

Community Involvement Plan

Anaconda Smelter Superfund Site
Anaconda-Deer Lodge County, Montana

May 2022



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Table of Contents

Section 1 Introduction.....	1
Purpose and Goals of the Community Involvement Plan.....	1
Regulatory Authority.....	1
Project Structure and Roles.....	1
Community Involvement Plan Structure	4
Section 2 Site Description.....	5
Location and Layout.....	5
Contamination.....	7
Clean Up Status	7
Current Land Use.....	9
Reuse	9
Community Programs Associated with the Remedy.....	9
The Superfund Process.....	10
Schedule.....	11
Latest Five-Year Review.....	11
Section 3 Community Profile.....	12
Demographics.....	12
Public Schools and Libraries	12
Local Government.....	13
Site-Related Local Groups	13
Community Involvement History.....	13
Section 4 Environmental Justice.....	17
EPA’s Environmental Justice Program.....	17
Local Suggestions to Address Environmental Justice.....	17
EPA’s Environmental Justice Action Plan	17
Section 5 Stakeholder Concerns and Issues.....	19
Section 6 Community Involvement Action Plan.....	23
Planned Actions	23
Measurement of Success.....	27
Section 7 References Cited.....	28

List of Exhibits

The Anaconda Smelter Stack.....	1
View of Downtown Anaconda.....	4
Superfund Sites in the Clark Fork River Basin.....	5
Site Operable Units.....	6
Types of Decision Documents.....	6
Photos of Cleanup.....	7
The Superfund Process.....	2-10
Outreach Milestones at the Anaconda Smelter Superfund Site.....	6-24

Appendices

- Appendix A Federal and State Agency Contacts
- Appendix B Federal Elected Officials
- Appendix C State, County, and Local Contacts
- Appendix D Potential Stakeholder Group Contacts
- Appendix E Local Media Contacts
- Appendix F Meeting Locations, Administrative Record, Information Repositories, Websites
- Appendix G EPA’s Environmental Justice Action Plan

List of Acronyms

ADLC	Anaconda-Deer Lodge County consolidated government
ATSDR	Agency for Toxic Substances Disease Registry
Arrowhead	The Arrowhead Foundation
Atlantic Richfield	The Atlantic Richfield Company
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CIP	community involvement plan
CPMP	Community Protective Measures Program
CSKT	Confederated Salish and Kootenai Tribes
DEQ	Montana Department of Environmental Quality
DPS	Development Permit System
EPA	U.S. Environmental Protection Agency
ESD	explanation of significant differences
Montana Tech	Montana Technological University
NCP	National Contingency Plan
OUs	operable units
PRP	potentially responsible party
RDM	RDM Multi-Enterprises, Inc
ROD	record of decision
RODA	record of decision amendment
TAG	technical assistance grant
%	percent
µg/dL	micrograms per deciliter

Table of Contents

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Section 1 Introduction

Purpose and Goals of the Community Involvement Plan

This community involvement plan (CIP) has been prepared in accordance with federal regulations 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 cleanup activities at the Anaconda Smelter Superfund site in Deer Lodge County, Montana.

EPA's goals for this CIP are to:

- Continue to provide opportunities for the community to learn about the site.
- Ensure the public continues to have appropriate opportunities for involvement.
- Determine if activities used for public outreach remain appropriate.
- Promote environmental justice.

The CIP is a roadmap for EPA to plan outreach and is also available to the public as a guide. Interviews, information from a variety of other sources, and recent demographic data were used to create this CIP and tailor it to fit the needs of the community. The plan is a living document that EPA will review and update periodically. Appendices will be updated annually to ensure contact information remains relevant.

Guidance documents and other resources used in drafting this plan (*Section 7, References*) include:

- *Environmental Justice Action Plan*
- *Superfund Community Involvement Handbook*
- *Community Involvement Toolkit*

- *National Oil and Hazardous Substances Pollution Contingency Plan (NCP)*
- *Anaconda Smelter Site Management Plan*

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. The NCP is a set of regulations detailing how Superfund cleanups are to be conducted, including requirements for community involvement.

Project Structure and Roles

EPA often divides a site into distinct operable units (OUs) to address specific problems, geographic areas, or areas where a specific action is required. There are five OUs at the Anaconda Smelter site, as described in Section 2. Two of the OUs have been completed and the three remaining OUs are in the cleanup or remediation stage and are governed by various consent decrees and administrative orders.



Photo from atlasobscura.com

The Anaconda Smelter Stack

Potentially Responsible Parties

Cleanups are being conducted by the primary potentially responsible party (PRP) and their contractors under the oversight of EPA and in accordance with the EPA-approved work plans, designs, and other documents.



The Atlantic Richfield Company

The Atlantic Richfield Company (Atlantic Richfield) is the primary PRP and is responsible for overall coordination and direction of project activities as required by the applicable enforcement mechanism, including submittal to the agencies of deliverables and/or reports summarizing key information and activities.

RARUS



The Butte, Anaconda & Pacific Railroad was constructed and operated by the Great Northern Railroad and The Anaconda Company and was purchased by RARUS in 1985. In 2007, Patriot Railway Company purchased the line and changed its name back to Butte, Anaconda & Pacific Railway. Patriot operated the active railroad and certain areas adjacent to the railroad and are responsible for operation and maintenance of the rail.

RDM



RDM Multi-Enterprises, Inc. (RDM) is the owner/operator of the Anaconda Landfill Slag and is a past operator of the Main Granulated Slag. RDM is responsible for final operation and closure of the slag.

Regulatory Oversight

EPA



EPA is the lead agency and is responsible for ensuring that work is done in accordance with Superfund law, the NCP, guidance and policy, and the terms of the applicable consent decrees. EPA performs oversight on the work conducted by the PRPs. For more information on EPA as an agency, visit their website (www.epa.gov).

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 site and reviews key documents, provides input, and represents the interests of the State of Montana. For more information on DEQ as an agency, please visit their website (www.deq.mt.gov).

Other Participating Parties

Certain agencies have responsibilities for implementing portions of the remediation through previous agreements. These include the Montana Department of Justice – Natural Resources Damage Program, Anaconda-Deer Lodge County government (ADLC), and DEQ.



Stakeholders

Stakeholders include other federal, state, tribal, and local governmental agencies that have roles, responsibilities, and/or authorities for certain aspects of the remediation.



Confederated Salish and Kootenai Tribes

The Confederated Salish and Kootenai Tribes (CSKT) are recognized as Natural Resource Trustees Upper Clark Fork River Basin. The Agencies require appropriate consultation with the Tribes and other compliance with applicable historic preservation requirements during remediation, as described in the 2022 *Cultural and Historic Mitigation and Preservation Plan*.



Montana Fish Wildlife and Parks

Montana Fish Wildlife and Parks administers the lands owned by the State of Montana in the Mount Haggin Wildlife Management Area. The Montana Department of Justice – Natural Resources Damage Program is leading the cleanup of a portion of the area under a consent decree settlement for the Milltown Sediments/ Clark Fork River site.



U.S. Forest Service

Portions of the site are under the jurisdiction, custody, and control of the U.S Forest Service within the boundaries of the Beaverhead-Deerlodge National Forest in the county. The Forest Service has CERCLA authority, similar to EPA and is the lead agency for response actions on National Forest System lands.



U.S. Fish Wildlife Service

Remedial activities require EPA to consult with the U.S. Fish Wildlife Service to assess and mitigate (as necessary) potential impacts to listed species and/or critical habitat resulting from remedial activities. A biological assessment must be prepared for any federal action that is a major construction activity to determine the effects of the proposed action on listed and proposed species. The Fish Wildlife Service may complete a biological opinion as to whether the proposed action is likely to jeopardize the continued existence of the listed species or destroy/modify or adversely impact critical habitat.

Landowners

The site includes Anaconda and Opportunity, as well as the surrounding rural population and remedial boundaries for the various remedial design units extend across properties owned by government and private entities, including Atlantic Richfield. Landowner access agreements must be executed with each affected landowner prior to construction and allow access for pre-construction, construction, and post-construction monitoring and maintenance.

Access may require multiple agreements depending on whether the remedy has been sufficiently defined (single agreement) or whether data gaps associated with the remedy need to be addressed and/or weed spraying is necessary (multiple agreements). After the work is complete, property management (e.g., weed control) and future development of properties by the landowners must comply with local and state laws, ordinances, building/development codes and requirements identified in the Development Permit System (DPS), and any revisions to those documents.

Community Involvement Plan Structure

The CIP structure is:

- **Section 1 – Introduction.** Purpose and goals of the plan, regulatory authority, and project structure and roles.
- **Section 2 – Site Description.** Location and layout, history of contamination, land use, nearby contamination, regulatory milestones, and schedule.
- **Section 3 – Community Profile.** Demographics and description and community involvement activities conducted to date.
- **Section 4 – Environmental Justice.** EPA’s commitment to environmental justice.
- **Section 5 – Stakeholder/Community Concerns.** Results of interviews conducted for the CIP update.
- **Section 6 – Community Involvement Action Plan.** Planned actions, schedule, and measurement of success.
- **Section 7 – References.** List of references.
- **Appendices – A through G.** Contact information for people, repositories, and venues and EPA’s *Environmental Justice Action Plan* (EPA 2022).



View of Downtown Anaconda

Photo from VisitMT.com

Section 2 Site Description

Location and Layout

The Anaconda Smelter site is one of four contiguous Superfund sites on EPA's National Priorities List in the upper Clark Fork River Basin. The other sites are:

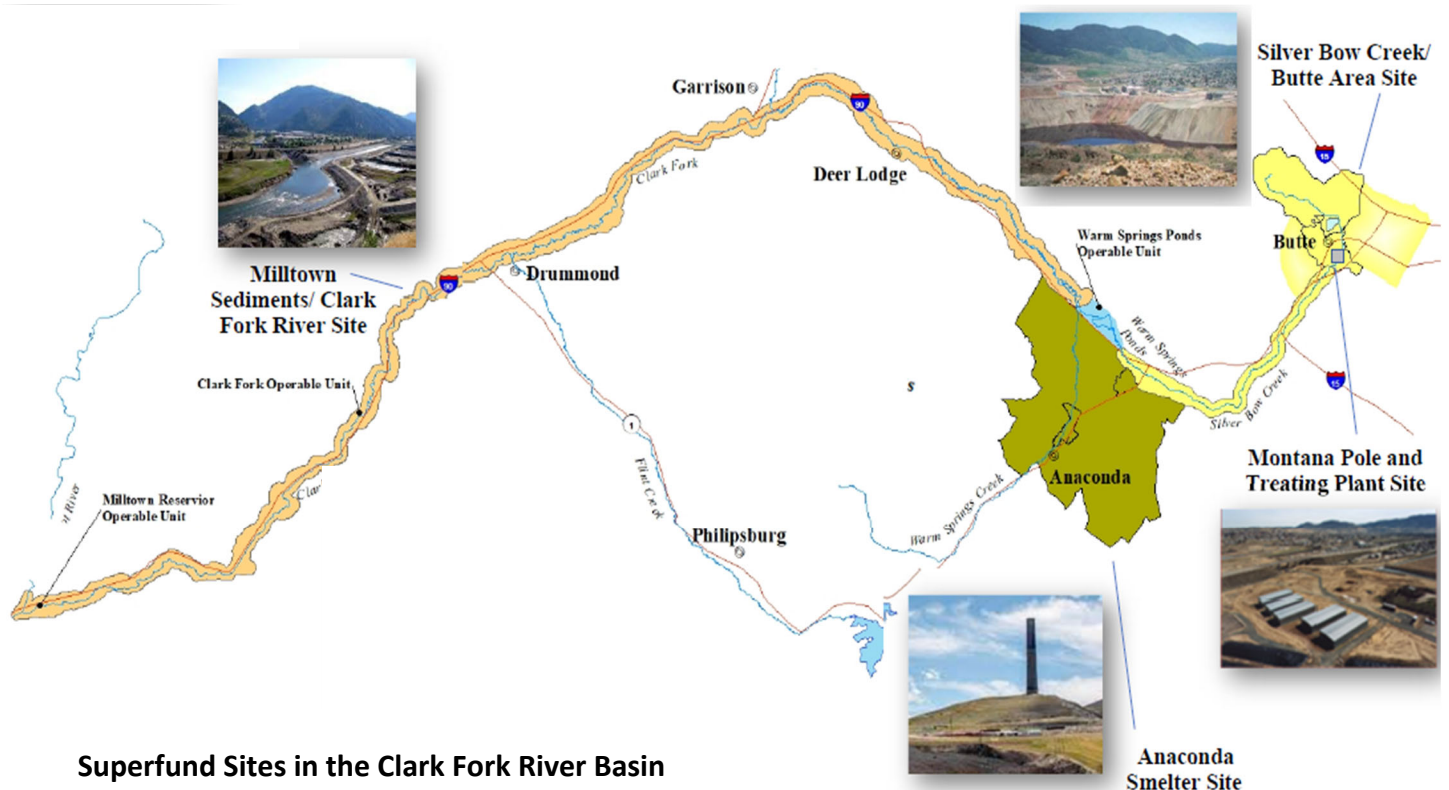
- Silver Bow Creek/Butte Area site
- Clark Fork River/Milltown Reservoir site
- Montana Pole site

The footprint of the four sites extends 140 miles from an area north of Butte to the Milltown Reservoir near Missoula, Montana.

