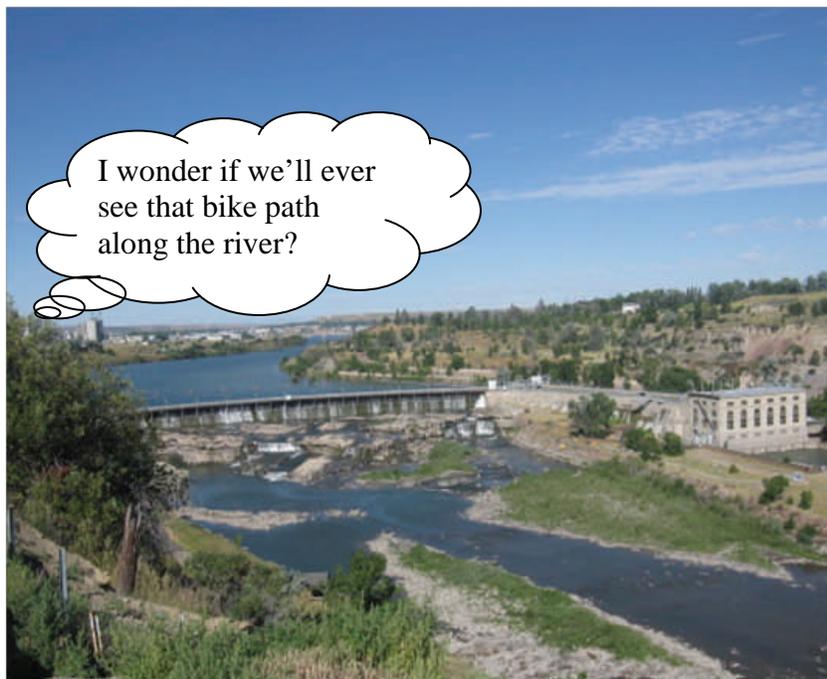


FINAL COMMUNITY INVOLVEMENT PLAN

ACM SMELTER AND REFINERY SITE CASCADE COUNTY, MT

June 2011



I wonder if we'll ever see that bike path along the river?



Will my yard be safer for the kids?

Prepared For:



United States
Environmental Protection Agency
Region 8

Prepared By:



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Can I eat my garden vegetables?

Questions on Cover page

1. Will my yard be safer for the kids?

EPA has not made a final conclusion that soils concentrations in Black Eagle yards pose a human health risk. We have explained that the metals levels are above EPA's screening levels and therefore require a closer look. During the upcoming Remedial Investigation ("RI") phase of the planned work, EPA will ensure a comprehensive sampling effort and a thorough risk assessment. If lead and arsenic, the primary contaminants of concern in residential yards, are found at levels posing a risk to children, adults or the environment, EPA will develop appropriate response actions.

If clean-up actions are undertaken on residential soils by EPA or a Responsible Party, the presumed remedy will be contaminated soil removal and replacement with clean soil.

2. I wonder if we'll ever see that bike path along the river...

Many factors play into a final land use decisions. With regard to a bike path along the Missouri River, one factor to consider is whether soils concentrations would pose a risk to users of the trail. If clean-up actions will be undertaken in the vicinity of a proposed trail location, future use plans may factor into clean-up decisions and actions. Other factors may include land ownership; responsibility for trail maintenance; cost; any master planning efforts that have been elaborated for future use of the area; and future public input.

3. Are my garden vegetables okay to eat?

Gardeners in black Eagle have asked this question and it is a good one. EPA will consider this point in the remedial investigation through sampling and risk assessment. Among other simple measures, EPA has asked residents to clean vegetables thoroughly before cooking or eating them; try growing vegetables in raised beds or containers; and add ample compost and peat moss to your garden soil. This information and additional detail is provided in a fact sheet that EPA distributed in Black Eagle in July 2009. The fact sheet is attached to this Community Involvement Plan.

Other questions?

Future fact sheets on subjects such as these and others will be distributed via EPA's postal mailing list; EPA's e-mail list; the Black Eagle Civic Club; EPA public meetings and other methods, as appropriate.

