Pulp Mill on the Clark Fork River near Frenchtown – summary by Vicki Watson & Travis Ross, 11/2018

The information below was summarized from a number of sources including EPA's preliminary assessment conducted in 2011 and a <u>recent study of the stability of the berms</u> that protect the river from the mill site.

The Smurfit-Stone Mill is an inactive pulp and paper mill located on the Clark Fork River, about 12 miles northwest of the city of Missoula, in Missoula County. The mill operated from 1957 to 2010 and made pulp from wood & cardboard then made cardboard liner paper from the pulp. The street address is 14377 Pulp Mill Road, Missoula, MT, and the geographical coordinates are latitude 46.957781° north and longitude 114.199623° west. The EPA identification number is MTN000802850.

The property covers about 3,150 acres. The core industrial footprint (about 150 acres) includes the former mill, a wood chip staging area, the effluent clarifier, and the hog fuel area. Over 900 acres of the property consist of a series of unlined ponds used to store both treated (primarily through aeration) and untreated wastewater effluent from the mill, as well as primary sludge recovered from wastewater that entered the clarifier. Some of these ponds were subsequently used for disposing of solid wastes produced at the mill. Much of the remaining property (approximately 1,800 acres) is used for agricultural purposes, with over 1,200 acres of grasslands for cattle grazing and over 600 acres irrigated for alfalfa and grain crops. While the core industrial part of the property is fenced and has a security building, other parts of the property are not fenced, including the west side which is separated from the Clark Fork River by earthen berms.

While the mill site has not been declared a superfund site (not added to the National Priority List), the EPA is evaluating human and ecological risk by using the superfund process which will result in a cleanup feasibility study. The Montana Department of Justice Natural Resource Damage Program is concurrently evaluating the impact the site had on natural resources.

The EPA is evaluating Surface Water Migration Pathways from the mill and has divided the site into source areas that potentially contain hazardous substances including sludge ponds, landfills, wastewater storage ponds. Additional potential sources of various hazardous substances at the property that were not characterized in the preliminary assessment include 11 additional wastewater storage ponds, 3 wastewater treatment aeration basins, 2 polishing ponds, a number of landfills, and the historical discharge of wastewater directly to the Clark Fork River via three outfalls.

Hazardous substances detected in at least one of the sources listed above include, but are not limited to: five kinds of dioxin, two kinds of benzofurans; arsenic and the metals cadmium, lead, and manganese.

Some of these hazardous substances have been released into ground water beneath the property, as well as into the Clark Fork River (located directly adjacent to the property), at concentrations elevated above background.

<u>A recent berm stability study conducted by New Fields</u> concluded that the earthen berms between the river and the waste ponds would not be overtopped by a 100 year flood; however long-term stability is of question. Channel migration/avulsion could erode the berms, causing downstream deposition of contaminated sediments.

The Clark Fork River is a fishery that supports a variety of finfish, including the federally designated threatened bull trout, as well as other species that are harvested for human consumption. Significant areas of wetlands are present along the Clark Fork River, in areas adjacent to and downstream of the Smurfit-Stone Mill. The segment of the Clark Fork River directly adjacent to the mill is listed as a Wildlife Protected Area by the Northwest Power and Conservation Council as it is a bald eagle nesting and winter concentration area, a big game critical wintering/spring area, and a historical peregrine falcon nesting area. The mill property also lies within the Clark Fork River – Grass Valley Important Bird Area, so designated due to its significance to bird species of conservation concern. It is considered the largest and most significant wetland-water complex in the Missoula area for migratory species such as waterfowl, shorebirds, herons, and raptors.

Because of the potential value to wildlife, water quality and watershed functions (like flood moderation), cleanup and restoration of the historic floodplain part of the property is highly desirable.

The Clark Fork Coalition provides a fall 2018 update on the status of work at the pulp mill linked here. EPA's web site on the Smurfit-Stone pulp mill near Frenchtown is here (has links to more recent info).