The site is in the Deer Lodge Valley in southwestern Montana, and includes approximately 300 square miles of agricultural land, pasture, residential areas, rangeland, forests, and riparian and wetland areas in the valley and foothills in and around Anaconda. For nearly a

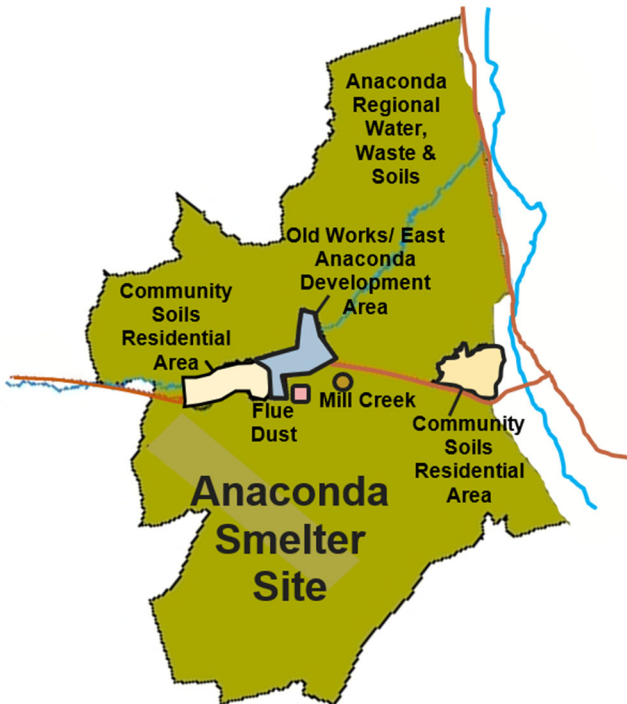
century The Anaconda Company and its predecessors conducted milling and smelting activities at the site. Work began in 1884 and ended in 1980, when the smelter closed. The facilities were dismantled by Atlantic Richfield, the successor by merger to The Anaconda Company and its predecessors. The nearly 100 years of mining and smelting contaminated soils, surface water, and groundwater, primarily through airborne emissions and disposal practices from smelting. The main contaminants of concern are arsenic, cadmium, copper, lead, and zinc.

The site was added to the National Priorities List in 1983, with Atlantic Richfield identified as the primary PRP. Since then, Atlantic Richfield has been actively involved in the investigation and cleanup under the direction and authority of EPA and Montana DEQ.



Superfund Sites in the Clark Fork River Basin

The five site OUs are shown on the map below and are described in the order of the date that a record of decision (ROD) for cleanup was first signed for each. A graphic illustrating the types of decision documents is also provided below.



Site Operable Units

Record of Decision (ROD)	•Documents what cleanup will be performed
Explanation of Significant Differences (ESD)	•Documents <i>significant</i> changes* to the remedy in the ROD
ROD Amendment (RODA)	•Documents <i>fundamental</i> changes* to the remedy in the ROD

**Changes to scope, cost, or performance are usually based on new information or technologies obtained after the ROD was issued*

Types of Decision Documents

- **Mill Creek OU (1986 ROD).** This former suburban community was located adjacent to and downwind of the smelter complex. Cleanup involved permanently relocating residents and stabilizing soils. Water issues were deferred to the Anaconda Regional Water Waste & Soils OU.
- **Flue Dust OU (1991 ROD).** Flue dust is a byproduct of copper smelting and contains very high levels of metals and arsenic. It was stockpiled at nine locations on and near Smelter Hill. Cleanup addressed flue dust on Smelter Hill through removal, treatment, and containment. Arbirer and beryllium wastes were similarly addressed. Wastes are contained within the Smelter Hill Repository Complex.
- **Old Works/East Anaconda Development Area OU (1994 ROD and 1995 and 2020 Explanation of Significant Differences [ESD]).** The OU encompassed historic milling and smelting areas immediately east of Anaconda, including former smelter properties conveyed from Atlantic Richfield to ADLC for redevelopment. Cleanup addressed waste sources within the Old Works smelter facility.
- **Community Soils OU (1996 ROD, 2013 ROD amendment [RODA], 2017 ESD, and 2020 ESD).** The OU is made up of soils and dust at residential and commercial properties and abandoned railroads in Anaconda, Opportunity, and adjacent rural areas. A 1996 risk assessment and additional sampling in 2002 showed unacceptable risks from exposure to arsenic and lead in soil. The ongoing cleanup addresses contamination above agreed upon standards.
- **Anaconda Regional Water Waste & Soils OU (1998 ROD, 2011 RODA, and 2020 RODA).** The 1998 risk assessment identified potential impacts to surface and groundwater from soils and waste sources

such as tailings and slag as well as human and environmental risks associated with arsenic-contaminated soils that have not been addressed by the other OUs. Mining wastes could also impact groundwater and surface water above regulatory criteria. Cleanup will address all remaining contamination, including large volumes of wastes, slag, tailings, debris, and contaminated soil, groundwater, and surface water spread over 170 square miles in nine subareas.

Contamination

More than 300 square miles of land were impacted by smelter and ore processing wastes from copper concentrating and smelting conducted between 1884 and 1980. This included over 260 million cubic yards of mill tailings, furnace slag, and flue dust. Contaminants of concern are arsenic, beryllium, cadmium, copper, lead, and zinc.

Clean Up Status

Cleanup of contaminated soil, mine wastes, tailings, sediment, surface water and groundwater is more than 70-percent complete. The Beryllium, Flue Dust, and Arbiter areas were partially deleted from EPA's National Priorities List. EPA and Atlantic Richfield have set a goal for completion of construction activities by the end of 2025. The site will then be in operation and maintenance.

Completed work is briefly summarized below.

- **Mill Creek.** Mill Creek residents exposed to contaminated soil and dust were permanently relocated in 1987. Cleanup was completed in 1988. Atlantic Richfield continues active monitoring and maintenance, and institutional controls limit exposure to surface soils.
- **Flue Dust.** Flue dust was treated to meet standards for arsenic, cadmium, and lead and put in a secure repository. There is no exposure to buried waste and site access is controlled by fencing, gates, and security.

David Gates power generation station



Large-scale soil treatment



Flue Dust Repository



Old Works Golf Course



Residential soil removals

Photos of Cleanup

Atlantic Richfield completed construction of the leachate collection and evaporation system in 2019 and it is fully operational. The remedial action completion report was approved in July 2020 and the OU has begun operation and maintenance.

- **Old Works/East Anaconda Development Area.** With the exception of uncovered waste left in place for historic preservation, all wastes have been capped. Caps are monitored and maintained, and institutional controls (such as trails, barriers, and signs) limit exposure. The OU has begun operation and maintenance.
- **Community Soils.** Construction to cleanup arsenic and lead in residential soils should be complete by 2025. Interim controls include the institutional controls administered by ADLC and described on page 8. The 2020 ESD addressed attic dust contamination through a long-term, dust-abatement program. As of December 2021, 1,380 properties had been remediated. Sampling and yard removals should be complete by the end of 2025 for properties where access is granted.
- **Anaconda Regional Water, Waste & Soils.** Since 2011, over 21,000 acres of contaminated land at this OU have been remediated under several unilateral administrative orders issued by EPA. These orders left the full implementation of the surface water component of the remedy open, pending further evaluation of site conditions and additional analysis. Work in the valley has been mostly completed, with remaining work to be done in the uplands. The work continues to improve vegetation and reduce erosion. Final operation and closure plans for the Main Granulated Slag and West Stack Slag were approved in June 2020 which upgrade the best management practices and provide a process for the development/closure of the slag piles. Remediation continues and

the completed remedy will be addressed in the next five-year review.



Wetlands

The Dutchman Creek Area is the largest natural wetlands complex in the watershed and the Opportunity Borrow Areas are the largest constructed wetlands **IN THE NATION**. Both have been preserved by Atlantic Richfield with public access for Dutchman Creek.



Revegetation

Revegetation has been so successful that motorists have complained about elk crossing the roads instead of dust from the dry ponds.



140,000 feet of engineered stormwater controls have been placed. *That's 26.5 miles - slightly longer than a marathon.*

Current Land Use

Land use at the site includes residential, open space, commercial, recreational, industrial, and agricultural. The predominant land use for each operable unit is shown below:

- **Mill Creek.** Commercial, industrial, recreational, and open space.
- **Flue Dust.** Open space.
- **Old Works/East Anaconda Development Area.** Commercial, industrial, open space, and recreational.
- **Community Soils.** Residential and commercial.
- **Anaconda Regional Water, Waste and Soils.** Residential, agricultural, recreational, open space, commercial, and industrial.

Water use is controlled primarily by surface land ownership, water rights, and major land use. Groundwater is used as water supply for irrigation in some areas. Consumption is limited to domestic purposes from small-capacity water wells in the Aspen Hills subdivision, Opportunity, and rural homes. Anaconda is permitted for the use of groundwater and surface water from its public water supply; the wells and reservoirs are outside of and upgradient from the site.

Reuse

Atlantic Richfield began reuse activities in 1994 by turning 250 acres of the site into the Old Works Golf Course, which opened to the public in 1997. More recently, dozens of new commercial developments have been created on remediated properties, including a natural gas power plant, regional prison, a campus of excellence for the disabled, and a Class III landfill. Thousands of acres of agricultural lands have been reclaimed and put back into productive use and thousands of acres of former waste disposal sites have been capped and now provide wildlife habitat. Nearly 1,000 acres of new wetlands have also been created. The Ready

for Reuse determination for approximately 105 acres located in the Old Works/East Anaconda Development Area will be issued in spring of 2022.

Community Programs Associated with the Remedy

The Community Protective Measure Program (CPMP) strives to create a protective environment for all Anaconda-Deer Lodge County residents, their homes, yards, and drinking water with regards to smelter-related contamination

Homeowners should contact the CPMP (406-563-7019 or cnyman@adlc.us) to take advantage of the following components of the program:

- **Test by Request.** Property owners can have their yards tested at no cost for arsenic and lead.
- **Attic Dust Abatement Program.** Provides a home renovation kit and instructions on proper use of tools to confine dust when renovating. Includes a guide to proper cleanup and disposal of materials and the use of a high-efficiency vacuum for dust removal.
- **Soil Swap Program.** Eligible homeowners with vegetable gardens, designated play areas, or excavation areas less than one cubic yard can obtain replacement soil for two, 4-foot by 8-foot inground or raised garden beds free of charge.
- **Domestic Well Sampling Program.** Provides free testing of groundwater used for drinking after a new well is installed.
- **Superfund Overlay.** The county maintains a map of the Superfund Overlay boundaries.
- **Blood Lead Monitoring Program.** Provides voluntary blood lead monitoring services to residents in the Superfund Overlay through 2030. Children 6 years and under, as well as expectant or nursing mothers, are particularly encouraged to participate.

- **Development Permit System.** The DPS is administered by the county and helps property owners identify if contamination is present on their property prior to planned earthwork. It provides for testing and disposal of soils at no cost to the owner to prevent contamination.

Blood Lead Testing and Attic Dust Sampling

In response to ATSDR's recommendations, Anaconda Deer Lodge County offers free blood lead testing all residents. Attic dust sampling is also available at no charge for area residents in homes built before 1980.

