



# Community Involvement Plan

## West Side Soils Operable Unit

Silver Bow Creek/Butte Area Superfund Site



**U.S. Environmental  
Protection Agency  
Region 8**

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## List of Acronyms

ACMC	Anaconda Copper Mining Company
Atlantic Richfield	Atlantic Richfield Company
ATSDR	Agency for Toxic Substances and Disease Registry
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CTEC	Community Technical Environmental Committee
DEQ	Montana Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
Montana Tech	Montana Technological University
NCP	National Contingency Plan
NPL	National Priorities List
PRP	potentially responsible party
ROD	record of decision
TAG	Technical Assistance Grant
UAO	Unilateral Administrative Order
WSSOU	West Side Soils Operable Unit
%	percent

# Section 1

## Introduction



### 1.1 Purpose and Goals of the Community Involvement Plan

This community involvement plan has been prepared in accordance with federal regulation as a guide for the U.S.

Environmental Protection Agency (EPA) to engage and inform community members, environmental groups, government officials, the media, and other interested parties in the environmental investigation and cleanup activities at the West Side Soils Operable Unit (WSSOU) of the Silver Bow Creek/Butte Area Superfund Site.

EPA's goals for the community involvement plan are to:

- Ensure that the public has appropriate opportunities for involvement in a wide variety of site-related decisions, including site analysis and characterization, remedial alternatives analysis, and selection of a response action.
- Determine, based on community interviews and other relevant information, appropriate activities to ensure such public involvement.
- Provide appropriate opportunities for the community to learn about the WSSOU and the Silver Bow Creek/Butte Area Superfund Site.

The community involvement plan is meant to be user-friendly and understandable to the public. Use of acronyms or scientific terminology has been avoided (where possible). The plan was written after

community interviews and research concerning community demographics were completed so the content could be tailored to fit the needs of the Butte area community.

The community involvement plan is a living document and EPA will review and update this plan periodically. Appendices will be updated annually to ensure contact information is relevant.

Guidance documents and other resources used in drafting this community involvement plan include:

- *Environmental Justice Action Plan* (EPA 2020a)
- *Superfund Community Involvement Handbook* (EPA 2020b)
- *Community Involvement Toolkit* (EPA 2016)
- *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP) (NCP 1994)

### 1.2 Regulatory Authority

In 1980, Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLA or "Superfund," as it is more commonly known, allows EPA to clean up hazardous waste sites and to force responsible parties to perform cleanups or reimburse the government for cleanups led by EPA.

To implement Superfund, EPA created the NCP, which is a set of regulations that detail how Superfund cleanups are to be conducted, including requirements for

community involvement. For the WSSOU, the first tasks to be conducted are the remedial investigation, which assesses the nature and extent of contamination and includes an assessment of potential risks to human health and the environment, and the feasibility study, which evaluates options to address contamination and possible risks. EPA will actively involve the community during these tasks (and beyond) using the process outlined in this community involvement plan.

## 1.3 Project Structure and Roles

EPA often divides a site into distinct operable units to address specific problems, geographic areas, or areas where a specific action is required. The WSSOU is one of seven operable units at the Silver Bow Creek/Butte Area Superfund Site and is the last to be evaluated in depth. The investigation and evaluation are being conducted by EPA’s contractors in accordance with the following:

- Remedial investigation quality assurance project plans (CDM Smith 2019a and b, and 2020)
- CERCLA, as amended, and other applicable federal, state, and local requirements
- *Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA* (EPA 1988)
- *Unilateral Administrative Order (UAO) for Remedial Investigation Data Collection Issued to Atlantic Richfield Company and ARCO Environmental Remediation, L.L.C. for the Silver Bow Creek Butte Area Superfund Site West Side Soils OU 13* (EPA 2019)

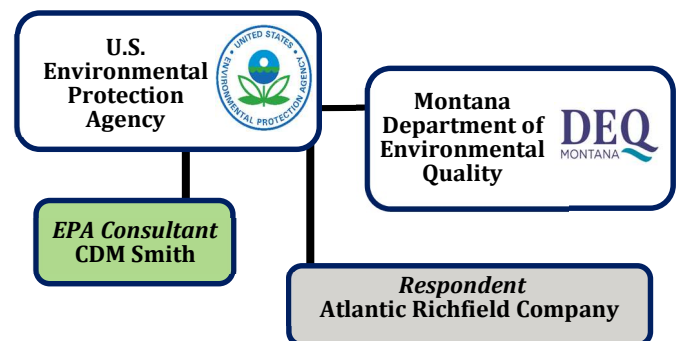
The project structure is shown in Exhibit 1.1 and described below.

### 1.3.1 Regulatory Oversight

#### EPA

EPA is the lead agency at the Silver Bow Creek/Butte Area Superfund Site and the WSSOU and is responsible for ensuring work is done in accordance with Superfund law, the NCP, guidance and policy, and the terms of the August 20, 2019 UAO.

For the WSSOU, EPA leads the remedial investigation and feasibility study. EPA’s contractors will perform field activities and write the work plans, quality assurance plans, health and safety plans, and various reports on findings. For more information on EPA, visit their website ([www.epa.gov](http://www.epa.gov)).



**Exhibit 1.1. WSSOU Project Structure**

#### Montana Department of Environmental Quality

The Montana Department of Environmental Quality (DEQ) is “charged with protecting a clean and healthy environment as guaranteed to our citizens by our State Constitution.” DEQ’s mission is “to champion a healthy environment for a thriving Montana today and in the future.” DEQ is a support agency to EPA at the WSSOU and reviews key documents, provides input, and represents the interests of the State of



Montana. For more information on DEQ, visit their website ([www.deq.mt.gov](http://www.deq.mt.gov)).

### 1.3.2 Unilateral Administrative Order

The Atlantic Richfield Company (Atlantic Richfield) is the respondent to the UAO. The UAO specifies that Atlantic Richfield will conduct sampling and data collection on Atlantic Richfield property within the WSSOU. The data will be provided to EPA for use in preparing a remedial investigation/feasibility study for the WSSOU.

### 1.3.3 Potentially Responsible Party

EPA makes every effort to find responsible parties to perform removal and remedial actions before spending tax dollars to perform them itself. EPA is now in the discovery phase of the search for, and identification of, potentially responsible parties (PRPs) for the WSSOU.

## 1.4 Community Involvement Plan Structure

This community involvement plan provides outreach information for the WSSOU in a single location. It is not necessary to read all sections to understand the scope of planned outreach activities; however, the individual sections provide added information on the WSSOU and on concerns expressed to EPA during community interviews conducted in April and May 2020.

The plan structure is:

- **Section 1 – Introduction.** Purpose and goals of the plan, regulatory authority, project structure and roles, and plan structure.
- **Section 2 – Site Description.** Location and layout, history of contamination,

physical description, current land use, nearby contamination, risk information, and regulatory milestones.

- **Section 3 – Community Profile.** Demographics, neighborhood description, and community involvement activities conducted to date.
- **Section 4 – Community Concerns and Issues.** Distillations of issues and concerns heard by EPA in interviews.
- **Section 5 – Environmental Justice.** EPA’s commitment to environmental justice at the WSSOU.
- **Section 6 – Community Involvement Action Plan.** Planned actions, schedule, and measurement of success.
- **Section 7 – References.** List of references cited.
- **Appendices – A through G.** Contact information for people, repositories, and venues and EPA’s *Environmental Justice Action Plan* (EPA 2020).

## Section 2

# Site Description

## 2.1 WSSOU Location and Layout

The WSSOU is in southwest Montana in Silver-Bow County, on the outskirts of Butte. It is comprised of abandoned mineral exploration and historical mining sites, generally north and west of the Butte Hill, that were not included inside the Butte Priority Soils Operable Unit boundary when it was established. Blacktail and Basin Creeks and their watersheds are also included.

Extensive underground mining took place in the Butte area beginning in the mid-1800s (Exhibit 2.1). Smelters, mills, and rail lines were built in Butte and Walkerville to support mining operations. In 1883, the copper baron Marcus Daly and the Anaconda Copper Mining Company (ACMC) built a smelter facility 25 miles away in the town to be named Anaconda and built a railroad to the smelter.

Just west of Butte, placer and underground mining took place in the area generally described as the Independence Mine District, primarily for silver ores. Mining had a resurgence during World War II in the 1930s and 1940s, and some old mines in the WSSOU reopened to mine primarily manganese, which was used to make steel. The Berkeley Pit and surface mining began in 1955.

The WSSOU study area boundaries are shown in Exhibit 2.2. Based on results of the remedial investigation and future investigations, the study areas boundaries could be expanded or contracted based on the nature and extent of contamination, and to be consistent with the scope and process of defining a remedy for the WSSOU.

## 2.2 Contamination

### 2.2.1 Silver Bow Creek/Butte Area Superfund Site

At the Silver Bow Creek/Butte Area Superfund Site, mine dumps, mill tailings, smelter fallout, slag, and other wastes impacted the immediate area. Some wastes migrated or were disposed of into Silver Bow Creek and other waterways.

Contamination at the site includes:

- Groundwater impacted by mine and process wastes in and adjacent to flooded mine workings and in the alluvial aquifer in the Butte Priority Soils Operable Unit, Butte Mine Flooding Operable Unit, and Rocker Operable Unit
- Surface water at the Berkeley Pit and adjacent areas of the Butte Mine Flooding Operable Unit, Silver Bow Creek, and other streams and drainages

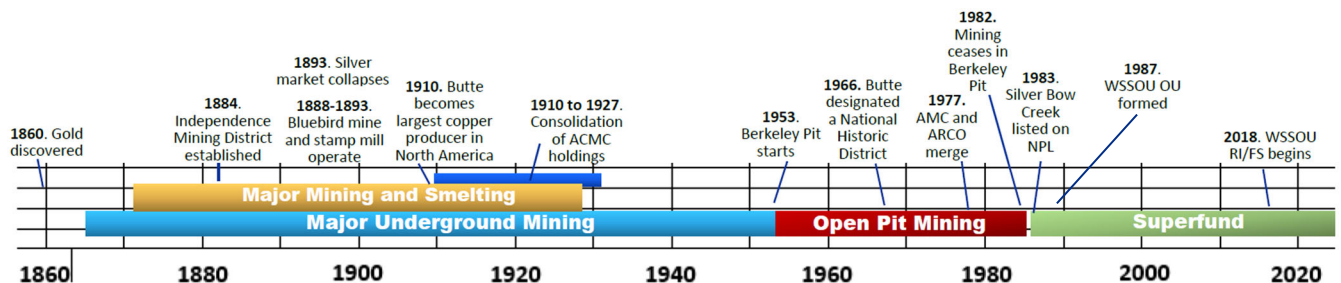


Exhibit 2.1. Mining and Superfund Timeline

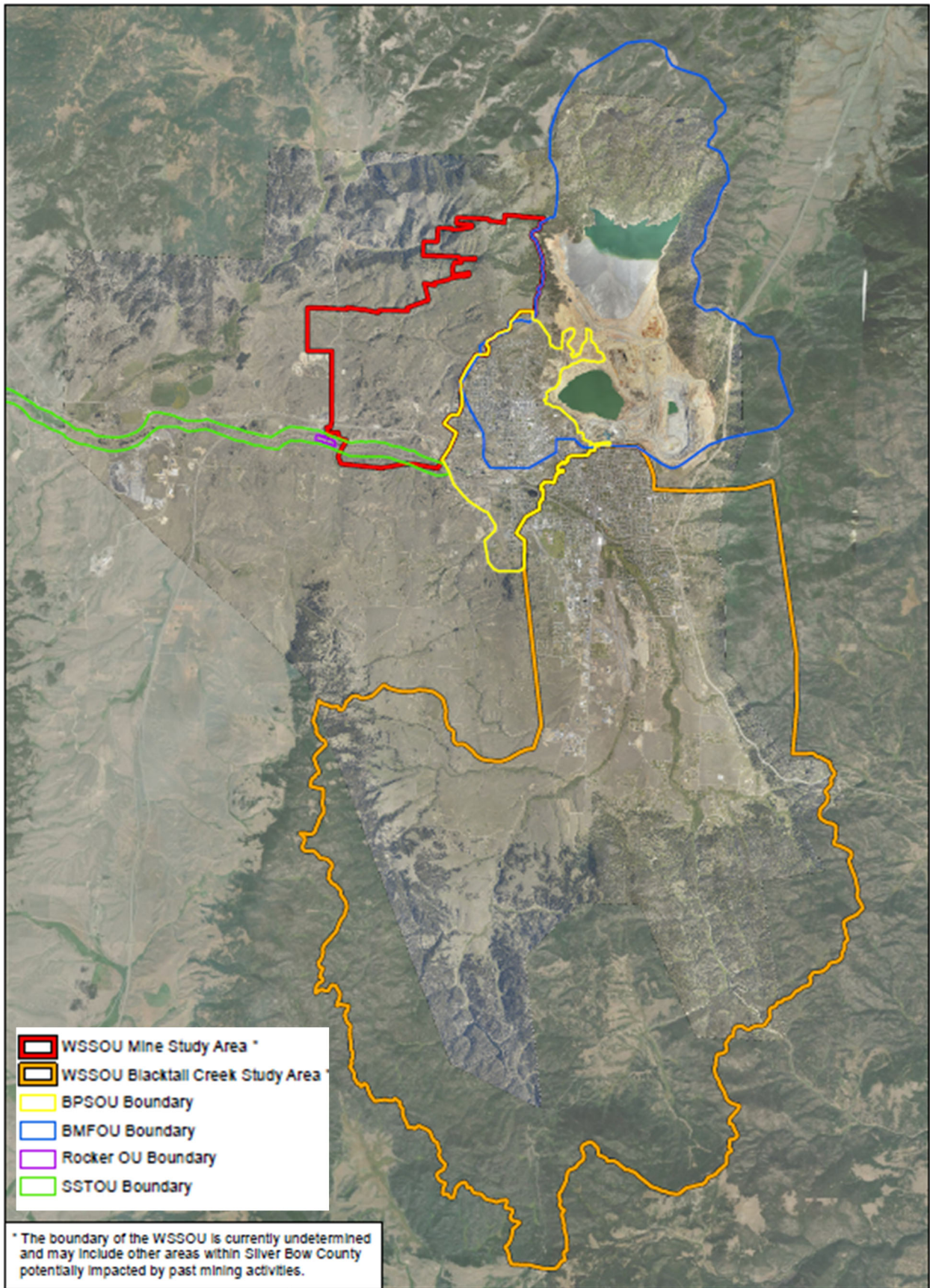


Exhibit 2.2. WSSOU Study Areas

- Sediment in Silver Bow Creek and its floodplain, and in other streams in drainages in the area
- Local soils and mine dumps
- Attic dust

### 2.2.2 WSSOU

The WSSOU includes two study areas (Exhibit 2.2):

- Mine Study Area
- Blacktail Creek Study Area

The WSSOU has many of the same issues as the larger Silver Bow Creek/Butte Area Superfund Site. Arsenic and heavy metals are present in mine dumps, which are devoid of vegetation, and elevated metals concentrations have migrated into stream drainages and soils. Mine dump soils are also acidic in many areas.

