



CFAC Proposed Plan Comments Overview

As many of our neighbors are aware, on June 1, 2023, EPA issued its proposed plan for cleanup of the Columbia Falls Aluminum Company (CFAC) site. When EPA released its proposed plan, which defines EPA's preferred cleanup option, it began a public comment period. The EPA accepted comments from any interested members of the public for 90 days before the period closed on August 31, 2023. EPA will include a response to comments in its Record of Decision, which will detail the cleanup plan for the site.

During the comment period, CFAC filed its own comments to clarify certain aspects of the Remedial Investigation and the Feasibility Study. Below, CFAC has summarized its key comments most relevant to the questions we've heard from the Columbia Falls community:

The EPA and MDEQ preferred alternative for addressing the legacy landfills impacting groundwater includes a combination of improving landfill caps and installing a slurry wall, which will isolate the impacted material from groundwater.

- The EPA characterizes a [Slurry Wall](#) as a proven remediation option that would protect human health and the environment, address risks identified in the remedial investigation and comply with legal and regulatory requirements.
- Past experience with these approaches at other locations shows that implementing a fully encompassing slurry wall and installing new and refurbished caps over the landfills impacting groundwater, will protect groundwater by preventing contaminants from entering it and effectively addressing the cyanide and fluoride in groundwater. This is why the EPA has published guidance showing improving caps and isolating wastes as the presumptive remedy for municipal landfills at Superfund sites. The principles in this guidance apply equally to the landfills at CFAC.
- The upgrade and maintenance of landfill caps would protect worker health by eliminating the potential for direct contact with impacted material and potentially harmful emissions.

The EPA and MDEQ - approved Remedial Investigation rigorously and thoroughly evaluated the impacts from the release of site hazardous materials.

- The Remedial Investigation was built on 45 years of previous site assessments, which consisted of over 16 separate investigations conducted by EPA, MDEQ and various independent consultants.
- Extensive sampling was conducted across the site to investigate all potential source areas. This included over 1,000 soil samples, 400 ground water samples from 77 monitoring wells and 200 surface water samples.
- Importantly, data has clearly shown that impacted groundwater has not migrated offsite and is not traveling toward adjacent communities, nor can it impact the drinking water of Columbia Falls.
- No additional sampling is necessary for the EPA to select a final site remedy in the Record of Decision.

EPA ruled out excavation and off-site disposal of site landfill materials as a preferred site cleanup option because it would be significantly less effective and more disruptive than the preferred alternative, while also increasing environmental impact and human health risk in the short term.



- During the excavation period, the landfill caps would have to be removed and the landfilled material would be open to the elements, allowing rain and snow to fall into the open pit and transport additional contaminants to the groundwater below.
- EPA estimated that transporting excavated material the nearly 500 miles (including over 130 miles of two-lane road) that would be required to move materials to the nearest approved offsite disposal location could result in multiple auto related injuries.
- In addition EPA and MDEQ concluded that the 70 trucks/rail cars per day over 4-5 years that would be necessary to move the landfill material off-site would cause significant noise, vibration, fallen materials and dust.

CFAC and EPA have solicited feedback from Columbia Falls residents and other interested parties throughout the superfund site review process. The entire site review process was highly comprehensive and included collection of over 1,000 soil samples and 400 ground water samples. CFAC worked closely with all parties involved throughout the assessment and evaluation process and remains committed to protecting public health and the environment every step of the way.