



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE**

FEDERAL BUILDING, 10 West 15TH Street, Suite 3200
Helena, MT 59626-0096
Phone 866-457-2690
www.epa.gov/region8

September 4, 2020

Ref: 8SEM-RBC

Karen Knudsen
Clark Fork Coalition
P.O. Box 7593
Missoula, Montana 59807
Sent by email only

Dear Ms. Knudsen:

Thank you for your August 5, 2020 letter regarding the Smurfit Stone Site (Site). The U.S. Environmental Protection Agency appreciates the Clark Fork Coalition's (CFC) interest and involvement at the Site, and the EPA endeavors to be open and transparent about the Superfund process and the data upon which we rely. This letter responds to the CFC's request for expedited study of certain areas of the Site. While the EPA understands the CFC's desire to hasten potential cleanup of certain areas within the Site, existing data do not support deviating from the Superfund process.

The EPA is currently working with the potentially responsible parties to prepare the remedial investigation (RI) report. The purpose of the RI is to characterize site conditions, determine the nature of the contamination, and assess risk to human health and the environment. After collecting game fish in 2019, the EPA risk assessors are finalizing the Human Health and Baseline Ecological Risk Assessments, critical components of the RI Report. If the risk assessments determine where there are unacceptable risks to human health and the environment, remedial alternatives can be evaluated and considered in a Feasibility Study (FS). Thereafter, the EPA presents cleanup options for public input.

While the EPA and the CFC are aligned regarding the need to begin looking toward the FS, the EPA does not concur with the CFC's conclusion that the Site's solid waste basins and sludge ponds pose acute problems resulting in an imminent threat to groundwater and the Clark Fork River. In general, the EPA agrees with CFC's characterization of what is known about historic use of these areas and potential or known remaining contaminants. However, the EPA has not completed its evaluation and analysis of the available data (i.e., the RI Report) and the analysis done to date does not support the CFC's conclusion for the following reasons:

- *No waste management areas (WMAs) are located within the 100-year floodplain.* The term "waste management areas" includes all landfills and sludge ponds where mostly solid wastes were deposited during mill operations. The current FEMA maps indicate there are no landfills, waste disposal or sludge ponds located within the 100-year floodplain boundary. All waste materials are located behind an internal berm above the base flood elevation (*Remedial Investigation Work Plan, NewFields, November 2015, Section 2.2.2*).
- *No investigations have indicated buried drums or barrels remain at the Site.* Investigations associated with the WMAs have so far included targeted test-pitting, reviews of historic reports and documents, installation of monitoring wells downgradient from the WMAs, and interviewing

and conducting Site walks with former employees. Ongoing efforts have not yielded the location of any drums or barrels.

- *Data indicate groundwater contaminants are not migrating beyond WMA areas.* Groundwater monitoring wells are purposely located within and immediately downgradient of waste basins to evaluate the potential for hazardous substances to leach from the wastes into groundwater. Groundwater has been sampled and analyzed repeatedly under high and low (regional) groundwater conditions in these wells, and on several other occasions. Arsenic and manganese levels are elevated above background concentrations, and dissolved oxygen conditions are low in groundwater underlying the former WMAs. The EPA is evaluating oxidation/reduction (redox) conditions as a possible cause for the observations that elevated concentrations of arsenic and manganese in source areas are found to decrease before groundwater migrates toward the Clark Fork River. The results of this evaluation will be detailed in the RI Report.
- *Sampling data does not indicate that the dumps and landfills pose acute problems for the groundwater and the Clark Fork River.* As such, alternatives for how to best address these areas will be evaluated in the FS, after completion of the RI, and presented for public input.

The EPA and the CFC have a similar mission and goals for the Smurfit Site: to protect human health and the environment. The EPA's commitment at the Site has been to share Site-related data with stakeholders, including the CFC. The data supporting the statements above have been made available for stakeholder review and input. If the CFC has additional information supporting the need for imminent action, the EPA will consider such information to determine whether a change in approach is warranted.

In the meantime, the EPA will work with Site stakeholders to finalize the risk assessments and the RI Report. Barring any further data gaps, the EPA plans to complete the RI Report as soon as next year. Long-term decisions about how to best address the WMAs will be presented for public input in accordance with the CERCLA process.

Thank you for your continued interest in the progress. The EPA is working hard to put the Site back into reuse. Please feel free to contact me at (406) 457-5033 or archer.allie@epa.gov.

Sincerely,



Allie Archer
Remedial Project Manager

cc by email only:

Missoula County Commissioners: Josh Slotnick, Dave Strohmeier, and Juanita Vero

U.S. Senator Steve Daines, c/o Danielle Tribble

U.S. Senator Jon Tester, c/o Deb Frandsen

The Confederated Salish and Kootenai Tribes: Mary Price, Legal Department Scientist

The Montana Natural Resource Damage Program: Doug Martin, Restoration Program Chief

Smurfit-Stone Community Advisory Group: Jeri Delys, Bruce Sims, Jennifer Harrington, and Brian Campbell, CAG Admin Team

Missoula City-County Water Quality District: Travis Ross, Division Supervisor

Missoula City-County Water Quality Advisory Committee: Ian Magruder, Chair

Montana Department of Environmental Quality: Keith Large, Superfund Project Officer