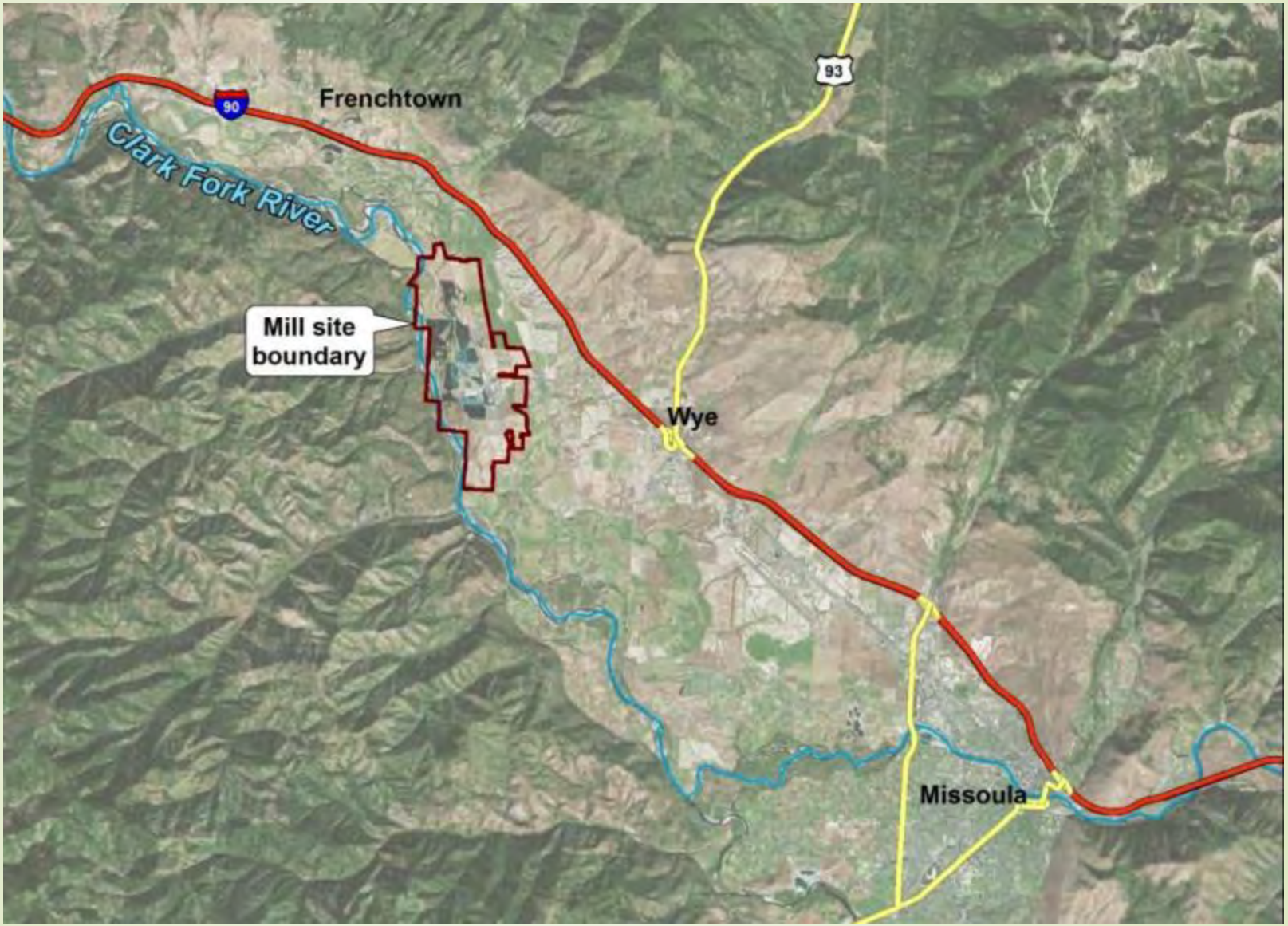
