



Remedial Investigation / Feasibility Study

Progress Report #29
July 2019

August 2, 2019

Prepared for:
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1. Introduction

This Progress Report (Report) prepared by Roux Environmental Engineering and Geology, D.P.C. (Roux) presents a summary of activities completed during the period of July 2019, on behalf of Columbia Falls Aluminum Company, LLC (CFAC), for the Remedial Investigation / Feasibility Study (RI/FS) being performed at the Anaconda Aluminum Co. Columbia Falls Reduction Plant (a/k/a Columbia Falls Aluminum Plant) generally located near Columbia Falls in Flathead County, Montana (“Site”). The RI/FS is being conducted pursuant to the Administrative Settlement Agreement and Order on Consent (AOC) dated November 30, 2015 between CFAC and the United States Environmental Protection Agency (USEPA) (CERCLA Docket No. 08-2016-0002).

This Report provides a description of the actions that have been taken to comply with the AOC during the reporting period and describes work planned for the upcoming reporting period, including an updated project schedule as Appendix A. This report also provides updates regarding the availability of any new, validated sampling data received by CFAC during the reporting period. Lastly, this Report provides an update on any scope revisions and/or project delays encountered and solutions implemented to address any changes.

2. Work Completed

This section provides a summary of activities completed or ongoing during July 2019.

2.1 Final Phase II Site Characterization Data Summary Report

The draft Phase II Site Characterization Data Summary Report (Phase II SC DSR) was submitted to USEPA and MDEQ on March 1, 2019 in accordance with the schedule provided in Section 5.0. The draft Phase II SC DSR was prepared in accordance with the RI/FS Work Plan and Phase II SC Sampling and Analysis Plan (Phase II SAP) and presented all Site Characterization data collected to date (including the Phase I SC dataset, Supplemental South Pond Assessment dataset, Phase II SC dataset, and Background Investigation dataset). As documented in prior progress reports, there have been multiple rounds of comments/responses regarding the draft Phase II SC DSR. In an effort to help streamline USEPA/MDEQ review of the responses, CFAC/Roux submitted a revised draft of the Phase II SC DSR in red-line format on June 25, 2019. CFAC/Roux submitted the final Phase II SC DSR to USEPA/MDEQ on July 29, 2019. A letter approval from USEPA for the final Phase II SC DSR is pending.

2.2 Final Baseline Risk Assessments

The draft Baseline Human Health Risk Assessment (BHHRA) and draft Baseline Ecological Risk Assessment (BERA) were submitted to USEPA and MDEQ on March 1, 2019 in accordance with the schedule provided in Section 5.0. The draft risk assessment reports were prepared in accordance with the BHHRA Work Plan, BERA Work Plan, and the three-risk assessment interim deliverables. As documented in prior progress reports, there have been multiple rounds of comments/responses and conference calls regarding the BHHRA and BERA.

During this reporting period, additional USEPA/MDEQ comments on the risk assessments were received on July 12, 2019. The project team held a conference call on July 16, 2019 to discuss the comments and CFAC's proposed responses. Agreement on a path forward for all comments was reached during the call. CFAC/Roux/EHS submitted the final BHHRA and BERA to USEPA/MDEQ on July 29, 2019 along with revised red-line format risk assessments and responses to the additional USEPA/MDEQ comments. A letter approval from USEPA for the final BHHRA and BERA is pending.

2.3 Preparation of Draft Remedial Investigation Report

During this reporting period, CFAC/Roux continued preparing the draft Remedial Investigation Report (RIR), which combines the results of the Site Characterization and Risk Assessments. As discussed in Section 5.0, the draft RIR will be submitted no later than September 27, 2019 in accordance with the schedule outlined in the AOC.

2.4 Preparation of Draft Feasibility Study Work Plan

During this reporting period, CFAC/Roux continued preparing the draft Feasibility Study Work Plan (FSWP) in accordance with the RI/FS Work Plan. As discussed in Section 5.0, the draft FSWP will be submitted by October 21, 2019 in accordance with the non-binding, accelerated schedule.