Exceedances of surface water standards at the upstream boundary of the Butte Priority Soils Operable Unit are assumed to be caused by increased, high-flow runoff that transports suspended solids.

#### 2.2.2.1 Mine Study Area

Compared to the City of Butte and populated areas of the Butte Priority Soils Operable Unit, the WSSOU mine study area is sparsely populated, with minimal commercial activity. The mine study area has been extensively disturbed by mining operations, and significant mine dumps and other features remain. The area extends south to Silver Bow Creek and west to Browns Gulch, but some mining claims south and west of these streams are included. Surface terrain is rolling grasslands and sagebrush with some forested areas.

Oro Fino Gulch, Gimlet Gulch, Browns Gulch, Beef Straight Gulch, Placer Creek, and Whiskey

Gulch divide the mine study area into different drainages.

Disturbances range from minor exploratory pits or shafts to large-scale mine dumps. Larger mine dumps and adjacent areas are unvegetated, likely because of metals contamination, and subject to significant erosion. There are at least 460 unique mining claims. Primary sites are associated with larger formerly active mines, whereas secondary sites had minor exploration.

#### 2.2.2.2 Blacktail Creek Study Area

Upgradient sources of metals contamination to Blacktail and Basin Creeks are also included in the WSSOU. Blacktail Creek flows north from the mountains south of Butte and discharges into Silver Bow Creek. This study area begins just south of the Berkeley Pit and continues 10 miles south to the headwaters of Blacktail and Basin Creeks.

A portion of the Blacktail Creek Study Area is referred to as “the flats,” and includes the portion of Butte south of the Berkeley Pit and north of Interstate 15/90. The study area also includes the Butte Airport, residential/commercial areas south of Interstate 15/90, and rural developments and rangeland to the south. It is bordered to the east and south by the Continental Divide. Impacts from stormwater are seen in Blacktail and/or upper Silver Bow Creek during precipitation events.

## 2.3 Current Land Use

The predominant land use in the WSSOU is rural residential and there is no central business district or downtown. Except for localized areas near Silver Bow Creek and Orofino Gulch, the WSSOU is outside of any Federal Emergency Management Agency Flood Hazard Zones (EPA 2019).

## 2.4 Nearby Contamination

Impaired waters nearest to the WSSOU (EnviroMapper 2020) are Silver Bow Creek, Blacktail Creek, and the Clark Fork River. The Butte Priority Soils Operable Unit, Butte Mine Flooding Operable Unit, Stream Side Tailings Operable Unit, and Rocker Operable Unit are adjacent to the WSSOU. The Warm Springs Ponds Operable Units are northwest of Rocker and the Anaconda Smelter Superfund Site is approximately 24 miles to the northwest.

## 2.5 Regulatory Milestones

The initial environmental assessment was completed in 1979 and the 26-mile long Silver Bow Creek Superfund Site was added to the National Priorities List (NPL) in 1983. The Butte Area was added in 1987.

The Superfund process is summarized below and shown in Exhibit 2.3. Community involvement requirements and additional activities planned by EPA are provided in Section 6.

- **Remedial investigation.** Assesses the nature and extent of contamination. It includes a human health risk assessment, an ecological risk assessment, and a final report.
- **Feasibility study.** Screens and evaluates potential cleanup technologies based on remediation objectives and goals. Results are used by EPA's risk management team to develop a plan for cleanup. The feasibility study is typically conducted with an overlap to the remedial investigation.
- **Proposed plan.** The proposed plan presents EPA's preferred plan for cleanup, based on results of the remedial investigation and feasibility studies. It is issued shortly after those

reports are finalized. The public is provided an opportunity to comment.

- **Record of decision (ROD).** The ROD documents EPA's final decision on cleanup and is made after review of all comments are received on the proposed plan.
- **Remedial design.** Remedial design follows the ROD and includes development of engineering drawings and specifications for cleanup, as specified in the ROD.
- **Remedial action.** Remedial action is the actual construction period in which the plan specified in the remedial design is implemented.
- **Construction completion/deletion.** Deletion of sites from the NPL may occur once all response actions are complete and all cleanup goals have been achieved. EPA is responsible for processing deletions with concurrence from the state. Deleted sites may still require five-year reviews to assess protectiveness.

## 2.6 Schedule

Work began at the WSSOU in 2019. Although the schedule is flexible and subject to change, the current timelines for the regulatory milestones listed in Section 2.5 are presented below. They will be updated as the project moves forward.

- **Remedial investigation.** December 2021.
- **Feasibility study.** June 2022.
- **Proposed plan.** September 2022.
- **Record of decision.** December 2022.
- **Remedial design.** 2023 to 2024.
- **Remedial action.** 2024 to 2028.
- **Construction completion/deletion.** To be determined.

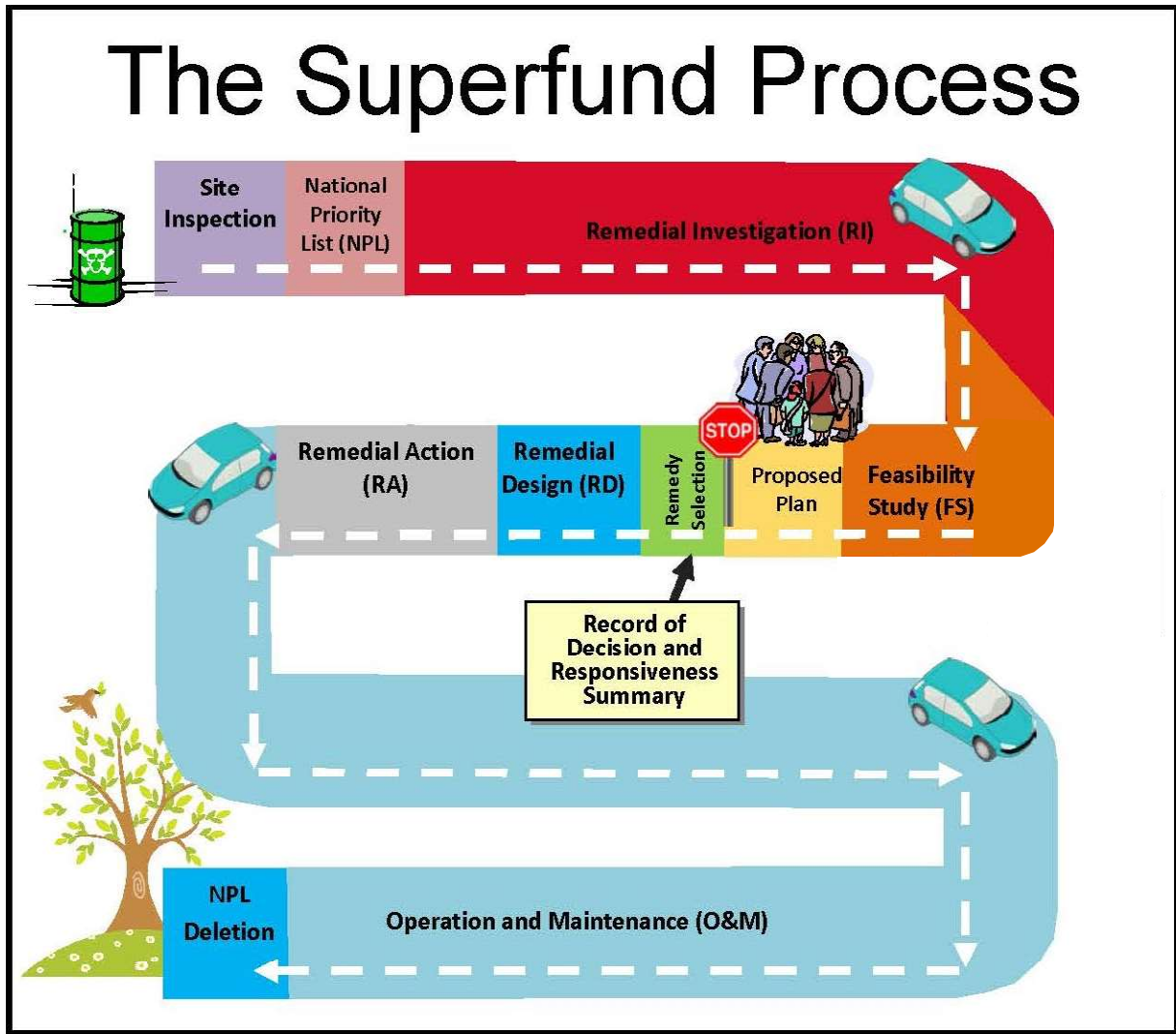


Exhibit 2.3. The Superfund Process

## Section 3

# Community Profile – Butte, Montana

### 3.1 Demographics

Butte was established as a mining camp in the 1860s and was once the most populous city in the state. Demographic highlights for Butte-Silver Bow County, as estimated by the U.S. Census Bureau website (Census 2019), are provided below:

- **Population.** 34,207.
- **Age.** Butte’s population is slightly older than that of the U.S. (19 percent [%] over age 64 versus 16% nationally).
- **Race.** The racial breakdown of Butte is 94% White, 5% Hispanic, 2% American Indian, less than 1% Asian, and less than 1% Black.
- **Education.** Approximately 93% of the population has a high school diploma and 27% of people over 25 have a bachelor’s degree or higher.
- **Median household income (2018).** \$45,797
- **Persons in Poverty.** 17%
- **Housing.** Most (67%) housing is owner-occupied, with an average of 2.2 people per household.
- **Computer and Internet Use.** Most (84%) households have a computer and broadband internet (76%).
- **Languages spoken.** English is the primary spoken language in most (97%) households.

### 3.2 Public Schools and Libraries

#### 3.2.1 Schools

Butte has 1 university, 1 college, 2 high schools, 2 middle schools, 10 elementary schools, and 2 all-grade schools. Butte Central, Capstone Christian, and Butte-Silver Bow Montessori are private schools. These are:

- Montana Technological University (Montana Tech)
- Highlands College
- Butte High School
- Butte Central High/Junior High/Elementary School
- Capstone Christian Academy High/Junior High/Elementary School
- East Middle School
- Emerson Elementary
- Hillcrest Elementary
- Kennedy Elementary
- Margaret Leary Elementary
- West Elementary
- Whittier Elementary
- Silver Bow Montessori

Eight schools are located wholly within the Blacktail Creek Study Area of the WSSOU. They are: Highlands College; East Middle School; Emerson, Hillcrest, Margaret Leary and Whittier Elementary Schools, Silver Bow Montessori, and Capstone Christian Academy.

There are no schools within the WSSOU Mine Study Area except for Montana Tech, which is partially within the WSSOU Mine Study Area and partially in the Butte Priority Soils Operable Unit. Kennedy and West Elementary Schools are in the Butte Priority Soils Operable

Unit but are east of and adjacent to the WSSOU Mine Study Area.

### 3.2.2 Libraries

There are two public libraries in Butte, and both are in the Butte Priority Soils Operable Unit.

- Butte-Silver Bow Public Library
- Montana Tech Library

## 3.3 Local Government

The Butte-Silver Bow County consolidated city/county government is led by an elected chief executive and board of commissioners representing 12 districts in Butte-Silver Bow County (Appendix C). A regular meeting happens the first and third Wednesday of each month. Their website is [www.co.silverbow.mt.us](http://www.co.silverbow.mt.us).

The Butte-Silver Bow Planning Department has a Superfund Division that is responsible for implementing several programs critical to the Silver Bow Creek/Butte Area Superfund Site. These are:

- Superfund Land Management Program
- Storm Water Management Program
- Residential Metals Abatement Program

Butte-Silver Bow County is a PRP for the Butte Priority Soils Operable Unit.

## 3.4 Site-Related Local Groups

Aside from the groups identified within the Silver Bow Creek/Butte Area Superfund Site (Appendix D), EPA is unaware of any other local groups with an interest in the work being conducted at the WSSOU. However, EPA welcomes such participation in the future.

The Community Technical Environmental Committee (CTEC) is a Technical Assistance Grant (TAG) group formed in 1989 to address interests and concerns with the Silver Bow

Creek/Butte Area Superfund Site. They are funded by an annual \$50,000 grant to review documents and provide public outreach and education.

Their website ([www.buttectec.org](http://www.buttectec.org)) describes CTEC's role as follows:

*“Our specific charge from the EPA is to hire independent scientific experts to review documents and provide public outreach and education on behalf of the local community. CTEC also provides access to government studies, BP-ARCO studies, and other studies about contaminants in the surface water, ground water, and air, and promotes public involvement in the Superfund process. CTEC informs local citizens about cleanup options, meetings, and how to contact those influential in choosing a course of action.*

*CTEC also prepares technical comments on the Superfund process. These technical comments are designed to provide decision-makers with an independent perspective on current Superfund activities. EPA established technical committees through grants under Superfund to provide technical assistance to local communities in and around Superfund sites. The more than 300 CTEC members make up a diverse group of individuals from all walks of life.*

*The easiest way to understand the role of a technical assistance committee in Superfund is to think of a triangle with a represented party at each point. In the instance of the Clark Fork Superfund process, the EPA and Montana Department of Environmental Quality (DEQ) represent the federal and state governments, the Potentially Responsible Parties (PRPs) represent their own and investors interests, and CTEC represents the interests of the local community. The goal is for all three parties—U.S. citizens at large (EPA), the PRP group, and*



*the local citizens—to have input into the EPA’s final cleanup decision.”*

CTEC’s website lists three goals, as follows:

1. *“To educate the general population through the assembly, analysis, interpretation, translation and dissemination of environmental information to those people in the area and to collect their questions, fears, needs, desires and opinions.*
2. *To develop and effectively convey community-based recommendations, advice and criticism, independent of government or industry-based special interests, to include both consensus and dissenting views about particular issues.*
3. *To assure the sustainability of CTEC, so that we may fulfill our mission to foster meaningful, informed public discourse about issues of environmental concern in our community, now and in the future.”*

CTEC holds meetings and provides background, project news, TAG information, and other information. EPA representatives for the WSSOU have participated and are available to participate in public functions to encourage active participation and education about remedial activities for the WSSOU.

## 3.5 Community Involvement History

The WSSOU was intended to be the last operable unit to be addressed at the Silver Bow Creek/Butte Area Superfund Site so minimal sampling had been done prior to 2019 beyond the initial Butte Soils Screening Study in 1988 and sporadic sampling by different stakeholders and landowners.

The screening study was conducted to provide EPA with site characterization data to prioritize the investigation, response, and

removal activities in the Butte area. It helped established areas of high priority (the Butte Priority Soils Operable Unit and Butte Mine Flooding Operable Unit) and lower priority. The Butte Flats and nonurbanized areas outside of Butte proper were sequenced as a lower priority because of a low potential for human health exposure. Field work for the WSSOU remedial investigation began in 2019.

