

Progress Report #58 – September 2020

Smurfit-Stone/Frenchtown Mill Site

Missoula County, Montana

Date: October 9, 2020

EPA Site ID: MTN000802850

To: Allie Archer (EPA), Keith Large (MDEQ)

Docket No: CERCLA-08-2016-0001

From: David Tooke, Chris Cerquone (NewFields)

Subject: Remedial Investigation Progress Report, Smurfit-Stone/Frenchtown Mill Site
September 1, 2020 to September 30, 2020

This progress report was prepared to comply with Section IX, Paragraph 55 of the Administrative Settlement Agreement and Order on Consent (AOC) for the Remedial Investigation/Feasibility Study (RIFS) at the Smurfit-Stone/Frenchtown Mill Site, Missoula County, Montana (Site). The following sections report on actions taken during September 2020 to implement the AOC, including progress on field investigation and risk assessment activities undertaken in accordance with the Remedial Investigation Work Plan (RIWP) approved by the Environmental Protection Agency (EPA) on November 12, 2015 and amendments approved thereafter. This report is directed to the EPA and Montana Department of Environmental Quality (MDEQ) collectively the “Agencies” and focuses on activities which occurred during September 2020.

ACTIVITIES COMPLETED DURING SEPTEMBER 2020

Work Plans, Regulatory Correspondence and Meetings

- September 29: Project Update Call with the EPA and MDEQ was held to discuss ongoing RI data collection and organization of the RI report.

Field Work

- September 21 – October 6: The Fall 2020 groundwater monitoring event was conducted in accordance with Addendum 10¹.

Laboratory Reports

- No laboratory reports were received during the month of September.

Data Review and Data Management

- Updates to Scribe were conducted in September as detailed in memos associated with the Database Tracking Table within Scribe.

Reporting

- September 2: Submitted a letter with questions regarding the EPA-prepared 2018 OU3 HHRA

¹ NewFields. (2020). Addendum 10 to the Remedial Investigation Work Plan 2020 Groundwater Monitoring. Smurfit-Stone/Frenchtown Mill, Missoula County, Montana (p. 78) [Technical Memo].



- September 15: Submitted a letter transmittal of the Results from the June 2020 Groundwater Monitoring Event
- September 23: Provided Responses to 7/15/20 Agency Comments and updates to the Scribe database.

PROBLEMS, DEVIATIONS, AND SOLUTIONS

- On September 17th, EPA identified issues with accessing recent data from the scribe database. ERT (Scribe database technical support) recommends all users update their version of the scribe software and resubscribe to the database. The most recent version of the software is “scribe (v3.11.3)” which can be downloaded from: <https://www.ertsupport.org/download?PKNAME=SCRIBE&DKEY=Scribe>

ANTICIPATED REMEDIAL INVESTIGATION WORK ACTIVITIES (OCTOBER AND NOVEMBER 2020)

Work Plans, Regulatory Correspondence and Meetings

- During October and November, the PRPs will continue to develop a sitewide CSM with the Agencies.
- In October, the PRPs will meet with the Agencies for a monthly technical meeting to discuss RI reporting.
- On October 13th NewFields will present a summary of the Groundwater Conceptual Site Model during the Missoula Water Quality Advisory Committee Meeting.
- November 5: BTAG Meeting

Field Work

- The Fall 2020 groundwater monitoring event will be completed during the first week of October.

Data Review and Management

- Database updates will resume in November pending Agency review of update memos and further comment.

Reporting

- Proposed October and November Project Deliverables:
 - Site Reuse Assessment version 2 (v2) and Responses to Agency Comments
 - Revisions to the sitewide CSM graphics pending Agency Comments
 - 2020 Berm Inspection Summary Report
 - 2019 Berm Inspection Summary Report v2 and Responses to Agency Comments

Risk Assessment

- In October EPA proposes to complete draft ecological and human health Risk Assessments for OU2 and OU3.

PROJECT SCHEDULE

The current project schedule is provided in **Attachment A**.

Attachment A
Project Schedule

