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

Ref: 8SEM-RBC

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

Dear Ms. Knudsen:

Thank you for your November 13th letter regarding the Smurfit-Stone Mill Site (Site). The U.S. Environmental Protection Agency (EPA) appreciates the Clark Fork Coalition's (CFC's) involvement and agrees with the CFC's desire to move the Site expeditiously through the Superfund Process. We are currently reviewing, and compiling comments received on the Groundwater Conceptual Site Model (CSM). As part of that review, EPA will include additional information regarding the effects of the berms and changes in frequency and magnitude of high-water events on the Site.

Your letter asserts that 'the evidence supports CFC's request to begin evaluating cleanup options for these highly contaminated areas.' A necessary precursor to evaluating cleanup options is understanding Site risk, as EPA makes risk-based remedial determinations. EPA will still evaluate various cleanup options, but not until the completion of the remedial investigation study, which includes a full risk assessment. The Operable Unit 2 (OU2) and Operable Unit 3 (OU3) Baseline Ecological Risk Assessment (BERA) is now available for public review. The OU2 and OU3 Human Health Risk Assessments will be available later this month, December 2020, for public review. Below we've included specific excerpts from your letter *in italics*, followed by our responses:

EPA asserts that site data collected to date "indicate groundwater contaminants are not migrating beyond WMA areas." (EPA Letter dated Sept. 4, 2020, p. 2). This statement is concerning because it appears to prematurely endorse erroneous conclusions drawn in the Potentially Responsible Parties (PRP's) Draft Groundwater Conceptual Site Model (GCSM).

This conclusion is based on data collected from the groundwater monitoring well network specifically designed to determine if hazardous substances are migrating, and to-date, the conclusion is supported. This is demonstrated in a summary of water quality information presented in the groundwater Data Summary Reports and further supported in the CSM (Section 4.2.2), If the CFC has data to share that indicates otherwise, EPA will take a look and is happy to discuss.

While the PRPs have proposed a theory to explain attenuation of contaminants as they move toward the river, surface water samples collected to date are woefully insufficient to support a conclusion that decades of buried contaminants are disappearing from groundwater before reaching the river.

To support Remedial Investigation activities, the PRPs previously collected sediment and surface water samples from locations within the Clark Fork River (CFR) upstream of the Site. These samples were

analyzed for dioxins/furans, PCBs (as Aroclors), metals, and Semivolatile Organic Compounds (SVOCs). Additional surface water and sediment data from locations within the CFR upstream of the Site are available from U.S. Geological Survey (USGS) monitoring stations located upstream of Missoula (Station ID 12340500), at Turah (Station ID 12334550), and near Drummond (Station ID 12331800).

As a part of EPA's risk assessment investigation, additional surface water and sediment samples were collected in the CFR upstream of the Site, the CFR adjacent to and downstream of the Site, O'Keefe Creek and Lavalle Creek. Based on the background (upstream of site in the CFR) comparison done in the OU2/3 BERA, manganese is higher adjacent to and downstream of the site compared to upstream. Four samples adjacent to or downstream of the site are above a chronic toxicity benchmark for manganese. No manganese values exceeded acute surface water benchmarks.

EPA is in the process of reviewing the CSM and has provided draft risk assessments for public review. Before these documents are finalized and included in a sitewide remedial investigation report, no conclusions have been drawn by the Agency about Site impacts.

CFC has serious concerns about the long-term implications of an EPA decision to allow a "status quo" remedy, whereby internal and external berms are made permanent, onsite groundwater is rendered permanently un-useable, and unlined waste dumps/sludge ponds are sanctioned to remain perilously close to the Clark Fork River and floodplain – perpetually leaking into the aquifer.

CFC is not making a demand for a specific remedial action at this time. Nonetheless, we firmly believe that EPA should move toward discussing options for cleanup of the waste and sludge dumps.

Our September response to the CFC explained the process for identifying options to address the Site through the remedial investigation and feasibility study. We intend to continue communicating and coordinating regarding this process and the expected timelines. EPA has emphasized community involvement and the importance of an open and transparent dialogue throughout the Remedial Investigation phase. As we move toward determining remedial alternatives, the CFC will have additional opportunities to raise concerns and provide its perspective. EPA will continue to share information, keep an open dialogue, and address concerns and comments on documents. However, EPA will not move toward discussing options for cleanup of the waste basins and sludge ponds until EPA and the stakeholders and community have had a chance to review and comment on the Site risk assessments and Remedial Investigation Report.

In response to your request for a timeline, I appreciate the CFCs sense of urgency to continue to move through the CERCLA progress on this Site. We have committed to releasing the draft Remedial Investigation Report in 2021, recently adjusting that projection from the summer to the fall to account for additional community-requested review time. Meanwhile, I am committed to providing updates at monthly Community Advisory Group (CAG) meetings, hosting quarterly teleconferences, and continuing to meet with individual stakeholders, including the CFC, at any time to discuss questions and concerns over reports and timelines.

I would be happy to discuss these issues further with you anytime. Please feel free to contact me at (406) 438-6255 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 Sharon Parks-Banda
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