The focus on the other operable units, plus the rural setting of most of the WSSOU, has kept community interest in the WSSOU relatively low. Community involvement activities have been limited to the basic Superfund requirements:

- Designate a WSSOU contact
- Notify affected citizens
- Establish a local information repository
- Conduct community interviews
- Prepare a community involvement plan

These activities are discussed below, along with the addition of a website and a public meeting.

### 3.5.1 Designate a WSSOU Contact

Since 2019, EPA has maintained one or more designated spokespersons to inform the community of actions taken, respond to inquiries, and provide information concerning the release of hazardous substances.

The EPA contacts identified for the WSSOU (as of 2021) are:

- **Community Involvement Coordinator**, Dana Barnicoat
- **Remedial Project Manager**, Nikia Greene

Contact information for these EPA staff and those of DEQ are provided in Appendix A. Responsibilities are presented in Section 6.1.

### 3.5.2 Notify Affected Citizens

As documented in the administrative record, EPA began notifying affected citizens within and near the WSSOU in March 2019 and has provided updates since then. EPA has also notified all county, state, and federal officials, as necessary.

This notification was in the form of an ad placed in the *Butte Weekly* and *Montana Standard* in March 2019 that briefly described the WSSOU, the work to be done in 2019, and the need for voluntary access from property owners. EPA followed the ad with sending letters to property owners listing the parcels of land potentially impacted and including a form for providing access for environmental investigation relative to performance of the remedial investigation.

### 3.5.3 Establish Administrative Record and Information Repository

EPA established an administrative record and an information repository for the WSSOU in 2019. The administrative record is housed in the EPA Region 8 Superfund Records Center in Helena. It holds the documents that EPA considers or relies upon in selecting the response action at a Superfund site, culminating in the ROD for remedial action.

The information repository is at the Montana Tech Library in Butte and contains documents useful to the public such as legal documents, this community involvement plan, fact sheets, work plans and—as time progresses—reports, a proposed plan, and a ROD. In some cases, a summary will be provided with technical reports to relay the facts in simple terms and enhance understanding. Technical reports must provide a realistic and understandable view of the work being done and findings. Summaries can provide key points to the community. The physical location of the information repository is the Montana Tech

Library. There are also two electronic information repositories—the websites for CTEC and EPA (Appendix F).

EPA ran a notice in the *Montana Standard* on September 13, 2020, to alert the public to the availability of the administrative record and information repository and hours of availability. Both the administrative record and information repository will be updated as necessary. In accordance with the Americans with Disabilities Act, the information repository location is handicapped accessible.

### 3.5.4 Conduct Community Interviews

EPA conducted a series of community interviews in Spring 2020 to gather the information needed to complete the community involvement plan.

### 3.5.5. Prepare a Community Involvement Plan

This document is the community involvement plan for the WSSOU.

### 3.5.6 Website

EPA's website for the [Silver Bow Creek/Butte Area Superfund Site](#) (Appendix F) includes information on EPA's involvement with the site, the site status, what is being done to protect human health and the environment, how to stay informed, what the risks are, and potential for redevelopment activity. It also houses many reports and documents that can be downloaded for viewing, lists public information repositories, and provides information on public meetings.

### 3.5.7 Public Meetings

EPA has not held a public meeting specific to the WSSOU, but the topic has been included in meetings for the Silver Bow Creek/Butte Area Superfund Site. EPA updated the Butte-Silver Bow Council of Commissioners (December 2017 and March 2019).

EPA has also started hosting monthly meetings online for residents of Butte to keep them updated on current EPA issues and events. Updates regarding progress at the WSSOU are included in these meetings. Program updates are provided by EPA, DEQ, Butte-Silver Bow County, and Atlantic Richfield, and other organizations are invited to present about Superfund-related issues. The meetings include a community discussion and a question and answer session to get community input.

## Section 4

### Environmental Justice

This section discusses EPA’s Environmental Justice Program, local suggestions to address environmental justice, and EPA’s *Environmental Justice Action Plan* (EPA 2020).

#### 4.1 EPA’s Environmental Justice Program

EPA defines environmental justice as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

Fair treatment means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies.

Meaningful involvement means:

- People have an opportunity to participate in decisions about activities that may affect their environment and/or health.
- The public’s contribution can influence the regulatory agency’s decision.
- Public concerns will be considered in the decision-making process.
- Decision makers seek out and facilitate the involvement of those potentially affected.

By using readily available environmental and demographic information, EPA conducts environmental justice screenings to highlight areas within a community where disproportionate environmental and health

impacts may fall on low-income and/or racial minority groups.

#### 4.2 Local Suggestions to Address Environmental Justice

EPA received written comments stressing that additional educational outreach to impacted areas was needed to involve low-income citizens. Concern was expressed that low-income citizens—who often have compromised immune systems, poor diet because of monetary restrictions, less access to health care, and live in substandard housing—may be at a higher risk.

The Residential Metals Abatement Program and Butte-Silver Bow Health Department outreach were cited as examples of successful appeals tailored to low-income citizens to boost participation in their respective programs.

Suggestions received regarding environmental justice are:

- Involve low-income communities in Superfund decision-making
- Consider impacts and cleanup of toxic waste in Butte on the vulnerable
- Promote environmental justice in Butte

Suggested communication tools are:

- Print media (newspapers)
- Targeted-distribution flyers
- Posters placed in areas used by low-income citizens (such as laundromats)

- Meetings in informal settings (home or neighborhood center)
- Social media (texting and Facebook)
- Radio talk shows (*Party Line*)
- Television news and public affairs programming

Suggested locations for outreach are:

- Neighborhood associations (Centerville Citizens group and Greely Neighborhood Association)
- Workplaces
- Schools
- Homes
- Local meeting places (volunteer fire stations)
- Libraries
- Providers of services to low-income citizens
- Churches
- Union halls

## 4.3 EPA's Environmental Justice Action Plan for Butte

EPA has prepared an *Environmental Justice Action Plan* (EPA 2020) (Appendix G) specifically for Butte. Highlights relevant to the WSSOU community involvement plan are presented below.

### 4.3.1 Environmental Justice Goals

EPA's goals are to embrace all residents and stakeholders in Superfund decision-making in Butte and the surrounding area (the area of the expanded Residential Metals Abatement Program) and to:

- Assess risks and design remediation programs concerning harmful effects of contaminants of concern on all citizens living in Butte
- Identify and notify the community of potential environmental justice concerns in Butte and the surrounding area

- Familiarize and inform the public on a regular basis of the environmental justice activities being conducted in Butte and the surrounding area
- Promote a clean, healthy, and natural environment in Butte and Silver-Bow County

### 4.3.2 Steps to Meet the Goals

EPA will partner with community organizations and interested individuals to help achieve the goals.

Actions will include:

- Identify issues related to environmental justice and the impact of remediation decisions and activities on vulnerable communities in Butte and the surrounding area
- Develop and disseminate information regarding the impact of remediation decisions and activities, and steps individuals can take to protect themselves and their families from exposure to contaminants of concern like arsenic and lead
- Develop and disseminate information that focuses on vulnerabilities of low-income residents regarding available services such as the Residential Metals Abatement Program
- Provide feedback opportunities for communities in Butte and surrounding areas to EPA and partners regarding the implementation and effectiveness of the *Environmental Justice Action Plan*

### 4.3.3 Potentially Impacted Area

EPA's publicly available, nationally consistent screening and mapping tool is called EJSCREEN and can be found at [www.epa.gov/ejscreen](http://www.epa.gov/ejscreen). The 2020 EJSCREEN report in the Action Plan (Appendix G) was prepared for the Butte Priority Soils Operable Unit and indicated that the overall low-income

population in the area is 55% (compared to 34% for the State of Montana). “Low-income” is defined as the percent of a population in households where the household income is less than or equal to twice the federal poverty level. Demographics for Butte are presented in Section 3.1.

#### 4.3.4 Update of the Community Involvement Plan

EPA’s *Community Involvement Handbook* (EPA 2020) states that it is important to consider if there are hard-to-reach people in the community, such as people who may speak languages other than English or community members who may be wary of the government because of legal status or other concerns.

If the community is likely to have environmental justice concerns, additional efforts should be made to involve segments of the community that are not effectively reached by conventional approaches. The WSSOU teams will embrace this approach in their community involvement activities. Assessing and addressing potential environmental justice concerns is one of the overarching themes to keep in mind when planning and conducting community involvement and outreach. Teams should consider tailoring community involvement approaches to reach out more effectively to specific populations.

Some examples include:

- Use translation or interpretation services
- Partner with local community groups or community leaders
- Use nontraditional media outlets for outreach
- Identify nongovernment locations to hold public meetings
- Schedule community involvement activities at times other than during

subsistence fishing, hunting, or agriculture seasons

- Continue to distribute paper copies of outreach materials when members of the community lack access to electronic forms of communication

#### 4.3.5 Considerations Prior to Implementing Environmental Justice Activities

The following will be considered when implementing environmental justice activities:

- Specify and delineate the goals for reaching out to the low-income communities in Butte
- Agree on the roles to be played by community partners and interested individuals, as well as EPA
- Identify specific activities and how EPA and partners will interface with the low-income communities in Butte
- Develop and articulate a common understanding of environmental justice goals and identify opportunities to participate in the development and evaluation of EPA project plans
- Articulate a methodology for reaching out to all community members and determine the most effective venues for reaching out to low-income communities around Butte

#### 4.3.6 WSSOU Activities

Environmental justice activities have or could include any of the following:

- Tailoring cleanup activities to address the needs of low-income citizens
- Involving all citizens in Superfund remedial design decision-making
- Considering the impact and cleanup of contaminants of concern on all citizens

- Promoting educational outreach about human health protection throughout Butte community
- Helping the local health department promote and support environmental justice goals and activities
- Identifying opportunities for financial support through, for example, environmental justice grants
- Adding the *Environmental Justice Action Plan* into the WSSOU community involvement plan

## Section 5

# Community Concerns and Issues

### 5.1 Community Interviews

Community interviews were conducted in April, May, and June 2020. The objective of the interviews was to find out how to best keep individual property owners, stakeholders, and the public informed and involved as the project progresses. Eleven people were interviewed and were selected to provide a range of input. These included retirees, teachers, landowners, city and county officials, nonprofit environmental representatives, local businesspeople, and respondent representatives. All were residents of Butte-Silver Bow County, including homeowners in the area behind Montana Tech and in the Greeley neighborhood.

Because of coronavirus restrictions, interviews were conducted by phone. Each interviewee was asked a list of 10 questions to determine their interests, concerns, and preferred methods of receiving information about the WSSOU. Those questions and a summary of their results are provided below.

#### 5.1.1 What Are Your Main Issues or Concerns About the WSSOU?

Interviewees offered a wide variety of issues or concerns, and most had more than one.

- Is there water contamination from the Yankee Doodle tailings?
- Is there soil contamination from years of smelter emissions and how do metals concentrations relate to human health risk, especially in attics and yards?
- We need a complete and thorough job and timely results for property owners.

- What are risks from dust disturbed by four wheelers and motorcycles on what seems to be mine soils?
- Property access is important. Owners need to know who's coming and who's going and when they are around.
- There is too much dust in the Greeley neighborhood from Montana Resource's mining. It loads metals to storm drains and rain gutters and the air quality needs continuous sampling. Move the crusher to another location.
- Impacts from historical mining need to be separated from current mining.
- Long-term land use should preserve as much as possible of Butte's history (picnic area and walking trail).
- How will the WSSOU be integrated into the Butte Priority Soils Operable Unit and Residential Metals Abatement Program?
- Contamination should be addressed by watershed to better determine the reason for elevated concentrations.
- Tell people what is going on, and the earlier the better.

#### 5.1.2 What Kinds of Information Would You Like About EPA's Activities at the WSSOU?

- Individual property results should be presented in comparison with national and state standards to show what they mean.
- Provide an overall map of how results from one property fit in with



neighboring properties and how widespread the contamination is.

- Property owners should know when to expect results and should be told of any delays.
- Give us an abstract of the project. What has been done so far? What is planned?
- Show the process for Superfund. What comes after sampling? How are decisions made? What is EPA doing and when?
- Show continuous progress. What was identified to study and how is it being studied? Knowing the process and timeline are important.
- What data will be considered and how they will EPA weigh environmental harm versus the cost of intervention?
- Prefer quarterly updates.
- Address who is responsible for cleanup. Many owners are concerned they may have liability if contamination is found and if EPA or Atlantic Richfield run out of money for cleanup. By agreeing to sampling, they feel responsible for reporting contamination to potential buyers, so they prefer not to know. This limits the number of people who will grant EPA access.
- The Greeley neighborhood has periodic meetings and EPA should have a representative present to update the neighborhood on what is happening. Two-way communication is important.
- Results of air studies need to be made available to the residents. Disseminate them using brochures, email, and radio (KBMF).
- A schedule and/or a pamphlet on the status and scope of upcoming activities would be nice to have.

- What other investigations are being done (i.e., Blacktail Creek, Basin Creek, etc.)?

### 5.1.3 Are You Happy with the Level of Information You Are Receiving?

Interviewees were generally happy with the limited information they had received to date, although many indicated they would like to have something other than the access letter to refer to.

To date, no fact sheet has been distributed to WSSOU property owners that explains the Superfund process, the schedule, and the scope of the sampling being done. A request was made for information on how much access EPA got and how much sampling they did, both in 2020 and 2019, as well as what EPA is looking for and what the expected outcomes might be. This information should be presented in layman's terms.

Sample results letters had also not been sent at the time of the interviews; property owners were looking forward to receiving those and hoped there would be information on the Silver Bow Creek/Butte Area Superfund Site in addition to their property. Results letters were sent out in June and October 2020.

Face-to-face or phone communications with specific individuals (Nikia Greene and Dana Barnicoat of EPA) were rated as good, as were interactions with EPA's contractor (CDM Smith sampling crews).

### 5.1.4 What is the Best Way to Get Information to You?

Interviewees overwhelmingly preferred email and standard mail as methods for EPA to get WSSOU information to them. One person requested that results be provided in a letter in case they need it for a real estate sale. Other people were interested in fact sheets targeted

at property owners, provided by either email or mail.

A few people said that they no longer look to the newspaper as a primary source of information. Facebook was suggested as a potentially useful information tool, with the caveat that “a lot of people hate it.”

Several people mentioned public meetings, as long as they have a well-stated purpose and are well-mediated so they don’t out of control.

### 5.1.5 What is the Best Way to Get Information to the Community?

Interviewees generally agreed that it was difficult to get large numbers of people outside of the WSSOU to pay attention to what was happening on the project. Some said that it might not be necessary, and that people don’t really pay attention unless it pertains to them.