For more information, call or email:

Anaconda Deer Lodge County

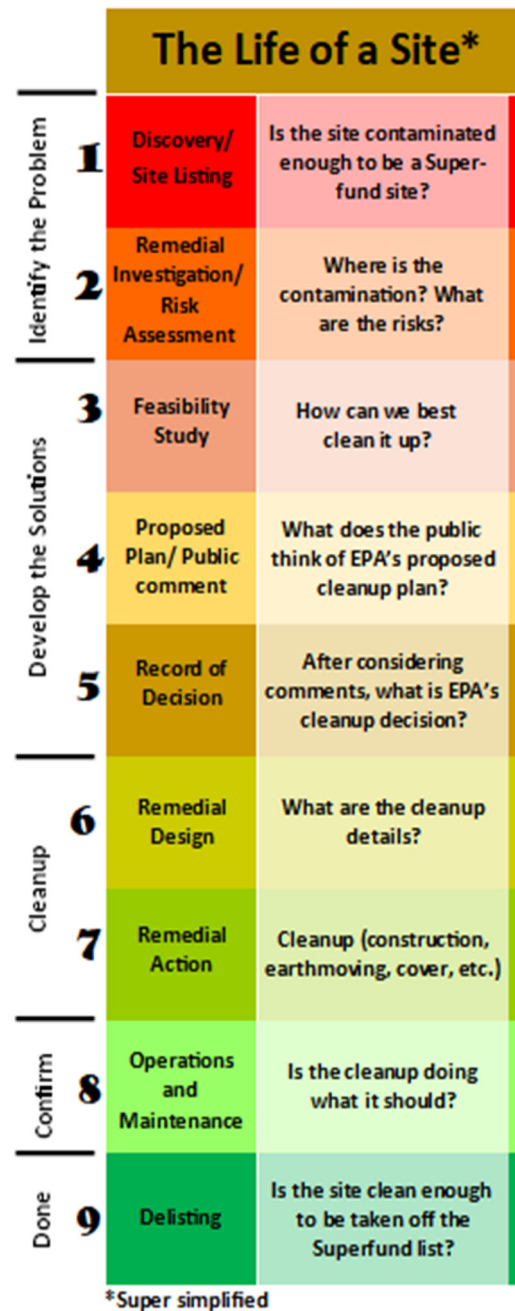
- Carl Nyman, 406-563-7019, cnyman@adlc.us
- Linda Moodry, 406-563-7476, lmoodry@waterenvtech.com



The Superfund Process

The Superfund process is summarized below and illustrated to the right. Community involvement requirements and additional activities planned by EPA are provided in Section 6. The OUs covered by this plan are in the remedial design, remedial action, or construction completion and deletion phases.

- **Remedial investigation.** Assesses the nature and extent of contamination. Includes human health and 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. Typically overlaps the remedial investigation.



The Superfund Process

- **Proposed plan.** Presents EPA's preferred plan for cleanup based on the remedial investigation and feasibility study. The public is provided an opportunity to comment.
- **Record of decision.** Documents EPA's final decision on cleanup and is made after review of all comments are received on the proposed plan.

- **Remedial design.** Development of engineering drawings and specifications for cleanup, as per the ROD.
- **Remedial action.** The construction period in which the plan specified in the remedial design is implemented.
- **Construction completion and deletion.** Deletion of sites from the National Priorities List 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.

Schedule

As with any Superfund site, the schedule is flexible and subject to change, but EPA and Atlantic Richfield have set a goal for completion of construction activities by the end of 2025. The entire site will then be in operation and maintenance.

Construction Activities Done
by December 2025!!



Latest Five-Year Review

EPA issued its sixth, five-year review of clean-up actions for the site on September 25, 2020. The review evaluated completed and ongoing construction activities to assess if they protect human health and the environment.

As part of the five-year review process, people who have been working at the site, local officials, and interested members of the public were interviewed to get their thoughts on the cleanup. An ad announcing the upcoming interviews was run in the *Anaconda Leader*.

The resulting five-year review report is available online at EPA's website for Anaconda and at the Arrowhead Foundation office library.

The five-year review included the following activities:

- Community notification and interviews
- Evaluation of risk and applicable or relevant and appropriate requirements
- Document and data review
- Site inspections

The review found that the completed cleanup activities are protective of current and potential land uses. A program to inform and educate residents on ways to reduce exposure to potentially contaminated soils and dust is in place. Operation, maintenance, and monitoring are being conducted and can identify potential issues and provide opportunities to address these issues in a timely manner.

**The Remedy Is
PROTECTIVE**

Section 3 Community Profile

Demographics

Anaconda was established as a smelter town in the 1860s and the smelter was the primary employer until its closure in 1980. Anaconda is too small to have associated demographic data, so demographic highlights for Anaconda-Deer Lodge County, as estimated by the U.S. Census Bureau website (Census 2021), are provided below:

- **Population.** The county population is 9,421, which is a slight increase from 2010 (9,298).
- **Age.** The county population is older than that seen nationwide (23 percent [%] is over age 64 versus 16% nationally). Only 3.8% of the population is under age 5 versus 6% nationwide.
- **Race.** The county is much less racially diversified than the nation. The population is 93% White, 3.5% Hispanic, 2% American Indian, less than 1% Asian, and less than 1% Black. National averages are 76%, 18.5%, 1.3%, 6%, and 13%, respectively.
- **Education.** Approximately 91% of the population has a high school diploma and 20% of people over 25 have a bachelor's degree or higher. Nationwide statistics are 88% and 32%, respectively.
- **Median household income (2019).** Median household income (\$41,820) is significantly below the nationwide average (\$62,843).
- **Persons in poverty.** Roughly one in five persons in the county (20%) live in poverty. This is almost twice the rate seen nationally (10.5%).
- **Housing.** The county has a higher rate of owner-occupied housing (68%) than seen nationwide (64%). There are fewer people

per household in the county (2) than seen nationally (2.6).

- **Computer and Internet Use.** Most (84%) households have a computer and broadband internet (74%). National rates are 90% and 83%, respectively.
- **Languages spoken.** English is the primary spoken language in most (96%) households versus 78% nationwide. Roughly 1.5% of those living in Anaconda are foreign born.

Based on a cost-of-living index that sets the United States at 100, Anaconda-Deer Lodge County has an index of 77.4, due primarily to the low cost of housing, utilities, and transportation. Other factors (grocery, health, and miscellaneous are as high or higher than the nationwide index. The index for Montana is 103.

Public Schools and Libraries

Schools

Anaconda School District #10 has approximately 1,050 students spread across kindergarten through high school.

The district schools are:

- Anaconda Junior/Senior High
- Fred Moodry Intermediate School
- Lincoln Primary School
- Center for Excellence (for children with complex behavioral and emotional needs)
- Copper Academy (high school alternative)

Schools outside of the district are the Anaconda Head Start, which is geared to pre-kindergarten, and AWARE, which is geared to services for those with mental health challenges or developmental disabilities. There are no schools in Opportunity.

Libraries

Anaconda has one public library. The Hearst Free Library has a collection of roughly 24,000 volumes and circulates over 34,000 items per year. It also provides internet access and has an online catalog. There are no libraries in Opportunity.

Local Government

ADLC is the combined government structure of the Town of Anaconda and Deer Lodge County and is led by an elected Chief Executive Officer (Bill Everett) and a County Commission (Terry Vermeire, Steve Gates, Kevin Hart, Paul Smith, and Mike Huotte) that represents five districts. Contacts for these individuals are provided in Appendix C. The commission meets the first and third Tuesday of each month. Additional information is available at www.adlc.us/207/County-Commission.

The primary contact between EPA and ADLC is ADLC Superfund Coordinator, Carl Nyman. Implementation of Superfund institutional controls relevant to the county (such as the Development Permit System) is handled by the Planning Department (Carl Hamming). Other departments relevant to the site include Public Health, Tri-County Health, and Code Enforcement.

Site-Related Local Groups

Groups identified as having an interest in the site are listed in Appendix D. The list includes [The Arrowhead Foundation](#), (Arrowhead) a Technical Assistance Grant (TAG) group formed in the 1980s to address interests and concerns with the site. Arrowhead operates on an annual \$50,000 grant to review documents and provide public outreach and education. Their website was last updated in January 2020.

Community Involvement History Required Outreach

EPA has conducted the community involvement required by Superfund, including:

- Designate a contact
- Notify affected citizens

- Establish a local information repository
- Conduct community interviews
- Prepare a CIP

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

Designate a Contact

Since the 1980s, 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.

Current EPA contacts are:

- **Community Involvement Coordinator,**
Dana Barnicoat
- **Remedial Project Manager,**
Charlie Coleman

Contact information for these EPA staff is provided in Appendix A.

Notify Affected Citizens

As required, EPA began notifying affected citizens shortly after the site was listed on the National Priorities List and has provided updates since then. EPA has notified all county, state, and federal officials, as necessary.

Establish Administrative Record and Information Repository

EPA established an administrative record and an information repository for the site. The administrative record is housed in the EPA Region 8 Superfund Records Center in Helena. It holds the documents that EPA considers or relies on in selecting response actions that culminate in a ROD for remedial action.

The local information repository is housed at the offices of Arrowhead in Anaconda and contains documents useful to the public such as legal documents, this CIP, fact sheets, work plans, reports, proposed plans, RODs, ESDs, and RODAs. A summary is sometimes provided with technical reports to relay facts in simple terms and enhance

understanding. There are also two electronic information repositories—the websites for [Arrowhead](#) and [EPA](#) (Appendix F).

Both the administrative record and information repositories are updated as necessary. In accordance with the Americans with Disabilities Act, the information repository locations are handicapped accessible.

Prepare a CIP

This document is the revised CIP for remediation of the Anaconda site. The original CIP was completed in the 1980s and focused on site investigation and evaluation. It was updated in 2004 as some OUs moved into remedial action. This update is intended to take the site through remediation at all OUs. Interviews were conducted for those documents and also for the five-year reviews completed in 2000, 2005, 2010, 2015, and 2020.

Website

EPA's [website](#) for the Anaconda site has information on EPA's involvement, site status, what is being done to protect human health and the environment, how to stay informed, what the risks are, and redevelopment. It houses many reports and documents that can be downloaded for viewing and provides information on public meetings.

Additional Outreach Conducted by EPA

For many years, EPA's community involvement efforts have extended well beyond those mandated by Superfund. The most recent activities are listed below.

Advertisements and Notices

EPA has developed and run advertisements and notices in the *Anaconda Leader* and the *Montana Standard* on a variety of topics. Ads for the last four years are as follows:

- Release of fact sheets on milestones for the Anaconda Regional Water & Waste OU and Community Soils OU (2021)
- Planned update of the CIP (2021)

- Results of the five-year review (2020)
- Invitation for public comment on the proposal to delete the Beryllium, Flue Dust, and Arbiter OUs (2020)
- Release of the June 2020 RODA (2020)
- Upcoming 5-year review (2020)
- Release of the proposed plan for the Anaconda Regional Water & Waste OU (2019)
- Project update public meeting (2019)
- Home grown produce study volunteers needed (2018)

The advertisements for the planned update of the CIP, the 5-year review results, and the release of the milestone fact sheets all announced the upcoming CIP interviews and asked that interested individuals contact EPA if they wanted to be interviewed.

Environmental Justice Action Plan

In 2022, EPA finalized a plan for the Anaconda site that established environmental justice goals, objectives, and considerations for Superfund work in the community (Appendix G).

Fact Sheets and Other Written Materials

Fact sheets prepared by EPA in recent years include:

- *A Closer Look at Smelter Slag* (2021)
- *2020 Five-Year Review* (2021)
- *2020 Project Update* (2021)
- *Proposed Plan to Amend the 1998/2011 Record of Decision, Anaconda Regional Water, Waste and Soils Operable Unit* (2019)
- *Record of Decision Amendment for the Anaconda Regional Water, Waste & Soils Operable Unit* (2020)

- *Anaconda Healthy Home Best Practices (2020)*
- *Mt. Haggin Homes – 2020 Cleanup (2020)*
- *PJ Hagan Manor – 2020 Cleanup (2020)*
- *Pintler Apartments 2020 Cleanup (2020)*
- *Cedar Park Homes – 2019 Cleanup (2019)*
- *EPA Community Education Series Fact Sheet – 2017 Surface Water Technical Impracticability Report (2019)*
- *EPA Community Education Series Fact Sheet – Supplemental Surface Water Remediation Work Plans (2019)*
- *Anaconda Garden Study Results (2019)*
- *Volunteers Needed for a Sampling of Home-Grown Produce in Anaconda! (2018)*
- *Summary of EPA’s Anaconda School Sampling—2018 (2018)*

Meetings with Elected Officials

EPA meets informally with ADLC officials, as needed through face-to-face meetings and phone calls, to keep them up to date with project progress. ADLC’s Superfund Coordinator regularly attends weekly construction progress meetings, as well as scoping meetings with EPA and DEQ.

Public Meetings

EPA has held numerous public meetings specific to the site. The most recent were held prior to the CoVid restrictions on travel and face-to-face meetings:

- *Anaconda Regional Water, Waste & Soils Operable Unit Proposed Plan (September 2019)*
- *Anaconda Smelter Site Project Update (April 2019)*
- *Summary of Anaconda Smelter Conceptual Agreement (December 2018)*

- *Anaconda “Superfund Priority” (August 2018)*
- *Anaconda Status Update (April 2018)*

Special Projects

Special activities conducted for the community by EPA, Atlantic Richfield, or the Agency for Toxic Substances Disease Registry include a garden produce study, sampling of dust in schools, and an exposure investigation. All required significant outreach efforts. Summaries of the information release to the public in fact sheets about these efforts are provided below.


Garden Produce Study

In fall of 2018, EPA conducted a study of garden produce and soil for certain metals and for attributes that may influence soil metal concentrations and/or uptake of these into produce. Participation was open to anyone in the community and 40 properties were included.