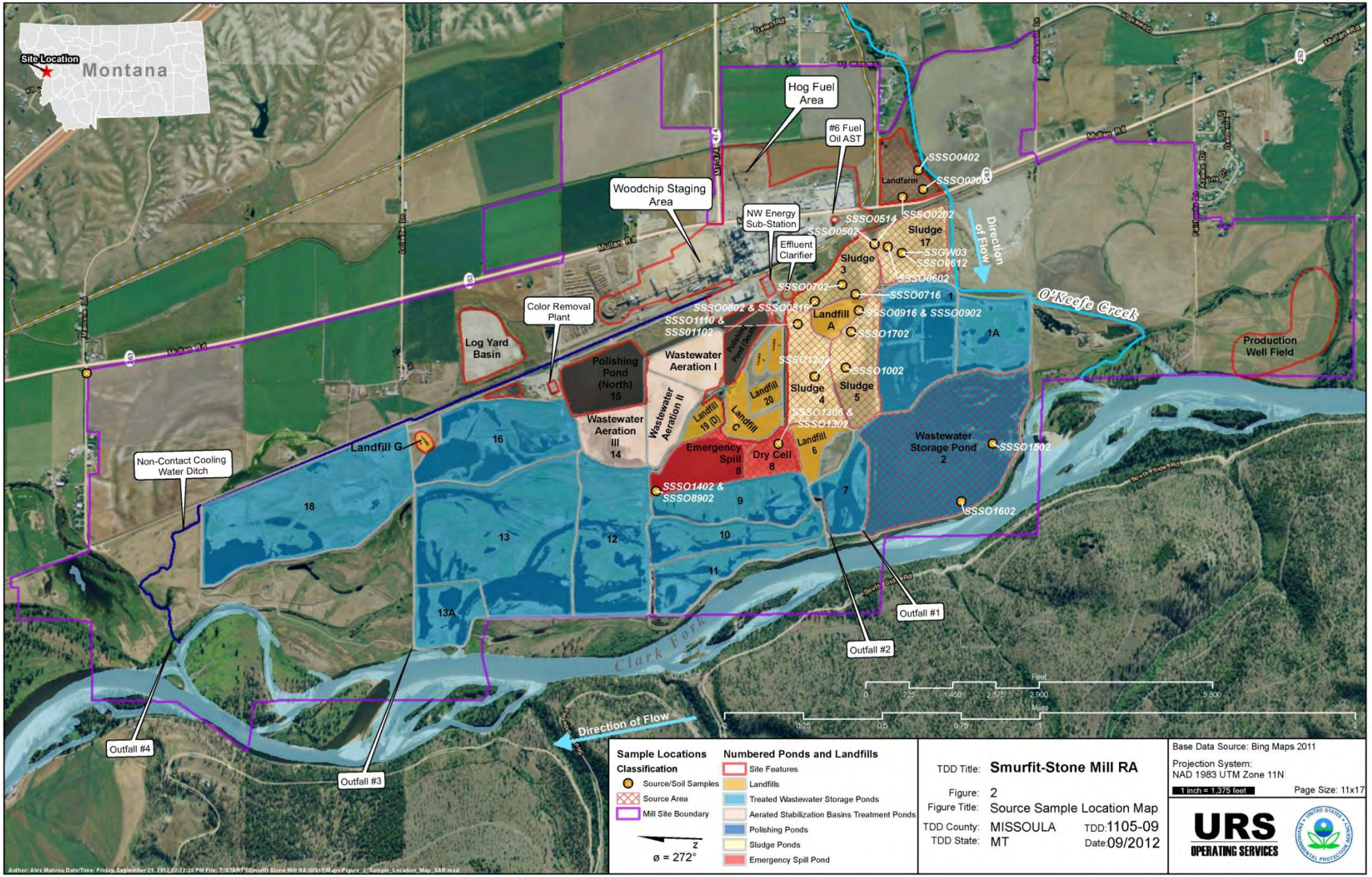
Missoula County's Goals:

- Eliminate all public safety and health risks
- Restore the river and the floodplain
- Hold the polluter responsible for the financial and environmental liabilities at the site to ensure the burden is not shifted to the taxpayers and residents of the area
- Incentivize concurrent development of the site and continue economic development efforts
- Provide public involvement throughout the process of investigation and cleanup

Smurfit Stone

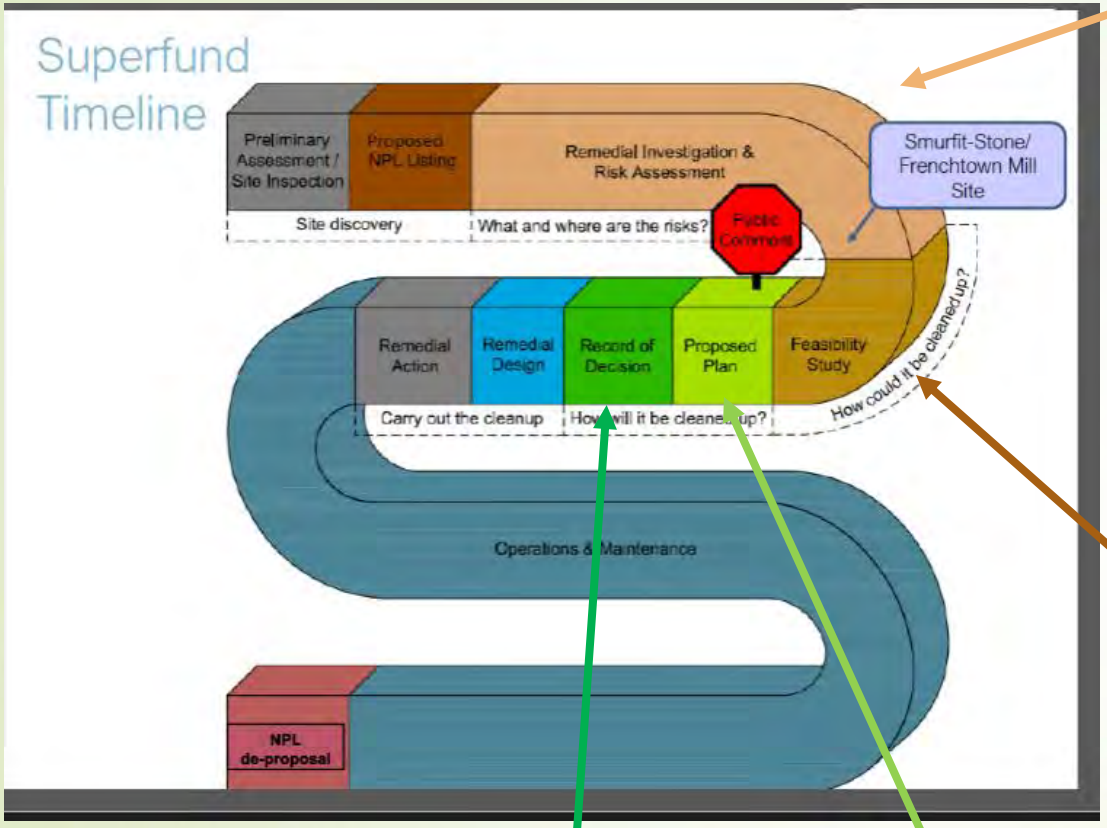



Site Location
Montana
Hog Fuel Area
#6 Fuel Oil AST
Woodchip Staging Area
NW Energy Sub-Station
Effluent Clarifier
Color Removal Plant
Log Yard Basin
Polishing Pond (North) 15
Wastewater Aeration I
Wastewater Aeration II
Wastewater Aeration III 14
Landfill G
Non-Contact Cooling Water Ditch
Landfill A
Landfill 19 (D)
Landfill C
Landfill 20
Landfill 6
Sludge 3
Sludge 4
Sludge 5
Sludge 17
Landfarm
Emergency Spill 8
Dry Cell 8
Wastewater Storage Pond 2
Production Well Field
O'Keefe Creek
Direction of Flow
Mullan Rd
South Side Rd
Clark Fork
SSSO0402
SSSO0301
SSSO0514
SSSO0202
SSSO0502
SSGW03
SSSO0612
SSSO0602
SSSO0702
SSSO0716
SSSO0802 & SSSO0819
SSSO0916 & SSSO0902
SSSO1110 & SSSO1102
SSSO1702
SSSO1202
SSSO1002
SSSO1306 & SSSO1302
SSSO1502
SSSO1402 & SSSO8902
SSSO1602
Outfall #1
Outfall #2
Outfall #3
Outfall #4
Feet
Miles
Sample Locations
Classification
Source/Soil Samples
Source Area
Mill Site Boundary
Numbered Ponds and Landfills
Site Features
Landfills
Treated Wastewater Storage Ponds
Aerated Stabilization Basins Treatment Ponds
Polishing Ponds
Sludge Ponds
Emergency Spill Pond
ø = 272°
TDD Title: Smurfit-Stone Mill RA
Figure: 2
Figure Title: Source Sample Location Map
TDD County: MISSOULA
TDD State: MT
TDD:1105-09
Date:09/2012
Base Data Source: Bing Maps 2011
Projection System: NAD 1983 UTM Zone 11N
1 inch = 1,375 feet
Page Size: 11x17
URS OPERATING SERVICES

Smurfit – Stone
1957-2010

- 2010 – Smurfit Stone emerges from bankruptcy, closes mill
- 2011 – property acquired by Green Investment Group, M2 Green LLC
- 2011-12 – EPA preliminary site investigation
- 2013 - EPA proposes Superfund listing
- 2014 – EPA identifies Potentially Responsible Parties (PRPs)
- 2015 – EPA and DEQ negotiate Administrative Order on Consent with PRPS, site investigation begins
- 2022 – KC Becker, Region 8 administrator commits to address community concerns via additional characterization sampling
- 2023 - Public development of Data Quality Objectives
- 2023 – EPA commited to sample

Superfund Snake – Where We Are



Remedial Investigation will summarize the remedial investigation and the risk assessments. Draft now likely 2025 due to additional sampling.