Specific suggestions were:

- A mailing to a given area.
- A website like Pit Watch, which is an interesting read on a more interesting subject. Get a local historian to contribute interesting stories on what happened in the WSSOU.
- Go through the school district.
- Well-advertised public meetings that are scheduled in advance can work well for older people, but not at night.
- The newspaper used to be best way but no longer. Facebook and other social media for may work for some.
- The *Party Line* radio program is a way to get information out.
- Email, press releases, and CTEC.
- Television.
- Keep making sure information gets to Butte-Silver Bow County.

### 5.1.6 Did You Know EPA Has a Website for the Silver Bow Creek/Butte Area Superfund Site?

Except for two people who were affiliated with the project, only one of the people interviewed knew that EPA had a webpage with information specific to the site.

When asked if they would visit the website now that they knew, respondents said that they would never remember the URL, were worried that it would have only “bureaucratic nonsense,” and hoped that EPA would make sure that the information was kept up to date.

People said they wanted to get information about their property directly so they wouldn’t have to look for anything but agreed that the website might be a good place to keep maps.

### 5.1.7 Who Would You Contact for Information about Work at the WSSOU or on Your Property?

Responses to this question included:

- EPA (Nikia Green and Dana Barnicoat)
- SARTA board members
- Butte-Silver Bow Chief Executive or City Manager
- Contractors (CDM Smith)

### 5.1.8 Who Do You Trust for General Advice and Information?

Responses to this question included:

- EPA (Nikia Greene and Dana Barnicoat)
- State of Montana
- Upper Clark Fork Coalition
- *Montana Standard*
- Montana Bureau of Mines and Geology
- Private citizens (Joe Griffin and Fritz Daley)
- Clark Fork Watershed Education Program and CTEC
- Local engineering firms
- Butte-Silver Bow County (Eric Hassler)

### 5.1.9 Can You Think of Anyone Else We Should Interview?

Interviewees provided names of people who they felt might be potential interview candidates. Where possible, they were added to the list of interviewees.

### 5.1.10 What Would You Ask EPA to Do Better for Community Engagement at the WSSOU?

- Improve transparency.
- Keep scheduling public meetings and follow-up with the public.
- Keep in touch and be a little more proactive about pushing stuff out to people. Try something like a short version of a newspaper article. Email format is good.
- EPA is doing the right stuff, other than Timber Butte. Atlantic Richfield and EPA have been very responsive. The effort put into presentations and providing subject experts is appreciated. EPA is good about follow up.
- Send regular email updates on the project (quarterly is best). Keep them short. Let residents know where things are.
- Keep property owners in the loop.
- Talk directly with the stakeholders and streamline communications.
- There has been no continuity with EPA Community Involvement Coordinators. They have come and gone, and one put Silver Bow Creek in a bad spot by siding with naysayers and promising more than he could deliver.
- EPA should ask the community for their help on historical features. Some people are knowledgeable about the area.

Collect the emails of people who want to provide information.

## 5.2 Take-Home Messages

Take-home messages from the interviews for outreach relevant to the WSSOU are:

- Provide results to property owners in a timely fashion and give them a method for comparison with other properties and relevant standards
- Provide regular project updates, even if it seems that nothing of interest is happening
- When in doubt, err on the side of overcommunication
- Provide information via email or mail
- Use a variety of outreach methods—local radio, social media, mass mailing, newspaper, television—to inform the community
- Know that many people will not be interested in the WSSOU
- Understand that most people are not familiar with the EPA website as a resource
- Use illustrations and graphics to explain technical issues in fact sheets
- Develop an easy-to-read pamphlet or brochure about the WSSOU and its relationship to the rest of the Silver Bow Creek/Butte Area Superfund Site
- Discuss the project in installments so it doesn't appear static
- Develop public education materials about the WSSOU with outreach to local schools and the community
- Address the human health risk to property owners and financial responsibility issues

## Section 6

# Community Involvement Action Plan

Communication and engagement are important throughout the Superfund process to ensure the public is made aware of opportunities for meaningful involvement. This is especially important with the issuance of a proposed plan for cleanup when the public has opportunity to provide input on a remedial decision document. This section presents tools for communication and engagement and includes:

- **Section 6.1 – Planned Actions.** Provides specific steps that will be taken to address community concerns outlined in Sections 4 and 5 over the remainder of the project.
- **Section 6.2 – Schedule of Outreach Activities.** Provides a table of specific outreach activities and the general times for implementation and identifies which are required by Superfund and which are additional efforts on EPA’s part.
- **Section 6.3 – Measurement of Success.** Describes why and how EPA will measure the success of activities.

This plan is a blueprint for outreach work that EPA intends to implement based on a current knowledge. It is a living document and will change as work progresses. As a Superfund requirement, it is independent of any other plans that may be specific to a task or entity.

EPA is committed to environmental justice and will make use of the *EJScreen* mapping tool when planning new outreach efforts. This will provide insight into challenges that people might have in understanding and

following the complexities associated with risks from contamination and with Superfund investigation or cleanup.

Examples of existing site-specific maps produced using the *EJScreen* tool are provided in Appendix H. They include a map to help target priorities for Residential Metals Abatement Program sampling (children under 5, low-income, and lead paint potential) as well as a general map showing low-income and education level which highlights where people may need more face-to-face communication. Specific demographic or environmental factors mapped will depend upon the task at hand.

EPA will urge other stakeholders to consider environmental justice in their plans and activities and will encourage use of the free *EJScreen* mapping tool, or other available tools, in that effort.

## 6.1 Planned Actions

Planned actions are individual activities that EPA intends to implement or continue implementing, as needed. The scope of these actions is based on CERCLA requirements and on feedback from the community (Sections 4 and 5).

For ease of reading, these actions have been divided as follows:

- Points of contact, information repositories, and administrative record
- Face-to-face interactions
- Written materials

- Electronic media and sources of information

### 6.1.1 Points of Contact, Information Repositories, and Administrative Record

Two CERCLA-mandated outreach activities (points of contact and administrative record/information repository) have been conducted and are described briefly below.

#### 6.1.1.1 Points of Contact

EPA has designated points of contact for the WSSOU and has provided this information to stakeholders and the public. This plan identifies points of contact for distribution of information (e.g., agency representatives and local, state, and federal contacts).

Exhibit 6.1 summarizes the types of issues that are addressed by EPA (the lead agency) and DEQ (the support agency). Contact information is provided in Appendix A.

Agency	Area of Responsibility
U.S. Environmental Protection Agency	<ul style="list-style-type: none"> <li>▪ Scope and status of work</li> <li>▪ PRP issues</li> <li>▪ Protectiveness issues</li> <li>▪ Summary of activities</li> <li>▪ Plans, reports, and other technical documents</li> </ul>
Montana Department of Environmental Quality	<ul style="list-style-type: none"> <li>▪ Support agency issues and concurrence</li> </ul>

**Exhibit 6.1. Responsibilities by Agency**

#### 6.1.1.2 Administrative Record and Information Repository

EPA will continue to make information available to the public in the administrative record and the information repository, which are described in Section 3.4.3. Contact information for the administrative record and information repository is provided in Appendix F.

### 6.1.2 Face-to-Face Interactions

Interactions between EPA and stakeholders, or EPA and the community, are effective in educating and fostering relationships that increase trust and understanding about work being conducted at the WSSOU. This helps to avoid surprises as the project progresses.

Face-to-face interactions will be conducted remotely (e.g., Skype, Zoom, Teams) if social distancing restrictions are in place or if requested by those involved.

#### 6.1.2.1 Public Meetings

EPA will sponsor public meetings/open houses at appropriate times during the Superfund process. These may include:

- Periodic update meetings (such as after the remedial investigation report is finalized)
- Proposed plan public comment period meeting (with a 30-day minimum comment period)
- Remedial design/remedial action meetings (such as prior to the start of field activities)

Virtual meetings will be held using virtual platforms if social distancing restrictions are in place or if requested by those involved. A combination of virtual and in-person meetings may also be used. In-person meetings will be held at facilities near the WSSOU (Appendix F) that meet the accessibility requirements of the American with Disabilities Act at times and days that are judged to be convenient for residents and others interested in the WSSOU.

Meetings will include handouts and visual aids to explain the topics in an easily accessible language and will include translations of materials, where appropriate.

Advance notice of the meetings will be provided in the form of notices/ads that will run at least a week in advance in the *Butte Weekly* and *Montana Standard* (Appendix E), emails, and announcements on websites of interested groups (e.g., CTEC). The news desk of the two newspapers will also be notified to allow them the opportunity to cover the meeting and an announcement may be made on the radio. A stenographer will record the proposed plan meeting.

#### **6.1.2.2 CTEC Meetings and Interaction**

As discussed in Section 3.3, CTEC is funded by a federal TAG that provides the resources for a community group to hire someone to interpret and explain technical reports, site conditions, and EPA's proposed cleanup plans. The group is then responsible for sharing information with the community at large.

EPA is exploring opportunities to ensure that CTEC's strengths are utilized in information sharing during all phases of the Superfund process. These may include presenting at CTEC meetings, providing information for the CTEC website, using the CTEC website as second local information repository, and providing handouts or other materials for events.

CTEC is involved in the communication process between EPA, Atlantic Richfield, and the community during remedial action work at the Butte Priority Soils Operable Unit and will likely perform that function when the WSSOU gets to that phase of the project.

#### **6.1.2.3 Open Communication with Key Stakeholders**

EPA will coordinate with key stakeholders, including local health agencies, to keep them informed of project activities, and will obtain feedback on their concerns. This will

encourage ongoing communication with local health agencies and clarify roles.

EPA's communication efforts may include:

- Holding small group meetings on a regular basis to stay in touch
- Periodic (but regular) conversations

As discussed in Section 3.5.7, EPA is hosting monthly meetings online for residents of Butte and other stakeholders to keep them updated on current EPA issues and events. Program updates are provided by EPA, DEQ, Butte-Silver Bow County, and Atlantic Richfield, and other organizations are invited to present about Superfund-related issues. The meetings include a community discussion/question and answer session to get community input.

EPA will rely on input from the stakeholders as to how often and what format is preferred for additional stakeholder communication.

#### **6.1.2.4 Community Networking**

Additional networking events will be considered if EPA determines there is an interest.

Such opportunities may include:

- Partnering with local schools, community organizations, and youth organizations
- Partnering with environmental and civic organizations to announce project updates, meetings, and involvement opportunities
- Participating in local cultural and civic events and project area activities

#### **6.1.2.5 Briefing Elected Officials**

Briefings for elected officials (Appendix B and C) will be scheduled, as needed or requested, to communicate significant events at the WSSOU.

Briefings will keep leaders involved and informed on progress and will provide an opportunity for questions or resolution of concerns. Briefing packages may also be provided to assist officials in responding to public inquiries and could include site history and status, and copies of any print media released to the public (e.g., fact sheets, newsletters, media releases, media articles).

### **6.1.2.6 Community Visits/Tours and Open Houses**

Tours and visits provide the public access to portions of the WSSOU that may be of interest. EPA is open to conducting tours of the WSSOU should there be an interest.

An open house is a chance for posters to be displayed. Stations with multiple posters are staffed with technical and resource personnel who guide people and answer questions. This can increase small group and one-on-one communication, build relationships, and educate people about environmental issues. If there is interest, EPA would be open to holding an annual open house in conjunction with a public meeting to update the community on project status.

### **6.1.3 Written Materials**

Written materials include a wide variety of tools that may help to expand understanding and engagement.

#### **6.1.3.1 Community Involvement Plan**

CERCLA requires that each site have a community involvement plan. The plan is a living document that will be reviewed periodically to ensure it is up to date, particularly the contacts lists. As work progresses, EPA may seek feedback from organizations, stakeholders, and individuals on how successful they believe the actions in the plan are in engaging and informing the community (Section 6.3).

Prior to the start of any remedial action, EPA will review the community involvement plan and update it as warranted by site conditions. Additional interviews may be conducted at that time.

#### **6.1.3.2 Fact Sheets, Flyers, Posters, and Other Materials**

EPA will periodically prepare written materials to increase community awareness and knowledge of the project and its status.

These may include:

- Fact sheets (update, proposed plan, ROD, and remedial action)
- Topic-specific flyers for meetings or other events
- Posters or other displays for events
- Proposed plan for cleanup
- A responsiveness summary for the ROD (summarizing comments received and EPA's responses to those comments)

Written materials will use nontechnical language understandable to an audience not trained in environmental issues. Graphics and illustrations will be common. Content may include project status, names of recent documents, contacts for more information, descriptions of study methods or technologies, and project milestones.

Topics for flyers and the extent and nature of their distribution (hard copy versus electronic) will be discussed within the project team and with the TAG and other interested parties.

#### **6.1.3.3 Mailing List**

EPA will continue to update a site mailing list that includes property owners, individuals and organizations identified in the appendices, and people who indicate

interest on sign-in sheets at public meetings or who otherwise request to be added.

#### 6.1.3.4 Advertisements/Notifications

Notifications will be placed in the *Butte Weekly* and *Montana Standard* (Appendix F) to notify the public of the availability of major documents as they become available. Opportunities for public review or involvement will also be advertised.

These include:

- Issuance of significant documents (e.g., the *Environmental Justice Action Plan* or the remedial investigation report)
- Issuance of the proposed plan and start of the public comment period
- ROD signing
- Public meetings/open houses

Public notices will be published to inform stakeholders and the community of significant events. Local officials will be notified prior to publication in newspapers so they have can respond to community questions or concerns. The ads and notices will be easy to read and understand.

#### 6.1.3.5 Press Releases

For milestones, EPA will provide press releases to the media contacts listed in Appendix E. Media briefings can also be arranged if media representatives have the need for additional information on the WSSOU, specific issues of concern, or project status.

#### 6.1.3.6 Project Technical Documents

EPA will post technical documents online in a timely fashion. Hard copies will be placed in the local information repository.

### 6.1.4 Other

#### 6.1.4.1 Social Media and Websites

EPA will explore the use of social media, such as Twitter and Facebook, in notifying the community of upcoming meetings, available documents, and opportunities for involvement at the WSSOU.

EPA will also ensure the EPA website is up to date and contains electronic copies of all fact sheets, notices, handouts, maps, and other documents of interest to the public.

#### 6.1.4.2 Email List

Given the popularity of email for information dissemination, EPA will maintain an email distribution list for status updates and notifications of meetings or deadlines.

## 6.2 Schedule of Community Involvement Activities

Exhibit 6.2 lists EPA's responsibilities for community involvement under CERCLA and includes additional activities EPA has taken or will undertake to engage the community at the WSSOU.

## 6.3 Measurement of Success

EPA will implement the activities in Exhibit 6.2 to build on and improve engagement with the community in and around the WSSOU and achieve the overall goals listed in Section 1.

Questions asked before each undertaking will include:

- What do we want to accomplish?
- Who is our target audience?
- What do we want members of the community to learn or what actions do we want them to take as a result?



