



December 19, 2024

KC Becker, Regional Administrator
US Environmental Protection Agency
Region 8
1595 Wynkoop Street
Denver, CO 80202-8917

RE: State Concurrence December 2024 Record of Decision for Columbia Falls Aluminum Company NPL Site

Dear Ms. Becker,

The Montana Department of Environmental Quality (DEQ) concurs with the 2024 Record of Decision (ROD) for the Columbia Falls Aluminum Company National Priorities List (NPL) Site in Montana (the Site). The Environmental Protection Agency (EPA) added the Site to the NPL in 2016. DEQ has been the consultative agency to EPA throughout the superfund process. Development of the ROD has been consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and, to the extent practicable, the National Contingency Plan. DEQ and EPA have worked collaboratively throughout this process to engage and inform the community. DEQ supports the proposed remedy and concurs with the ROD for the Site for the following reasons: the EPA, in consultation with DEQ, oversaw and approved the Remedial Investigation (RI) and Feasibility Study (FS), the agencies anticipate the remedy will be protective of human health and the environment, and the selected remedy will meet applicable state standards and regulations. Issuing the ROD and advancing the superfund process at the CFAC site is in the interest of the State of Montana.

Glencore, a responsible party at the site, completed the RI and FS, with oversight and approval by EPA in consultation with DEQ. The RI was based on robust data collection, including more than 1,500 samples of soil, surface water, groundwater, pore water and sediment. DEQ agreed that the identification of contaminants of concern and that the evaluation of the nature, extent and migration of contaminants were technically sound. The RI, Human Health Risk Assessment and Ecological Risk Assessment provided the basis for developing and evaluating an appropriate range of alternatives in the FS.

The highest priority of DEQ is that the selected remedy be protective of human health and the environment. The selected remedy meets this criterion and is also consistent with applicable or relevant and appropriate requirements (ARARs), which include state water quality standards promulgated in DEQ-7. The selected remedy utilizes engineered controls to meet the Remedial Action Objectives, including consolidation and on-site containment, containment via capping, a fully encompassing slurry wall for the West Landfill and Wet Scrubber Sludge Pond, installation of extraction/monitoring wells, and construction of a groundwater treatment facility. The remedy additionally includes performance monitoring and retains extraction and treatment of groundwater if necessary. The selected remedy is anticipated to be protective of human health and the environment.

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DEQ has reviewed the ROD, including the Responsiveness Summary and the ARARs, and is in concurrence for the reasons outlined in this letter. DEQ looks forward to working closely with EPA, the lead agency, and the responsible parties to complete Remedial Design and the Remedial Action in a timely manner.

Sincerely,

Signed by:

Sonja Nowakowski

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Sonja Nowakowski

Director

CC: Honorable Greg Gianforte, Montana Governor
Michael Freeman, Montana Governor's Office
U.S. Senator Steve Daines
U.S. Senator Jon Tester
U.S. Representative Ryan Zinke
Incoming U.S. Senator Tim Sheehy