



Five Things to Know About EPA's Proposed Plan for ROD Amendment

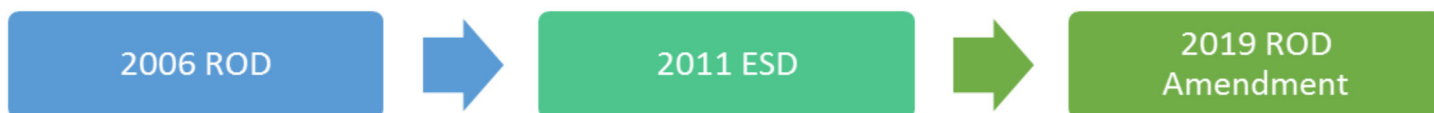
Butte Priority Soils Operable Unit, Butte, Montana

April 2019

On April 11, 2019, the U.S. Environmental Protection Agency (EPA) released its proposed plan for changes to the existing cleanup of the Butte Priority Soils Operable Unit (BPSOU) of the Silver Bow Creek/Butte Area Superfund Site. We encourage interested citizens to read the proposed plan and/or attend the public meeting. For those who can't, this fact sheet give the key take home messages from the plan.

1. Cleanup Plans Change

At large and complicated sites, cleanups can change over time, as a result of new information obtained from studies or from the progression of cleanup activities. Cleanup work at the BPSOU is dictated by the 2006 Record of Decision (ROD). The 2006 ROD was modified by the 2011 Explanation of Significant Differences (ESD). The 2019 change proposed by EPA will be a ROD amendment. Changes follow a Superfund process that ensures that the remedy remains protective and that public input is considered before agency decisions are made.



Public Meetings

April 23 and May 23, 2019
6:00 to 8:30 p.m.
MT Tech Auditorium,
1300 W. Park Street,
Butte, MT

2. You Have A Voice in The Change

The 60-day public comment period (April 11 to June 11, 2019) for the proposed plan includes a public meeting and gives the public a voice in the process. We welcome your comments. After the comment period closes, all comments will be evaluated and modifications will be made to the plan, if needed. The comments received and EPA's responses will be available to the public in a Responsiveness Summary, issued at the same time as the ROD amendment.



3. There is One Fundamental Proposed Change

The proposed plan includes only one fundamental change—the waiver of two Montana water quality standards and replacement with federal ambient water quality standards for measuring in-stream water quality remedial goals. Standards for additional contaminants of concern may also be , if needed, under specific criteria.

Immediate Change

1. Waive State of Montana DEQ-7 acute aquatic life standards for copper and zinc based on a total recoverable (unfiltered) sample and adopt the federal acute aquatic life standards based on a dissolved (filtered) sample.
2. Adopt the current DEQ-7 allowance for one exceedance of water quality standards in three years .
3. Adopt the updated DEQ-7 aquatic life standard for cadmium (May 2017).

Potential Change

1. If acute performance standards (cadmium, lead, and silver) and/or chronic performance standards (copper and lead) for these previously unwaived contaminants of concern are not met, waivers would be granted but *only* after construction and monitoring. If waived, protective federal water quality standards would be substituted.
2. If dissolved acute performance standards for copper and zinc are not met, further waivers to the federal water quality criteria in place at that time may be needed.