When	Community Involvement Action
Throughout the Superfund process	<ul style="list-style-type: none"> <li>▪ Ensure EPA website is updated</li> <li>▪ Prepare fact sheets on progress and post on website</li> <li>▪ Use written materials and meetings to address community issues</li> <li>▪ Hold public meetings/open houses</li> <li>▪ Brief elected officials as needed</li> <li>▪ Measure success and effectiveness of outreach</li> </ul>
Prior to commencing fieldwork for the remedial investigation	<ul style="list-style-type: none"> <li>✓▪ Establish information repositories and an administrative record file</li> <li>✓▪ Publish notice of availability in paper</li> <li>✓▪ Conduct community interviews</li> <li>✓▪ Prepare a community involvement plan*</li> </ul>
Upon publication of proposed plan (early 2023)	<ul style="list-style-type: none"> <li>▪ Publish proposed plan notice in paper</li> <li>▪ Prepare a fact sheet that summarizes the proposed plan and describes where the plan can be obtained and the time and location of the public meeting</li> <li>▪ Add proposed plan and supporting information to administrative record</li> <li>▪ Provide a public comment period of at least 30 days</li> <li>▪ Conduct a public meeting and add transcript to the administrative record</li> </ul>
After comment period (mid 2023)	<ul style="list-style-type: none"> <li>▪ Summarize significant comments and EPA’s responses (responsiveness summary) and make available with the record of decision</li> </ul>
After ROD signing/prior to remedial action (late 2023)	<ul style="list-style-type: none"> <li>▪ Make the record of decision available for public inspection at or near the site and in the administrative record</li> <li>▪ Publish notice of availability for record of decision in local newspaper</li> <li>▪ Prepare a record of decision fact sheet</li> </ul>
Prior to remedial design (2024)	<ul style="list-style-type: none"> <li>▪ Review community involvement plan</li> <li>▪ Update plan for remedial design/ remedial action</li> </ul>
Prior to cleanup (2025)	<ul style="list-style-type: none"> <li>▪ Issue a fact sheet on the remedial action</li> <li>▪ As appropriate, provide a public briefing on the remedial action</li> </ul>
<p>Red text is outreach mandated by CERCLA.                      Black text is additional outreach conducted and/or proposed by EPA.                      ✓ Indicates the task is complete.                      * The community involvement plan was delayed because of changing Community Involvement Coordinators and coronavirus restrictions.</p>	

To ensure outreach is effort well-spent, EPA will periodically monitor the outreach activities to determine if adjustments are needed. Consistent evaluation of outreach can help the team continuously improve its approach.

Obtaining and responding to feedback is an important aspect of the measurement of success. Feedback will be evaluated against the questions asked above (and others) and the results will be used to adjust specific activities or the overall approach. Specific methods (informal and formal) can be determined as work progresses and will include tracking of project progress milestones.

Informal feedback can be obtained through conversations after a community meeting or via emails or phone calls from community members regarding outreach efforts. It can be used to make mid-course corrections or to address any issues or shortcomings as they arise. When more formal input is needed, EPA may draw from the approved customer satisfaction surveys in EPA’s *Superfund Community Involvement Handbook* (EPA 2020) to gather input about EPA’s efforts.

**Exhibit 6.2. Summary of CERCLA-Mandated Outreach and Additional Outreach Proposed by EPA**

## Section 7

### References Cited

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# Appendix A

## EPA and Montana DEQ Contacts

### EPA

Montana mailing address: 10 W 15th St, Helena, MT 59626

- **Region 8 Director**, Superfund and Emergency Management Division, Betsy Smidinger, 800-227-8917, [smidinger.betsy@epa.gov](mailto:smidinger.betsy@epa.gov)
- **Montana Superfund Chief**, Joe Vranka, Baucus Federal Building, 10 West 15th Street, Suite 3200, Helena, MT 59626, 866-457-2690, 406-457-5039, [vranka.joe@epa.gov](mailto:vranka.joe@epa.gov)
- **Montana Office Remedial Project Managers:**
  - Nikia Greene (Operable Units 3, 7, 8, and 13), 406-457-5019, [green.nikia@epa.gov](mailto:green.nikia@epa.gov),
  - Allie Archer (Operable Units 1, 4, 7, and 12), 406-457-5033, [archer.allie@epa.gov](mailto:archer.allie@epa.gov)
- **Montana Office Community Involvement Coordinator**, Dana Barnicoat, 406-457-5007 [barnicoat.dana@epa.gov](mailto:barnicoat.dana@epa.gov)

### DEQ

Mailing address: P.O. Box 200901, Helena, MT 59620-0901

- **Headquarters**, 1520 East Sixth Avenue, Helena, MT
    - Chris Dorrington, Director, [cdorrington2@mt.gov](mailto:cdorrington2@mt.gov), 406-444-2544
  - **Waste Management and Remediation Division**, 1225 Cedar Street, Helena, MT
    - Jenny Chambers, Administrator, [jchambers@mt.gov](mailto:jchambers@mt.gov), 406-444-6383
    - Moira Davin, Public Information Specialist, [moira.davin@mt.gov](mailto:moira.davin@mt.gov), 406-444-6360
    - Kevin Stone, Public Information Specialist, [kevin.stone@mt.gov](mailto:kevin.stone@mt.gov), 406-444-6469
  - **Federal Superfund and Construction Bureau**, 1225 Cedar Street, Helena, MT
    - Matt Dorrington, Bureau Chief, [matthew.dorrington@mt.gov](mailto:matthew.dorrington@mt.gov), 406-444-6445
    - Joel Chavez, State Project Officer, [jchavez@mt.gov](mailto:jchavez@mt.gov), 406-444-6407
- Daryl Reed, State Project Officer, [dreed@mt.gov](mailto:dreed@mt.gov), 406-444-6433.

## Appendix B

### Federal Elected Officials and Contacts

- **Senator Steve Daines**, 320 Hart Senate Office Building, Washington, DC 20510, 202-224-2651, [press@stevedaines.com](mailto:press@stevedaines.com)
  - Helena office, 30 West 14th Street, Suite 206, Helena, MT 59601, 406-443-3189, no email address listed on website
  
- **Senator Jon Tester**, 311 Hart Senate Office Bldg., Washington, DC 20510-2604, 202-224-2644, [rjt@tester.senate.gov](mailto:rjt@tester.senate.gov)
  - Butte office, Silver Bow Center, 125 West Granite Street, Suite 200, Butte, MT 59701, 406-723-3277, no email address provided on website
  
- **Congressman Matt Rosendale**, 1037 Longworth House Office Building, Washington, DC 20515, 202-225-3211, no email address provided on website
  - 7 West 6th Avenue, Suite 3B, Helena, MT 59601, 406-502-1435, no email address provided on website

# Appendix C

## State, County, and Local General Contacts

### State Officials

- Governor Greg Gianforte, Office of the Governor, P.O. Box 200801, Helena MT 59620-0801, 406-444-3111
- Lt. Governor Kristen Juras, Office of the Lt. Governor, see above

### County Officials

- House District 73, Butte-Silver Bow County, Jim Keane (D), 2131 Wall Street, Butte, MT 59701, 406-723-8378, no email address listed on website
- House District 74, Butte-Silver Bow County, Derek Harvey (D), PO Box 3111, Butte, MT 59702-3111, 406-490-5472, [derek.harvey@mtleg.gov](mailto:derek.harvey@mtleg.gov)
- House District 75, Jefferson County, Marta Bertoglio (R), PO Box 294, Clancy, MT 59634-0294, 406-438-1772, [marta.bertoglio@mtleg.gov](mailto:marta.bertoglio@mtleg.gov)
- House District 76, Butte-Silver Bow County, Donovan Hawk (D), PO Box 3791, Butte, MT 59702, 406- 578-1233, [Donavon.Hawk@mtleg.gov](mailto:Donavon.Hawk@mtleg.gov)
- House District 78, Anaconda-Deer Lodge County, Gregory Frazer (R), 210 4th Street, Deer Lodge, MT 59722, 406-560-4707, no email address listed on website
- Senate District 37, Butte-Silver Bow County, Jerry Schillinger (R), Butte, MT 59701, 406-974-2478, [jerry.schillinger@mtleg.gov](mailto:jerry.schillinger@mtleg.gov)
- Senate District 38, Butte-Silver Bow County, Edie McClafferty (D), 1311 Stuart Avenue, Butte, MT 59701, 406-490-5873, [edie.mcclafferty@gmail.com](mailto:edie.mcclafferty@gmail.com)
- Senate District 39, Anaconda-Deer Lodge County, Mark Sweeney (D), PO Box 200500, Helena, MT 59620-0500, 406-560-0171, [masween@hotmail.com](mailto:masween@hotmail.com)

### Local Officials

Butte Silver Bow County, Courthouse, Room 106, 406-497-6214

- Chief Executive, J.P. Gallagher, 155 West Granite Street, Butte, MT 59701, 406-497-6222, [jgallagher@bsb.mt.gov](mailto:jgallagher@bsb.mt.gov)
- Butte-Silver Bow County Planning Department, Courthouse, Room 108, Lori Casey, Director, 406-497-6250, [lcasey@bsb.mt.gov](mailto:lcasey@bsb.mt.gov)
- Butte-Silver Bow County Superfund Division, Courthouse, Room 108, Eric Hassler, Superfund Operations Manager, 406-497-5042, [ehassler@bsb.mt.gov](mailto:ehassler@bsb.mt.gov)

- Butte-Silver Bow County, Weed Control, 25 Front Street, Butte, MT 59701, John Moodry, Director, 406-497-6462, [jmoodry@bsb.mt.gov](mailto:jmoodry@bsb.mt.gov)
- Butte-Silver Bow County Commission, 155 Granite Street, Butte, MT 50701, 406-497-6219, [commissioners@bsb.mt.gov](mailto:commissioners@bsb.mt.gov)
  - District 1 Shawn Fredrickson
  - District 2 Michele Shea
  - District 3 Hattie Thatcher
  - District 4 John Sorich
  - District 5 Justine Fortune
  - District 6 Jim Fisher
  - District 7 Josh O'Neill
  - District 8 John Riordan
  - District 9 Eric Mankins
  - District 10 Bill Andersen
  - District 11 Cindi Shaw (Chair)
  - District 12 Dan Callahan
- Butte-Silver Bow County Health Department, 25 West Front Street, Butte, MT 50701, Karen Sullivan, Health Officer, 406-497-5003, [ksullivan@bsb.mt.gov](mailto:ksullivan@bsb.mt.gov)

## Appendix D

### Stakeholder Group Contacts

- **Berkeley Pit Public Education Committee**, 155 West Granite Street, Butte, Montana 59701
- **Big Brothers/Sisters**, 405 W. Park, Butte, MT, 406-782-9644, [info@bbbsbutte.org](mailto:info@bbbsbutte.org)
- **Butte Citizens for Preservation and Revitalization**, P.O. Box 164, Butte, MT, [info@buttecpr.org](mailto:info@buttecpr.org)
- **Butte Historical Society**, P.O. Box 3913, Butte, MT, 406-491-1259
- **Butte Local Development Corporation**, 65 E. Broadway St, Floor 5, Butte, MT 59701, 406-723-4349, [www.bldc.net](http://www.bldc.net)
- **Butte-Silver Bow Chamber of Commerce**, 1000 George Street, Butte, MT 59701, 800-735-6814, [bsbchamber@gmail.com](mailto:bsbchamber@gmail.com), [chamber@buttechamber.org](mailto:chamber@buttechamber.org)
- **Citizens Technical Environmental Committee**, 27 West Park Street, PO Box 0593, Butte, MT 59703-0593, [ButteCTEC@hotmail.com](mailto:ButteCTEC@hotmail.com). David Williams, President; Bill McGreggor, VP; Janice Hogan, TAG administrator; Dr. John Ray, Board member
- **Clark Fork Coalition**, PO Box 7593, Missoula, MT 59807, 406-542-0539, [info@clarkfork.org](mailto:info@clarkfork.org)
- **Clark Fork River Tech Advisory Committee**. P.O. Box 224, Deer Lodge, MT 59722, 406-502-1570 x2506
- **Clark Fork Watershed Education Program**, Montana Tech – Inst. for Educational Opportunities, 1300 West Park Street, Butte, MT 59701, 406-490-5191
- **Exchange Club**, P.O. Box 430, Butte, MT, [info@butteexchangeclub.org](mailto:info@butteexchangeclub.org)
- **Food Bank**, 1019 E. 2nd Street, Butte, MT, 406-782-381, [buttefoodbankmt@yahoo.com](mailto:buttefoodbankmt@yahoo.com)
- **Habitat for Humanity**, 66 W. Park, Suite 211, Butte, MT, 406-782-8579, [info@habitatswmt.org](mailto:info@habitatswmt.org)
- **Joe Griffin**, former DEQ project officer/activist, 406-560-6060, [jgriffin.redmountain@gmail.com](mailto:jgriffin.redmountain@gmail.com)
- **Kiwanis, Butte-Silver Bow**, P.O. Box 4296, Butte, MT, [www.silverbowkiwanis.org](http://www.silverbowkiwanis.org)
- **Mainstreet Uptown Butte**, George Everett, 66 W. Park St., Suite 201, P.O. Box 696, Butte, MT 59703, 406-565-2249, [geverett@montana.com](mailto:geverett@montana.com), [www.mainstreetbutte.org](http://www.mainstreetbutte.org)

- **National Affordable Housing Network**, P.O. Box 632, Butte, MT, 406-782-8579, [nahn@nahn.com](mailto:nahn@nahn.com)
- **Pit Watch**, Butte-Silver Bow Planning Department, 406-497-6264, [info@pitwatch.org](mailto:info@pitwatch.org)
- **Restore Our Creek Coalition**, Northey Tretheway, 406-498-3274, [ntretheway59701@yahoo.com](mailto:ntretheway59701@yahoo.com)
- **Rotary Club**, 3400 Elizabeth Warren Ave, Butte, MT, 406-494-2394
- **Senior Citizens (Belmont)**, 615 E. Mercury, Butte, MT, 406-723-7773, [belmontseniors@gmail.com](mailto:belmontseniors@gmail.com)
- **State Historic Preservation Office**, Pete Brown, 1301 East Lockey Avenue, P.O. Box 201201, Helena MT 59620, 406-447-8357, [mtshpo@mt.gov](mailto:mtshpo@mt.gov)
- **Upper Clark Fork River Basin Remediation & Restoration Advisory Council**, Department of Justice, P.O. Box 201401, Helena, MT 59620, 406-444-2026, [contactdoj@mt.gov](mailto:contactdoj@mt.gov)



# Appendix E

## Local Media Contacts

### Television

- **KTVH** (NBC), channel 12, 100 West Lyndale, Helena, MT 59601, 406-457-2700, [www.ktvh.com](http://www.ktvh.com)
- **KXLH** (CBS), Helena, channel 9, PO Box 7479, Helena, MT 59604, 406-457-2700, [news@kxlh.com](mailto:news@kxlh.com)
- **KXLF** (CBS), channel 4, 1003 South Montana Street, Butte, MT 59701, 406-782-0444, [News@kxlf.com](mailto:News@kxlf.com)
- **KTVM** (NBC), channel 8, 750 Dewey Blvd, PO Box 3118, Butte, MT 59701, 406-494-7603, [news@ktvm.com](mailto:news@ktvm.com)
- **KUSM TV** (public television), Montana State University, Visual Communications Building 183, Bozeman, MT 59717, 406-994-3437, [kusm@montanapbs.org](mailto:kusm@montanapbs.org)