2.5 Project Conference Calls and Project Meetings

As discussed in Section 2.2, the project team held a conference call on July 16, 2019 to review the additional USEPA/MDEQ comments received on July 12, 2019 and to discuss CFAC's proposed responses. Representatives from USEPA, MDEQ, CFAC, Roux, CDM Smith, and EHS were present for the call. Agreement on a path forward for all comments was reached during the call.

3. Work Planned for Next Reporting Period

This section summarizes the work planned for the next reporting period of August 2019.

3.1 Draft Remedial Investigation Report

As described in Section 2.3, CFAC/Roux will continue to prepare the draft RIR in accordance with the RI/FS Work Plan. The draft RIR will be submitted no later than September 27, 2019 in accordance with the schedule outlined in the AOC.

3.2 Draft Feasibility Study Work Plan

As described in Section 2.4, CFAC/Roux will continue to prepare the draft FSWP in accordance with the RI/FS Work Plan. The draft FSWP will be submitted by October 21, 2019 in accordance with the non-binding, accelerated schedule.

4. Database Updates

No project data was generated during this reporting period. If additional data is generated during the RI/FS, validated data will continue to be imported into the project database and managed in accordance with the data management procedures outlined in applicable Sampling and Analysis Plans. Future progress reports will discuss updates to the project database as additional data is generated.

5. Scope/Schedule Revisions

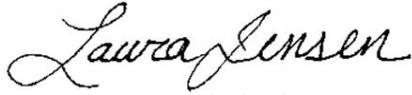
An updated project schedule is attached to this progress report in Appendix A. The schedule was updated to reflect progress based on RI/FS activities completed through July 2019. Except as noted below, the dates reflected in this schedule are based on the agreed upon accelerated schedule, which in some cases are in advance of the schedule dates included in the AOC and AOC amendments.

As noted in the May and June 2019 progress reports, based upon time required to respond to comments and obtain agency concurrence on the Phase II SC DSR, BHRRA and BERA, the draft RIR will not be complete by the original accelerated schedule date of July 5, 2019. The draft RIR will be submitted no later than September 27, 2019 in accordance with the schedule outlined in the AOC. Due to the schedule change for the draft RIR, the draft FSWP schedule has also been extended for an additional 45 days (to October 21, 2019) as this document will rely upon data presented in the RIR. The project schedule was updated to reflect this change.

On behalf of CFAC, Roux will continue to pursue the overall objectives described in the AOC and the RI/FS Work Plan. Roux will continue to inform the USEPA of completed and upcoming activities pursuant to the requirements of the AOC in future progress reports.

Respectfully submitted,

ROUX ENVIRONMENTAL ENGINEERING AND GEOLOGY, D.P.C.



