

www.gallatin.mt.gov/health

Gallatin City-County Health Department

Human Services
215 W. Mendenhall, Rm 117
Bozeman, MT 59715-3478
(406) 582-3100 • Fax (406) 582-3112

Environmental Health Services
215 W. Mendenhall, Rm 108
Bozeman, MT 59715-3478
406-582-3120 • Fax: 406-582-3128

July 3, 2012

Millie Heffner
Montana Department of Natural Resources
Water Rights Bureau
PO Box 201601
Helena, MT 59620-1601

ENVIRONMENTAL
PROTECTION AGENCY

JUL 06 2012

MONTANA OFFICE

Sean Becker
Mayor of the City of Bozeman
City Hall
PO Box 1230
Bozeman, MT 59715

Les Lonning
Director, Technical and Environmental Affairs
McFarland Cascade Pole and Lumber Company
1640 E. Marc Avenue
Tacoma, WA 978421-2939

Re: Idaho Pole CERCLA Site Status

Dear Ms. Heffner, Mayor Becker and Mr. Lonning:

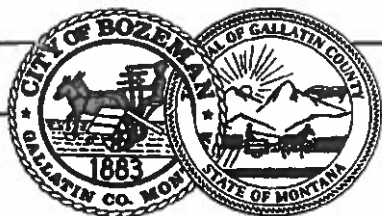
Last year, the Gallatin City-County Board of Health (Board) was approached by a representative of the US Environmental Protection Agency about potentially petitioning DNRC to shrink the Controlled Groundwater Area at the Idaho Pole CERCLA site on the northern edge of Bozeman. Working with the Gallatin County Local Water Quality District, we reviewed site documents, met with Idaho Pole, EPA and DEQ representatives, toured the site and deliberated whether we were ready to forward such a petition. We concluded we were not, as three concerns were outstanding (see attached letter). The Board's principal concern is the enormous volume of hydrocarbon (carrier oil) that was discharged at this site, which has not been tracked nor its status ascertained in two decades. We understand this contamination is not the purview of the federal Superfund program, but it is certainly a potential health concern. Can DEQ do anything to resolve the status of the hydrocarbon plume(s) at the Idaho Pole site? Without better hydrocarbon information than it has now, the Board will not be ready to approve shrinking the Controlled Groundwater Area at this site.

We look forward to your response. If you have questions or concerns about our inquiry, please address them to Health Officer Matt Kelley at 582-3120 or at matt.kelley@gallatin.mt.gov.

Best Regards,

Gretchen Rupp, PE
Chair, Gallatin City-County Board of Health

cc: Roger Hoogerheide, US EPA
Lisa Dewitt, Montana DEQ
Sandra Olsen, MDEQ
Kerri Strasheim, DNRC
Mike Trombetta, MDEQ
Jeff Kuhn, MDEQ
Chris Saunders, City Planning
Dustin Johnson, City Planning



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MONTANA OFFICE

Lisa Dewitt
Federal Superfund Bureau
Remediation Division, Montana DEQ
PO Box 200901
Helena, MT 59620-0901

RE: Idaho Pole CERCLA Site

Dear Mr. Lonning and Ms. Dewitt:

For the last few years, the Gallatin City-County Board of Health (Board), EPA, DEQ, Bozeman City officials and Idaho Pole representatives have discussed proposed changes in the boundary of the Idaho Pole Controlled Ground Water Area (CGWA). These discussions illustrate that all parties understand the potential benefits of commercial development on the south side of the CGWA. During the discussions the Board has raised specific concerns regarding the site. The purpose of this letter is to reiterate the concerns raised by the Board and the Local Water Quality District during a subcommittee meeting on July 26, 2011. To date, the Board has not received any response from Idaho Pole regarding those concerns. We believe any redevelopment of any portion of the Idaho Pole site should be contemplated in conjunction with an effort to address environmental health concerns related to the site.

The concerns, summarized below, are shared by the Gallatin Local Water Quality District, which has been working with the Board on issues at the Idaho Pole site:

1) Status of petroleum hydrocarbons (carrier oil) in the subsurface; According to the Record of Decision for this site, as much as 300,000 gallons of carrier fluid were spilled during pole treating operations at Idaho Pole. Since hydrocarbons are excluded from CERCLA, ongoing monitoring and testing at the site have not attempted to characterize the nature and extent of hydrocarbon contamination. But, as the Board of Health, we are quite concerned about the fate of this substance. Were there no PCP involved, this would be a state Superfund site, with careful delineation of the hydrocarbon plume(s) and assessment of remediation possibilities. We voiced this issue in a letter to EPA last spring, but its May 27, 2011, response letter did not address this question. The board believes this is an important question since such materials might be in the

ground-water system, encountered in construction excavations and could conceivably release volatile contaminants into the air through foundations in buildings constructed on site.

2) Status of Rocky Creek water and sediments: When the site was originally assessed, Rocky Creek was considered a hydrologic barrier. If that is correct, then any dissolved contaminants in the ground water downgradient of the pump-and-treat system, and any carrier fluid that might have continued to migrate towards the creek, would discharge into the creek. Since the early assessment work was completed, it is our understanding that very little monitoring or assessment has been conducted to assure that no contaminants are entering Rocky Creek. Given the length of time since the ROD was prepared, both the dissolved plumes and free carrier fluid have likely moved. Members of our community drink well water that has interacted with surface water downstream from the site, and others eat fish which swim in the creek and eat macroinvertebrates which live on and in the streambed sediments. The potential for health impacts are of concern to the Board.

3) Groundwater contamination north and east of Rocky Creek: While the creek was assumed to be a hydrologic barrier, no data were generated to show whether hydrocarbons have moved across (north and east) of the creek. Consequently very little information is available to assure that ground water quality north and east of Rocky Creek poses no potential health hazard.

The Board is willing to work with all parties to modify the CGWA; however, we feel it would be premature to move forward on any proposal for such modification until the above questions have been answered to the Board's satisfaction. The Board will entertain a responsible proposal to modify the CGWA, but in order to fulfill our statutory mandates to protect public health and the environment, we must have a clear understanding of status of the constituents of concern, including those not covered by CERCLA. The Board looks forward to resolving these remaining issues and moving forward on this important initiative. If you have questions or concerns, please address them to Matt Kelley at 582-3120 or at matt.kelley@gallatin.mt.gov.

Best regards,



Gretchen Rupp, PE
Chair, Gallatin City-County Board of Health

cc: **Roger Hoogerheide, US EPA**
Sean Becker, Mayor of Bozeman
Mike Trombetta, Montana DEQ
Sandra Olson, MDEQ
Millie Heffner, DNRC
Kerri Strasheim, DNRC
Kris Kukulski, City Manager
Chris Saunders, City Planning
Dustin Johnson, City Planning
Alan English, GLWQD