To be added to EPA's postal mailing list or EPA's e-mail list, please call EPA's Helena office toll free 1-866-457-2690 and asked to be placed on the list.

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List of Acronyms

ACM Site	Anaconda Copper Mining Smelter and Refinery Site
AR	Atlantic Richfield Company
ATSDR	Agency for Toxic Substances and Disease Registry
CAG	Community Advisory Group
CCHD	Cascade County Health Department
CECRA	Comprehensive Environmental Cleanup and Responsibility Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CIP	Community Involvement Plan
EPA	United States Environmental Protection Agency
ERT	Environmental Response Team
GFWS	Great Falls Weed and Seed
MDEQ	Montana Department of Environmental Quality
MDT	Montana Department of Transportation
MT DPHHS	Montana Department of Public Health and Human Services
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
OSC	On-Scene Coordinator
PRP(s)	Potentially Responsible Parties
RCRA	Resource Conservation and Recovery Act
RPM	Remedial Project Manager
RTI	Recreational Trails, Inc.
SARA	Superfund Amendments and Reauthorization Act
TAG	Technical Assistance Grant

1.0 PURPOSE

This Community Involvement Plan (CIP) for the former ACM Smelter and Refinery Site (ACM Site), Cascade County, Montana, has been prepared in accordance with the *Superfund Community Involvement Handbook* (Handbook) (Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency (EPA), April 2005) and the Community Engagement Initiative endorsed by the Office of Solid Waste and Emergency Response, EPA. The Handbook outlines the community involvement requirements stipulated in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), the regulations that govern Superfund. In addition, implementation of the CIP will follow EPA's Community Engagement Initiative, which is designed to help interested community members more effectively participate in EPA decision-making processes.

The CIP guides EPA's communications and interactions with the community as part of the Superfund process. The NCP requires a CIP for all removal actions lasting longer than 120 days and for all sites listed on the National Priorities List (NPL). The CIP serves as a basis for identifying community concerns and planning two-way communications so that the public gets questions answered, and concerns publically addressed. Community Involvement staff members strive to anticipate, identify, and acknowledge areas of conflict so that decisions can be made with full understanding of community views.

EPA conducts community interviews and, based on these interviews, prepares a CIP that includes a description of the site background, history of community involvement at the site (including major community concerns), community relations objectives, and a list of affected and interested groups and individuals. The community interviews form the foundation for developing a plan for keeping the community engaged throughout the Superfund process.

It is important to emphasize that the CIP often presents opinions of residents and other interviewees. The information obtained in these interviews and summarized in the CIP reflects interviewees' responses regardless of whether those responses are factually precise. The interview questions and responses for the ACM Site are discussed further in Section 3.4.

1.1 Law, Programs, Government Agencies, and Local Groups

Superfund Law and Cleanup Program

Superfund is the nation's program to clean up uncontrolled or abandoned hazardous waste sites. The Federal regulation that guides the Superfund program is the NCP, which was revised in 1990. The Superfund law, officially known as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), was passed by Congress in 1980 and amended in 1986 by the Superfund Amendments and Reauthorization Act (SARA).

Superfund:

- Gives EPA the authority to stop releases or potential releases of hazardous substances
- Enables EPA to compel those responsible for site contamination to pay for cleanup
- Provides funding for cleanup when money from responsible parties is not available.

CERCLA requires EPA, or the state at state-lead sites, to develop and manage community involvement programs at both fund-lead and enforcement-lead sites. At fund-lead sites, cleanup is paid for with Superfund money; at enforcement-lead sites, potentially responsible parties (PRPs) pay for cleanup. At either type of site, community involvement remains the responsibility of the EPA. The Superfund community involvement effort promotes two-way communication between members of the public and the lead government agency responsible for investigation and cleanup actions. The overall objectives of Superfund community involvement are as follows:

- Provide the public the opportunity to have input on technical decisions
- Inform the public of planned and ongoing actions; and
- Identify and resolve conflicts.