### Newspapers

- **Montana Standard**, Butte Office, 25 West Granite Street, Butte, MT 59701, 800-877-1074, [editor@mtstandard.com](mailto:editor@mtstandard.com)
- **Butte Weekly**, Robin Jordan, PO Box 4898, Butte, MT 59702, 406-782-3820, [butte.news@butteweekly.com](mailto:butte.news@butteweekly.com)
- **Silver State Post**, Jesse Mullen, PO Box 111, Deer Lodge, MT 59722, [info@adedpro.com](mailto:info@adedpro.com)
- **Anaconda Leader**, Kathie Miller, Editor, 121 Main Street, Anaconda, MT 59711, 406-563-5283, [leadernews@anacondaleader.com](mailto:leadernews@anacondaleader.com)
- **Missoulian**, Keila Szpaller, Editor 500 South Higgins, Missoula, MT 59802, 406-523-5200, 800-366-7102, [newsdesk@missoulian.com](mailto:newsdesk@missoulian.com)
- **Helena Independent Record**, Jesse Chaney, Editor, PO Box 4249, Helena, MT 59604, 406-447-4074, [jesse.chaney@helenair.com](mailto:jesse.chaney@helenair.com)

### Radio

- **KBOW/KOPR Radio**, PO Box 3389, 660 Dewey Boulevard, Butte, MT 59701, 406-494-7777 [mail@kbowkopr.com](mailto:mail@kbowkopr.com)
- **MTPR**, Montana Public Radio, University of Montana, 32 Campus Drive, Missoula, MT 59812 406-243-4931, [news@mtpr.org](mailto:news@mtpr.org), Nora Saks, 978-996-5766, [nrv.saks@gmail.com](mailto:nrv.saks@gmail.com)

## Appendix F

# Meeting Locations, Administrative Record, Information Repositories, Websites

### Meeting Locations

- Montana Tech Library Auditorium, 1300 West Park, Butte, MT, 406-846-3680
- Butte Archive, 17 West Quartz Street, Butte, MT, 406-782-3280

### Administrative Record

- EPA Records Center, 10 West 15th Street, Suite 3200, Helena, MT 59626, 406-457-50
- Montana Tech Library, 1300 West Park, Butte, MT 59701, 406-496-4281 (physical location)

### Information Repositories

- Montana Tech Library, 1300 West Park, Butte, MT 59701, 406-496-4281 (physical location)
- EPA website, <https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0800416>
- CTEC website, [www.buttectec.org](http://www.buttectec.org)

The Montana DEQ Remediation Division also has its own information repository for the WSSOU. It is located at 1225 Cedar Street, Helena, MT 59620, 406-444-6444, 800-246-8198.



## Appendix G

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### EPA's Environmental Justice Action Plan



## Environmental Justice

EPA is committed to promoting and supporting environmental justice (EJ) in all its programs and activities.

The purpose of this Environmental Justice Action Plan (EJ Plan) is to establish EJ goals, objectives and considerations for site activities of the Butte Priority Soils Operable Unit (BPSOU) and the West Side Soils Operable Unit (WSSOU) at the Silver Bow Creek/Butte Area Superfund Site.

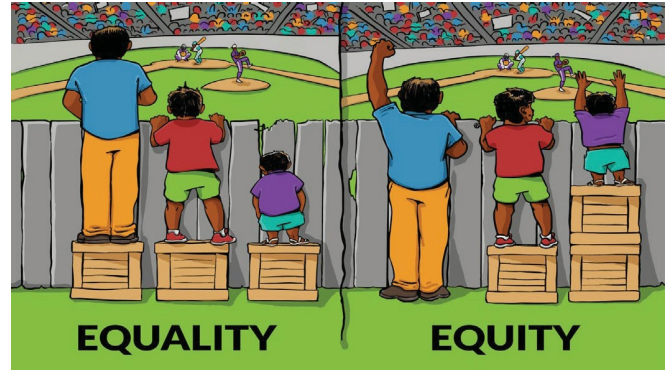
This plan was developed collaboratively by EPA and long-time EJ advocate and community partner, Dr. John Ray. EPA welcomes input from the community and other stakeholders on this plan.

The EJ Plan will become an addendum to the updated BPSOU Community Involvement Plan and to the WSSOU Community Involvement Plan when it is developed.

## What is environmental justice and what does it include?

On February 11, 1994, through Executive Order 12898, President Clinton declared that: “each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States.”

Today, EPA defines environmental justice as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal and commercial operations.



Interaction Institute for Social Change | Artist: Angus Maguire. <https://interactioninstitute.org/illustrating-equality-vs-equity/>

EPA's goal is to provide an environment where all people enjoy the same degree of protection from environmental and health hazards; and equal access to the decision-making process to support and maintain a healthy environment in which to live, learn, and work.

EPA's Office of Land and Emergency Management in their *Integration of Environmental Justice into OSWER Policy, Guidance, and Regulatory Development* states “Environmental Justice issues should be considered at all stages of policy guidance and regulation development, beginning with preliminary efforts.” (*OSWER Directive No. 9200.3-17*)

## Goals for Environmental Justice Activities in Butte, MT

EPA's goals are to embrace all residents and stakeholders in Superfund decision making in Butte and the surrounding area (the area covered by the expanded Residential Metals Abatement Program (RMAP) and to:

- Assess risks and design remediation programs concerning harmful effects of Contaminants of Concern (COC's) on all citizens living in Butte, MT.
- Identify and notify the community of EJ concerns in Butte and the surrounding area.

- Familiarize and inform the public on a regular basis of the environmental justice activities being conducted in Butte and the surrounding area.
- Promote a clean and healthy natural environment in Butte and Silver-Bow County.

EPA will partner with community organizations and interested individuals to help achieve this EJ Plan's goals and to facilitate effective implementation. Specifically, EPA will partner with community organizations and interested individuals in Butte to:

- Identify issues related to environmental justice and the impact of remediation decisions and activities on vulnerable communities in Butte and the surrounding area.
- Develop and disseminate information regarding the impact of remediation decisions and activities as well as steps that individuals can take to protect themselves and their families from exposure to the COCs (e.g. arsenic and lead).
- Develop and disseminate information that focuses on vulnerabilities of low-income residents regarding services, such as the RMAP, that is available to make our lives safer from the possible effects of exposure to the COCs.
- Provide feedback opportunities for communities in Butte and surrounding areas to EPA and partners regarding the implementation and effectiveness of the EJ plan.

## **Profile of Potentially Impacted Area**

EPA's publicly available, nationally consistent screening and mapping tool is called EJSCREEN and can be found at [www.epa.gov/ejscreen](http://www.epa.gov/ejscreen). An EJSCREEN report is attached that helps describe the area potentially impacted by site activities for the Butte Priority Soils Operable Unit (BPSOU).

As indicated in the report for the BPSOU area, the overall low-income population in the area is 55% (compared to 34% for the State of Montana).

EPA's EJSCREEN tool defines low income as the percent of a population in households where the household income is less than or equal to twice the federal "poverty level."

## **Community Involvement Plan**

EPA's Community Involvement Plan for Butte Priority Soils Operable Unit, dated *November 2003*, will be updated to incorporate the EJ Plan and include the EPA's commitment to all low-income citizens that they are represented in a meaningful way and have full opportunities to participate in the remedial design process surrounding the BPSOU and the WSSOU.

EPA's Community Involvement Handbook states that it is important to consider if there are hard to reach people in the community, such as people who may speak languages other than English or community members who may not trust the government because of legal status or other concerns.

If the site is in a community that is likely to have environmental justice concerns, additional efforts should be made to involve segments of the community that are not effectively reached by conventional approaches.

The EPA's Butte and West Side Soils site teams will embrace this approach in their community involvement activities. Assessing and addressing environmental justice concerns is one of the overarching themes to keep in mind when planning and conducting community involvement and outreach.

As described in the Handbook, Site teams should consider tailoring community involvement approaches to reach out more effectively to specific populations.

Some examples include:

- Using translation or interpretation services
- Partnering with local community groups or community leaders
- Employing nontraditional media outlets for outreach
- Identifying non-government locations to hold public meetings
- Scheduling community involvement activities at times other than during subsistence fishing, hunting, or agriculture seasons
- Continuing to distribute paper copies of outreach materials when members of the community lack access to electronic forms of communication.

## THE SUPERFUND REMEDIAL PROCESS

### ASSESSMENT



Discovery of Contamination



Preliminary Assessment



Site Inspection



National Priorities List (NPL) Site Listing

### CHARACTERIZATION



Remedial Investigation/ Feasibility Study &  
Proposed Plan

### SELECTION OF REMEDY



Record of Decision

### CLEANUP



Remedial Design



Remedial Action

### POST-CONSTRUCTION



Operation and  
Maintenance



NPL Deletion

Community involvement and planning for a site's redevelopment are integral to the entire

Five-Year Reviews

## Considerations Prior to Implementing Environmental Justice Activities

As part of the development of the environmental justice action plan in Butte, MT and in collaboration with interested organizations and individuals, EPA and partners will:

- Specify and delineate the goals for reaching out to the low-income communities in Butte.
- Agree on the roles to be played by community partners and interested individuals as well as the EPA.
- Identify specific activities and how EPA and partners will interface with the low-income communities in Butte.
- Develop and articulate a common understanding of EJ goals and participant opportunities in the development and evaluation of EPA project plans in the BPSOU and WSSOU.
- Articulate a methodology for reaching out to all community members and determine the most effective venues for reaching out to low-income communities in Butte.
- Develop a timeframe for EJ activities and outreach to the community.

## Citizens Technical Advisory Group

In all the above activities, EPA will work alongside the local Citizens Technical Advisory Group, CTEC, to ensure EJ information and activities are available to all citizens of Butte, MT.

*“Making environmental justice concerns an integral part of all EPA activities in Butte and the surrounding area”*



Picture of Butte and the Berkeley Pit in the mid-2000s (photo provided by Nikia Greene)

## Site Activities

EJ site activities could include any of the following:

- Tailoring cleanup activities to address the needs of low-income citizens.
- Involving all citizens in Superfund remedial design decision making in Butte.
- Considering the impact and cleanup of contaminants of concern in Butte on all citizens through health studies and risk assessments that consider EJ concerns.
- Promoting educational outreach about human health protection throughout the community in Butte.
- Helping the local health department promote and foster environmental justice.
- Identifying opportunities for financial support through, for example, environmental justice grants in Butte.
- Adding this EJ Action Plan for BPSOU and the West Side Soils Operable Unit into the updated BPSOU Community Involvement Plan and the upcoming West Side Soils Community Involvement Plan.

- Continuing to include an environmental justice assessment/evaluation a part of all Five-Year Reviews of the BPSOU and WSSOU Superfund sites.
- Designating at least one EPA Montana Office employee as a member of the Region 8 Environmental Justice Action Team.
- Integrating environmental justice into all site activities, as appropriate.

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*“Tailoring cleanup activities to address the needs of all citizens.”*

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## Involving Communities in Butte in Superfund Decision Making

This effort includes outreach activities and ensures opportunities exist for low-income citizens to serve on existing and future community groups, such as the CTEC which assists EPA in developing the expanded RMAP Plan and the decision documents for the WSSOU.

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*“Promote the overall health of Butte Silver Bow by addressing an important component of that health—a clean and healthy natural environment.”*

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Picture of RMAP workers in Butte, MT in early 2000s, cleaning-up attic dust photo provided by Nikia Greene



Picture of the Butte Berkeley Pit taken in mid-2010 photo provided by Nikia Greene in 2014

## Examples of Environmental Justice Successes in Butte:

- Residential Metals Abatement Program (RMAP). RMAP has designed and implemented specific, tailored appeals to low-income citizens to participate in the program. The RMAP has been successful in reaching out to low-income residents.
- Butte-Silver Bow Health Department outreach to low-income citizens was successful as well.
- Be Contaminant Smart EPA Brochure

## Superfund Cleanup Considerations

This involves evaluating the adverse and disproportionate effects on low-income citizens that is not experienced to the same extent by non-low-income citizens.

EPA and partners will focus on the special needs of low-income citizens. So, for example, a low-income citizen may not have access to Butte Silver Bow's website to learn about the RMAP and understand the adverse effects or what you can do about it.

EPA and partners may reach out by mail, go door to door, provide EJ information and contact information at local low-income community service centers, to name a few.

## Attachment(s)

1. BPSOU Area EJSCREEN Report
2. Be Contaminant Smart EPA Brochure



Picture of a meeting in Butte provided by Nikia Greene

## EPA Contact Information

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## EJSCREEN Report (Version 2019)

