



Community Liaison Panel

Columbia Falls Aluminum Company Community Liaison Panel Minutes
September 10, 2015
North Valley Hospital
Teakettle Community Room
6:00 p.m.

CLP Members Attending: Don Bennett, Nino Berube, Senator Dee Brown, John Fuller, Chief Rick Hagen, Lyle Mitchell, Commissioner Phil Mitchell, Ray Negron, Susan Nicosia, Joe Russell, Kyle Schmauch, Stacey Schnebel, Anna Stene, Nikki Stephan, Clarence Taber, Brad Walterkirchen, and Bev York.

CLP Members Absent: Mayor Don Barnhart, Jessy Coltrane, Hillary Hanson, Virginia Loranger, Mike Nicosia, Chief David Perry, Rep. Zac Perry, Erin Sexton, and Shannon Stringer.

CFAC Representatives: Haley Beaudry, Cliff Boyd, Cheryl Driscoll, Mike Ritorto, John Stroiazzo, Steve Wright.

Guests: Chad Campbell, Senator Tester's Office; Cindy Ritter; Bill Baum; and Becca Parsons.

Facilitator: Mary Green, Ann Green Communications, Inc.

Minutes: Kristi Moore, Ann Green Communications, Inc.

The regular meeting of the Columbia Falls Aluminum Company Community Liaison Panel (CLP) was called to order by facilitator Mary Green at North Valley Hospital Teakettle Community Room, beginning at 6 p.m. on Thursday, September 10, 2015.

Mary welcomed Don Bennett, Freedom Bank. She asked each member to introduce himself or herself, and the community or organization each represents. The following guests were present: Chad Campbell, Senator Tester's Office; Cindy Ritter, Bill Baum, and Becca Parsons.

Mary reviewed the agenda and meeting materials. She confirmed that all members received a copy of the August meeting minutes. The minutes were accepted as distributed. Mary

mentioned that Vonda Matthews worked with Susan Nicosia to place meeting minutes on the City of Columbia Falls website. It was recommended that a repository of meeting minutes be placed at the Columbia Falls Library in addition to the RI/FS work plan. Ms. Nicosia said she would take a notebook of past meeting minutes to the library. Mary will ask Vonda to prepare a notebook for the library's CFAC repository.

Unfinished Business

John Stroiazzo, Project Manager, shared an update related to meetings between CFAC and EPA. Since the last meeting, a number of meetings took place with EPA and a lot of progress was made. During a conference call on August 25th, EPA and CFAC discussed the terms and conditions of the Administrative Order on Consent ("AOC"). John noted that following the conference call Mike Cirian, EPA, went on vacation; however, that has not slowed the process. He said EPA brought some items forward that will be addressed. A meeting has been scheduled for September 21st to further discuss the terms and conditions of the agreement. John noted the next meeting between CFAC and EPA will be a technical session scheduled for October 6th and 7th. John noted that no attorney's will be present as it is a technical session.

John reported the AOC is moving along well. The EPA is reviewing the RI/FS work plan developed by Roux Associates. John expects some questions and noted Roux will respond. Following the October 6th and 7th technical session, CFAC will be in a position to get to the items at the end of the process. John noted no gaps in the process have been identified.

Commissioner Phil Mitchell said he understands there will be an agreement by Thanksgiving. John replied that the EPA had suggested in their public meeting that the AOC would be completed by Thanksgiving. He added that the Thanksgiving time frame is an EPA timeframe that CFAC is working closely to achieve. Cheryl Driscoll added that it is a good possibility.

Nino Berube asked if the October 6th and 7th meeting between EPA and CFAC is open to the public. John Stroiazzo replied, no. He said an update will be provided to those attending the October 8th Open House. John added that he hopes the agency will participate in the Open House.

Joe Russell asked what specifically will be final in November. John said the AOC will allow for execution of the RI/FS work plan. He added that this is a long process, but this will focus on the RI/FS.

Commissioner Mitchell said by Thanksgiving he hopes both parties will have come to an agreement on how this will get done. John noted that the RI/FS is scheduled for four years, however the entire project could take up to an additional 5-10 years. He added that the demolition process is a two year plan, independent of the sampling plan and includes structures and surfaces.

Clarence Taber asked if the wells that are being drilled are specialized and can only be done by certain companies. Mike Ritorto said the technology used will be similar; however, not

every driller will have that type of rig. John Stroiazzo said some local firms have the appropriate technology and it is CFAC's intention to use local vendors where applicable.

Nino Berube asked why sonic drilling will be conducted versus other types. Mike Ritorto said deep wells have been proposed and some technology cannot go to that depth. He added that sonic drilling brings up nice cores that provide the clearest picture of soil composition.

