



Progress Report #116 – July 2025

Smurfit-Stone/Frenchtown Mill Site
Missoula County, Montana

Date: August 6, 2025

EPA Site ID: MTN000802850

To: Allie Archer (EPA), Breana Pabst (MDEQ)

Docket No: CERCLA-08-2016-0001

From: David Tooke (GSI)

Subject: Remedial Investigation Progress Report, Smurfit-Stone/Frenchtown Mill Site
 July 1 to July 31, 2025

This progress report was prepared to comply with Section IX, Paragraph 55 of the Administrative Settlement Agreement and Order on Consent (AOC) for the Remedial Investigation/Feasibility Study (RIFS) at the Smurfit-Stone/Frenchtown Mill Site, Missoula County, Montana (Site). The following sections address activities in July 2025 to implement the AOC, including progress on field investigation and risk assessment activities undertaken by the Potentially Responsible Parties (PRPs) in accordance with the Remedial Investigation Work Plan (RIWP) approved by the Environmental Protection Agency (EPA) on November 12, 2015, and amendments approved thereafter. This report is directed to the EPA and Montana Department of Environmental Quality (MDEQ), collectively known as the “Agencies,” and focuses on activities which occurred during July 2025.

ACTIVITIES COMPLETED DURING JULY 2025

Work Plans, Regulatory Correspondence and Meetings

- Throughout the month of July, GSI provided progress updates on completed data transmittals for the 2024 additional RI work.
- July 10, 2025 – The PRPs met with the Agencies (remotely) to discuss RIFS taskwork.

Fieldwork

- July 22, 2025 – GSI performed a Clark Fork River (CFR) berm inspection in accordance with the 2025 CFR Berm Contingency Plan¹.
- July 24 and 30, 2025 - GSI monitored field parameters in the lysimeters (LS28a, LS28b, LS35a) and selected wells (MW28, MW35, MW34, CFR4a) in accordance with the Ongoing Addendum 12B workplan².

Laboratory Reports

- Throughout July, the PRPs received revisions to Pace Analytical laboratory results for Addenda 12C³ and Addendum 14⁴ for groundwater samples collected during Q4 of 2024 and Q2 of 2025 respectively.

¹ GSI (2025). Clark Fork River Berm Surveillance and Contingency Plan (p. 165).

² GSI. (2025). DRAFT Ongoing Monitoring for Field Sampling Plan 12B. Former Smurfit-Stone/Frenchtown Mill Site (p. 48) [Workplan].

³ GSI. (2024). Appendix C of Addendum 12 to the Remedial Investigation Work Plan. Field Sampling Plan 12C - Quarter 4, 2024. Groundwater Monitoring. Smurfit-Stone/Frenchtown Mill Site, Missoula, Montana v.4 (p. 97) [Workplan].

⁴ GSI. (2025). Addendum 14 of the Remedial Investigation Work Plan. Groundwater and Surface Water Monitoring. Smurfit-Stone/Frenchtown Mill, Missoula County, Montana (p. 92) [Workplan].

Data Review and Data Management

- July 1, 2025 - GSI submitted Scribe Memo 39 transmitting Q2 and Q3 2024 RI data collected in accordance with Addenda 12a, 12b, and 13.
- July 21, 2025 - GSI submitted Scribe Memo 40 transmitting Q4 2024 RI data collected in accordance with Addendum 12C.

Reporting

- July 2, 2025 – GSI submitted the Q2/Q3 2024 DSR summarizing results from RI Addendum 12A, 12b and 13.
- July 18, 2025 - GSI submitted a revision to the Q2/Q3 2024 DSR summarizing results from RI Addendum 12A, 12b and 13.
- July 31, 2025 – GSI submitted the Q4 2024 DSR summarizing results from RI Addendum 12C.

Risk Assessment

- Integral updated the groundwater analysis of TEQ_{D/F & PCB} and total PCBs to include all supplemental RI data (Q2-2023, Q2-2024, Q3-2024 and Q4-2024).
- Integral evaluated Q4-2024 surface water and sediment data to compare concentrations to risk-based screening levels and assess impacts to EPA's previous risk assessment conclusions.

