Project Schedule

Complete?	Remedial Investigation/ Feasibility Study Task Schedule	Estimated Completion Dates	Complete?	Remedial Investigation/ Feasibility Study Task Schedule	Estimated Completion Dates
✓	AOC is executed	30-Nov-15	✓	Revised Phase I Site Characterization Data Summary Report and SLERA Summary Report	Aug-17
✓	Project Planning / Subcontractor Procurement	Jan – March 2016	✓	Baseline Human Health and Ecological Risk Assessment Work Plans	Nov-17
✓	Site Reconnaissance / Geophysical Survey / Soil Gas Screening	Apr-16		Phase II Site Characterization Field Program	4th Quarter 2018
✓	Sampling and Analysis Plan Addendum	May-16		Phase II Data Summary Report	1st Quarter 2019
✓	Drilling Program	May – September 2016		Baseline Risk Assessment	3rd Quarter 2019
✓	Groundwater Sampling Event #1	Sept – Oct 2016		Final Remedial Investigation Report	1st Quarter 2020
✓	Draft Phase I Site Characterization Data Summary Report	Feb-17		Feasibility Study Work Plan	3rd Quarter 2020
✓	Draft Screening Level Ecological Risk Assessment Report	Feb-17		Feasibility Study Report Submitted to EPA	1st Quarter 2021
✓	Completion of Fourth Round of Groundwater and Surface Water Sampling and Summer 2017 Field Activities	Aug-17			

CFAC Community Liaison Panel

In May 2015, as a tool for communicating with the local and regional community residents and leaders, Columbia Falls Aluminum Company (CFAC) organized a community group to meet on a regular basis. The CFAC Community Liaison Panel's (CLP) purpose is to provide a forum for the discussion and exchange of ideas and opinions about the project. Those involved represent the community, project consultants, state and federal agencies and CFAC.

The most recent CLP meeting was held on October 5, 2017, and included presentations by CFAC's consultant, Roux Associates, and by USEPA. Roux's presentation provided a project update since the April 2017 meeting, reviewed groundwater flow at the site and recent sampling results, and discussed next steps, including Risk Assessment Work Plans and Phase II Sampling and Analysis Plan.

The next meeting of the community liaison panel is scheduled for May 2018. The exact date and location will be provided in an upcoming Update. The meeting is open to the public; those interested in attending are asked to contact Vonda Matthews at 1-800-784-4343.

For more information about the project or the community liaison panel, contact Ann Green at 1-877-384-7036.

Draft Phase I Report Is Available for Review at These Resources

- Roux Inc. - www.rouxinc.com/cfac-phase-I-site-characterization-data-summary-report
  Email comments to: CFAC-Comments@rouxinc.com
- USEPA - https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0800392
  Email comments to: Mike Cirian, Cirian.Mike@epa.gov
- MDEQ - http://deq.mt.gov/DEQAdmin/cfac
  Email comments to: Lisa Dewitt, ldewitt@mt.gov
- CFAC Community Liaison Panel website http://www.cfacproject.com/
- Columbia Falls Branch of Flathead County Library 130 6th Street West, Columbia Falls, MT
  Phone: 406-892-5919.

Superfund Process

To learn more about the Superfund Process visit the CFAC Project website: http://www.cfacproject.com/wp-content/uploads/2016/02/Superfund-Process-April-2017-CAP-Presentation.pdf

Columbia Falls Aluminum Company
2000 Aluminum Drive
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CFAC

For more information about the project or the community liaison panel, contact Ann Green at 1-877-384-7036.

CFAC

Columbia Falls Aluminum Company

Project Update

Issue # 13 December 2017

History of the Project

Columbia Falls Aluminum Company, LLC (CFAC) announced the permanent closure of the Columbia Falls aluminum reduction facility March 3, 2015. CFAC retained Calbag Resources to decommission the facility and salvage materials from the site. Calbag's activities began in early May 2015 and is currently underway.

CFAC also retained Roux Associates, Inc. to prepare a Remedial Investigation/Feasibility (RI/FS) Work Plan, the road map to investigate site conditions and determine next steps for the project. Roux prepared the RI/FS Work Plan, which was approved by the U.S. Environmental Protection Agency.

CFAC is the owner of the site and the party responsible for the investigation.