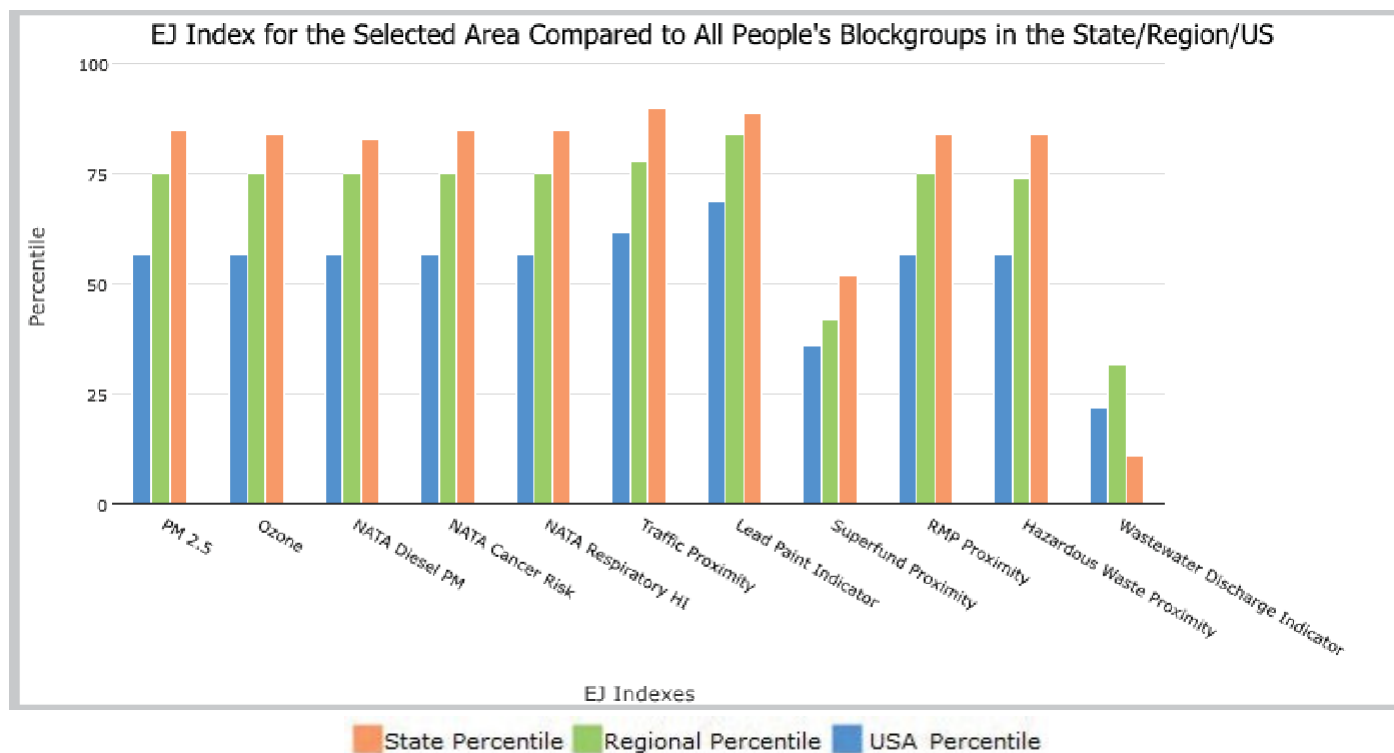


the User Specified Area, MONTANA, EPA Region 8

Approximate Population: 14,158

Input Area (sq. miles): 5.69

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	85	75	57
EJ Index for Ozone	84	75	57
EJ Index for NATA* Diesel PM	83	75	57
EJ Index for NATA* Air Toxics Cancer Risk	85	75	57
EJ Index for NATA* Respiratory Hazard Index	85	75	57
EJ Index for Traffic Proximity and Volume	90	78	62
EJ Index for Lead Paint Indicator	89	84	69
EJ Index for Superfund Proximity	52	42	36
EJ Index for RMP Proximity	84	75	57
EJ Index for Hazardous Waste Proximity	84	74	57
EJ Index for Wastewater Discharge Indicator	11	32	22

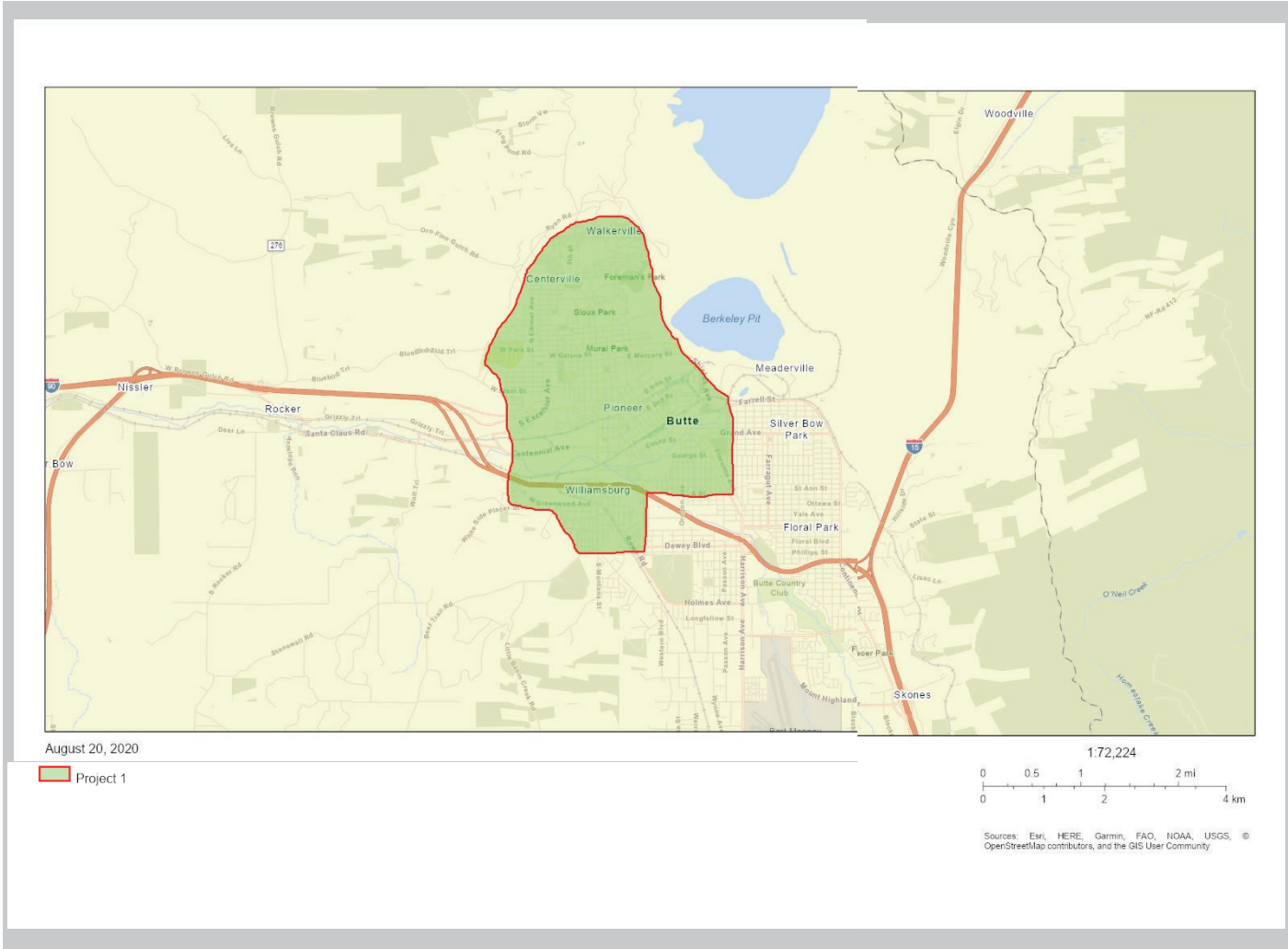


This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

the User Specified Area, MONTANA, EPA Region 8

Approximate Population: 14,158

Input Area (sq. miles): 5.69



Sites reporting to EPA	
Superfund NPL	1
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

## EJSCREEN Report (Version 2019)

the User Specified Area, MONTANA, EPA Region 8

Approximate Population: 14,158

Input Area (sq. miles): 5.69

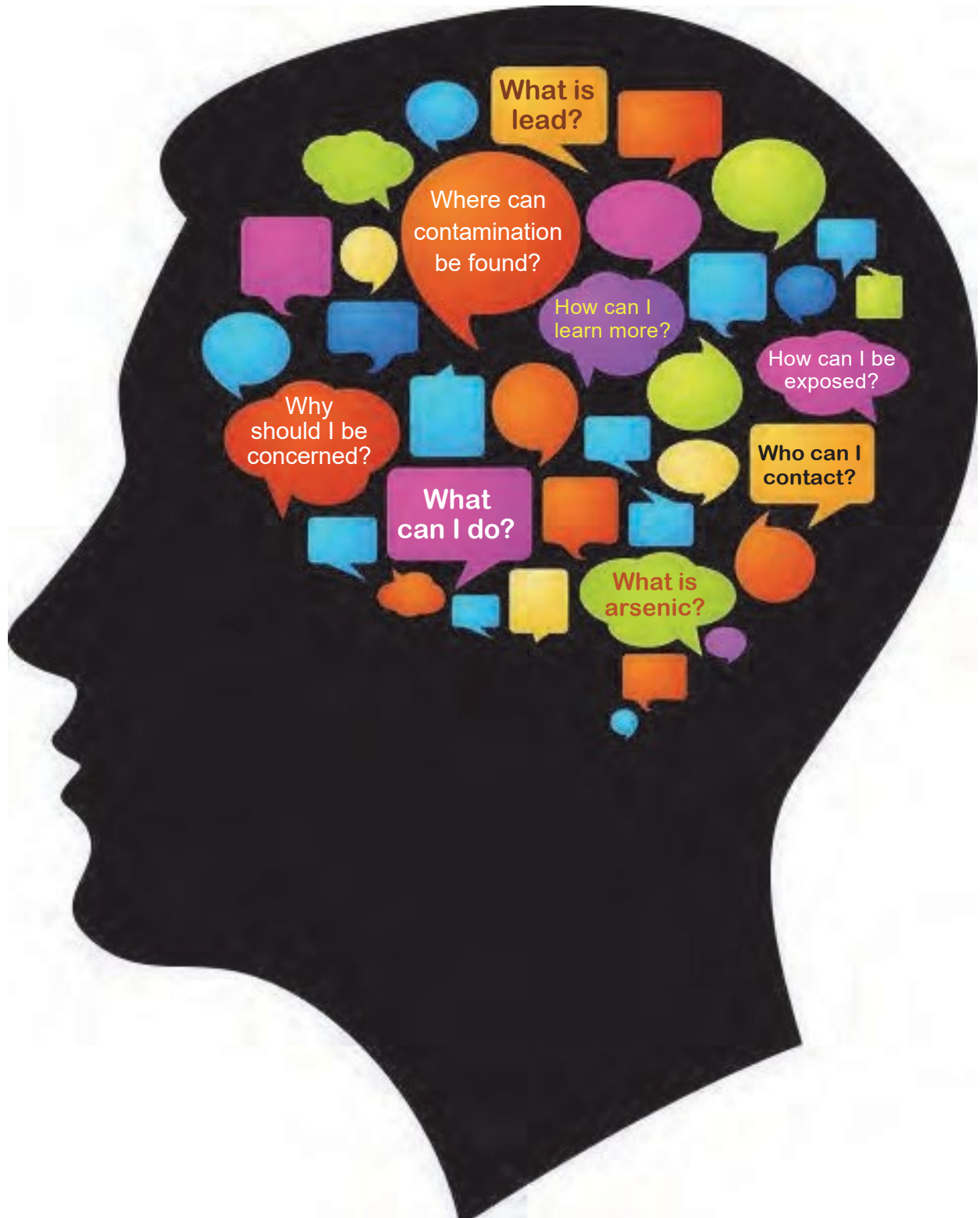
Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	6.37	5.82	71	6.4	48	8.3	10
Ozone (ppb)	40.3	39.2	55	49.2	12	43	30
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.0902	0.113	52	0.423	<50th	0.479	<50th
NATA* Cancer Risk (lifetime risk per million)	14	18	15	23	<50th	32	<50th
NATA* Respiratory Hazard Index	0.18	0.24	21	0.31	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	280	190	77	460	58	750	55
Lead Paint Indicator (% Pre-1960 Housing)	0.79	0.29	95	0.22	96	0.28	92
Superfund Proximity (site count/km distance)	0.48	0.12	96	0.11	95	0.13	94
RMP Proximity (facility count/km distance)	0.08	0.49	31	0.62	14	0.74	11
Hazardous Waste Proximity (facility count/km distance)	0.08	0.42	39	0.63	25	4	14
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0052	0.00061	97	80	64	14	75
<b>Demographic Indicators</b>							
Demographic Index	33%	24%	82	26%	72	36%	55
Minority Population	12%	13%	70	24%	35	39%	26
Low Income Population	55%	34%	85	29%	89	33%	83
Linguistically Isolated Population	0%	0%	84	2%	56	4%	45
Population With Less Than High School Education	10%	7%	75	8%	70	13%	52
Population Under 5 years of age	6%	6%	54	7%	42	6%	50
Population over 64 years of age	13%	17%	33	13%	55	15%	46

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

# Be Contaminant Smart



**Help protect yourself, your family, and  
your community from mining-related  
contamination in Butte, Montana**

# Be Safe and Avoid Mining Impacts

Land in and around Butte has been impacted by over a century of mining, leaving potentially harmful contamination. Cleanup measures are in place to ensure that people are protected from mining contamination and to promote comprehensive public health and wellness. **You can help!** There are steps you can take to protect yourself and your family.

## Lead

Lead is the primary contaminant of concern in Butte. It is a naturally occurring element in the earth's crust and is found in higher soil concentrations in Butte because of historic mining activity. There are also many possible sources of lead in the home.

### Sources of Lead in Butte

The infographic is set against a teal background with a white house silhouette on the right. On the left, under the heading 'Indoors', there is a vertical list of six items, each with a white icon in a teal square: 'Toys' (three blocks labeled A, B, C), 'Interior and attic dust' (a broom), 'Lead-based paint' (a paint can), 'Hobby materials' (a glue stick), 'Folk medicine' (a mortar and pestle), and 'Some cosmetics' (a lipstick). To the right of this list, under the heading 'Outdoors', the text reads 'Contaminated soil in yards, gardens, and throughout the hillside of Butte'. Below this text, the words 'Lead pipes' are written in white inside the house's doorway.

## Arsenic and Other Metals

Arsenic and, to a lesser extent, copper, aluminum, cadmium, iron, mercury, and zinc are also contaminants found in Butte. Like lead, they are naturally occurring elements in the earth's crust and found in higher concentrations in Butte because of historic mining activity.

## Exposure Pathways

Exposure pathway is the term used to describe how people come in contact with a contaminant. In Butte, the exposure pathways for lead, arsenic, and the other contaminants of concern are similar. They include breathing, touching, and eating. For lead, exposures can also occur to the fetus during pregnancy causing reduced growth and premature birth.



Sampling and testing are the only way to know if your soil is contaminated.

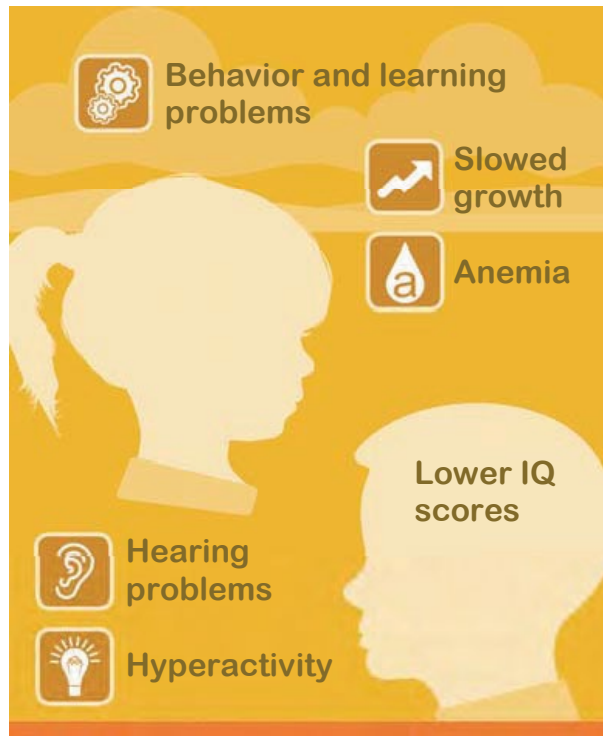
# Understanding Health Impacts

Lead is a poisonous metal that can cause learning, hearing, and behavioral problems. While it has beneficial uses, it can be toxic to humans and animals and can cause adverse health effects.