Laura Jensen, P.G. (NY)
Senior Hydrogeologist

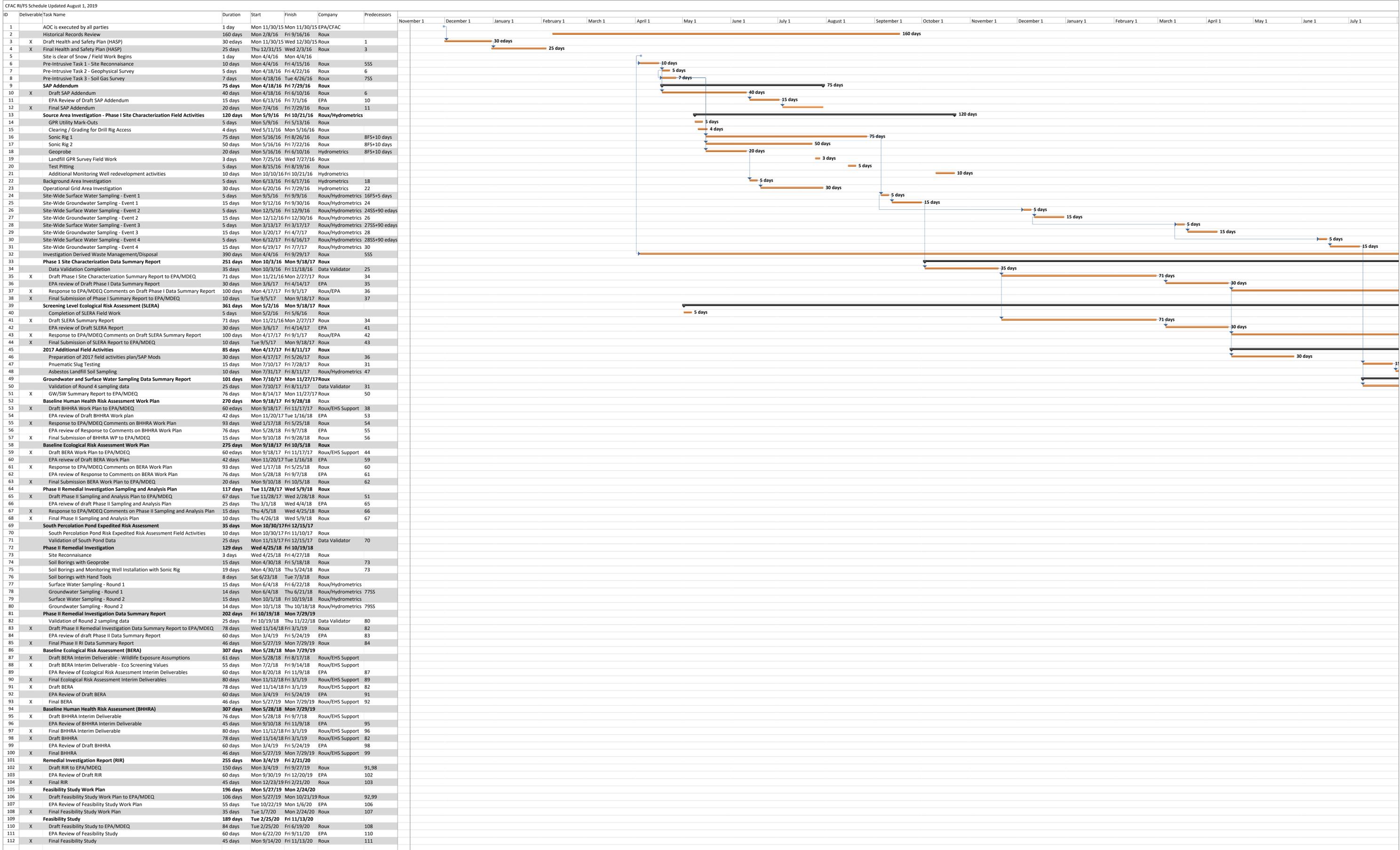


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Project Schedule



ID	Deliverable/Task Name	Duration	Start	Finish	Company	Predecessors	August 1	September 1	October 1	November 1	December 1	January 1	February 1	March 1	April 1	May 1	June 1	July 1	August 1	September 1	October 1	November 1	December 1	January 1	February 1	March 1	April 1	
1	AOC is executed by all parties	1 day	Mon 11/30/15	Mon 11/30/15	EPA/CFAC																							
2	Historical Records Review	160 days	Mon 2/8/16	Fri 9/16/16	Roux																							
3	Draft Health and Safety Plan (HASP)	30 edays	Mon 11/30/15	Wed 12/30/15	Roux	1																						
4	Final Health and Safety Plan (HASP)	25 days	Thu 12/31/15	Wed 2/3/16	Roux	3																						
5	Site is clear of Snow / Field Work Begins	1 day	Mon 4/4/16	Mon 4/4/16																								
6	Pre-intrusive Task 1 - Site Reconnaissance	10 days	Mon 4/4/16	Fri 4/15/16	Roux	555																						
7	Pre-intrusive Task 2 - Geophysical Survey	7 days	Mon 4/18/16	Fri 4/22/16	Roux	6																						
8	Pre-intrusive Task 3 - Soil Gas Survey	7 days	Mon 4/18/16	Tue 4/26/16	Roux	755																						
9	SAP Addendum	75 days	Mon 4/18/16	Fri 7/29/16	Roux																							
10	Draft SAP Addendum	40 days	Mon 4/18/16	Fri 6/10/16	Roux	6																						
11	EPA Review of Draft SAP Addendum	15 days	Mon 6/13/16	Fri 7/1/16	EPA	10																						
12	Final SAP Addendum	20 days	Mon 7/4/16	Fri 7/29/16	Roux	11																						
13	Source Area Investigation - Phase I Site Characterization Field Activities	120 days	Mon 5/9/16	Fri 10/21/16	Roux/Hydrometrics																							
14	GPR Utility Mark-Outs	5 days	Mon 5/9/16	Fri 5/13/16	Roux																							
15	Clearing / Grading for Drill Rig Access	4 days	Wed 5/11/16	Mon 5/16/16	Roux																							
16	Sonic Rig 1	75 days	Mon 5/16/16	Fri 8/26/16	Roux	8FS+10 days																						
17	Sonic Rig 2	50 days	Mon 5/16/16	Fri 7/22/16	Roux	8FS+10 days																						
18	Geoprobe	20 days	Mon 5/16/16	Fri 6/10/16	Hydrometrics	8FS+10 days																						
19	Landfill GPR Survey Field Work	3 days	Mon 7/25/16	Wed 7/27/16	Roux																							
20	Test Pitting	5 days	Mon 8/15/16	Fri 8/19/16	Roux																							