EPA's community involvement activities will also address environmental justice issues. Specific environmental justice goals are:

- Raising awareness of equity issues to the Superfund cleanup team
- Reviewing past site procedures to determine whether changes need to be made in areas which would impact minorities; and
- Tailoring communications which are sensitive to the language and cultural differences of the community to assure that all citizens have equal opportunity to become involved in EPA's decision making process.

Under the Superfund program, EPA investigates hazardous waste sites and is authorized to conduct two types of response actions:

- *Removal Actions* – these are short-term actions designed to stabilize or clean up incidents involving hazardous substances that present an imminent threat to human health or the environment. Time-critical removal actions can last no longer than 12 months or cost no more than \$2 million. Non-time critical actions may be authorized and generally cost more and take longer to complete.
- *Remedial Actions* – these are long-term cleanup actions that significantly and permanently reduce dangers due to releases or potential releases of hazardous substances that are serious but not immediately threatening to human health or the environment.

Both removal and remedial actions may take place at the ACM Site. Removal and remedial actions are funded either through the Superfund account or directly from the parties responsible for the contamination. Removal actions allow for quick response to focused areas of contamination or specific properties requiring immediate attention. Remedial actions continue the cleanup process with thorough investigations and extensive cleanup.

Relevant EPA Groups

EPA administers and enforces the nation's environmental laws. Based in Washington, D.C., it includes 10 regional offices, each of which includes community relations and technical staff involved in Superfund site cleanups. EPA Region 8 encompasses Colorado, Utah, Wyoming, North Dakota, South Dakota, and Montana. The EPA Region 8 regional office, located in Denver, Colorado includes several offices, branches, and sections related to the Superfund Program. In addition, there is an EPA

Region 8 office located in Helena, Montana. See Appendix A for the names, addresses, and telephone numbers of the EPA staff and managers for the ACM Site investigation and cleanup.

Superfund Community Involvement Section - Region 8

This section, part of EPA's Office of Communication and Public Involvement, oversees communication between EPA and all residents, public officials, media representatives, and community groups associated with Superfund sites. The Superfund Community Involvement Program for each site involves the planning, coordination, and implementation of activities designed to facilitate communication and enhance community involvement. Each site has at least one Community Involvement Coordinator who works closely with EPA technical staff to keep the local community informed and involved.

Office of Ecosystem Protection and Remediation - Region 8

The Office of Ecosystem Protection and Remediation oversees the development and implementation of Superfund remedial and removal program activities, as well as Resource Conservation and Recovery Act (RCRA) activities.

Preparedness, Assessment and Emergency Response Program - Region 8

The Superfund Preparedness, Assessment and Emergency Response Program manages short-term actions and emergency responses. These actions include responses to accidental releases of hazardous substances, as well as short-term work at sites on EPA's NPL. Removal actions are supervised by EPA On-Scene Coordinators (OSCs).

Superfund Remedial Response Program - Region 8

The Superfund Remedial Response Program is responsible for long-term technical work at Superfund sites, including site assessments, remedial investigations and feasibility studies, treatability tests, and remedial design and action (cleanup). Each NPL site has a Remedial Project Manager (RPM) who supervises private contractors and other parties involved in site study and cleanup. The ACM Site is managed by the EPA office in Helena, MT.

Program Support Group

The program support group is an advisory group of scientists available to senior EPA managers, OSCs, and RPMs for consultation on technical and scientific matters pertaining to Toxicology, Ecology, Human or Veterinary Medicine, Chemistry, Hydrogeology, and/or Air Modeling. Scientists and/or physicians within the group are sometimes consulted to develop or review environmental sampling and analysis plans, or to develop or interpret environmental, epidemiological, medical or toxicological data. The Program Support Group provides 24 hours per day/7 days per week emergency response capacity to assist with science support and coordination during environmental emergencies. Most individuals within the Program Support Group actively pursue environmental research, education, and/or clinical practice at the Regional or national levels and maintains professional standings in their scientific disciplines; many Program Support members are board-certified in their respective fields of expertise.

Environmental Response Team

The Environmental Response Team (ERT) located in Edison, NJ is a branch of the Emergency Response Division of EPA's Office of Emergency and Remedial Response located in Washington, DC. ERT includes hazardous waste experts who provide 24-hour technical assistance to EPA regional offices. ERT staff members are involved in the testing of remedial technologies throughout the country, and can provide assistance during Superfund site cleanups.