Produce Results

The findings for produce were:

1. Risks were within EPA’s acceptable risk range of 1 per 1,000,000 to 1 per 10,000 for cancer at all properties.
2. One property had slightly elevated non-cancer risks, due to arsenic.



Soil Results

1. No samples had arsenic concentrations above the soil cleanup level of 250 mg/kg.
2. Four garden soil samples had lead concentrations above the 400 mg/kg cleanup level. Produce from these gardens did not have elevated concentrations relative to the produce consumption levels.

A fact sheet on the garden produce study is available at EPA’s website.

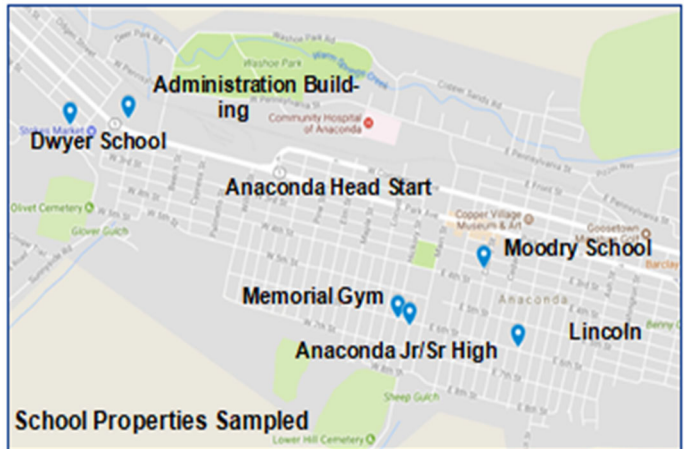
www.epa.gov/superfund/anaconda-co-smelter

School Dust Sampling

In March and June 2018, EPA sampled all Anaconda schools to determine the concentrations of arsenic and lead in interior dust and the potential for students and school personnel to contact dust at concentrations that exceed residential soil clean up levels. EPA placed and sampled entryway mats at all schools. March and June represented wet and dry conditions. Floor mat sampling was done in September instead of June to ensure conditions were representative of times when students are actively tracking dirt in on their shoes.

Sampling was consistent with how Atlantic Richfield samples residential interiors for dust (high-volume and micro-vacuum samplers). Over 250 samples were collected.

The results indicated that all arsenic and lead concentrations in accessible interior dust in all Anaconda schools were below cleanup action levels. However, a few dust samples collected in inaccessible areas (such as basements and boiler rooms) were above the cleanup levels. Based on this information, EPA cleaned up these inaccessible areas, since they were outside of the superfund remedy and thus could not require Atlantic Richfield to do so.



Exposure Investigation

In 2018, Agency for Toxic Substances Disease Registry (ATSDR) measured blood lead levels and urine arsenic levels in 367 Anaconda residents. The values in Anaconda were compared to those for the U.S. general population. ATSDR published the results in an exposure investigation report in 2019.

In brief, their four findings were:

1. **Blood lead levels.** Children under 6 and women of child-bearing age are the groups at greatest risk for harmful health effects from lead. In Anaconda, they had **less than 5 micrograms per deciliter (µg/dL)** of blood lead, which is not considered elevated. Children aged 6 to 19 also had less than 5 µg/dL and while some adults had blood lead levels slightly above national norms, they were still less than 5 µg/dL. No follow-up was needed.
2. **Inorganic Arsenic.** Inorganic arsenic is associated with smelter-related contamination and the mean level in Anaconda was **slightly lower** than the mean for the general U.S. A few people had elevated levels but not at concentrations expected to cause health problems.

3. **Total Arsenic.** Total arsenic is the sum of inorganic and organic arsenic. Inorganic is linked with smelter contamination, while organic comes mainly from diet (such as seafood and rice). Total arsenic in Anaconda participants was slightly higher than the U.S. population but is not considered to be a problem.
4. **Job- or Attic-Related Lead and Arsenic.** People who said that they had jobs where lead may be present had increased levels of blood lead. Blood lead and urinary arsenic were also elevated for people who regularly entered their attic.

ATSDR recommended that residents participate in the Community Soils cleanup, that the health department conduct regular blood lead screenings for children under 6, that EPA continue Superfund cleanup, and that people working in jobs where lead and arsenic are present wear appropriate personal protective equipment on the job.

Section 4 Environmental Justice

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 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.

Using readily available environmental and demographic information, EPA screens communities to highlight areas where disproportionate environmental and health impacts may fall on low-income and/or racial minority groups.

Local Suggestions to Address Environmental Justice

At the nearby Silver Bow Creek/Butte Area site, 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 reside in substandard housing—may be at a higher risk.

Suggestions included:

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

Suggested communication tools include:

- 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)

Suggested locations for outreach include neighborhood associations, workplaces, schools, homes, local meeting places (volunteer fire station), library, providers of services to low-income citizens, churches, and union halls.

EPA's Environmental Justice Action Plan

In January 2022, EPA prepared an *Environmental Justice Action Plan* (Appendix G) for Anaconda to promote environmental justice in the community. Highlights are presented below.

Environmental Justice Goals

- Embrace residents and representatives in Superfund decision making.
- Assess risks and design cleanups to reduce harmful effects of arsenic and lead.

- Make environmental justice concerns an integral part of EPA activities.
- Regularly inform the public of environmental justice activities being conducted.
- Promote the health of ADLC through a clean and healthy natural environment.

Steps to Meet the Goals

EPA will partner with community organizations and interested individuals to:

- Identify issues related to environmental justice and the impact of remediation decisions and activities on vulnerable communities.
- 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.
- Provide feedback opportunities for communities to EPA and partners regarding the implementation and effectiveness of the *Environmental Justice Action Plan*.

Potentially Impacted Area

EPA's screening and mapping tool, EJSCREEN www.epa.gov/ejscreen estimates the low-income population of ADLC at 43% (versus 34% for Montana and 33% nationwide). 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. Other ADLC demographics are presented in Section 3.

Updated CIP

EPA believes it is important to consider people in the community who may be non-English speakers or those 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 project team 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/interpretation as needed.
- Partner with community groups or leaders.
- Use nontraditional media outlets.
- Identify nongovernment venues for meetings.
- Schedule outreach activities to avoid conflicts with fishing, hunting, or agriculture.
- Distribute paper copies of outreach materials when access to electronic media is lacking.

Considerations Prior to Implementing Environmental Justice Activities

The following will be considered in implementing environmental justice activities at the site:

- Goals
- Roles of EPA, community partners and interested individuals
- Targets of specific activities
- How activities will promote environmental justice
- Timeframe
- Effective methodology and venues

Section 5 Stakeholder Concerns and Issues

The Anaconda Smelter site is in the final stages of the Superfund process described in Section 1 (remedial action and operations and maintenance). Residential cleanups are largely complete and the much of the work remaining is on hillsides and other remote areas outside town. Public interest in the project as a whole has waned over the decades and opportunities for public participation through public comment on decision documents has passed. Advertisements regarding the opportunity to be interviewed for the CIP revision were placed in the *Leader* and announcements were made in fact sheets. No one from the general public expressed an interest in being interviewed. In June 2020, EPA's five-year review contractor had the same experience. They ran ads in the *Anaconda Leader* for two weeks soliciting input from locals about the Superfund site and got no response.

Although public interest in remediation is relatively low, ongoing engagement is needed to finish residential cleanup, to raise awareness of the institutional controls process, and to obtain public input once the site-wide consent decree is finalized. Communication with stakeholders remains crucial for optimization of the cleanup process.

For that reason, EPA focused the CIP interviews on county employees with responsibilities for running the IC programs or the Superfund programs. Three interviews were conducted with representatives of ADLC in winter 2022 to determine their issues and concerns and those of the community they serve. EPA has been engaged with the public and major stakeholders, especially over the last ten years and feedback from that interaction has informed this section. Input from the 2020 interview with Arrowhead and the 2022 interviews with ADLC has been summarized herein.

Impacts of CoVid19 on Outreach

CoVid19 protocols for EPA, DEQ, and Atlantic Richfield prohibited non-essential travel and face-to-face meetings for the majority of 2020 and all of 2021. The frustration with the lack of in-person communication was apparent in the interviews.

At the time this CIP was updated, restrictions had recently been lifted or were expected to soon be lifted, allowing meetings and site visits to resume. The CIP addresses communication moving forward. Stakeholder preferences for type and frequency of meetings are noted.



Communication with EPA

Communication with EPA suffered during the period of CoVid restrictions on travel and meetings. However, a resumption of regular face-to-face meetings will likely address the issues. It was stated that EPA staff were “superb to work with and are good human beings.” Those interviewed felt that their concerns were heard, even if the result was not always what they had hoped for. In the past, EPA has been able to provide a deciding voice in disagreements between parties.

Interviewees stated that the interest level at the Region 8 has been missing over the last two years, especially in contrast to the two years prior. ADLC would like a visit from the new EPA Regional Administrator as soon as possible. The previous Regional Administrator visited several times and stated repeatedly that the site was a top priority for EPA. ADLC believes this is an important time to remain active, get things done, and keep people informed and “someone needs to put their foot on the accelerator to provide direction and pressure” to overcome the inherent inertia of Superfund.

Face-to-Face Stakeholder Meetings

ADLC requests that they be included in quarterly, face-to-face meetings with the agencies and Atlantic Richfield. Minor disputes that arise between Atlantic Richfield and ADLC about the way work is conducted could be resolved if EPA was in the room to break the stalemate. They need only last an hour or two.

Annual construction planning meetings with decision-makers at the agencies, Atlantic Richfield, and ADLC are also important.

Information Sources

People interviewed are directly involved in site Superfund activities and get their information from colleagues and meetings with agencies and stakeholders. They report that the public gets information from print media and social media.

Suggestions on how to communicate with the public are:

- **Newspaper Articles.** A lot of good work has been done in Anaconda that the public is not aware of. EPA, ADLC, and the DEQ should engage the *Anaconda Leader* and *Montana Standard*. Invite them to listen to success stories such as the trees planted as part of remediation, the potential for reuse after cleanup, or the success of vegetation in former barren areas.
- **Public Meetings.** Public meetings, especially with the Regional Administrator, are important. A public meeting may also be warranted to explain the site-wide consent decree when it is finalized.
- **Arrowhead Technical Assistance Group.** Arrowhead has been largely absent for two years and their website was last updated in January 2020. Discussions should be held about how best to use their website. EPA's fact sheets and other public-facing materials could be stored there and would be more accessible than they are on EPA's website.

Perhaps a schedule of remedial activities for each year would be useful.

- **Designated EPA Point of Contact for Referrals.** ADLC staff sometimes get questions they can't answer. For example, Warm Springs Ponds is in the county but is not part of the site. County staff would like to direct people with questions to the appropriate contact, but don't know who that is. They were surprised to find the Remedial Project Manager for the Warm Springs Ponds was Allie Archer, not Nikia Greene. The suggestion of using the EPA Community Involvement Coordinator, Dana Barnicoat, as a central contact met with some approval. ADLC would like to discuss his role and how he can help. Dana came on board just as CoVid travel restrictions were put in place.
- **Facebook.** EPA doesn't have a presence on Facebook in Anaconda, but people ask questions online about activity they see. In lieu of a credible source, they make stuff up. For example, people have posted that the earthwork on Smelter Hill is for a new subdivision.
- **Handouts.** Provide materials to put in the rack outside the CPMP office.

Concerns

- **Blowing Slag.** Interviewees are concerned about slag that blows across the highway and may contaminate the water treatment facility and previously remediated areas. They have not reported their concern to EPA. EPA needs to be in the room when they have a meeting with Atlantic Richfield to clarify the authorities and responsibilities related to restoration and revegetation of the slag pile. They believe that Atlantic Richfield is needlessly dragging their feet on this issue.
- **Warm Springs Ponds.** Are the ponds contaminating the river? This is not part of the site but is an EPA site and is in the

county. People are trying to figure out what is going on with the fish downstream. They will want to know more about waste in the pond in the near future.

- **Revegetation.** Areas denuded by contamination need to be revegetated to prevent blowing dust and soil erosion.
- **Reuse of the Triangle Wastes.** This is the largest tract of land for reuse and there is huge potential for reuse, but land discussions have been off the table.
- **Funding for Institutional Controls.** Agreements made with Atlantic Richfield for funding ADLC administration of the institutional controls program have not kept pace with inflation. Without adequate funding, the county cannot run the program.
- **Cleanup Goal.** The 2025 goal for active cleanup is not realistic.
- **Loss of Institutional Knowledge.** Jim Davidson recently retired from Anaconda Local Development Corporation. Charlie Coleman is retiring from EPA. Joel Chavez of DEQ retired in December. These are people who have been on the project for decades.
- **Lack of An Easy Source of Public Information.** Up to date information about the remediation isn't readily available. The Superfund library has not been maintained since Arrowhead stepped away from it. There is an online document registry, but the public doesn't have access, nor do groups who want to provide information.
- **Trespassing.** The five-year review interview noted that "*...people motorbike and ride ATVs in the hills and do trespass the stack on smelter hill. We want public trails and also do not want the capped areas to get wrecked. The public would like a greenway from Whitehall to Anaconda.*"

- **Simple Information.** The five-year review noted that "The hardest part is for people to understand the science. Even when an EPA scientist comes here to present, the information goes in one ear and out the other for many folks. A lot of people here talk about cancers and illnesses in the community."