21	Additional Monitoring Well redevelopment activities	10 days	Mon 10/10/16	Fri 10/21/16	Hydrometrics																							
22	Background Area Investigation	5 days	Mon 6/13/16	Fri 6/17/16	Hydrometrics	18																						
23	Operational Grid Area Investigation	30 days	Mon 6/20/16	Fri 7/29/16	Hydrometrics	22																						
24	Site-Wide Surface Water Sampling - Event 1	5 days	Mon 9/5/16	Fri 9/9/16	Roux/Hydrometrics	16FS+5 days																						
25	Site-Wide Groundwater Sampling - Event 1	15 days	Mon 9/12/16	Fri 9/30/16	Roux/Hydrometrics	24																						
26	Site-Wide Surface Water Sampling - Event 2	5 days	Mon 12/5/16	Fri 12/9/16	Roux/Hydrometrics	2455+90 edays																						
27	Site-Wide Groundwater Sampling - Event 2	15 days	Mon 12/12/16	Fri 12/30/16	Roux/Hydrometrics	26																						
28	Site-Wide Surface Water Sampling - Event 3	5 days	Mon 3/13/17	Fri 3/17/17	Roux/Hydrometrics	2755+90 edays																						
29	Site-Wide Groundwater Sampling - Event 3	15 days	Mon 3/20/17	Fri 4/7/17	Roux/Hydrometrics	28																						
30	Site-Wide Surface Water Sampling - Event 4	5 days	Mon 6/12/17	Fri 6/16/17	Roux/Hydrometrics	2855+90 edays																						
31	Site-Wide Groundwater Sampling - Event 4	15 days	Mon 6/19/17	Fri 7/7/17	Roux/Hydrometrics	30																						
32	Investigation Derived Waste Management/Disposal	390 days	Mon 4/4/16	Fri 9/29/17	Roux	555																						
33	Phase I Site Characterization Data Summary Report	251 days	Mon 10/3/16	Mon 9/18/17	Roux																							
34	Data Validation Completion	35 days	Mon 10/3/16	Fri 11/18/16	Data Validator	25																						
35	Draft Phase I Site Characterization Summary Report to EPA/MDEQ	71 days	Mon 11/21/16	Mon 2/27/17	Roux	34																						
36	EPA review of Draft Phase I Data Summary Report	30 days	Mon 3/6/17	Fri 4/14/17	EPA	35																						
37	Response to EPA/MDEQ Comments on Draft Phase I Data Summary Report	100 days	Mon 4/17/17	Fri 9/1/17	Roux/EPA	36																						
38	Final Submission of Phase I Summary Report to EPA/MDEQ	10 days	Tue 9/5/17	Mon 9/18/17	Roux	37																						
39	Screening Level Ecological Risk Assessment (SLERA)	361 days	Mon 5/2/16	Mon 9/18/17	Roux																							
40	Completion of SLERA Field Work	5 days	Mon 5/2/16	Fri 5/6/16	Roux																							
41	Draft SLERA Summary Report	71 days	Mon 11/21/16	Mon 2/27/17	Roux	34																						