Project Update

Cliff Boyd shared an update related to the auction. He said the month of August was spent removing auction items. He noted that all purchased items have been removed.

Cliff noted asbestos activities ramped up a bit since the last meeting. Calbag has applied for the next asbestos abatement permit from MDEQ. This permit will allow Calbag to go into the pot lines. Cliff added that six structures have been cleared by MDEQ for asbestos removal. Cliff noted that Calbag has initiated anode carbon removal.

There are 60 people working at the site in addition to two tiers of subcontractors for removal of asbestos and anodes. There are 35 Calbag employees of whom 23 are from Columbia Falls or Kalispell. Cliff said Calbag's monthly payroll is \$175,000. He added that Calbag spends \$95,000 per month locally on various expenses.

When asked about challenges, Cliff said the recent wildfires have led to Calbag having to shut down their burn crews. He added that exterior torch activities have also been curtailed. He noted that with the cooler weather, they are starting to process metal. Commissioner Mitchell asked Calbag to be respectful of fire even though fire levels 1 and 2 have been lifted.

Over the next 60 days, Calbag will continue to work in the pot lines. Cliff noted permits are in place to begin some structural wrecking of other buildings within 30 to 45 days. Cliff said he needs to coordinate the scheduling of disposal loads with the local landfill, because of the amount of volume that will be placed there. Nino Berube asked what will be taken to the landfill. Cliff replied that it will be construction and demolition debris, office furniture, leftover auction items and excess ores.

Nino said he is concerned about the structural strength of concrete floors under the cathodes and anodes. Nino remarked if Calbag uses heavy equipment to remove the anodes and cathodes, it may exceed the weight limits of the concrete floors. Cliff said they will use existing overhead cranes (that will be re-certified) in a process similar to CFAC's to remove anodes and cathodes. Cliff said the anode carbon has been sold to a steel mill in Oregon. Nino said it provides an opportunity to take care of another problem. He asked if thought had been given to combining calcium fluoride (from the closed calcium fluoride disposal landfill) with the anode carbon for use at the steel mill that purchased the anode carbon. Cliff noted that mixing products is not in Calbag's scope.

Chief Rick Hagen said Calbag has used floor slabs to create a large concrete slab for loading out scrap metals. He noted they have done a great job.

Mary Green asked if there will be visual changes at the site. Cliff said smoke may be visible in the area. He added that as the weather gets cooler, smoke will become more visible. Cliff said Calbag operates from 6:30 a.m to 5 p.m. Work hours change based on daylight. During the winter, operations will be five, eight-hour days. Chief Hagen noted the fire department has been dispatched to CFAC twice for smoke.

Joe Russell asked about ventilation forecasting. He told Cliff he may want to check atmospheric conditions. During the Fall season, burning is allowed between 11 a.m. and 5 p.m. in Flathead County; however, he said there is no issue if wood is not being burned. Cliff said they should be done cutting aluminum in March.

Responding to a question from Nino, Cliff said the carbon from the anode is sent to a licensed recycler in Oregon that reprocesses it and uses it as fuel for steel mills.

Nino Berube asked if particulate matter or opacity monitoring is being conducted. Cliff said they are monitoring for particulate matter.

Cliff reported that MDEQ conducted an asbestos abatement inspection three months ago and noted a 100 percent approval.

Donations

Steve Wright said sleeping bags, cots and pillows were found prior to the auction and Calbag and CFAC agreed to donate them. Based on suggestions at the August meeting, Steve contacted Sherry at the United Way. Once a final plan is in place, Calbag has offered to deliver the items to United Way's location.

Public Availability Session/Open House

As a follow-up to a discussion in August, Mary reviewed the concept of a Public Availability Session/Open House, which is an informal event. She said stations are set up by project representatives from different areas of work to provide one-on-one information to the public. The following booths will be available for the community to gain more information:

- Sign-In/Registration
- Community Liaison Panel
- Calbag/Roux
- Agency Involvement
- CFAC History
- Other

She asked the CLP to provide details about the type of information the community would be

interested in learning at each booth. The following was shared:

- Sign-In/Registration
 - Nametag
 - Handout of displays with purpose for each

- Calbag
 - Demolition timeline
 - Copies of project brochures (three editions)
 - Environmental protection methods
 - Company background/credentials
 - Disposal and recycling
 - Elemental breakdown of material being moved
 - Workforce

- Agency Involvement
 - EPA/MDEQ
 - Handouts related to the Superfund process
 - Oversight and management of process
 - Schedule timeline of process