Cleanup Expectations

It was stated by all interviewees that an impressive amount of work has been done. Expectations for the future include:

- **Continued Cooperation.** There is confidence in the Superfund process in the near future as teams are in place to address issues like the mudslide/rockslide at golf course and the subdivision on Pennsylvania. ADLC is not sure how things will be handled beyond that. They are hopeful that the five-year review process will catch problems to be fixed and Atlantic Richfield will fix them.
- **Revegetation.** Revegetate Hillsides A and C and Stuckey Ridge.
- **Covered Slag Pile.** The blowing slag must stop.
- **Stormwater Controls.** Stormwater controls need to be completed around Clear Creek and Sheep Gulch.
- **A Clean and Healthy Environment.** ADLC trusts that EPA won't leave until this is ensured.
- **Replacement of What Was Lost.** Revegetate, reforest, redevelop the economic community. Anaconda was a great contributor to the development to the nation. It is the Gateway to the Pintler Range and is a young and thriving community that has been reinvigorated. The 2020 partial consent decree was able to resolve an amazing amount of issues. There is a new Murdoch's store, a wastewater treatment plant, and a new water system. The heavy lifting has been done. Finish the deal.

Institutional Controls

ADLC reported that the institutional controls are functioning as planned and that the public is compliant with the permit requirements and the protocols put in place to prevent waste from being disturbed. Tweaks and adjustments are made as needed.

In their interactions with the public, ADLC stresses that people should focus on the desire for a clean community and a healthy place for their kids to live. ADLC also points out the value in knowing that, if questions arise during a future sale of the property, the homeowner can show that they participated in the DPS. ADLC reports that the public also reaches out to them for additional information and follow-up when a child has tested high for blood lead levels.

Input on institutional controls from the five-year review was, *“There are outstanding questions about how the institutional controls will work, including the liability and who pays for sampling and soil work. Also, how the enforcement of institutional controls will be funded. The local planning office has only two staff and would not be expected to monitor how folks are using properties.”*

Future Land Use

Concerns about future land use were minimal and most interviewees believed the “Superfund stigma” was no longer a significant issue at the site. ADLC believes that EPA and Atlantic Richfield have been responsive about addressing issues from potential buyers as they arise. It now seems like “everyone and their brother is trying to find land to develop.” Although high-end commercial real estate developers sometimes get spooked about covenants, ADLC believes that the covenants are there for a good reason.

Input from the five-year review regarding future land use was, *“From a land buyer perspective, it is tough for a prospective buyer to come in and see a big document with land covenants. Updating the covenants is a huge process since each deed has all the covenants attached. ARCO solution is to say we will take off the covenants if buyer signs covenant not to sue but this is still unclear.”*

Section 6 Community Involvement Action Plan

Communication and engagement are important throughout the Superfund process to ensure the public is aware of opportunities for meaningful involvement. This section presents tools for meeting that goal in two parts:

- **Planned Actions.** Specific steps to be taken to provide outreach and address topics outlined in Sections 4 and 5.
- **Measurement of Success.** Why and how EPA will measure outreach success.

This CIP is a blueprint for EPA’s planned outreach. It is a living document and will change as work progresses. As noted in Section 4, EPA is committed to environmental justice and will use the *EJScreen* mapping tool when planning new outreach efforts. This will provide insight into challenges that people might have in understanding and following complexities associated with risk and with Superfund investigation or cleanup.

Site-specific *EJScreen* maps (Appendix G) identify areas with populations that may be most susceptible to metals contamination (children under age 5, low-income, and lead paint potential). Maps of low-income and education levels highlight where face-to-face rather than written communication may be needed. Specific factors mapped will depend on the task at hand. EPA urges stakeholders to consider environmental justice in their plans and activities and will encourage use of the *EJScreen* mapping tool, or other tools, in that effort.

The table on page 24 lists EPA’s responsibilities for community involvement under CERCLA and includes additional work EPA has completed or will undertake to engage the community. All CERCLA-mandated tasks have been completed (see Section 3) and the remaining activities are ongoing. EPA is committed to community engagement in Anaconda and has been for decades.

ACTION PLAN			
WHO	WHAT	WHEN	HOW

Planned Actions

Planned actions are outreach activities EPA intends to implement, as needed based on CERCLA requirements and on community input.

CERCLA-Required, Ongoing Actions



Points of Contact

EPA points of contact for the site are provided in Appendix A. Contact information for distribution of information are provided in Appendices B, C, and D.



Administrative Record/Information Repository

EPA will continue to make public information available in the administrative record and information repository. Documents will be posted in a timely fashion and hard copies will be placed in the local repository. Contact information is provided in Appendix F.

CIP

Community Involvement Plan

Superfund sites are required to have a CIP and the plan is reviewed periodically to ensure it is up to date, particularly the lists of contacts. EPA may occasionally seek feedback from organizations, stakeholders, and individuals on the success of various outreach effort.

When	Community Involvement Action
Ongoing Activities	
Throughout cleanup	<ul style="list-style-type: none"> ▪ Maintain EPA points of contact with the community ▪ Update the administrative record, information repository, and CIP ▪ Schedule a visit to the site by the EPA Regional Administrator ▪ Explore the interest in a public meeting, tour, or open house, possibly for the 2022 site-wide consent decree ▪ Hold quarterly stakeholder meetings and annual construction meetings ▪ Optimize the strengths of Arrowhead ▪ Explore the interest in quarterly online community meetings ▪ Brief elected officials, as needed ▪ Explore the interest in limited site tours ▪ Prepare annual updates, topical fact sheets, and other written materials ▪ Maintain an email list for distributing materials electronically ▪ Run ads in the <i>Anaconda Leader</i>, as needed ▪ Coordinate with ADLC and Atlantic Richfield to promote a story of site progress in the <i>Leader</i> and/or <i>Montana Standard</i> ▪ Ensure the EPA website is updated and urge Arrowhead to update theirs by providing fact sheets and other informational materials for Arrowhead to post ▪ Explore the use of social media with Arrowhead ▪ Measure success and effectiveness
Completed Activities	
Prior to remedial investigation fieldwork	<ul style="list-style-type: none"> ▪ Establish information repositories and an administrative record file ▪ Publish notice of availability in paper ▪ Conduct community interviews ▪ Prepare a CIP
Upon release of a proposed plan	<ul style="list-style-type: none"> ▪ Publish proposed plan notice in the newspaper ▪ Prepare a fact sheet that summarizes the proposed plan and provides other information ▪ Add proposed plan and supporting information to administrative record ▪ Provide a public comment period of at least 30 days ▪ Conduct a public meeting and add transcription to administrative record
After the public comment period	<ul style="list-style-type: none"> ▪ Summarize significant comments and EPA’s responses (responsiveness summary) and make available with the record of decision
After a record of decision is signed and prior to a remedial action	<ul style="list-style-type: none"> ▪ Make the record of decision available for public inspection at or near the site and in the administrative record ▪ Publish notice of availability for record of decision in local newspaper ▪ Prepare a record of decision fact sheet
Prior to remedial design/cleanup	<ul style="list-style-type: none"> ▪ Review/revise the CIP ▪ Issue a fact sheet on the remedial action ▪ As appropriate, provide a public briefing on the remedial action

Red text is outreach mandated by CERCLA Black text is *additional* outreach conducted and/or proposed by EPA.

Outreach Milestones at the Anaconda Smelter Superfund Site

Other Outreach Activities



EPA Regional Administrator Site Visit

EPA understands ADLC is eager for a visit from the newly appointed Regional Administrator, K.C. Becker, to introduce her to the Anaconda site and to ensure it remains a priority for EPA. Arrangements for a visit in 2022 will be a priority. The visit may coincide with a public meeting or other event.

Public Meetings/Open Houses



EPA will sponsor public meetings at appropriate times during remediation. These may include update meetings and construction status meetings (such as prior to the start of field work). Virtual meetings may be needed 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. If there is interest, the public meeting can be supplemented with an open house where poster stations are staffed with technical and resource personnel from the various stakeholders who guide people and answer questions. Meetings will be held at locations that meet the accessibility requirements of the American with Disabilities Act at times that are convenient locals. Handouts and visual aids will explain technical issues in accessible language and advertisements will run at least a week in advance in the *Anaconda Leader*. Announcements may also be made by email or on websites of interested groups (e.g., Arrowhead). The news desk of the *Anaconda Leader* and *Butte Standard* will be notified to allow them the to cover the meeting.

Stakeholder Meetings



Under the site management plan, EPA, DEQ, ADLC, and Atlantic Richfield meet annually. Based on input from ADLC during the interviews, EPA will consider quarterly, face-to-face meetings, if all parties are amenable. These meetings could be venues to discuss the issues in Section 5, such as redevelopment of the Triangle Wastes. Annual construction meetings will also continue to be held with decision-makers who represent the agencies, Atlantic Richfield, and ADLC.

Optimize Strengths of Arrowhead



Arrowhead is tasked with interpreting and explaining technical reports, site conditions, and EPA's proposed cleanup plans. They are responsible for sharing information with the community at large. EPA is exploring opportunities to use Arrowhead's strengths in information sharing during the cleanup. This may include presenting at meetings, providing information for the Arrowhead website, using Arrowhead's website as a second local information repository, and providing handouts or other materials for events.

Community Calls



EPA coordinates monthly calls for the Butte community and will explore holding similar calls in Anaconda on a quarterly basis. Based on the successful model used by EPA in Butte, the online meetings would be led by EPA's Community Involvement Coordinator, Dana Barnicoat, and would allow EPA, DEQ, ADLC, and Atlantic Richfield to provide updates. Other organizations, such as Arrowhead, would be invited to present about related issues.



Briefings for Elected Officials

Briefings for elected officials, such as the commissioners, school board, or Chief Executive, can be scheduled, as needed, to communicate significant events. Handouts may be provided to assist officials in responding to public inquiries.



Tours

If there is interest, EPA would be open to facilitating a tour with the cooperation of Atlantic Richfield and ADLC to highlight a particular aspect of site remediation. A tour can give the public access to portions of the site that are normally restricted, but which may be of interest. The most recent public tours were those of the Anaconda Stack conducted for *Smelterman's Days*.



Written Materials

EPA will periodically prepare written materials to increase project awareness. Moving forward, these will most likely include fact sheets and topic-specific handouts. Materials will be geared to an audience not trained in environmental issues and will include graphics and photos. Content may include project status, work conducted, recently released documents, contacts, and project milestones.



Mailing List

EPA will update a mailing list that includes property owners, individuals and organizations identified in the appendices, and people who indicate their interest on sign-in sheets or who otherwise ask to be added. The focus will be on distributing materials electronically via email.



Advertisements

EPA will continue to place advertisements in the *Anaconda Leader* on topics such as the issuance of significant documents (the *Environmental Justice Action Plan*, CIP, and five-year reviews) and upcoming public meetings. Advertisements will be user-friendly and contain graphics.



Media Interaction

EPA will coordinate with ADLC to promote a story of site progress in the *Anaconda Leader* and/or *Montana Standard*. Suggestions provided by ADLC include the success of tree planting and revegetation in reclaimed areas and the potential for redevelopment.



Social Media and Websites

EPA will explore the use of social media to notify the public of upcoming meetings, available documents, and opportunities for involvement. This may be done most effectively by Arrowhead, as the holder of the TAG grant.

EPA's website will be updated with fact sheets, handouts, maps, and other items of public interest. EPA will encourage the development of a single, non-EPA website that is easy to find and update (possibly hosted by Arrowhead or Atlantic Richfield). EPA may also explore the use of visual tools such as Arc-GIS storyboards to provide an easy-to-digest format for complicated issues.

Measurement of Success

EPA will implement outreach activities to build on and improve engagement with the local community 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?

To ensure outreach efforts are effective, EPA periodically monitors the work conducted to determine if adjustments are needed. Consistent evaluation of outreach can help the team continuously improve its approach.

Obtaining and responding to feedback is important to measuring success. Feedback will be evaluated and used to adjust specific activities or the overall approach. Specific methods can be determined as work progresses and will include tracking of project progress milestones.



Informal feedback comes from conversations with community members regarding outreach and can be used to address 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* to gather input about EPA's efforts.