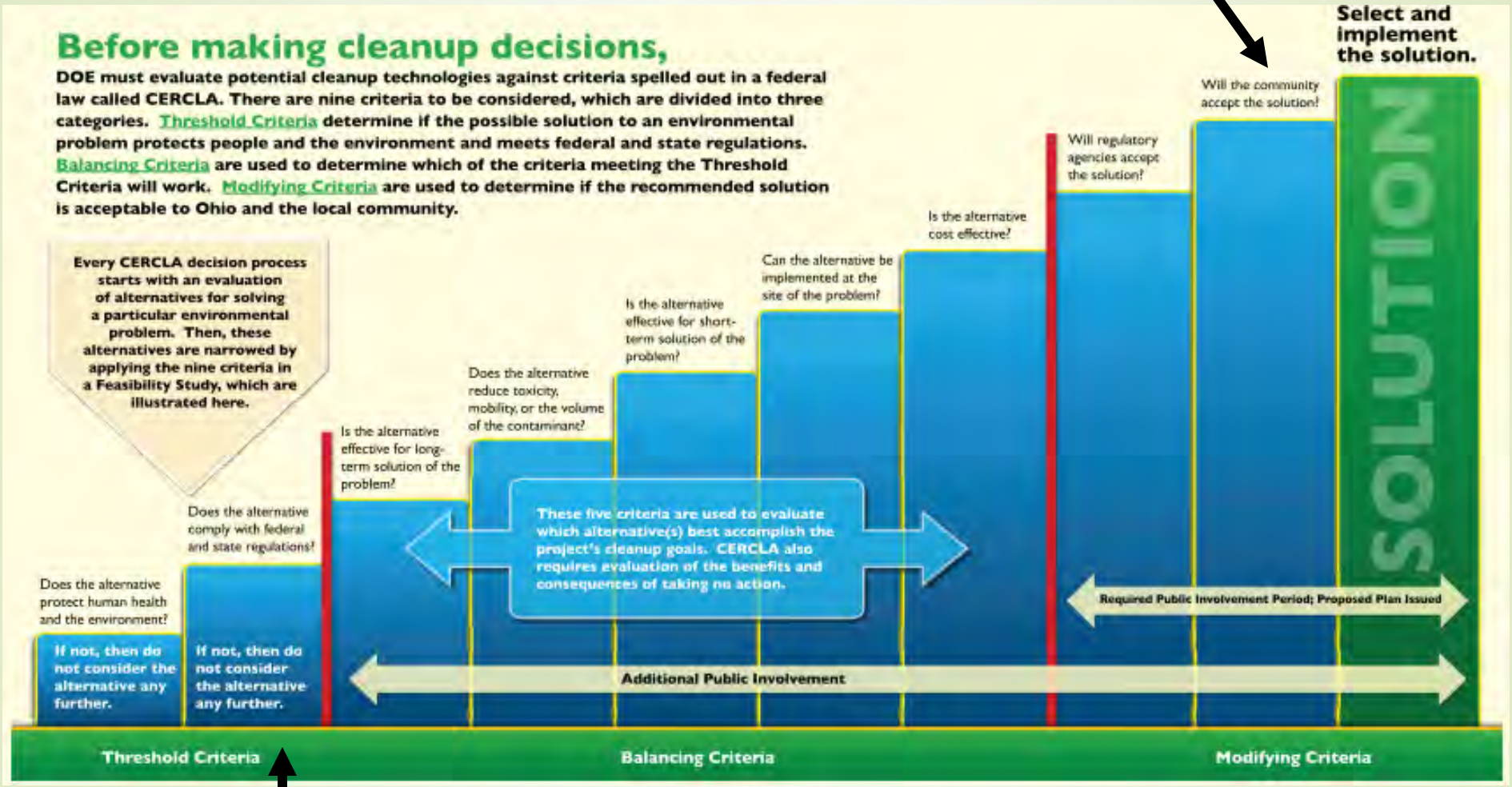
Feasibility Study develops, screens and evaluates alternative remedial actions. This is done using 9 criteria on next slide (Notable are ARARs and Community Acceptance).