- CFAC & Site History
 - History of site
 - Copies of handouts provided in the blue folder
 - Potline display
 - Large displays of site figure, aluminum reduction cell, and site figure of landfill

- Roux
 - Copy of RI/FS
 - Handout of location to submit comments to work plan (email, web address, and physical address)
 - Timeline for process
 - Company background/credentials
 - Water investigation
 - Process for conducting sampling: water and soil

- CLP
 - Purpose statement
 - CAP notebook with prior sets of meeting minutes
 - Meeting information
 - Comment cards

Building on suggestions from the August meeting, Mary asked members to share preferred methods to promote the session. The following were suggested:

- Local television (channels 8, 13, 11, and 10)
- Direct Mail Postcards

- Project update brochure
- Newspaper
- Radio (KGEZ, KOFI – talk radio, KAJ)
- Reader board at local banks
- City of Columbia Falls website
- Chamber of Commerce Website/Facebook page
- Flathead County website
- Flyers at the library and other targeted locations

It was mentioned by several members that the word “Superfund” has a negative connotation and stigmatizes the community. Members suggested using “clean-up process” or something similar.

New Business: Environmental Sampling and Analysis

Mary introduced Mike Ritorto, Senior Hydrogeologist, Roux Associates. Mike began by sharing the sampling and analysis within the Superfund process.

The first step of the process is to conduct a site evaluation. The evaluation will determine whether or not hazardous substances have been released and whether or not there is a potential threat.

The second step is the Remedial Investigation (RI), which looks at the nature and extent of contamination as well as the risk. It also looks at whether or not action is needed to address the risk.

The third step is the Feasibility Study (FS), which determines whether or not pilot testing or a feasibility study is needed.

The next few steps include Remedial Design, Remedial Action and Operation and Maintenance.

Commissioner Mitchell asked at what point former employees will be interviewed. Mike said the work plan can be found on the website. The work plan provides opportunity for former employees to make comments right now. Mike noted only one comment has been received. Comments can be made at <http://www.rouxinc.com/cfac-draft-ri-fs-work-plan-available-for-public-comment/> or mailed to:

Roux Associates, Inc.
c/o Columbia Falls Aluminum Company
2000 Aluminum Drive
Columbia Falls, MT 59912

Mike added that those who have contacted Commissioner Mitchell should contact Roux Associates.

Each phase of the RI/FS field work requires a Sampling and Analysis Plan (SAP). The SAP is developed to achieve data quality objectives. Mike noted that EPA guidance and accepted methods are used to develop the SAP. RI/FS, Data Quality Objective, sampling plan design, soil screening guidance, compendium of field methods, and standard operating procedures, are all part of the guidance provided by EPA.

A plan is developed when determining where to take soil samples. The plan includes review of historical site data, developing a conceptual site model, and proposing sampling near site features, areas of historical operation, and potential down gradient receptors. Mike noted that prior to sampling, site reconnaissance is performed, pre-intrusive activities are conducted, and modifications are made to sampling locations, if needed.

Mike reviewed the different types of soil sampling. Surface samples are taken from the first few inches of soil. Surface soil sampling is usually done with hand tools. Geologists log soil characteristics such as color and size. They utilize field instruments such as a Photo Ionization Detector (PID). Geologists also package soil for shipment to the laboratory.

Subsurface soil samples are deeper than surface samples and evaluate the potential for impacts to groundwater. To collect subsurface soil samples, a driller utilizes a rig to collect soil core at the desired depth. The core is brought to the surface and passed to the geologist. The geologist logs soil characteristics and utilizes field instruments. The geologist also selects the interval for sample collection. Once collected, the geologist packages soil for shipment to the laboratory.

In addition to soil sampling, groundwater sampling will also be conducted. To conduct groundwater sampling, monitoring wells are installed by a driller. The geologist collects groundwater samples by using a submersible pump. The geologist then screens the water for multiple field parameters. The water is then placed in jars/bottles and sent to the laboratory for analysis.

To collect surface water, geologists directly fill the sample jar from the surface water body or decanting from another collection device. Geologists screen water for multiple field parameters and send it to the laboratory for analysis.

Mike said samples are shipped along with a Chain-of-Custody form that provides sample ID information and requested analysis. The samples are packed in coolers with ice for shipment. Mike noted samples are sent to the lab via courier or FedEx.

Sample analysis will commence upon arrival at the lab based on method hold-times. Mike noted that laboratory analysis of field samples utilize accepted EPA methods. Mike also noted various Quality Assurance/Quality Control procedures.