Section 7 References Cited

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<https://19january2017snapshot.epa.gov/superfund/community-involvement-tools-and-resources.html>

NCP. 1994. *National Oil and Hazardous Substances Pollution Contingency Plan*.

U.S. Census. 2021. www.census.gov/quickfacts/fact/table/anacondadeerlodgecountymontana/PST045221

Appendix A Federal and State Agency Contacts

U.S. Environmental Protection Agency

Region 8, 1595 Wynkoop St., Denver, CO 80202-1129, 303-312-6312

- **Region 8 Regional Administrator**, K.C. Becker, beckerkc@epa.gov
- **Region 8, Superfund and Emergency Management Division Director**, Betsy Smidinger, Smidinger.betsy@epa.gov

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

- **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
- **Montana Office Remedial Project Manager:**
 - Charlie Coleman, 406-457-5038, coleman.charles@epa.gov,
- **Montana Office Community Involvement Coordinator**, Dana Barnicoat, 406-560-6261, barnicoat.dana@epa.gov

Montana Department of Environmental Quality

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

- **Headquarters**, 1520 East Sixth Avenue, Helena, MT
 - Chris Dorrington, Director, cdorrington2@mt.gov, 406-444-2544
- **Waste Management and Remediation Division**, 1225 Cedar Street, Helena, MT
 - The Administrator position is vacant at this time
 - Kevin Stone, Public Information Specialist, kevin.stone@mt.gov, 406-444-6469
- **Federal Superfund and Construction Bureau**, 1225 Cedar Street, Helena, MT
 - Gordon Levin, Senior Project Officer, Gordon.levin@mt.gov, 406-444-6569

Appendix B Federal Elected Officials

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

Appendix C State, County, and Local 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 address above)

County Representatives in State Legislature

- House District 77, Anaconda-Deer Lodge County, Sara Novak (D) 2136 N. Cable Road, Anaconda, MT 59711, novak4hd77@gmail.com
- 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 39, Anaconda-Deer Lodge County, Mark Sweeney (D), P.O. Box 200500, Helena, MT 59620-0500, 406-560-0171, masween@hotmail.com

Local Officials

Anaconda-Deer Lodge County Commission, 800 Main Street, Anaconda, MT 59711

- Chief Executive, Bill Everett, Courthouse, First Floor, 800 Main Street, 406-563-4000, beverett@adlc.us
- Anaconda-Deer Lodge County Planning Department, Courthouse, First Floor, 800 Main Street, 406-563-4015, Director, 406-563-4015, chamming@adlc.us
- Anaconda-Deer Lodge County Superfund Division, Anaconda Community Service Center, Third Floor, 118 E 7th Street, Superfund Operations Manager, Carl Nyman, 406-563-7019, cnyman@adlc.us
- Anaconda-Deer Lodge County Commission, 800 Main Street, Anaconda, MT 59711. No phone number provided. Email for Clerk of Commission lsturm@adlc.us
 - District 1 Terry Vermeire
 - District 2 Steve Gates
 - District 3 Kevin Hart
 - District 4 Paul Smith
 - District 5 Mike Houtte
- Tri-County Environmental Health, Anaconda-Deer Lodge County Courthouse, Third Floor, 800 Main Street, Anaconda, MT 59711, Sanitarian, Chad Lanes, 406-563-4066

Appendix D Potential Stakeholder Group Contacts

- **Anaconda Historical Society**, 401 E Commercial Ave # A, Anaconda, MT 59711, 406-563-2422
- **Anaconda Local Development Corporation**, 406-563-5538, www.anacondadevelopment.org
- **Arrowhead Foundation**, 406-563-5538, 118 East 7th Street, Anaconda, MT 5971, www.anacondasuperfund.com,
- **Clark Fork Coalition**, PO Box 7593, Missoula, MT 59807, 406-542-0539, 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 – Institute for Educational Opportunities, 1300 West Park Street, Butte, MT 59701, 406-490-5191
- **Discover Anaconda/Anaconda-Deer Lodge Chamber of Commerce**. 306 East Park Avenue, Anaconda, MT, 406-563-2400, info@discoveranaconda.com, www.discoveranaconda.com
- **Elks Club**. P.O. Box 757, Anaconda, MT 59711, 406-560-2236,
- **Rotary Club**, PO Box 1152, Anaconda MT, 59711, AnacondaRotaryClub@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
- **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

Appendix E Local Media Contacts

Television

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

Newspapers

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

Radio

- **KBOW/KOPR Radio**, PO Box 3389, 660 Dewey Boulevard, Butte, MT 59701, 406-494-7777 mail@kbowkopr.com
- **MTPR**, Montana Public Radio, University of Montana, 32 Campus Drive, Missoula, MT 59812 406-243-4931, news@mtpr.org,

Appendix F Meeting Locations, Administrative Record, Information Repositories, Websites

Meeting Locations

- Anaconda High School, Little Theater, 515 Main Street, Anaconda, MT
- Metcalf Senior Center, 115 East Pennsylvania, Anaconda, MT, 406-563-3504

Administrative Record

- EPA Records Center, 10 West 15th Street, Suite 3200, Helena, MT, 406-457-5046

Information Repositories

- EPA website, www.epa.gov/superfund/anaconda-co-smelter
- Arrowhead Foundation, www.anacondasuperfund.com

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



Appendix G

EPA's Environmental Justice Action Plan

Environmental Justice Action Plan

Anaconda Smelter Superfund Site, Anaconda, MT

The U.S. Environmental Protection Agency (EPA) promotes and supports environmental justice in all its programs and activities. This environmental justice action plan establishes environmental justice goals, objectives, and considerations for the Anaconda Smelter Superfund site. It has been included as an appendix to the 2022 update of the community involvement plan for the Anaconda site.

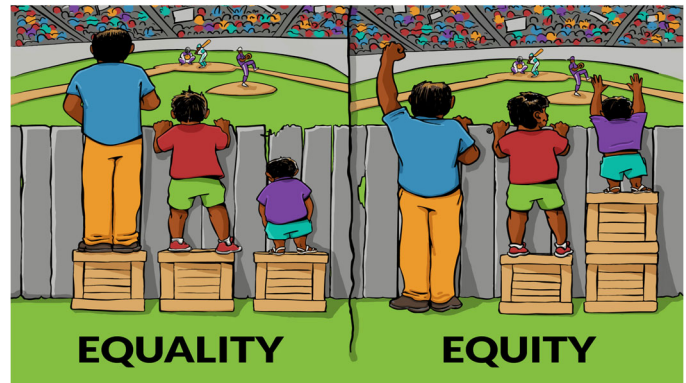
What is Environmental Justice and What Does it Include?

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 further 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, including a racial, ethnic, or a socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal and commercial operations.*”

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 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](#))



Interaction Institute for Social Change | Artist: Angus Maguire.

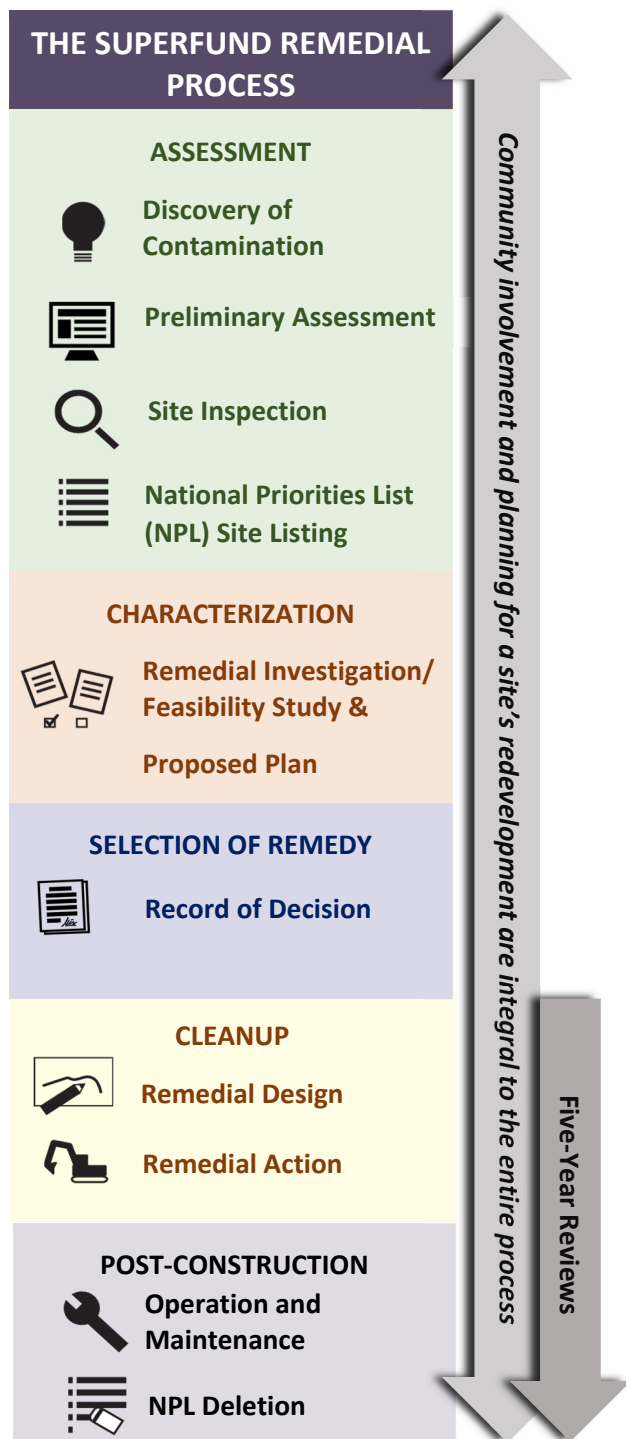
<https://interactioninstitute.org/illustrating-equality-vs-equity/>

Environmental Protection Agency and Community Partnership Action

Partnering with community organizations and interested individuals will help achieve EPA's environmental justice goals for the site and facilitate effective implementation. EPA will partner with community organizations and interested individuals in Anaconda to:

1. Identify environmental justice issues in vulnerable communities.
2. Evaluate the impact of remediation decisions and activities on vulnerable communities.
3. Develop and disseminate information specifically targeted to low-income residents, including rural residents, regarding the impact of remediation decisions and activities as well as steps individuals can take to protect themselves and their families from exposure to arsenic and lead.
4. Develop and disseminate information that focuses on services that are available to lessen exposure to the vulnerable.

- Provide feedback opportunities for low-income communities regarding implementation and effectiveness of the environmental justice plan.



ranking for several variables related to environmental justice: low-income, population over 64 years of age, population with less than high school education, and lead paint indicator (age of homes). Anaconda’s population of children under age 5 is low in comparison with the nation and there are no identifiable issues related to language.

Community Involvement Plan

EPA’s community involvement plan for the Anaconda site was revised in 2022 to cover the remainder of the cleanup work at the site. It includes EPA’s commitment that Anaconda residents will be represented in a meaningful way and will have meaningful opportunities to participate.

EPA’s Community Involvement Handbook states, “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.”

EPA’s Anaconda site team will embrace this approach to community involvement. Assessing and addressing environmental justice concerns will be an overarching theme to keep in mind when planning and conducting 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 nongovernment locations to hold public meetings; scheduling community involvement activities at times other than during subsistence fishing, hunting, or agriculture seasons; and continuing to distribute paper copies of outreach materials when members of the community lack access to electronic forms of communication.”

Profile of The Potentially Impacted Area

Environmental Justice Screening and Analysis (EJSCREEN) is EPA’s nationally consistent screening and mapping tool. An EJSCREEN report is provided at the end of this plan that describe the area in and near the site. The report shows that the Anaconda area has a higher-than-average

Considerations Prior to Implementing Environmental Justice Activities

As part of implementing the environmental justice action plan in Anaconda, EPA, and its partners (in collaboration with interested organizations and individuals) will:

1. Specify and delineate goals for reaching out to the low-income community.
2. Specify EPA's role and the role to be played by community partners and interested individuals.
3. Determine the target of specific activities and how EPA and its partners will interface with the target. Low-income communities are the environmental justice concern and focus.
4. Develop and articulate a clear understanding of why focused activities are a priority for EPA and a commitment to promote environmental justice.
5. Develop a timeframe for focused activities and outreach.
6. Articulate the steps for reaching out to low-income citizens and determine the most effective venues for outreach.

Arrowhead Technical Advisory Group and Anaconda-Deer Lodge County Institutional Controls Program

EPA will work alongside the Arrowhead Technical Advisory Group and the county's Superfund and Planning Department representatives to ensure environmental justice information and activities are available to all.

Goals for Environmental Justice Activity

- Embrace all residents and representatives in Superfund decision making.
- Assess risks and design cleanups to reduce differential harmful effects of arsenic and lead.
- Make environmental justice concerns an integral part of EPA activities.
- Inform the public on a regular basis of the environmental justice activities being conducted.
- Promote the overall health of Anaconda-Deer Lodge County through a clean and healthy natural environment.

