

Section 14 Documentation of Significant Changes

The Proposed Plan for the BPSOU was released for public comment in December 2004. The Proposed Plan identified Comprehensive Alternative 4 (Engineered Covers/Partial Removal/ Limited Treatment for Solid Media, Groundwater Collection and Lime Treatment, Surface Water BMPs, ICs, and Monitoring) as the preferred alternative. EPA reviewed all written and verbal comments submitted during the public comment period. It was determined that, with some exceptions, no significant changes to the remedy, as originally identified in the Proposed Plan, were necessary. However, based on the public's concern over potential health risks from residential metals, particularly attic dust, EPA decided to enhance the medical monitoring program already in place as part of the current Lead Intervention and Abatement Program to include the general population (not just sensitive populations) and to include evaluation of urinary arsenic and blood mercury with the blood lead evaluation. EPA will support all efforts to make the attic dust portion of a residential abatement plan workable and effective.

The Proposed Plan identified construction of a new water treatment plant for captured groundwater. The ROD allows the continued use, after appropriate remedial design, of the lagoon treatment system on a demonstration basis. This is based on the continuing data reports which show a general compliance with water standards from the treatment lagoon system, and on the continued consultation with DEQ and Butte Silver Bow County, both of whom found use of the lagoon treatment system on a demonstration basis acceptable. EPA, DEQ, and Butte Silver Bow will carefully evaluate the sludge excavation and disposal activities associated with this aspect of the Selected Remedy during remedial design.

Finally, the estimated cost of the Selected Remedy increased from costs presented in the Proposed Plan. Additional costs were included for upgrades to the storm water system and for the expanded residential metals abatement program. Capital costs were escalated by a factor of 17.4 percent to reflect inflation in the construction industry from 2004 (FS costs are 2004 costs) to 2006. Then, for the present value analysis, a discount factor of three percent was used instead of seven percent. The Agencies believe the three percent discount rate reflects more realistic investment return and inflation conditions. It is more conservative considering the importance of long-term O&M of the Selected Remedy. As a result of these changes, the cost of the Selected Remedy more than doubled.

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