42	EPA review of Draft SLERA Report	30 days	Mon 3/6/17	Fri 4/14/17	EPA	41																						
43	Response to EPA/MDEQ Comments on Draft SLERA Summary Report	100 days	Mon 4/17/17	Fri 9/1/17	Roux/EPA	42																						
44	Final Submission of SLERA Report to EPA/MDEQ	10 days	Tue 9/5/17	Mon 9/18/17	Roux	43																						
45	2017 Additional Field Activities	85 days	Mon 4/17/17	Fri 8/11/17	Roux																							
46	Preparation of 2017 field activities plan/SAP Mods	30 days	Mon 4/17/17	Fri 5/26/17	Roux	36																						
47	Pneumatic Slug Testing	15 days	Mon 7/10/17	Fri 7/28/17	Roux	31																						
48	Asbestos Landfill Soil Sampling	10 days	Mon 7/31/17	Fri 8/11/17	Roux/Hydrometrics	47																						
49	Groundwater and Surface Water Sampling Data Summary Report	101 days	Mon 7/10/17	Mon 11/27/17	Roux																							
50	Validation of Round 4 sampling data	25 days	Mon 7/10/17	Fri 8/11/17	Data Validator	31																						
51	GW/SW Summary Report to EPA/MDEQ	76 days	Mon 8/14/17	Mon 11/27/17	Roux	50																						
52	Baseline Human Health Risk Assessment Work Plan	270 days	Mon 9/18/17	Fri 9/28/18	Roux																							
53	Draft BHHRA Work Plan to EPA/MDEQ	60 edays	Mon 9/18/17	Fri 11/17/17	Roux/EHS Support	38																						
54	EPA review of Draft BHHRA Work plan	42 days	Mon 11/20/17	Tue 1/16/18	EPA	53																						
55	Response to EPA/MDEQ Comments on BHHRA Work Plan	93 days	Wed 1/17/18	Fri 5/25/18	Roux	54																						
56	EPA review of Response to Comments on BHHRA Work Plan	76 days	Mon 5/28/18	Fri 9/7/18	EPA	55																						
57	Final Submission of BHHRA WP to EPA/MDEQ	15 days	Mon 9/10/18	Fri 9/28/18	Roux	56																						
58	Baseline Ecological Risk Assessment Work Plan	275 days	Mon 9/18/17	Fri 10/5/18	Roux																							
59	Draft BERA Work Plan to EPA/MDEQ	60 edays	Mon 9/18/17	Fri 11/17/17	Roux/EHS Support	44																						
60	EPA review of Draft BERA Work Plan	42 days	Mon 11/20/17	Tue 1/16/18	EPA	59																						
61	Response to EPA/MDEQ Comments on BERA Work Plan	93 days	Wed 1/17/18	Fri 5/25/18	Roux	60																						
62	EPA review of Response to Comments on BERA Work Plan	76 days	Mon 5/28/18	Fri 9/7/18	EPA	61																						
63	Final Submission BERA Work Plan to EPA/MDEQ	20 days																										