Other Relevant Government Groups

Agency for Toxic Substances and Disease Registry

The Agency for Toxic Substances and Disease Registry (ATSDR), headquartered in Atlanta, GA, is part of the Public Health Service within the U.S. Department of Health and Human Services. ATSDR conducts Public Health Assessments at Superfund sites to evaluate data and information on the release of hazardous substances into the environment.

ATSDR is developing a public health response plan for the ACM Site. The plan will have two key elements: 1) a review of environmental data to assist EPA and the state of Montana in identifying and eliminating human exposures to metals; and 2) health education for community residents and local health care providers. See Appendix A for the names, addresses, and telephone numbers of the ATSDR staff involved with the ACM Site.

Montana Department of Environmental Quality

The Montana Department of Environmental Quality (MDEQ), as part of its own Montana Superfund Program, acts as the support agency during EPA-lead investigations and cleanups at federal Superfund sites in Montana. The Remediation Division responsibilities also include investigation and cleanup activities at state-lead federal Superfund sites, state hazardous waste sites under its Comprehensive Environmental Cleanup and Responsibility Act (CECRA) authority, and reclamation of abandoned mine lands. Other regulatory activities include permitting and licensing underground storage tanks; implementing corrective actions at sites with leaking underground storage tanks; administering the Petroleum Tank Release Cleanup Fund (reimbursing owners for the costs of petroleum release cleanup); and overseeing groundwater remediation at sites where agricultural and industrial chemical spills have caused groundwater contamination. These activities help to protect human health and the environment, to prevent exposure to hazardous substances that have been released to soil, sediment, surface water, or groundwater, and to ensure compliance with applicable state and federal regulations.

MDEQ's involvement in the ACM Site includes reviewing and commenting on ACM Site work plans and studies, participating in community involvement activities, and providing technical assistance to EPA. See Appendix A for the names, addresses, and telephone numbers of the MDEQ staff involved with the ACM Site.

Montana Department of Public Health and Human Services

The Montana Department of Public Health and Human Services (MT DPHHS) is charged with improving and protecting the health, well-being, and self-reliance of all Montanans. The Office of Epidemiology and Scientific Support is charged with providing epidemiologic consultation and technical assistance to county and local health agencies and to federal agency partners. The State Medical Officer and the Senior Public Health Epidemiologist are available to provide technical consultation and review. See Appendix A for the names, addresses, and telephone numbers of the MT DPHHS staff who may be contacted with reference to the ACM Site.

Cascade City-County Health Department

The Cascade County Health Department (CCHD) Environmental Health Division focuses on providing a healthy environment for the residents of the local community through education, monitoring, and enforcement of state laws and regulations in several programs, including inspections of licensed establishments such as food services, swimming pools, public accommodations, trailer courts, tattoo and body-piercing facilities, and daycares. CCHD locally administers septic system permitting, subdivision review, air quality monitoring, and rabies prevention. CCHD is also involved with other agencies in drinking-water quality and storm-water management. CCHD will assist with education and post-cleanup activities at EPA's ACM Site.

Local Community Resources

Benefis Hospital

Benefis Hospital is one of the largest hospitals in Montana, operating 516 beds at two campuses. The Benefis Emergency Department is a Level II Trauma center that treats victims within a 200-mile radius via aeromedical transport. Additional medical specialties include: Bariatric Weight Loss Surgery, Breast Center, Behavioral Health, Birth Center, Geriatrics and Aging, Heart and Vascular Institute, Lung Disease, Med Spa and Vein Center, Neonatal Intensive Care Unit, Neurology and Neurosciences, Orthopedics, Pediatrics, Rehabilitation, Sletten Cancer Institute, Stroke, Surgical Services, and Therapy Center. Benefis Hospital is located at 101 26th Street South, Great Falls, MT 59405, (406) 455-5000, and at www.benefis.org/. The Community Relations contact for the Benefis Hospital is Karen Ogden who can be reached via phone at (406) 455-5463 or via email at: KarenOgden@benefis.org.