Alternative is selected. Responsibilities are outlined.

Next Public Comment on the Proposed Plan (favored alternative)

9 Criteria for Alternative Selection

Will the community accept the solution?



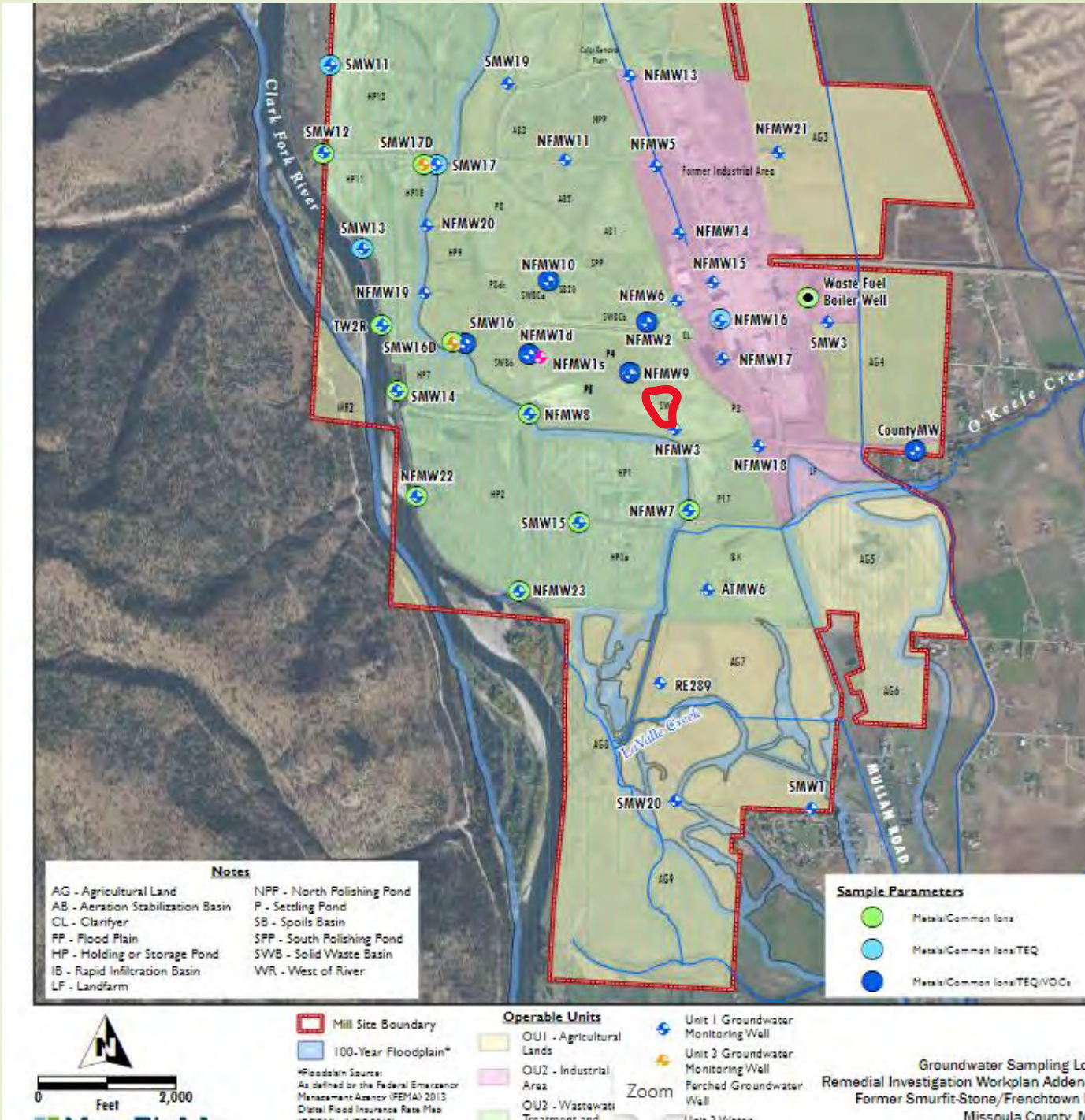
Does the Alternative comply with federal and state regulations?

