



Minutes
Water Quality Advisory Council
September 12 2017
Missoula City-County Health Department
301 West Alder 7:00 p.m.

Present:

Travis Ross – WQD Staff	Bruce Simms - WQAC	Shannon Lynch – UM Com and Env
Don Latham - WQAC	Ian Magruder - WQAC	Peter Nielsen – WQD/WQAC
Shane Randle– UM EVST	Lucretia Olson – WQAC	Chris Miller – UM EVST
Todd Klietz – Co Floodplain Admin	Brett Rosenberg – WQAC	Jen Harrington - WQAC

Smurfit Stone Update

Frenchtown Community Advisory Group

Peter gave a presentation regarding the sale of equipment. No known amount from sale. Sara Sparks and Keith Large will be at the October meeting. Addendum 4 (GW Monitoring) and PCB removal plans are available in hard copy at the fire station. Jen will facilitate the next Community Advisory Group meeting (October 5). One of the agenda items will be to clarify speed and thoroughness with regards to contaminant investigation.

PCB Removal Workplan – Deadline for comments was September 11, 2017 but the WQAC could still submit comments. Natural Resources Damage Program, Clark Fork Coalition and Confederated Salish and Kootenai Tribes also submitted comment. One of the removal areas is in the High Density Pulp Tank. EPA has proposed a removal at that site as well as around the transformer building. This additional removal is proposed as an addendum to the Investigation Work Plan. District comments also asked that the concrete be sampled in order to determine appropriate disposal. District comments also included sampling for congeners instead of arochlors only. The gist of the comments is that sampling density is not adequate to fully characterize the site. Re-development may be precluded if this is not adequately addressed. There really hasn't been any significant soil sampling taken place since 2015 other than these two areas targeted for pcb removal.

There's some question about the difference between the leaching-to-groundwater standards vs the human exposure standards. The Natural Resources Damage Program commented that ecological risk hasn't been addressed.

Floodplain Modeling

The model used to develop the current floodplain boundaries and elevations around the site was done in the 60's and then redone in the 70's. Flood frequency curves – there's 50 years of data that hasn't been included in the 100 year floodplain. What would Superfund have to consider for floodplain? They would be under Applicable or Relevant and Appropriate Requirements (ARARs). They can waive ARARs. In Butte, EPA generally followed ARAR's. Peter commented that Landfill 6 appears to have surface elevations below 100 year floodplain. The base of the dumps is another question in terms of elevation in regards to floodplain and groundwater. Montana's floodplain is where the natural ground meets the flood surface. What floodplain regulations have driven floodplain cleanup in other areas? Lucretia and Peter B will search Superfund sites in floodplains that have similar circumstances (including State and CERCLA sites). Denver Region 8, as of 15 years ago was not aware of superfund sites in designated floodplains.

In 1983 FEMA took DNRCs and Corps of Engineers maps and put them on a FEMA map. DNRC data came from a calculated engineers flood study. Even though that area would effectively decrease the base flood elevation (BFE), the official BFE remains the same. The information on the flood elevation could play into the ecological risk assessment. The drill logs could help with calculating the base depth of the landfills. It would be useful to take the drill logs and develop elevation of native alluvium. The Smurfit Stone Subcommittee of the WQAC will look into this.

FEMA will not certify the levees unless a government agency is willing to maintain them in perpetuity. This would not allow them to be kept in place in order to protect other areas on the site from flooding.

We may see a Berm study and Berm study workplan.

EPA Budget

The congressional hearings are occurring right now on the cuts to superfund budget. Senators Daines and Tester sit on this congressional committee and are opposing the cuts.

Brett Rosenberg will draft a letter to the editor under the council's name to bring attention to issues that occur with short term clean-ups without thorough investigation that occurs through superfund highlighting the issue with the Bonner Mill Cleanup.

Submitted by: Travis Ross