Great Falls/Cascade County Historic Preservation Advisory Commission

The Historic Preservation Advisory Commission seeks to provide a leadership role in the preservation of cultural, historic, and pre-historic sites, structures, buildings and districts within the city and county. They work in partnership with the City of Great Falls, Cascade County, the State Historic Preservation Office and the National Park Service to identify, evaluate, and protect cultural resources. Ellen Sievert is a Historic Preservation Officer with the organization, and may be reached by email at esievert@greatfallsmt.net, or by telephone (406) 455-8435. The commission mailing address is P.O. Box 5021, Great Falls, MT 59403.

Opportunities Incorporated

Opportunities Incorporated is a private non-profit organization in Great Falls, MT. The mission of Opportunities Inc. is to "educate individuals to achieve self-reliance through community support." The organization provides emergency services to assist with basic necessities, as well as access to various resources within Great Falls and outlying areas. Additional services include low income energy assistance, youth services programs, Section 8 rental assistance, and Head Start programs. Opportunities Inc. is located at 905 1st Avenue North, Great Falls MT 59401. The telephone number is (406) 761-0310.

Great Falls Housing Authority

The mission of the Great Falls Housing Authority (GFHA) is to "responsibly and respectfully make safe, basic, affordable housing for qualifying residents." In addition, GFHA programs include a satellite unit of the Boys and Girls Club, social functions, free Computer Lab, scholarship programs, mental health counseling, and consumer credit counseling. GFHA is located at 1500 Chowen Springs Loop, Great Falls, MT 59405. The telephone number is (406) 453-4311

- Cascade City-County Health Department, 115 4th St. South, Great Falls, MT 59401 (406) 454-6950
- Montana Dept. of Public Health and Human Services, 201 First St. South, Suite #1, Great Falls, MT 59403 (406) 454-5640
- United Way of Cascade County, 417 Central Avenue, Suite 320, Great Falls, MT 59403 (406) 727-3400

See Appendix E for a complete listing of community resources.

Local Civic and Interest Groups

Black Eagle Civic Club

The Black Eagle Civic Club is a community-centered charitable organization that provides services for the aged and various community benefit activities. The club mailing address is PO Box 202, Black Eagle, MT 59414-0202. The telephone number is (406) 453-4736.

Black Eagle Loyal Order of Moose Lodge 532

The Black Eagle Moose Lodge celebrated 100 years of service to the community in March of 2011. This fraternal and community service organization, along with its sister organization, Women of the Moose, provides a positive impact to the community in many areas, supporting local youth organizations such as scouting clubs, Toys for Tots, D.A.R.E., Safe Surfin and March of Dimes as well as offering scholarships for Moose members children. They participate in local highway and community cleanup events, as well as supporting other community groups like the Great Falls Food Bank and Opportunities Inc. The Moose Lodge also offers meeting space for members to host birthday parties, weddings or similar events. The Lodge mailing address is 401 21st Street, Black Eagle, MT 59414. The telephone number is (406) 452-5420.

Great Falls Weed and Seed

Great Falls Weed and Seed (GFWS) is a collaborative effort among organizations and individuals who care about the Lower Northside of Great Falls and the community of Black Eagle. The GFWS Steering Committee brings together a unique group of residents, governmental agencies, faith based organizations and nonprofits to identify areas of greatest needs in those neighborhoods.

GFWS provided monetary support to the Black Eagle Civic Club to create a website and publish a quarterly newsletter for hand-delivery to all Black Eagle residents. GFWS is located at 509 1st Avenue South, Great Falls, MT 59403. The telephone number is (406) 216-3526.