Site Activities

Environmental justice activities will include:

- Tailor cleanup activities to address the needs of citizens, where possible.
- Involve low-income communities in Superfund remedial design decision making, where possible.
- Partner with local government and groups that promote environmental justice.

- Promote educational outreach about human health protection in the community.
- Help the health department promote and foster environmental justice.
- Identify opportunities for financial support, where possible.
- Make the environmental justice action plan part of the community involvement plan.
- Continue to include an environmental justice assessment/evaluation as part of all five-year reviews.
- Designate an EPA Montana Office employee as a member of the Region 8 Environmental Justice Action Team.

Involving the Community in Superfund Decision Making

EPA will tailor outreach activities to low-income citizens and will identify opportunities for those individuals to serve on existing and future community groups, where they exist.

Cleanup Considerations

EPA will evaluate the unique adverse and disproportionate effects of cleanup on low-income citizens. Together with our partners, we will focus on the special needs of those populations in terms of outreach. This may include providing information on cleanup and institutional controls in hard copy to people who may not have access to internet. We may reach out by mail, go door-to-door, or provide environmental justice information and contact information at local low-income community service centers.

Examples of Environmental Justice Successes in Anaconda

School Dust Sampling

In March and June 2018, EPA sampled all Anaconda schools to determine the concentrations of arsenic and lead in interior dust and the potential for students and school personnel to contact dust at concentrations that exceed residential soil clean up levels. EPA placed and sampled entryway mats at all schools. March and June represented wet and dry conditions. Floor mat sampling was done in September instead of June to ensure conditions were representative of times when students are actively tracking dirt in on their shoes. Sampling was consistent with how Atlantic Richfield samples residential interiors for dust (high-volume and micro-vacuum

samplers). Samples were also taken from areas generally inaccessible to students and staff (such as pipe runs, tops of ceiling tiles, and boiler rooms). These areas are rarely, if ever, cleaned and are the most likely to contain smelter-related deposits. As such, they represent the worst case. Over 250 samples were collected.

There were no exceedances of arsenic or lead cleanup levels in airborne or surface dust from accessible areas. Areas where children spend the most time and have the greatest potential of exposure do not pose a risk and do not appear to contain smelter-related material. There were also no exceedances of arsenic or lead cleanup levels in floor mat samples, indicating that smelter-related material is not being tracked into school interiors. The job done by the maintenance staff is largely responsible for the low levels of dust in the accessible areas of active schools.

Some exceedances for lead were not related to elevated arsenic. Because smelter-related wastes have both lead and arsenic in elevated concentrations, this indicates that elevated lead is likely from past use of lead-based paint, common in buildings of this age. Similar results would be expected in schools of the same age across the country.

Cleanup of the inaccessible attic dust with elevated lead concentrations was completed in 2018 for the active school and 2019 for the inactive school. No additional follow up or sampling is needed.

Garden Study

In fall of 2018, EPA conducted a study of garden produce and soil for certain metals and for attributes that may influence soil metal concentrations and/or uptake of these into produce. Participation was open to anyone in the community and 40 properties were included.

The findings for produce were:

- Risks for produce were within EPA's acceptable risk range of 1 per 1,000,000 to 1 per 10,000 for cancer at all properties.
- One property had slightly elevated non-cancer risks from produce, due to arsenic.
- No soil samples had arsenic concentrations above the soil cleanup level of 250 mg/kg.
- Four garden soil samples had lead concentrations above the 400 mg/kg cleanup level. Produce from these gardens did not have elevated concentrations relative to the produce consumption levels.

Exposure Investigation

In 2018, the Agency for Toxic Substances Disease Registry (ATSDR) measured blood lead levels and urine arsenic levels in 367 Anaconda residents. The values in Anaconda were compared to those for the U.S. general population. ATSDR published the results in an exposure investigation report in 2019.

ATSDR's findings were:

- **Blood lead levels.** Children under 6 and women of child-bearing age are the groups at greatest risk for harmful health effects from lead. In Anaconda, they had less than 5 micrograms per deciliter ($\mu\text{g}/\text{dL}$) of blood lead, which is not considered elevated. Children aged 6 to 19 also had less than 5 $\mu\text{g}/\text{dL}$ and while some adults had blood lead levels slightly above national norms, they were still less than 5 $\mu\text{g}/\text{dL}$. No follow-up was needed.
- **Inorganic Arsenic.** Inorganic arsenic is associated with smelter-related contamination and the mean level in Anaconda was slightly lower than the mean for the general U.S. A few people had elevated levels but not at concentrations expected to cause health problems.
- **Total Arsenic.** Total arsenic is the sum of inorganic and organic arsenic. Inorganic is linked with smelter contamination, while organic comes mainly from diet (such as seafood and rice). Total arsenic in Anaconda participants was slightly higher than the U.S. population but is not considered to be a health risk.
- **Job- or Attic-Related Lead and Arsenic.** People who said that they had jobs where lead may be present had increased levels of blood lead. Blood lead and urinary arsenic were also elevated for people who regularly entered their attic.

ATSDR recommended that residents participate in the Community Soils cleanup, that the health department conduct regular blood lead screenings for children under 6, that EPA continue Superfund cleanup, and that people working in jobs where lead and arsenic are present wear appropriate personal protective equipment on the job.

Blood Lead Testing and Attic Dust Sampling

In response to ATSDR's recommendations, Anaconda Deer Lodge County offers free blood lead testing all residents. Attic dust sampling is also available at no charge for area residents in homes built before 1980.

The Community Protective Measures Program

The Community Protective Measures Program (CPMP) provides:

- Home inspections to identify sources of contamination
- Renovation kits to reduce contamination from home improvement projects and loans of high-efficiency vacuums to cleanup residual contamination
- Clean soils for existing or proposed vegetable gardens and play areas

The goal of the CPMP's Soil Swap Program is to assist property owners in creating a protective barrier between human contact and possible contamination. Homeowners within the Anaconda Superfund Overlay Area can obtain replacement soil for two, 4-foot by 8-foot inground or raised garden beds free of charge by calling the CPMP.

Raised beds extend Montana's limited growing season by allowing soil to warm up faster and drain better. Weeds are also easier to manage and there is less bending.

Test by Request

Property owners who want their yards tested, at no cost to them, for arsenic and lead can contact the Anaconda-Deer Lodge County Institutional Controls Program.

Housing and Urban Development Property Cleanups

Cleanup was expedited at four Housing and Urban Development Properties (Cedar Park Homes, Mount Haggin Homes, Pintler Apartments, and PJ Hagan Manor) sampled in 2018 and 2019. The cleanup addressed arsenic and lead concentrations that exceeded one or both action levels for cleanup. EPA provided special fact sheets for the residents prior to cleanup.

Community Focused Fact Sheets

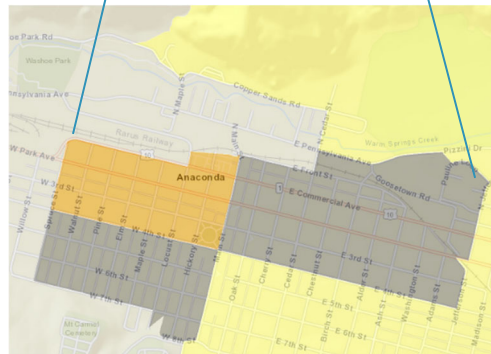
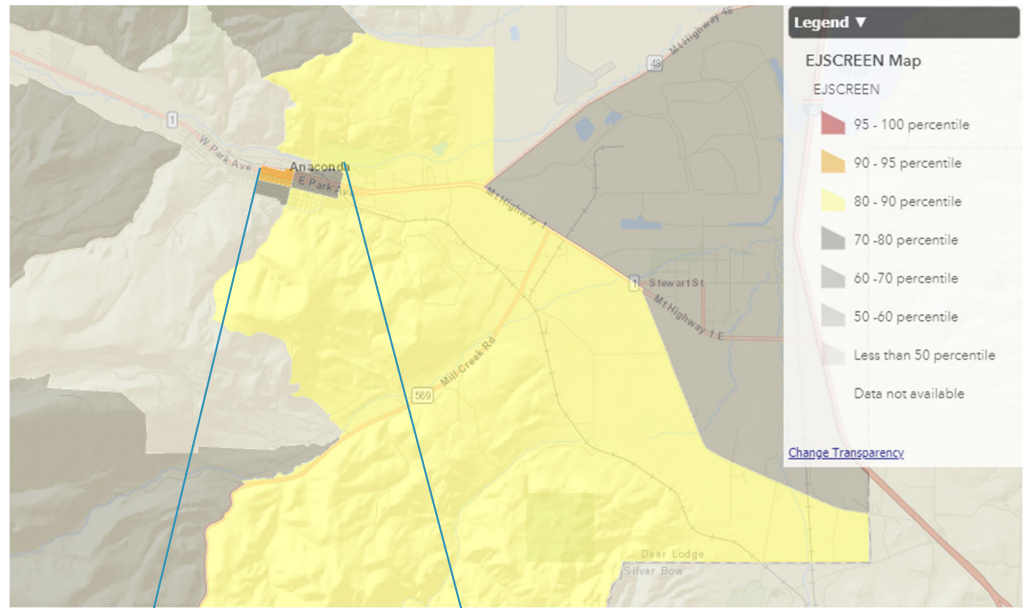
EPA has developed numerous fact sheets focused on providing easy to understand information for specific aspects of this very large and very complicated site. These fact sheets are announced in the newspaper and available online at EPA's website. Hard copies are generally available the offices of Arrowhead or the county's IC program (see last page).

The most recent examples include:

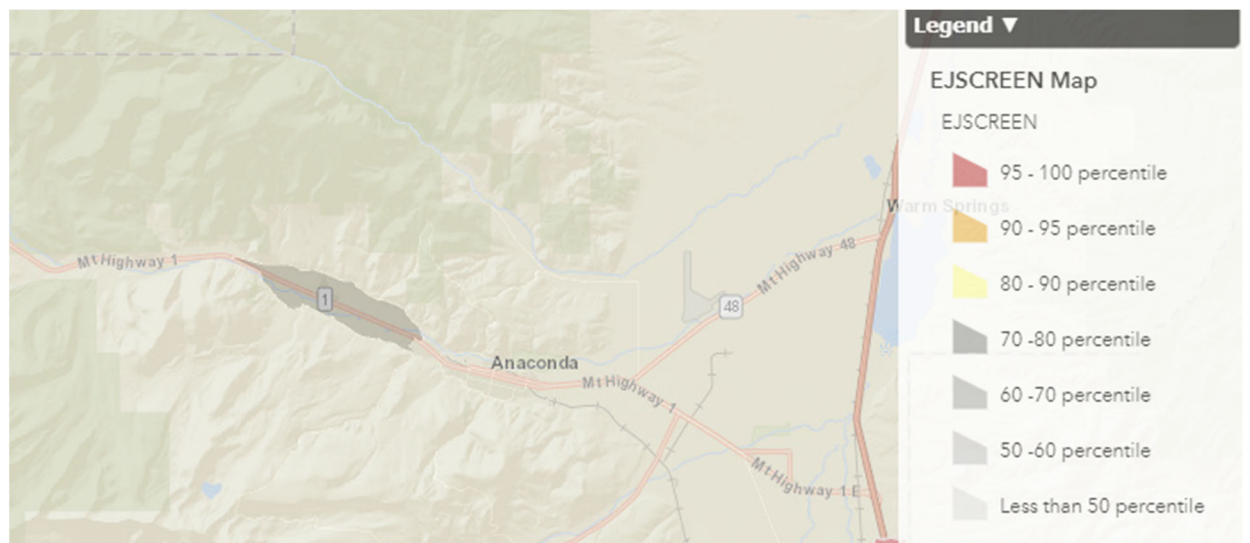
- *A Closer Look at Slag*, September 2021
- *2020 Five-Year Review*, April 2021
- *2020 Project Update*, February 2021
- *EPA Completes Anaconda Garden Produce Study*, September 2020
- *Mt. Haggin Homes 2020 Cleanup*, June 2020
- *Pintler Apartments 2020 Cleanup*, June 2020
- *PJ Hagan Manor 2020 Cleanup*, June 2020
- *Anaconda Smelter Healthy Home Best Practices*, June 2020
- *EPA Community Education Series Fact Sheet, Supplement Surface Water Remediation Work Plans*, August 2019
- *EPA Community Education Series Fact Sheet, 2017 Surface Water Technical Impracticability Report*, August 2019
- *Cedar Park Homes 2019 Cleanup*, March 2020