Concerns

- Community concerns not considered or incorporated at earlier stages of remedial investigation, hopefully remedied through EPA's commitment to additional sampling to characterize site
- It's a giant site sampled comparable to much smaller sites
- Berms are not easily incorporated into Superfund process
- Groundwater sampling does not consider seasons (no quarterly sampling)
- Potentially Responsible Parties exerting considerable control over the Superfund process
- Do not consume fish advisory impacting local economy
- Community wants cleanup that will not limit opportunities (so no controlled groundwater area)
- Do not want a double standard in terms of what is allowed at an EPA site and what local residents can do

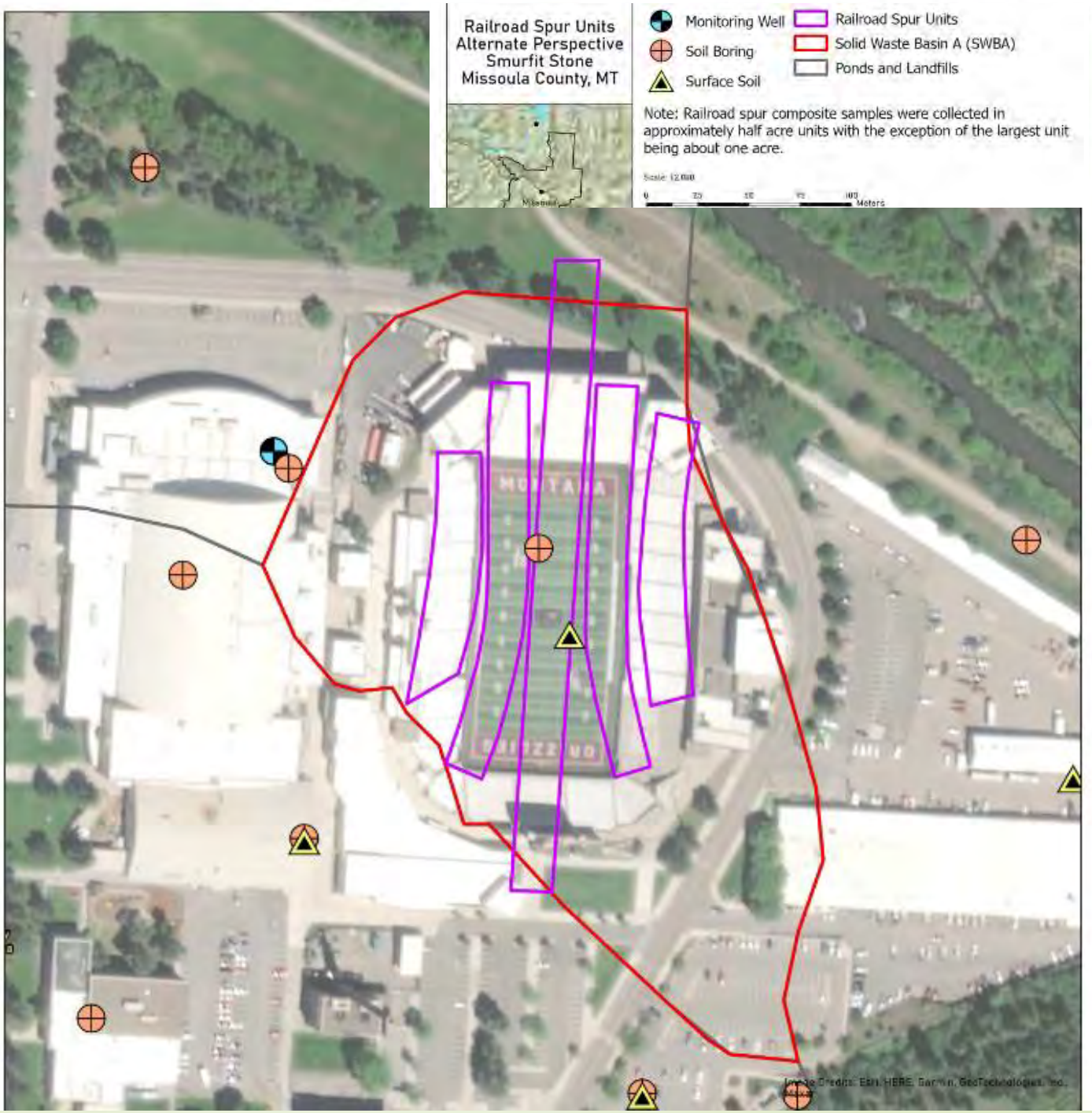
Large Site - Limited Samples

The site is so large that dots on a map make it seem like there are many samples. Dump A is outlined in red. The next slide will show the same area for scale.