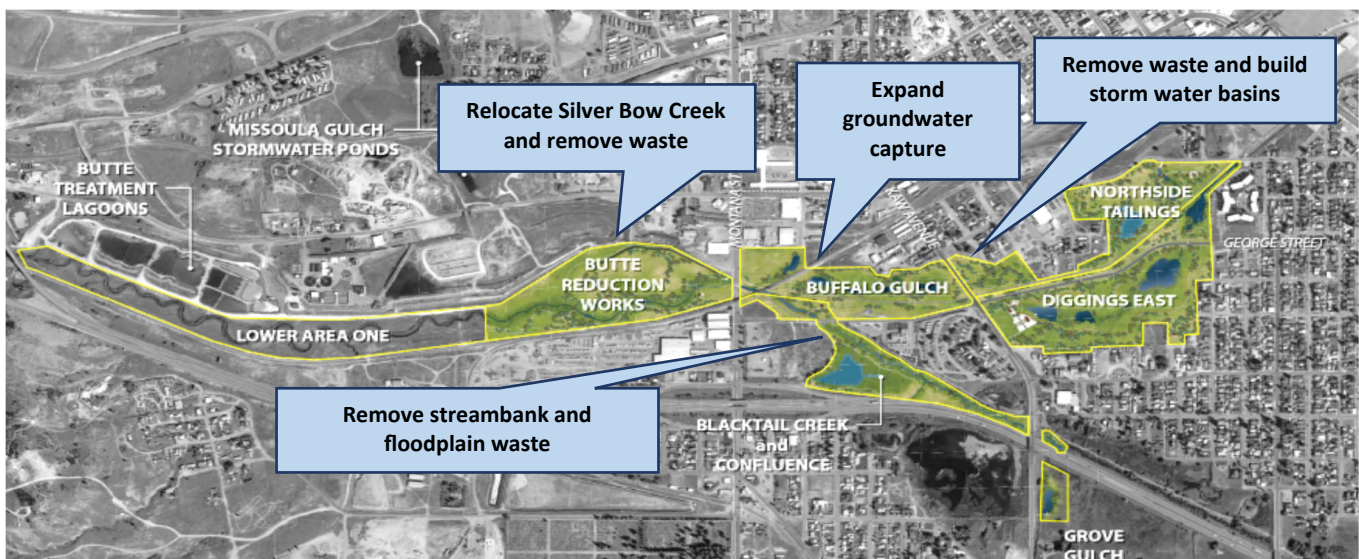
Get the details. The proposed plan is online at:

www.epa.gov/superfund/silver-bow-butte

4. There Are Seven Significant Proposed Changes

The proposed plan includes seven significant changes, four of which are expansions of construction activities to make the cleanup better. Relevant areas are shown in the photo below by item. Additional details are in the proposed plan.

- Expand waste removals in streams and require additional hydraulic controls.** Add bank sediment and nearby floodplain waste removal along Blacktail Creek (George Street to Grove Gulch).
- Move Silver Bow Creek .** Remove tailings, slag, contaminated soils, and other waste from Butte Reduction Works to allow Silver Bow Creek to be moved out of Slag Canyon.
- Expand groundwater control and capture system along Blacktail Creek and through the Butte Reduction Works/ Slag Canyon area.** Route contaminated groundwater from new systems to the Butte Treatment Lagoons. Revegetate
- Remove mine waste to construct storm water controls in upper Silver Bow Creek.** Construct final storm water controls (primarily detention ponds) to settle out contaminated suspended sediments from Buffalo Gulch and drainages reporting to upper Silver Bow Creek for 5-year storm event. Buried tailings at Diggings East and Northside Tailings will be removed to accommodate new basins. This is in response to public input.



The remaining three significant changes are removals of two existing requirements and a clarification.

- Remove contingency requirement for storm water treatment.** Treated water may still not meet standards. Detention ponds make this contingency unnecessary.
- Clarify flow augmentation contingency.** It is not needed and it is difficult to predict when a stable source of water would be available.
- Remove requirement for evaluation of infiltration barriers.** No longer needed due to removal of buried tailings at the Diggings East and Northside Tailings to accommodate storm water basins.

5. There Are Thirteen Minor Modifications

The proposed plan includes 13 minor modifications as a formality of getting them into the public record. We invite the public to view a description (including maps) in the proposed plan.

- Clarify and expand BPSOU boundary
- Change and expand the Residential Metals Abatement Program (RMAP) boundary
- Revise points of compliance and determination of compliance for in-stream water quality remedial goals
- Simplify compliance determination for in-stream water quality remedial goals
- Allow sludge dewatering, drying, and management
- Revise definition of *wet weather* events for surface water flow regime
- Modify West Camp pumping level requirements
- Modify RMAP target numbers
- Correct lead bioavailability percentage used in the human health risk assessment
- Correct test animals used in the human health risk assessment
- Better describe the mandate for future health studies
- Confirm that compliance with human health applicable, relevant and appropriate regulations for surface water is not required during wet weather conditions
- Revise use of the names "Metro Storm Drain" and "MSD subdrain"