Great Falls Neighborhood Councils

The purpose of the Great Falls Neighborhood Council is to provide a means for citizens to actively participate in local government through a formal organization working at the neighborhood level. The Great Falls Neighborhood Council Coordinator is Patricia Cadwell, at (406) 455-8496. The Chair of Council Number 3 (Black Eagle) is Lori Fay, at (406) 454-1476. Council Number 3 meets at 7:00 pm on the first Thursday of every month at the Riverview Elementary School Library, 100 Smelter Avenue NW, Great Falls, MT 59404. Additional information is provided in Appendix D and at http://www.greatfallsmt.net/people_offices/ncouncils/index.php

Oddfellows Lodge

The mission of the International Order of Oddfellows is to “visit the sick, relieve the distressed, bury the dead and educate the orphan”. The majority of their work is in raising funds that assist with costs for medical care for the elderly, and educational scholarships, and summer camps for youth. Each lodge directs their work to the needs of their local community. Contact their office to find out more information about their work in Great Falls. Their address is 2905 15th Street Northeast, Black Eagle, MT 59414. The telephone number is (406) 727-2620.

Recreational Trails, Inc

Recreational Trails, Inc (RTI) is a volunteer non-profit corporation that works with agency partners to develop, extend and maintain River’s Edge Trail. The group is interested in establishing a multi-use trail link between the Lewis and Clark Interpretive Center Foundation property and the Black Eagle raceway parking lot through AR property. RTI’s mailing address is P.O. Box 553, Great Falls, MT 59403-0553. The contact person is Doug Wicks. His telephone number is (406) 788-3313.

1.2 Document Organization

EPA has prepared this CIP for the ACM Site based upon information from interviews with a wide range of Black Eagle and Great Falls community members and other relevant sources. The CIP describes their concerns and comments and outlines community involvement activities planned for the ACM Site. EPA is committed to fully involving potentially affected interests in ACM Site activities and decisions. The activities and opportunities for community involvement are explained in the pages that follow. EPA Region 8 will be responsible for implementing the community engagement program outlined in this CIP. The CIP will be modified, if necessary, to meet changing needs as activities at the Site progress.

The remaining CIP sections are as follows:

- 2.0 Site Background: This section identifies the location, land uses, recent agency activities, and the potential nature of the threat of the hazardous substances at the ACM Site.
- 3.0 Community Background and Concerns: This section describes the communities located within the ACM Site boundaries and documents their concerns.
- 4.0 Objectives of the Community Involvement Program: This section provides the basis for, and clarifies the goals of, the Community Involvement Program.
- 5.0 Community Involvement Activities: This section describes the activities tailored to meet specific community needs and planned to promote effective community involvement at the ACM Site.
- 6.0 References: This section contains a list of references used in the CIP.
- 7.0 Resources: This section summarizes the information contained in the CIP appendices.

2.0 SITE BACKGROUND

2.1 Location

The ACM Site is a former metals refinery next to the unincorporated community of Black Eagle along the Missouri River in Cascade County, Montana. The ACM Site is located in the northeast quadrant of Great Falls, Montana, on the north side of the Missouri River adjacent to the Black Eagle Dam.

The City of Great Falls is located to the south across the Missouri River from the site, and the community of Black Eagle is located to the west and northwest of the former refinery site. The ACM Site covers approximately 427 acres on the northern bank of the river between Black Eagle and Great Falls. Great Falls is located in the Great Plains physiographic province, in the valley of the Missouri River in central Montana. This region is generally characterized by broad, relatively flat, or gently sloping plateaus traversed by streams with relatively wide valleys. Figure 1 shows the location of the ACM Site.

2.2 Smelting and Refining Operations

In 1889 the Boston and Montana Consolidated Copper and Silver Mining Company, headquartered in nearby Butte, Montana, decided to build a new smelter on the north bank of the Missouri River at Great Falls. The new smelter would use nearby coal deposits for smelting and the hydro power of the Missouri River to mechanically treat ore, to sluice away byproducts, and to generate electricity for electrolytic refining (EPA 2010). Operations began in 1893 when copper ore mined in Butte and shipped to the site was concentrated, smelted, and refined. Smelting and refining of copper from mines in Butte, as well as milling of other specialty metals, continued for more than 80 years. The ACM Site primarily produced copper, zinc, arsenic, and cadmium (EPA 2010).