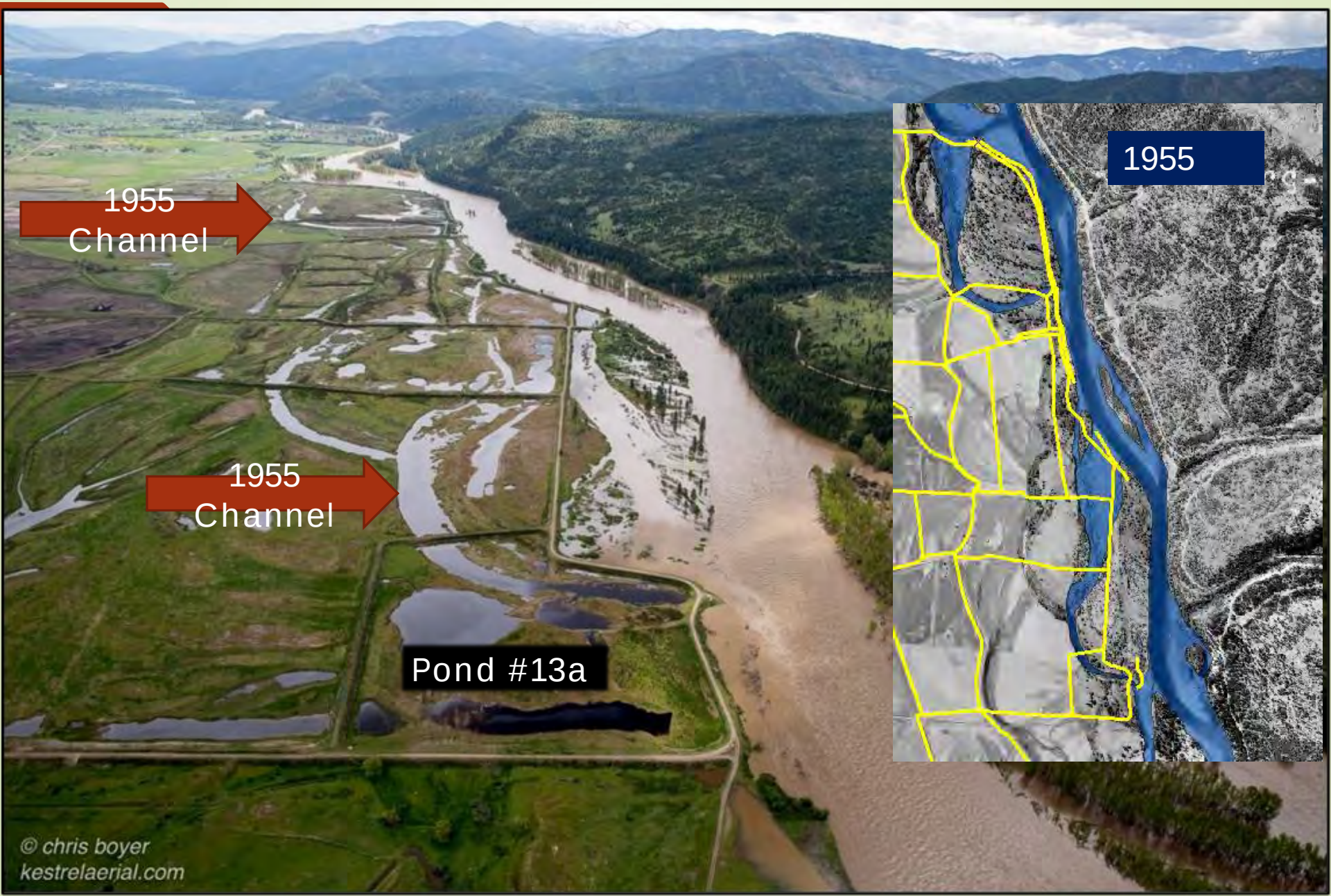


For Scale

Dump A is outlined in red. There is one soil boring and one surface sample. One monitoring well is within view.