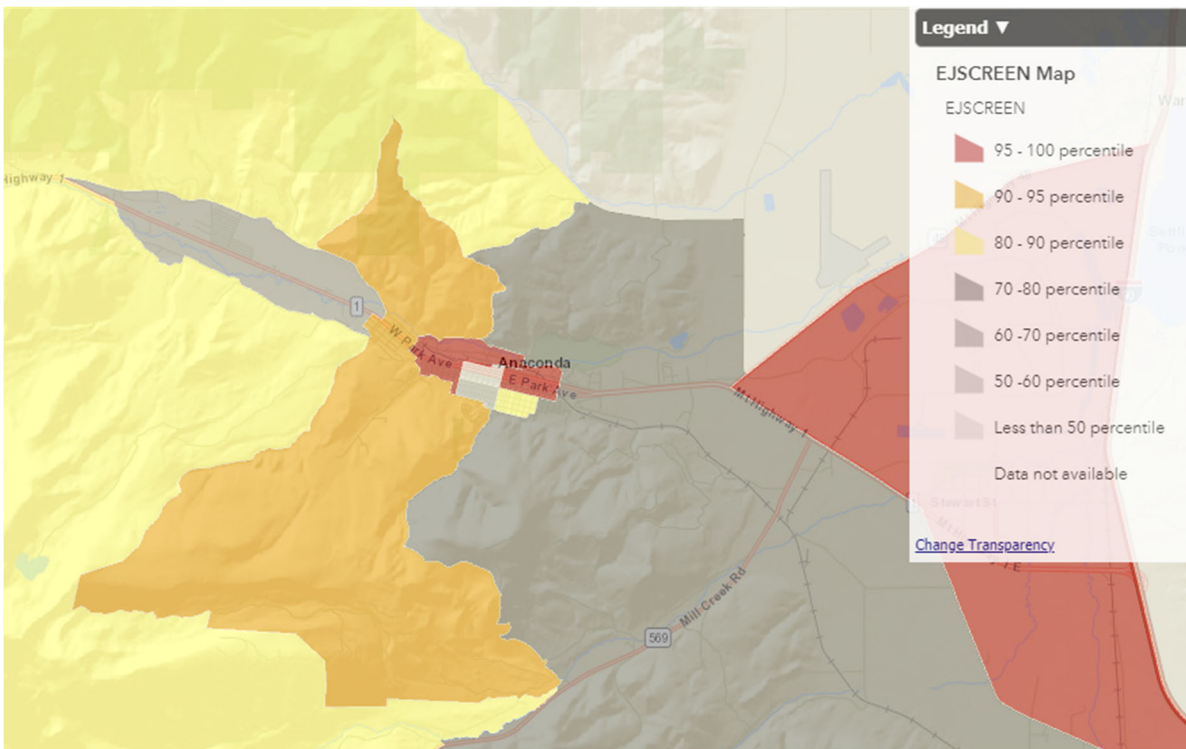
EJScreen Maps for Income, Age, and Education

Environmental Justice Low-Income



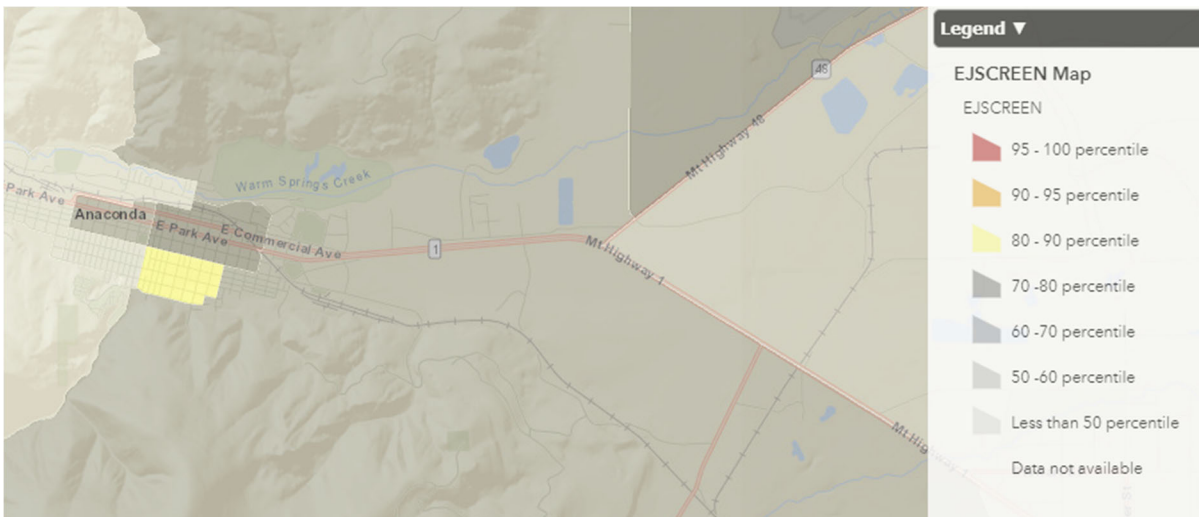
Population Less Than 5 Years Relative to National Percentages





Population Greater Than 64 Years Relative to National Percentages

Population with Less Than High School Education



Relative to National Percentages

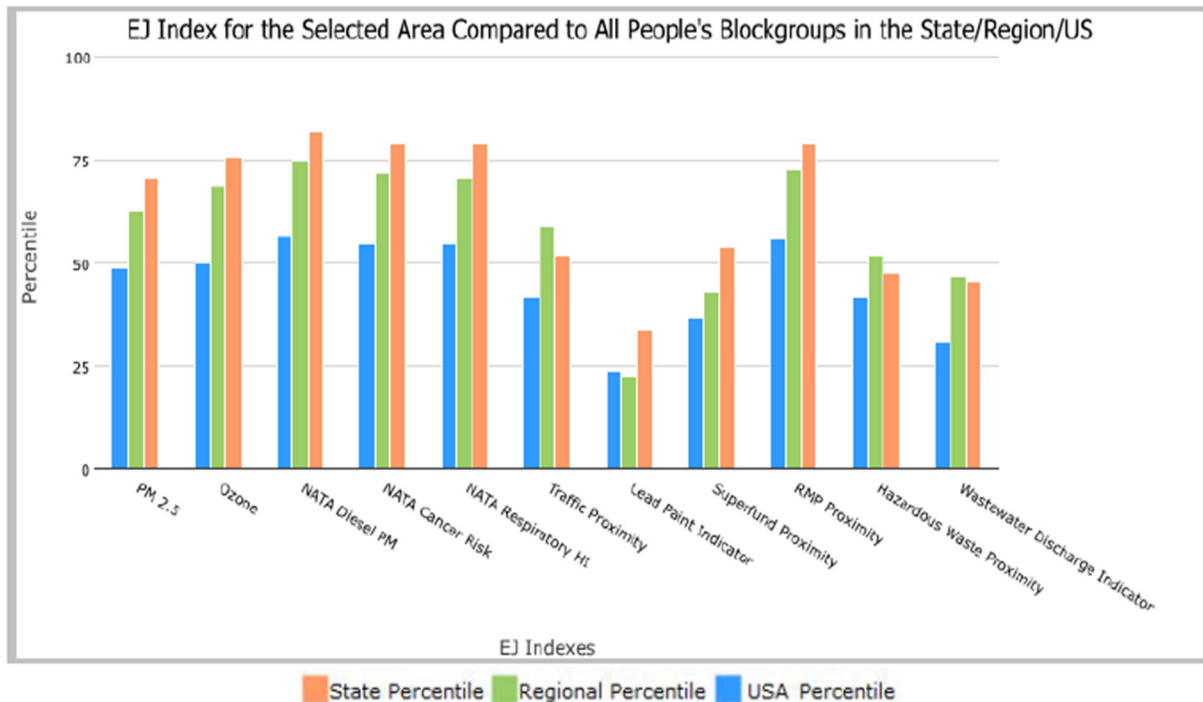
the User Specified Area, MONTANA, EPA Region 8

Approximate Population: 6,842

Input Area (sq. miles): 79.28

Anaconda

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	71	63	49
EJ Index for Ozone	76	69	50
EJ Index for NATA* Diesel PM	82	75	57
EJ Index for NATA* Air Toxics Cancer Risk	79	72	55
EJ Index for NATA* Respiratory Hazard Index	79	71	55
EJ Index for Traffic Proximity and Volume	52	59	42
EJ Index for Lead Paint Indicator	34	23	24
EJ Index for Superfund Proximity	54	43	37
EJ Index for RMP Proximity	79	73	56
EJ Index for Hazardous Waste Proximity	48	52	42
EJ Index for Wastewater Discharge Indicator	46	47	31



Approximate Population: 6,842
 Input Area (sq. miles): 79.28
 Anaconda

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	10.7	8.7	72	7.05	97	8.55	93
Ozone (ppb)	47.1	45.2	86	51.4	22	42.9	82
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.0199	0.112	6	0.423	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	12	18	3	23	<50th	32	<50th
NATA* Respiratory Hazard Index	0.17	0.24	12	0.31	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	190	190	69	460	48	750	47
Lead Paint Indicator (% Pre-1960 Housing)	0.73	0.28	93	0.21	94	0.28	89
Superfund Proximity (site count/km distance)	0.13	0.12	71	0.11	75	0.13	73
RMP Proximity (facility count/km distance)	0.038	0.48	18	0.63	6	0.74	2
Hazardous Waste Proximity (facility count/km distance)	0.8	0.94	63	0.89	62	5	45
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	5.7E-05	2	49	33	38	9.4	51
Demographic Indicators							
Demographic Index	26%	24%	71	26%	61	36%	43
People of Color Population	9%	14%	55	25%	24	39%	19
Low Income Population	43%	34%	74	28%	80	33%	72
Linguistically Isolated Population	0%	0%	83	2%	55	4%	45
Population With Less Than High School Education	10%	7%	79	8%	73	13%	55
Population Under 5 years of age	4%	6%	31	7%	25	6%	30
Population over 64 years of age	23%	18%	76	13%	88	15%	85

* 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>.

Kevin Stone, Public

Information Resources

Questions

EPA Region 8

Charlie Coleman, Remedial Project Manager, 406-457-5018, coleman.charles@epa.gov

Dana Barnicoat, Community Involvement Coordinator, 406-461-5493, barnicoat.dana@epa.gov

Corbin Darling, Environmental Justice Coordinator, 303-312-6426, darling.corbin@epa.gov

Jean Belille, Environmental Justice Team Member, 303-312-6556, belille.jean@epa.gov

State of Montana

Gordon Levin, Senior Project Officer, 406-444-6569, Gordon.levin@mt.gov

Information Specialist, 406-444-6469, kstone@mt.gov

Anaconda-Deer Lodge County

Superfund Program, Carl Nyman, Superfund Coordinator, 406-563-7019, cnyman@adlc.us

Arrowhead Foundation

406-563-5538 (see website on next page)

Hard Copies of Fact Sheets or Reports

Anaconda-Deer Lodge County, Superfund Program, Anaconda Community Service Center, Third Floor, 118 E 7th Street, Anaconda, MT

Arrowhead Foundation (Technical Assistance Grant Group), 118 E 7th St, Anaconda, Montana

Online Resources



[Contact Us](#)

Superfund Site:

ANACONDA CO. SMELTER ANACONDA, MT

Announcements and Key Topics

EPA recently completed the sixth five-year review of the cleanup work being done at the Anaconda Smelter Superfund site. The review is required by Superfund and assesses the effectiveness and protectiveness of the cleanup and institutional controls to date.

The review found that the completed cleanup activities are protective of current and potential land uses. A program to inform and educate ...

Site Contacts

Community Involvement Coordinator
[Dana Barnicoat](#)
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www.epa.gov/superfund/anaconda-co-smelter

www.adlc.us/225/Superfund



ANACONDA-DEER LODGE
COUNTY, MT

GOVERNMENT SERVICES BUSINESS COMMUNITY HOW DO I

- Community Protective Measures Program
- Institutional Controls
- Maps & Data
- Priority & Economic Development Programs
- Smelter National Priority List Site
- Old Works Golf Course

[Home](#) > [Services](#) > Superfund

Superfund

History

In 1882, a rich copper vein was discovered in Butte by Copper King, Marcus Daly. As part of the mining process, a smelter was needed to refine the copper ore. An area only 25 miles west and north of the ore body with adequate space and an abundant water supply, was chosen for the smelter site. By 1883, the city of Anaconda was planned and quickly grew alongside Daly's Anaconda Mining Company.

After the smelter operations ceased in 1980, the community was faced with the environmental and public health impacts of over 100 years of smelting. In 1983, the U.S. Environmental Protection Agency (EPA) placed Anaconda-Deer Lodge County on the National Priorities List (NPL), also known as Superfund.

Despite these challenges, Anaconda-Deer Lodge County provided the leadership necessary for the community to not only survive, but once again thrive. Today, residents take pride in the unique, charming character of their community, and the crucial role its history played in the national mining era.

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adlc arco
settlement
agreement

ARCO and ADLC are working toward entering into a final settlement agreement.