



Minutes

Water Quality Advisory Council
January 12, 2016
Missoula City-County Health Department
Second Floor Conference Room
301 West Alder
7:00 p.m.

Present:

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|---------------------|---------------------------|----------------------------------|
| Bev Young – WQAC | Travis Ross - WQD | Peter Bierbach - WQD Jon |
| Harvala – WQD | Chris Brick – WQAC | Jen Harrington - WQAC |
| Ron Russell – WQAC | Becca Paquette - WQAC | Michelle Hutchins - WQD |
| Bruce Sims - WQAC | Vicki Watson – UM EVST | Daniel Westberg – WQAC |
| Peter Nielsen – WQD | Ian Magruder – WQAC Chair | Brett Rosenberg – WQAC vice char |

Discussion of Smurfit-Stone Remedial Investigation Comments

As part of a mixing zone study, Hydrometrics found that groundwater was mounding around the infiltration ponds. TDS and elevation gradients were influenced by pumping drawdown in the well fields. Background water elevations on the eastern side of the site have rebounded 5-10 ft since pumping has ceased. It would be beneficial to map chloride, sodium, tds to get an idea on how the wastewater plume has changed. It would also be good to monitor arsenic concentrations. Given that some areas of the site have higher groundwater levels since the mill has ceased operation, are contaminants being further mobilized because they are being saturated? The council is interested in seeing continuous water level monitoring over the site. Have water levels stabilized? How has stability of interior dikes been affected by gw elevations or dikes?

Manganese levels show that reducing conditions are present. Manganese could be present in the wood products or in the soil.

One concern is that the well that has tested highest for dioxin was subsequently abandoned (It was located in a sludge pond and installed as a temporary monitoring well). Dioxin doesn't readily dissolve but can be attached to particles and sediment. It doesn't typically show a plume unless attached to coarse sediments. Permanent monitoring wells have been installed on the berm around the sludge ponds.

Thickness of ponds closest to the river:

Sludge ponds: 10-15 ft – this should be evaluated

The ponds closest to the river likely don't have a thick layer of material; they were designed to discharge water as quickly as possible.

This site is going through all the steps of Superfund; it's being done as part of an Administrative Order on Consent. Steps will include: Feasibility Study/Remedial Investigation, Risk Assessment, Record of Decision. Restoration is not typically part of EPA's process unless combined under a Natural Resource Damage (NRD) claim which can be initiated by the tribes, state, BLM, USFWS. It would be good to get NRD involved early to wrap in a restoration component. Since these storage ponds have been built on former river channel, they could make a claim based on the fact that the floodplain has been impacted; ponds are in former river channel. The claim does not have to be linked solely to contamination.

EPA initially collected enough data to propose listing. The responsible party then decided to collect their own data. EPA delayed the formal listing process and is now working under and AOC which will inform future work.

Timing of comments:

Some comments presented now would perhaps influence reporting of the data that has already been collected. Comprehensive commenting would come later.

Can the floodplain administrator request floodplain amendments based on new topographic data?

Council Comments:

- The sludge ponds were never closed because in 1993 the water quality bureau said it could license them under a discharge permit. This never happened. This sludge has not had any formal oversight.
- Landfills are in groundwater; possibly at higher groundwater elevations than when they were installed. They received industrial waste from the site from 1957 – 1995. The council recommends landfills be fully characterized (depth of industrial waste, gw elevation, quantities of materials). The council strongly recommends breaking landfills out into a separate Operating Unit.
- Risk of erosion of sludge and landfills and moving downstream. The floodplain should be amended based on new topographic data. Floodplain is not the ideal location of a repository. We have no idea where the floodplain is and where the thalweg will be.
- Perhaps incorporating geo-physical surveys to locate buried waste
- Site should extend across the river (move the boundary on the figures or clarify it as former property boundary). We have indication that contamination migrated across the river.

Comments would be sent to Sarah, the EPA administrator for Montana - Julie DalSoglio, DEQ, NRDP and consultant working on the project.

Ian will draft a letter on behalf of the council and bring it to the next meeting.

Butte Superfund/Stormwater – Ian Magruder

The superfund process in Butte is 30 years old. There is currently a consent decree being negotiated regarding priority on soils on the hill, stormwater, etc. These negotiations have been occurring behind closed doors. BP will foot a big part of the bill. The railroads will be an RP. Butte-Silverbow will be an RP because they own the sewer and storm sewer system which were responsible for moving contamination around. They'll be responsible for maintaining a number of the remedies that will be installed as well.

There is a question as to whether or not stormwater will be cleaned up enough. The state is taking responsibility for removal of the Parrott tailings. This is more contaminated groundwater than the Berkeley Pitt. Extremely high metals levels. Lots of buried mining/mill waste. The stormwater picks up metals from buried and surface materials. EPA dealt with groundwater metals by intercepting the groundwater and treating it. It passed in the ROD but the state did not agree with it. The community of Butte has identified strongly to the Parrott tailings and really wants them to be removed. The Bureau of Mines and Geology has conducted demonstrations showing the water is bright blue due to the high concentrations of copper and other metals. http://missoulian.com/news/state-and-regional/parrot-tailings-epa-resists-calls-to-remove-mine-waste-in/article_9339ea85-2d1a-5bcd-9288-7afb5d523528.html

The state has decided unilaterally to clean up the Parrott Tailings. That still leaves two areas of buried smelter waste downstream (Diggings East and Northside Tailings). At the same time the state is pushing RPs to do something with the stormwater. Butte Metro Stormdrain was recently determined to actually be Silver Bow Creek due to a recent [lawsuit](#). The metals picked up during runoff events are at levels that are considered

toxic. The concern that is being brought up during the consent decree negotiations is that stormwater will never achieve metal standards. One idea is that EPA is moving toward a dissolved standard for some metals (namely copper). The metals attached to sediment in the water column would be ignored. The concern is that there would continue to be high levels of metals heading downstream that will impact the remarkable work that has been done in the river downstream. The issue is that Butte needs detention ponds of significant size to allow the metals/sediment to settle out prior to discharge. The problem is that these wetlands/detention ponds would ideally be located where the Diggings East and Northside Tailings are located. The question is whether EPA will force BP to clean up these tailings. Letters to the editor would be helpful.

There is a briefing and a public meeting in Butte on 1/14 regarding the removal of the Parrott Tailings. Public comment accepted until Feb 1st. ([plan and link to public comment](#))

Public Comment for items not on the agenda: None

Submitted by: Travis Ross