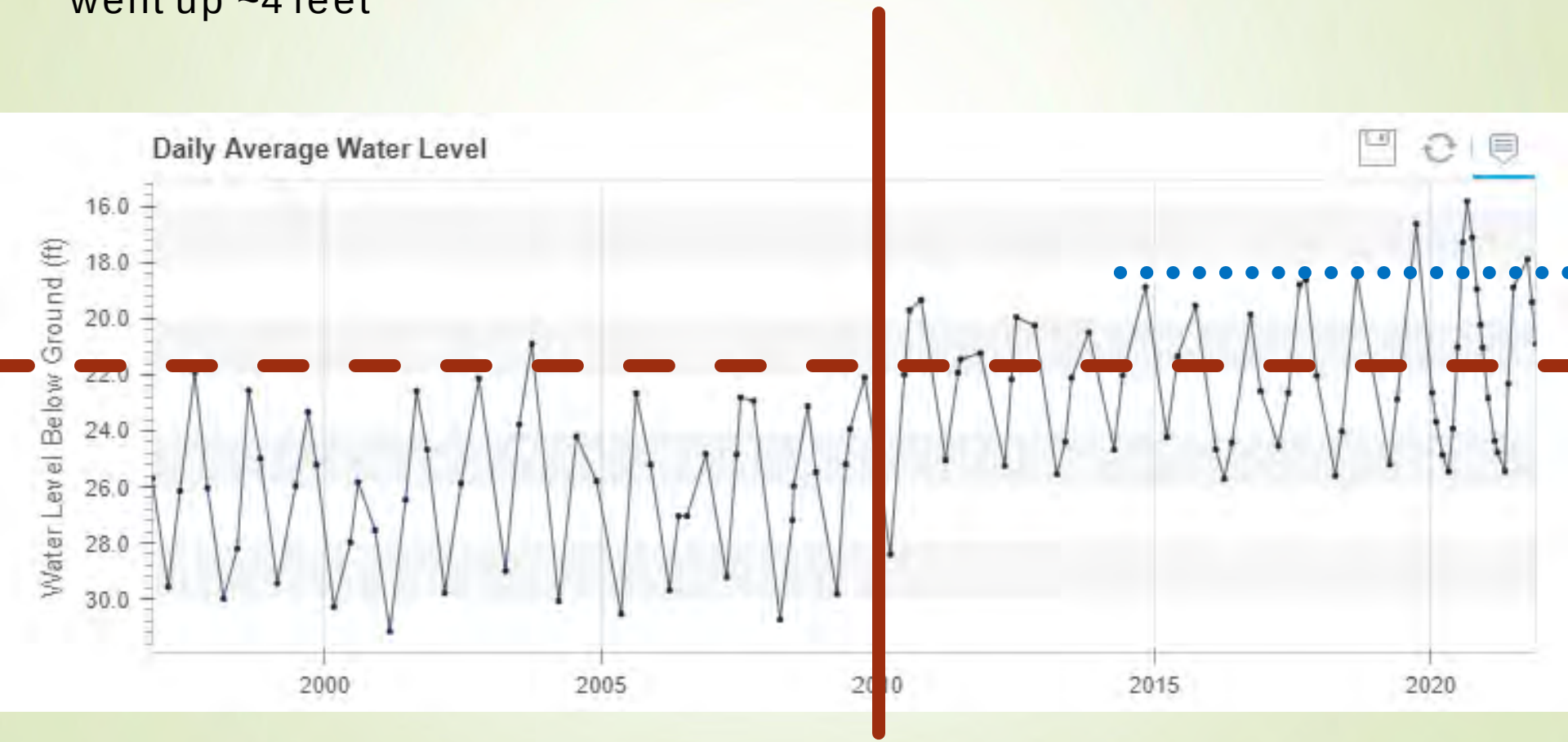


1950s Channels Behind Berms



Lacasse Lane Well – North of Production Wells

Mill closed in 2010 and water level at this offsite well went up ~4 feet



Inadequate sampling

- No quarterly sampling
- Addendum 11 cut sampling in half of the wells
- Sampling does not account for:
  - Historic cone of depression
  - Groundwater mounding
  - EPA Sole Source Aquifer

Missoula Aquifer Specific

.001 mg/L
7x as high

.1658 mg/L
17x as high

Comparison of On-Site Groundwater As, Fe, and Mn Concentrations to U.S. Glacial Aquifers				
Metal	Site Shallow Groundwater (mg/L)[1]		U.S. Glacial Aquifers (mg/L)	
	Maximum	Mean	Maximum	Mean
Arsenic	0.0607	0.0077	0.340	0.004
Iron	58.9	2.34	38.1	0.820
Manganese	52.2	2.88	28	0.220

[1] – Max and mean of 247 samples collected in shallow groundwater throughout the Site (NewFields, 2018d).

Floating through the old Milltown Dam Reservoir…Milltown Clean-Up example of what can be achieved if the EPA, State, and Locals all work together