Anaconda Copper Mining Company bought the property in 1910 and renamed it the Great Falls Reduction Company (later, the facility became known as the Great Falls Refinery). In 1916, electrolytic copper and zinc refineries were added (AR 2000). Also during this period, blister copper from the Washoe Smelter in Anaconda, Montana was transported to the facility to be refined and/or re-smelted before use in the rod or wire mills on site. These processes were performed to remove concentrations of arsenic, antimony, and other elements that interfered with the electrical conductivity of the blister copper. Millions of pounds of blister copper were processed at the facility every week. The concentration, smelting/refining, and processing of zinc ore (containing cadmium and lead) continued on site until the early 1970s (Tetra Tech EMI 2004).

Other site activities included experimental recovery of indium in the mid 1930's, which continued periodically throughout the 1940s and 1950s. In the 1950s, the facility was expanded to include manufacturing of aluminum rod. The indium plant was rebuilt in the mid 1960s and operated for only three to four years before its final closure in 1968. An experimental germanium process was added in the mid 1950s, but little if any marketable germanium was produced (AR 2000).

A 501-foot tall plant stack was part of the smelter operation at the refinery site for years before pollution control technology was common. The smoke from the stack allowed metal contaminants to be dispersed in the air over a wide area around the facility. The large stack went into service in 1909

and continued operation until 1972, and was designed to eject a volume of 1,575,000 cubic feet of air per minute at a velocity of 450 feet per minute to entrain and remove from the smelter all the gases and dust generated during the smelting process (EPA 2010).

Wastes generated from the operations also involved tailings and slag that were dumped into the Missouri River. Between 1893 and 1915, when onsite containment was instituted, the MDEQ estimates that between 27,500,000 and 31,000,000 cubic yards of waste were dumped into the river, including tailings, slag, smelter wastes, and flue dusts. It is likely that dumping of waste into the Missouri River continued at a reduced rate after 1915 until the facility closed in the 1970s (MDEQ 2002).

Demolition of plant facilities began in 1972, and the Atlantic Richfield Company (AR) acquired the property in 1977. All operations at the Great Falls Refinery ceased in September 1980. AR began closure in 1981 and completed the process in 1999. Closure activities included demolition and removal of buildings, backfilling of basement substructures, and salvaging and on-site burial of flue dust, granulated slag, asbestos-containing material, demolition debris, and other wastes. A soil cover ranging from six-inches to five-feet thick was placed over the wastes (AR 2000). There are no records of any regulatory oversight of the closure activities.

2.3 Nature of Potential Threat of Hazardous Substances

Area ranchers began complaining about contamination from the smelter and refinery stack falling on their property and adversely affecting their livelihood in the early 1900s. Chemical assays of flue dust and top soil near the stack performed in 1904 and 1905 concluded that over 40 pounds of arsenic trioxide (As_2O_3) had been deposited per acre by March of 1904 at a distance 6.24 miles from the stack. Additional sampling at new locations performed in 1905 concluded that almost 14 pounds of arsenic trioxide (As_2O_3) had been deposited at 2.5 miles from the stack. An internal Anaconda Copper Mining Company Memorandum from 1951 stated that approximately 15.04 pounds of arsenic passed out of the stack every 24 hours. For these reasons, aerial deposition of contaminants emanating from the smelter smoke stacks between 1893 and 1972 is the most likely mechanism of contaminant transport to the community soils in the vicinity of Black Eagle (EPA 2010).

Numerous complaints involving water quality issues, and slag and smelter waste clogging the Missouri River, were filed by property owners and communities along the Missouri River downstream of the ACM Smelter and Refinery. These complaints increased after the 1908 flood of the Missouri River inundated the community of Fort Benton, 40 miles downstream of the ACM Site, with smelter waste. An Anaconda company analysis of slime (very fine-grained slag and tailings, which tended to float on the Missouri River) taken above Rainbow Falls Dam in 1914 indicated that the slime contained between 0.55 and 1.1 percent copper (EPA 2010).

Following decommissioning of all operations in 1980, a post-closure solid waste inventory was conducted in 1981 and identified 27 areas of concern. A preliminary assessment completed in 1982 recommended that investigations be conducted at the site, and in 1983 a screening-level site investigation was conducted by AR documenting both on-site and off-site groundwater and surface water contamination. AR submitted a voluntary cleanup plan to MDEQ in 2000. MDEQ determined the plan to be incomplete and subsequently requested that EPA review the site (URS 2008).

