completion of the Feasibility Study. At that time, the plan will be made available to the public for comment before the Record of Decision that outlines the preferred remedy is finalized by the EPA.

Site Reuse

The Superfund site encompasses approximately 1,300 acres, most of which were used during the operating period. CFAC is remediating this area for the purpose of future industrial or commercial use.

In 2020, CFAC entered into an agreement to sell 772 acres of land to the Flathead Land Trust and the Montana Fish, Wildlife and Parks. The property is separate from the Superfund site and is located on the south side of the Flathead River and at the mouth of Bad Rock Canyon.