PROBLEMS, DEVIATIONS, AND SOLUTIONS

- Problems, deviations, and solutions are detailed in Corrective Action Reports (CARs) sequentially numbered by year and documented in data summary reports (DSRs) associated with RI Workplan Addenda 12A, 12B, 12C, 13 and 14.
 - During Q4 2024 data (Addendum 12C) verification and validation processes, GSI noted that an analytical result for hexavalent chromium was not collected in October 2024 as part of Addendum 12C for groundwater sample location SMW17D. To resolve this, GSI collected a sample from SMW17D for hexavalent chromium analysis on June 26, 2025. Pace Lab received the sample on July 1, 2025. Pace reported analytical results on August 4, 2025. After validation, these data will be uploaded to the scribe database (Memo 41). CAR_2024-26 documents this deviation.
 - During the June 2025 field event (Addendum 14), sample set (Brooks_COC_06.05.25) did not arrive at Brooks Applied Labs within the planned shipping timeframe and samples were logged in at a temperature of (11.4°C) which is above the maximum required storage temperature (4°C). Samples arrived within the required holding time. Sample set (Brooks_COC_06.05.25) included nine samples (MW24, NFMW1d, NFMW9, SMW14, CountyMW, SMW1, NFMW22, NFMW23, TW2R). GSI re-collected sample MW24 on June 11, 2025 and submitted it for testing in triplicate at three storage temperatures (4°C, 11°C, 25°C) to address uncertainty associated with the sample batch received at 11.4°C. GSI received analytical results from Brooks on July 28, 2025 and will report the uncertainty associated with this storage temperature deviation in the forthcoming Addendum 14 DSR. CAR_2025-2 documents this deviation.
 - During review of the Q2/Q3 dataset, GSI identified incorrect 0 DL TEQ (calculated) results for samples with all dioxin/furan congener concentrations reported below detection limits. GSI recalculated TEQs and revised the Scribe database on 7/15/2025. Memorandum 39 version 2 and

revised Draft Addenda 12A, 12B, and 13 Data Summary Report were submitted to EPA on 7/18/2025. CAR 2024-25 details this problem and solution.

ANTICIPATED REMEDIAL INVESTIGATION WORK ACTIVITIES (AUGUST AND SEPTEMBER 2025)

Work Plans, Regulatory Correspondence and Meetings

- The PRPs understand that EPA intends to continue holding monthly technical meetings with the PRPs.
- The PRPs will work with EPA to finalize Addendum 15 to the RIWP for an investigation of metal mobility in groundwater to support feasibility study objectives.

Fieldwork

- GSI plans to conduct additional slug testing on suitable monitoring wells in August and September.

Data Review and Management

- The PRPs will continue to update the Scribe database in August and September.
- The PRPs plan to upload the June 2025 RI data (Addendum 14) to Scribe in August or September as detailed in Scribe Memo 41.
- In August and September, the PRPs will continue to validate, tabulate, and analyze final laboratory data from the June 2025 investigation (Addendum 14).

Reporting

- In August or September, GSI will issue the June 2025 DSR summarizing Addendum 14 results for Agency review.
- In August GSI will issue a summary of 2025 CFR berm inspection reports for Agency review.

Risk Assessment

- The PRPs and the Agencies will meet to discuss 2023/2024 supplemental RI sampling results and implications to risk assessment findings in August and September.