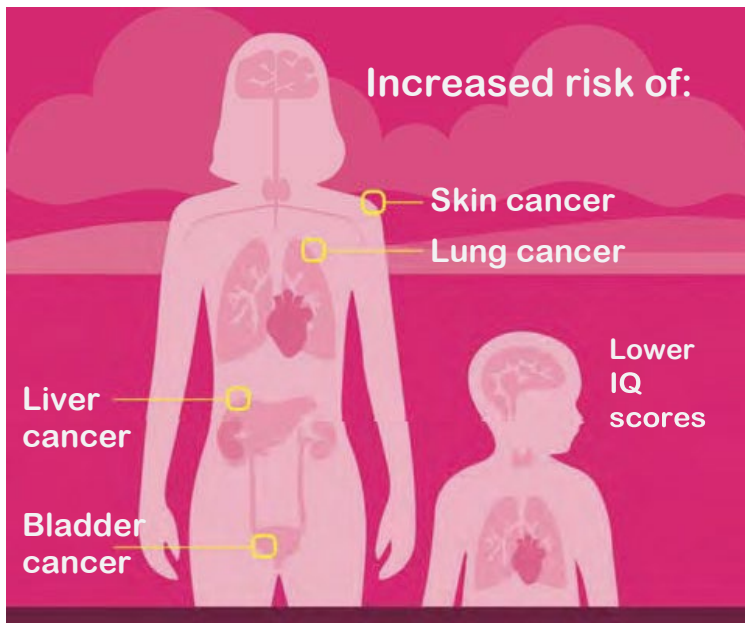
Lead can accumulate in our bodies over time. It is stored in bones along with calcium. **Children are more at risk from lead!** Exposure to lead can harm a child's brain, kidneys, and other organs. Children 6 years and younger are most susceptible since their nervous systems are still developing.

Even low levels of lead in the blood of children can result in serious problems. Children with elevated

## Lead Impacts in Children



## Arsenic Impacts



blood-lead levels usually do not look or act sick. The only way to know if your child has lead poisoning is by getting a blood test.

Like lead, exposure to arsenic can be bad for your health. Arsenic is a known carcinogen and can impact the skin, bladder, liver and lungs. Some studies have also shown that arsenic exposure in children can result in lower IQ scores.



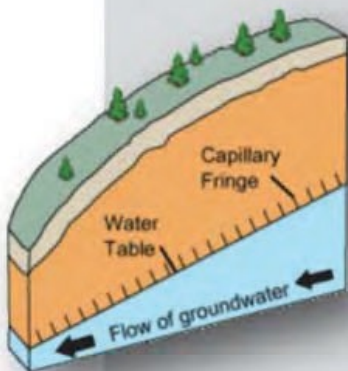
## Working Together

People are working together in Butte to ensure residents are protected from lead and arsenic and other potentially harmful contamination. Community groups, the City and County of Butte-Silver Bow, the Montana Department of Environmental Quality, and the U.S. Environmental Protection Agency Superfund Program are cooperating to address the contamination and promote education and blood-lead testing to protect human health and the environment.

## The Plan For Protection: Water

### Drinking Water

Water from Butte faucets is not contaminated and comes from sources outside of Butte, including the upgraded Basin Creek Reservoir. It is safe to drink and routinely tested.



### Groundwater

In certain areas of Butte, groundwater is contaminated. Use of this groundwater is restricted to prevent exposure and it is not allowed to be used for drinking. The contaminated groundwater is captured and treated before it is discharged into streams.

### Surface and Storm Water

Water that flows through Butte in creeks after rain and snow melt can transport surface contamination that is potentially harmful to aquatic life. The plan is to manage this water to reduce spreading contamination around Butte.



# The Plan For Protection: Soil

## Removal

- Millions of cubic yards of mine tailings and contaminated soil in Butte have been removed to prevent human exposure.
- Removals include contaminated yard soils and interior sources of lead such as lead paint and attic dust through Butte-Silver Bow's Residential Metals Abatement Program (RMAP).
- Removal actions are ongoing in Butte.

### The RMAP Will:

- Sample and analyze your home and yard.
- Clean up contaminated attic dust, indoor dust, yards and lead paint if needed.
- Provide these services free and with minimal disruption to the home occupant.



**Learn more about the program by calling 406-497-5040 or visiting the RMAP website.**

## Capping

- Potentially hazardous contaminated soil that is not removed is covered with a protective layer of clean soil.
- These “caps” are maintained by Butte-Silver Bow County and are monitored using the Butte Reclamation and Evaluation System to ensure they are protective.
- The Butte Reclamation and Evaluation System is:

Implemented in cooperation with the Clark Fork Watershed Education Program.

Responsible for evaluating all reclaimed areas (25 percent of all sites evaluated annually).

Responsible for correcting protective cap problems under EPA approved work plans.

# The Plan For Protection: Programs

## Blood Lead Screening

- Available to all county residents at no charge through Butte-Silver Bow's Women, Infants, and Children Program (406-497-5060).



## Public Education

- Projects are ongoing in Butte through community outreach by public, private, and non-profit groups.



## Butte-Silver Bow Women, Infants, and Children Program

- Offers and encourages free blood-lead testing at the County Health Department.
- Reports all elevated results to the RMAP for further evaluation.
- Provides a range of resources to improve health and nutrition to women, infants, and children up to 5 years of age.



## Be Contaminant Smart: Family

Contamination from historic mining will remain in Butte even after cleanup is complete. In addition to the cleanup measures, there are things you can do to for your family to be contaminant smart.

### Choose a Healthy Diet

- Eat iron-rich foods. Normal iron levels protect the body from lead. Good sources of iron are lean meats, fortified cereals, and dried fruits.
- Eat calcium-rich foods. Calcium reduces lead absorption. Good sources of calcium are green leafy vegetables, milk, and cheese.
- Eat regularly. Children with empty stomachs absorb more lead. Provide children 4 to 6 small meals during the day.

### Properly Prepare Garden Produce

- Keep preparation surfaces clean.
- Wash produce to remove soil.
- Throw away the outer leaves of leafy vegetables and peel root crops to remove the skin and any residual soil.

### Test Your Kids for Lead

- Enroll in the blood-lead testing program with Butte-Silver Bow's [Women, Infants, and Children Program](#) by calling 406-497-5060.

### Stay Informed

- Read and follow the suggestions in the EPA Guide [Fight Lead Poisoning with a Healthy Diet](#).
- Learn and educate others about lead, arsenic, and other contaminants in Butte.



# Be Contaminant Smart: Home

Safety starts at home and there are important and simple practices you can follow to keep your family healthy.

## Keep Things Clean

- Keep your home clean and dust-free. This will cut down on the amount of contamination present in the environment.
- Wash hands and toys frequently to help prevent spreading germs and cut down on colds.
- Keep painted surfaces in good condition and clean around painted areas where friction can generate dust, such as around doors, windows and drawers.



## Understand and Identify Potential Sources

- Identify and limit exposure to products that may contain lead. These may include toys, cosmetics, crafts, and other items.
- If buying a home built before 1978, find out if it contains lead-based paint. A seller must disclose any known lead-based hazards.

## Don't Create Unnecessary Exposures

- Practice safe do-it-yourself renovations. Read and follow guidance in the EPA pamphlet *Renovate Right*.

## Stay Informed

- Read and follow the suggestions in EPA's brochure *Protect Your Family from Lead in Your Home*.
- Contact Butte-Silver Bow's [Residential Metals Abatement Program](#) to have your home tested for lead and arsenic (406-497-5040).

**Web link to *Renovating Right*:**

[www.epa.gov/lead/lead-safe-certified-guide-renovate-right-2](http://www.epa.gov/lead/lead-safe-certified-guide-renovate-right-2)

**Web link to *Protect Your Family from Lead in Your Home*:**

[www.epa.gov/lead/protect-your-family-lead-your-home](http://www.epa.gov/lead/protect-your-family-lead-your-home)

## Be Contaminant Smart: Outside

Gardening is a fun and healthy hobby and there are contaminant smart tips to help keep gardening safe.

### Don't Let Contamination Into Your Home

- Leave dirty shoes at the door.
- Reduce dirt brought in by pets.
- Wash children's hands, bottles, pacifiers and toys often especially if they contact soil.
- Avoid contact between gardening clothes and furniture.
- Wash garden produce thoroughly to remove soil completely.

### Garden Carefully

- Wear gloves while gardening and when harvesting produce.
- Add organic materials, like compost, manure, leaves, or grass clippings to your garden. Organic compounds bind lead and make it less available to contaminate plants.
- Add mulch to the garden to reduce dust and prevent soil from splashing onto plants during irrigation or rainstorms.
- Locate your garden as far as possible from busy streets, highways, or old buildings. Traffic can spread dust contaminated with lead and old buildings may shed lead paint.
- Encourage kids to play away from the garden.
- Select plants with shallow roots to ensure that roots do not reach contaminated soil. Increase planting of fruits and vegetables that grow on vines and on fruit trees.
- Grow crops in containers filled with clean soil or build raised beds using safe materials.



## Be Contaminant Smart: Taboos

Finally, there are some things to avoid to be contaminant smart and keep your family safe.

# STOP!

- DO NOT knowingly consume lead, arsenic or other potentially harmful contamination.
- DO NOT let children chew or put paint chips in their mouths.
- DO NOT let children eat dirt.
- DO NOT try to remove lead-based paint yourself. Call the RMAP or use an EPA certified or approved contractor. Read and follow the guidance of EPA's **Renovation, Repair and Painting Program**.
- DO NOT allow children to play in known tailings or contaminated soil.
  - DO NOT have hobbies that use lead.



Remember, the Butte-Silver Bow RMAP is your best resource for help with lead paint identification and removal and for dealing with attic dust. Their assistance is provided at no cost to you.

## Contacts for More Information

### Citizens for Labor and Environmental Justice

- [www.facebook.com/Citizens-for-Labor-and-Environmental-Justice-860260360719942/](https://www.facebook.com/Citizens-for-Labor-and-Environmental-Justice-860260360719942/)
- 406-496-4228

### Citizens Technical Environmental Committee

- [www.buttectec.org](http://www.buttectec.org)
- 406-723-6247

### City and County of Butte-Silver Bow

- [www.co.silverbow.mt.us](http://www.co.silverbow.mt.us)
- Health Department, 406-497-5020
- Women, Infants and Children Program, 406-497-5060
- Residential Metals Abatement Program, 406-497-5040

### Montana Department of Environmental Quality

- [www.deq.mt.gov/Land/fedsuperfund](http://www.deq.mt.gov/Land/fedsuperfund)
- 406-444-6444

### U.S. Environmental Protection Agency

- [www.epa.gov/mt](http://www.epa.gov/mt)
- 406-457-5000



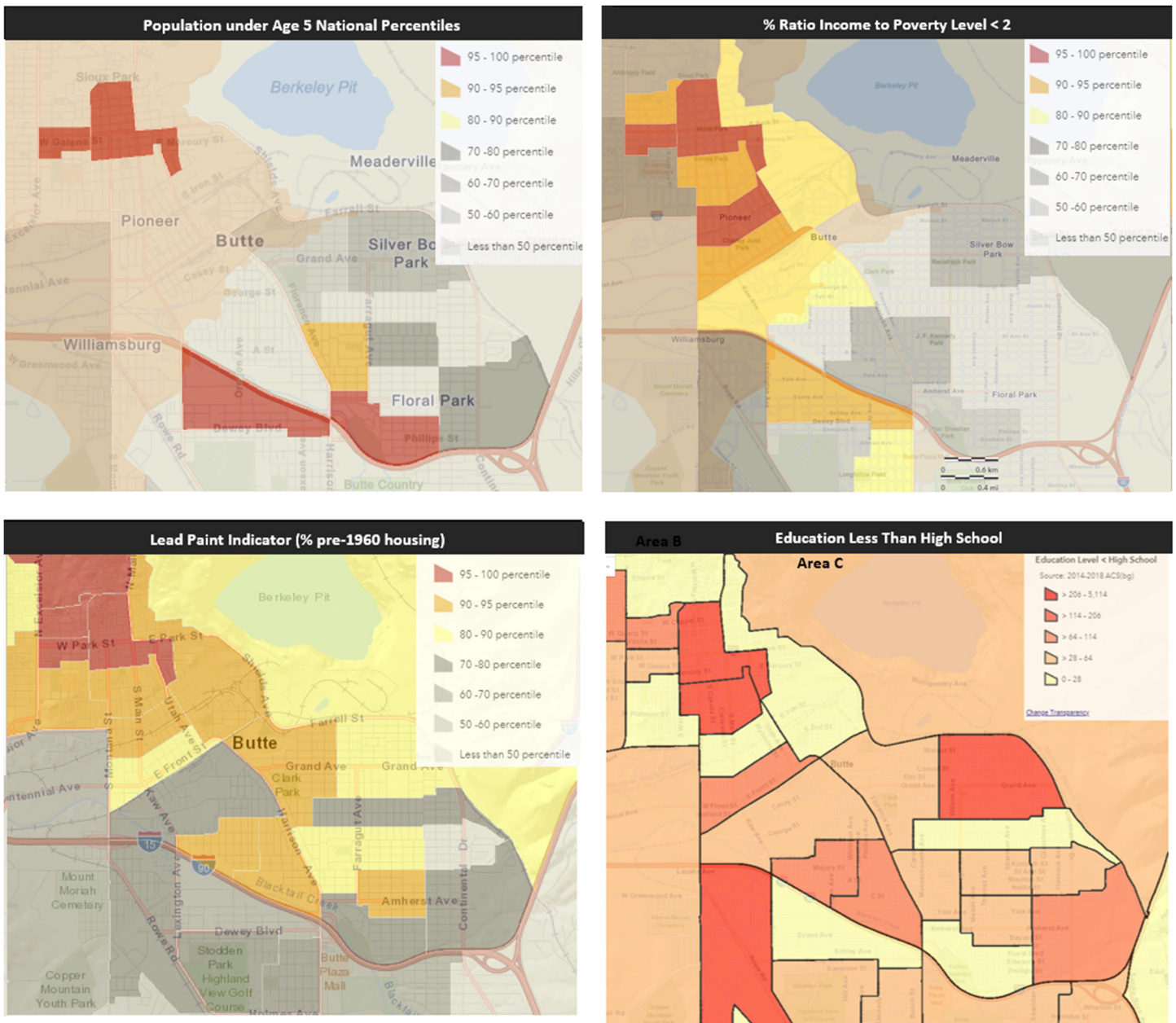


## Appendix H

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### Examples of Environmental Justice Maps Using EJ Screen

## Examples of Potentially Useful *EJScreen* Maps for the Silver Bow Creek/Butte Area NPL Site



Many mapping layers available on *EJScreen* may be useful to stakeholders in providing community-specific demographic and environmental information to help focus outreach efforts.

EPA encourages its use.

[www.epa.gov/ejscreen](http://www.epa.gov/ejscreen)