- CFAC is a subsidiary of Glencore. Glencore has made sure that CFAC has all the resources it needs to fulfill its obligations with regard to the site and will continue to do so.
- CFAC stepped up and entered into an agreement with EPA to address the site when former owner ARCO, whose operation of the site created most of the conditions that CFAC is now investigating, refused to negotiate with EPA or take any responsibility for the site.
- CFAC, with funding from Glencore, has paid all of the government's costs, including the costs of the EPA, the Agency for Toxic Substances and Disease Registry (ATSDR) and the State of Montana associated with the investigation. CFAC, with funding from Glencore, has also paid all of the costs necessary to perform the investigation – a total bill of over $4 million thus far.

Project Update

Columbia Falls Aluminum Company, LLC (CFAC) completed the first phase of Site evaluation work at the former Anaconda Aluminum smelter Site in late 2016. CFAC submitted a draft Phase I Data Summary Report and Screening Level Ecological Risk Assessment (SLERA) Summary Report to the United States Environmental Protection Agency (USEPA) and Montana Department of the Environmental Quality (MDEQ) in February 2017. The draft reports summarized the field activities, data collection, and data evaluation completed as part of the Phase I Site Characterization. The agencies reviewed the draft reports and provided multiple sets of comments to CFAC. CFAC provided a response to all comments and submitted revised reports in August 2017. Final reports were submitted to the USEPA and MDEQ on September 18, 2017.

Throughout 2017, CFAC also continued field activities with the objective of collecting additional data that will be needed as part of the Remedial Investigation/Feasibility Study (RI/FS). As part of these field activities, four rounds of groundwater and surface water sampling were completed to evaluate how groundwater and surface water data varies seasonally. Slug testing was also completed at monitoring well locations across the site to evaluate hydraulic conductivity. A draft Groundwater and Surface Water Data Summary Report was submitted to the USEPA for review on November 27,2017.

Results of recent groundwater and surface water testing include:

- Groundwater flow is south-south west and towards the Flathead River during all seasons
- Historical landfills are the source of cyanide and fluoride in the groundwater
- Iso-concentration maps show elevated concentrations are directed towards Flathead River, that is, follow groundwater flow paths.

The data collected at the Site to date were used to develop draft risk assessment work plans that were submitted to the USEPA in November 2017. The data will also be utilized to develop the sampling and analysis plan for the second phase of investigation.

Next steps:

- Revise the draft baseline risk assessment work plans based on USEPA and MDEQ comments
- Completion of the Phase II sampling and analysis plan
- Conducting Phase II remediation investigation in the summer of 2018

The state and federal agencies review all data and must approve and oversee all work related to the project. Work has been completed on schedule and has met the commitments CFAC made to the project. All parties are working cooperatively.

Demolition Update

The last of the spent potliner has been removed from the former Columbia Falls Aluminum Company plant by demolition contractor Calbag Resources.

Calbag is now removing the concrete from the basements and dismantling the potrooms themselves.

Former casthouse removed

Potroom 1 structure removed

Most of the 328 million pounds of material has been removed by rail car.

All cathodes from all pot rooms were processed as of November 2017 and the KO88 waste disposed of at Oregon's Chemical Waste Management Landfill.

Demolition of all pot rooms steel structures is scheduled to be completed by November 2018.

All other ancillary structures at the plant have been demolished.

Calbag and subcontractor employee count is now 26.

Calbag has reported to the Montana Department of Environmental Quality the following site statistics to date:

CFAC PROJECT SUMMARY	
Category	Pounds
Total Reuse / Recycled	262,649,803
Total Solid Waste	16,288,110
Total Asbestos	4,196,888
Total Hazardous Waste	59,217,350
Total CFAC Discarded	121,718
Total CFAC Solid Waste Commercial Product Waste	144,000
Total CFAC Project	**342,617,869**

Potroom 2 with anode, cathode and basement concrete removed

Recycled steel loaded into railcars

Next Phase of RI/FS Work

The next steps of the RI/FS include preparation of the Phase II Sampling and Analysis Plan and revisions to the draft Human Health and Ecological Risk Assessment Work Plans following receipt of USEPA and MDEQ comments. The risk assessment work plans outline the additional data that needs to be collected to complete the risk assessment process. The Phase II Sampling and Analysis Plan will outline the Scope of Work planned for the next phase of the Site investigation. The plans have been, or will be, submitted to the agencies for review and approval. Following review and approval of these documents, the Phase II Remedial Investigation will begin. The overall work associated with the RI/FS began in early 2016 and is expected to continue into 2021.