



Cleanup at Smurfit-Stone

Frequently Asked Questions



Q. Who owns the Smurfit-Stone site and why hasn't it been cleaned up?

A: A company called MLH Holdings – a subsidiary of Washington-based Wakefield – currently owns the Smurfit-Stone site. Wakefield acquired the property after the previous owner – M2Green Redevelopment – failed to pay its bills, including property taxes. In 2015, both M2Green and the previous owners of Smurfit agreed to conduct an investigation and cleanup of the environmental contamination at the site to ensure it is safe for redevelopment. Five years later, the investigation is still underway, meaning no significant cleanup has occurred and the bulk of the site remains unused.



Shuttered mill site

Q. Isn't the contamination relatively contained? What's the problem?

A: No. Contamination at Smurfit is not contained. Groundwater is the most obvious and problematic conduit for contamination leaving the site and entering the Clark Fork River and the food chain. Groundwater under and near the highly-polluted sludge and waste dump area contains arsenic, manganese, dioxins/furans, and other contaminants in excess of state and federal standards. The groundwater flows to the Clark Fork River, where elevated concentrations of dioxins and furans in fish have resulted in consumption advisories (see below). Contaminated water escapes the site in other ways too. During high flows in the spring of 2018, a plume of runoff appeared in the Clark Fork River adjacent to the site. Analysis of the plume showed that it carried heavy metals and chemicals that matched the chemical fingerprint of toxic substances found in the site's old waste ponds. For more on the need for cleanup, see our August 2020 letter to EPA here: tinyurl.com/CFC-EPA-8-20.

Q. Why focus on the waste and sludge dumps? Is it even feasible to clean those up, given the fact that they're a small subset of widespread and inter-related problems at Smurfit?

A: Yes, it is feasible to get started with a targeted cleanup of only the waste and sludge dumps while EPA gets a better handle on the rest of the site. These dumps are relatively close to the industrial footprint that housed the production of pulp and paper at the mill, making it accessible for heavy equipment. They are also the most acutely problematic portions of the whole site, because they are unlined and full of hazardous substances that come into contact with groundwater that flows to the Clark Fork River. In addition, EPA has full authority to carve out a smaller unit of a contaminated site and start cleanup there, while continuing to investigate other parts of the property.



Q. Where would all the waste and sludge be moved to? Wouldn't it be better to leave it alone so as not to make matters worse and create more problems somewhere else?

A: No. The waste and sludge are currently held in unlined and unregulated dumps that are in contact with groundwater and in the floodplain and channel migration zone of the Clark Fork River, representing something of a worst-case scenario for the location of a waste management area. It should be contained in a modern waste repository, isolated from groundwater and surface water, and constructed with a cap, liner, and leachate collection system. In other words: somewhere high, dry, and out of harm's way.



Q. What's the urgency? Why not wait until we have a complete picture of the contamination problems at the whole site?

A: The dumps are the most acutely-toxic portion of the Smurfit site. Unlined and largely unregulated, they have contaminated the groundwater with arsenic, manganese, and other pollutants. In 2016, Missoula County conducted a detailed investigation of the dumps and the failure of state and federal agencies to properly regulate them. The County called on EPA and DEQ to remove the dumps (see letter at tinyurl.com/MWQD-2016), but has never received a response to the request. The waste in these dumps will continue to pollute for as long as they are allowed to exist, which should come as no surprise, as the site was designed to discharge waste into the river. We have enough data now for EPA to stop asking *if* these dumps should be cleaned up, and start figuring out *how* to do it. Every day we wait means more contaminated groundwater flowing to the Clark Fork. Getting started now will stop the discharge and allow the river to start healing. (For more details on the history of the Smurfit site and its legacy of pollution, we suggest a 2018 report prepared by the Natural Resources Damage Program, part of the Montana Department of Justice. Available at: tinyurl.com/SmurfitPAS.)

Q. With so many demands on our federal government, does EPA even have the resources and tax dollars to clean up the site?

A: Luckily, the EPA doesn't need taxpayer dollars to clean up the site. Under Superfund law, the polluter pays, meaning previous and current owners at Smurfit are liable for paying to clean up the site, as directed by EPA, to ensure the site is protective of human health and the environment. In this case, International Paper, WestRock (and potentially Wakefield) are on the hook. International Paper and WestRock are the largest, and third-largest pulp and paper mills in the world, respectively.