PROJECT SCHEDULE

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

Attachment A
Project Schedule

DRAFT PROJECT SCHEDULE
2025 Remedial Investigation and Feasibility Study, Former Frenchtown Mill
 Updated 8/6/2025

Task	Jul 2024				Aug 2024				Sept 2024				Oct 2024				Nov 2024				Dec 2024				Jan 2025				Feb 2025				Mar 2025				Apr 2025				May 2025				Jun 2025				Jul 2025				Aug 2025				Sep 2025																																																											
	Week of (Monday)				01	08	15	22	29	05	12	19	26	02	09	16	23	30	07	14	21	28	04	11	18	25	02	09	16	23	30	06	13	20	27	03	10	17	24	03	10	17	24	31	07	14	21	28	05	12	19	26	02	09	16	23	30	07	14	21	28	04	11	18	25	01	08	15	22	29																																														
RIFS Activities																																																																																																																				
Technical Meetings with EPA and DEQ	7/1				8/21				9/23				10/10				11/14				12/19				1/16				3/12				4/10				5/1				5/22				7/10				8/14				9/11																																																															
EPA Monthly Progress Reports																																																																																																																				
Interim - Technical Working Group Meetings																																																																																																																				
Groundwater Investigation																																																																																																																				
Addendum No. 11 - 2021 GW Monitoring Work Plan																																																																																																																				
- 2023 Amendment 11A Work Plan																																																																																																																				
- 2023 Monitoring Event													v5				v5																																																																																																			
Addendum No. 12 - 2024 GW Monitoring Work Plan	12B				12B								12C																																																																																																							
- 2024 (Q2) GW Monitoring Event																																																																																																																				
- 2024 (Q3) GW Monitoring Event																																																																																																																				
- 2024/2025 Ongoing Addendum 12B Monitoring					8/2				9/26				10/24				10/31				11/25				12/27				1/30				2/27				3/27				4/24				5/22				6/5				7/1																																																															
- 2024 (Q4) GW Monitoring Event																																																																																																																				
Addendum No. 14 - 2025 GW Metal Mobility																																																																																																																				
- 2025 (Q2) GW Investigation																																																																																																																				
Addendum No. 15 - Slug Testing																																																																																																																				
- Slug Test Events																																																																																																																				
Sediment and Surface Water Investigation																																																																																																																				
River Stage & Berm Monitoring	7/17																																																																																																																			
Berm Monitoring Summary Report																																																																																																																				
Berm Contingency Plan																																																																																																																				
- 2024 Addendum 12C Sediment and Surface Waters									12C																																																																																																											
Sitewide and Multimedia Investigation																																																																																																																				
Scribe Database Updates																																																																																																																				
QAPP Updates																																																																																																																				
Sitewide Conceptual Site Model Figures																																																																																																																				
HASP Updates																																																																																																																				
Addendum No. 13 - 2024 Source Area Work Plan																																																																																																																				
- 2024 Source Areas Investigation																																																																																																																				
Remedial Investigation Report																																																																																																																				
- Reuse Assessment																																																																																																																				
- Chapters 1,2,3																																																																																																																				
- Chapters 4,5,6,7																																																																																																																				
Risk Assessment																																																																																																																				
Conference calls / risk assessment meetings																																																																																																																				
EPA Human Health Risk Assessment (HHRA)																																																																																																																				
- OU2 HHRA Report																																																																																																																				
- OU3 HHRA Report																																																																																																																				
EPA Community Involvement																																																																																																																				
Community Advisory Group Meetings					8/1				9/2				10/3				11/7																																																																																																			
Stakeholder / Public Meetings, Teleconferences & FWG					8/1				9/2				11/7				1/23				3/6				4/3				5/1																																																																																							
EPA Public Update & FWG Emails ^a	7/1				7/11				7/22				7/25				7/31				8/8				8/15				8/30				9/10				9/25				10/18				10/22				11/1				11/5				11/22				12/16				1/13				2/6				2/12				3/4				3/10				3/26				4/17				4/23				5/27				6/5				6/12				7/10				7/29			
Montana State Agency and EQC Meetings					8/16				9/24																																																																																																											

Notes: ^a - could include multiple correspondence between listed dates

- Current Week
- Meetings
- Field Work
- Laboratory Analysis
- Task Work
- Draft Correspondence and Reporting to PRP Group
- Draft Correspondence and Reporting to Agencies (V = version)
- Finalized Correspondence and Reporting