The Quality Assurance Project Plan (QAPP) describes Quality Assurance/Quality Control protocols necessary to achieve the data quality objectives of the investigation. The QAPP also discusses the project-specific applicable or relevant and appropriate requirements (ARARs) and

summarizes the procedures to be followed during data collection activities. Additionally, the QAPP details the data performance and acceptance criteria which determine if the data is usable.

The QAPP also outlines data management protocols. Mike said all samples and measurement locations are recorded using GPS. He added that field data are collected in notebooks and/or task-specific field forms. He noted that laboratory results are provided in electronic data deliverable formats. Data is managed by Roux Associates in an electronic database. Mike noted that EPA has real-time access to validated data in an online database. Geographic Information System (GIS) is used for data analysis and presentation.

Collected data is validated to ensure it meets performance and acceptable criteria as outlined in the QAAP. He added that data is compared to regulatory standards or risk-based screening levels. The data is evaluated and compared to data quality objectives. Data regarding the nature and extent of contamination; contaminant fate and transport; and Human Health and Ecological Risk Assessments is presented in summary reports.

Mike reviewed draft proposed phase I sampling and analysis, which includes 126 soil borings; 51 gridded sample locations; 43 new and 25 existing monitoring wells; 16 surface water and sediment locations; and approximately 750 new analytical samples. The samples will be analyzed for a variety of constituents including cyanide, fluoride, metals, and many others.

Stacey Schnebel asked to whom and by what means the results are provided. Mike said Roux receives data and prepares a summary report for submission to EPA. He added that EPA reviews the report. Also noted was EPA's capability to access real-time data. Mike noted that the AOC provides accountability. John Stroiazzo added that CFAC contracts with Roux who provides results to EPA and DEQ. He added that the AOC is a roadmap as to how everything is done. John said the sampling program is extremely important and fully transparent.

Joe Russell asked if when monitoring groundwater, there is artesian pressure. Mike said he did not believe so, because wells are at water table and deeper.

Susan Nicosia asked if the data gleaned from the groundwater monitoring can be made available to the Flathead County Health Department. Mike said that is a good comment to submit to the RI/FS work plan. Joe Russell noted that the Health Department does not have much comparative data.

Nino Berube asked if a material balance of what went into the plant and what came out will be conducted. Mike said it is not part of the current RI/FS.

It was noted that John Stroiazzo, Roux, and Mike Cirian are open to conducting a site walk with Nino so that he has an opportunity to share his knowledge.

Mike Ritorto reviewed the next steps. He reminded those present that it is a long process. The first step is to reach a settlement agreement with EPA; including finalization of the RI/FS work plan and Phase I Sampling and Analysis. Next is implementation of the work plan. The third step is evaluation of Phase I results to determine if data gaps exist, then prepare Phase II

Sampling and Analysis Plan. Next is implementation of Phase II work and an evaluation to determine if further work is necessary. The next step is to use Remedial Investigation data to conduct a baseline risk assessment. The final step is to conduct a Feasibility Study to evaluate remedial alternatives.

Clarence Taber asked where Superfund comes into play. Mike said whether or not the site is labeled Superfund or not, all steps in the process will be completed. He added that CFAC has voluntarily agreed to perform the work to move the process along. It was noted that Superfund designation often occurs when a Potentially Responsible Party does not step forward. Clarence said he volunteered at a booth at the County Fair for Montanans for Multiple Use. He said numerous people stopped by for information about the project. He noted eight full pages of signatures for those opposing Superfund designation. He added that people want the site cleaned up, but do not want the Superfund designation.

Commissioner Mitchell said part of the reason people do not understand Superfund is because Glencore did not communicate. Glencore has stepped up and taken responsibility and he applauds them for their efforts with EPA.

Nino asked if the location of wells indicated on the map were dictated by a document issued by EPA. Mike said EPA provides guidance on where to collect samples. He added that wells are also placed in certain locations based on professional judgment and historical data. Mike encouraged those with information to contact John Stroiazzo, project manager. John noted that as an employee, Steve Wright has added valuable input. Haley Beaudry added that the RI/FS is part of the AOC and is a draft plan in which EPA and CFAC will have to agree. If other areas are identified during execution of the plan, the plan can be changed.

Commissioner Mitchell said if people are going to be on-site, then he would expect former employees to do their part. This is the time to share input.

Don Bennett asked if precautions are taken when drilling to contain contaminants, if found. Mike said the top level is blocked-off so the contaminants do not migrate.

There being no further business, Mary asked members to complete their meeting evaluation forms. The meeting was adjourned at 7:52 p.m.

NEXT MEETING: **Thursday, October 8, 2015**
 Open House
 Location: Columbia Falls High School Cafeteria
 Time: 5:30 p.m. – 8 p.m.