Q. Don't the berms prevent contamination from getting into the river?

A: While the four-mile berm has prevented the surface water channel of the Clark Fork River from entirely inundating the site – at least so far – the berm does *not* prevent the migration of contamination via groundwater pathways under the site. In fact, the site's wastewater treatment ponds were *designed* to slowly leak contaminants to the river via groundwater, and the berm does nothing to prevent this

transmission. Further, because the waste and sludge dumps at the center of the site are unlined, contaminants from these areas continue to seep into the river via groundwater even though these areas are located farther from the river.



Q. If a flood did take out the berms, wouldn't the Clark Fork River just dilute the pollution?

A: No. Dilution may be effective at treating certain forms of pollution, such as nutrients, but the types of pollutants and the volume of pollution at Smurfit could not effectively be diluted by the Clark Fork River. In fact, dilution cannot render certain forms of pollutants (e.g., dioxin) harmless, because they bioaccumulate – meaning they persist through the food chain and increase in each organism. In addition, a flood that causes berms to fail would re-deposit the contaminants for 100 miles downstream. Currently, they are in one place and we have a chance to clean them up.

Q. How long will clean up take and what will it cost?

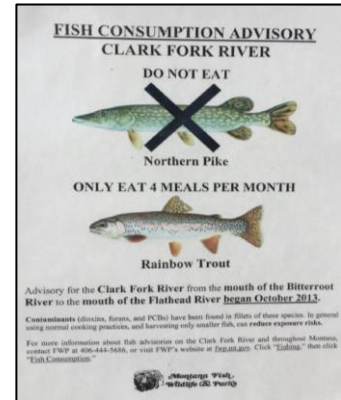
A: At EPA's current speed, we're not even going to get to the cleanup stage for another 20 to 30 years, if at all. (According to EPA, we are currently in the second step of an eight-phase process, a step we have been in since 2015 – see infographic below.) So first, we need to compel EPA to get started now on the most acutely problematic area – the sludge and waste dumps. It's time for EPA to stop asking *whether* that area should be cleaned up, and start asking *how*. We won't have a good sense of that – or of how long it will take and how much it will cost – until engineers estimate the volume of waste that needs to be cleaned up, and identify a location onsite for construction of the repository. For comparison, Milltown Reservoir's cleanup and site restoration took five years (it was closed to the public for another four years to let plants get established). It removed nearly four million cubic yards of contaminants, and it cost about \$120 million. That was 10 years ago. The Milltown site was large enough to hold four of Smurfit's waste dumps and was incredibly complex because contaminants sat in an active river channel. Smurfit's dumps do interact with groundwater, so cleanup here will have technical



challenges. But whatever the price tag, it should be manageable for the companies on the hook for cleanup: pulp and paper industry giants, International Paper and WestRock (and potentially Wakefield). After decades of profitable operations, the clean-up bill is due at Smurfit, and it's time for the responsible parties to step up and pay it.

Q. Are the fish in the river near Smurfit safe to eat?

A: No. In October 2013, Montana Fish, Wildlife and Parks, the Department of Environmental Quality, and the Department of Public Health and Human Services issued a “do not eat” advisory for northern pike and a “four meal per month” limit for rainbow trout. That advisory is still in effect today. The agencies found that fish near Smurfit contained elevated concentrations of dioxins, furans, and PCBs, which, according to the advisory, are “contaminants commonly associated with the pulp and paper mill industry.” More details here: tinyurl.com/FWP-FishAdv.



Q. The Smurfit-Stone pulp mill used to provide a lot of high-paying jobs and it was an economic driver. Will cleanup make any future industrial development at the site off-limits?

A: No. A hallmark of EPA-run environmental cleanups at former industrial sites is its 3-step process known as the “3Rs”: remediation, restoration, and revitalization that yields economic and other societal benefits. Given the vast size of the property, and its location on a river that is home to wild trout and diverse fish and wildlife species, this site could have it all: protected conservation areas and open, agricultural lands; public access to walking trails and the river; and sustainable industry that harmonizes with the natural values of the area. The site is privately held by Wakefield, however, so it will be critically important to engage with the company on a creative and integrated revitalization vision.



Clean. Smurfit. Now.

Learn more and get involved at clarkfork.org