2.4 *Summary of Investigation Activities*

MDEQ collected the first samples of Missouri River sediment for environmental analysis in May of 2002. These samples were collected from the Fort Benton area, approximately 30 miles downstream from the ACM Smelter and Refinery. MDEQ concluded that the five samples that had been collected contained anomalously high levels of antimony, arsenic, copper, lead, zinc, and other metals, and recommended that additional samples be taken from the smelter site in Black Eagle down to Judith Landing (State Highway 287) (MDEQ 2002).

Soil sampling by EPA in 2003 documented the presence of metals on the former smelter site, in Missouri River sediments and surface water, and along the railroad bed. Contaminants included antimony, arsenic, cadmium, chromium, cobalt, copper, iron, lead, manganese, mercury, nickel, silver, sodium, and zinc (EPA 2010).

The current owner, the Atlantic Richfield Company, conducted a limited study of sediment, surface water and fish tissue from the Missouri River near the facility in November, 2004. Their conclusions from that investigation were that concentrations of metals adjacent to and downstream of the ACM Site were comparable to or even less than background concentrations of the metals. A review of the report by EPA's Regional Ecological toxicologist noted that at three sample locations, ecotoxicological benchmarks were exceeded in soil samples, and it is likely that higher concentrations of metals in all samples could have been obtained by taking samples on the north side of the Missouri River, which is the same side as the facility, rather than across the Missouri River on the south bank (EPA 2010).

During the summer of 2007, EPA conducted a Superfund Site Assessment of residential soils. The assessment focused on neighborhoods in Great Falls, Montana, on the south bank of the Missouri River across from the former refinery site, and in the community of Black Eagle, west and northwest of the former refinery site. The results of the investigation identified an approximate area of 78 acres encompassing 375 residences in Black Eagle that were contaminated with arsenic and lead above screening levels (URS 2008). EPA conducted an Expanded Site Inspection of the residential soils in the community of Black Eagle in 2008, utilizing the same sample collection and analytical procedures as the 2007 investigation. The 2008 investigation also identified a large area of elevated arsenic and lead concentrations in residential soil as compared to background, in an area centered on the central and southwestern area of the community of Black Eagle (EPA 2010).

EPA conducted an Expanded Site Inspection of the sediments in the Missouri River adjacent to and downstream of the ACM Site in July 2009. The sediments were investigated from along the north side of the Missouri River channel between the 11th Street Bridge and Rainbow Dam. This investigation identified a stream segment of 2.39 miles with elevated concentrations of copper, lead, and silver. This segment of the Missouri River includes widely used fishing areas (EPA 2010).

In December of 2010, EPA conducted a subsurface investigation of the Black Eagle Railroad Beds between the western boundary of the site near the Black Eagle Community Center and Highway 87. Sampling was conducted to identify whether, and to what extent, contamination exists vertically from the surface of the railroad beds to the upper part of the underlying native soil horizon, and whether, and to what extent, contamination exists laterally over the full extent of the railroad beds.

Based on this investigation, contamination appears to extend vertically, in at least some locations, from the surface of the railroad beds into the underlying native soil. Contamination exists in the subsurface over the full linear extent of the December 2010 investigation area between the Black Eagle Community Center and Highway 87. The extent of subsurface contamination beyond this investigation area eastward onto the historic smelter site, and to the west beyond Highway 87, is unknown. Surface soil contamination is known to extend west along the railroad bed at least as far as 10th Street (PWT 2011).

On March 10, 2011 EPA, with support from MDEQ, announced the addition of the Anaconda Copper Mining Co. Smelter and Refinery site in Cascade County, Montana, to the National Priorities List of Superfund sites. EPA anticipates that Atlantic Richfield Company will perform investigation and cleanup work at the Site, to address the impacts from facility operations that date to the 1890s.

2.5 Summary of Community Involvement Activities

Community Interviews

EPA conducted approximately 22 community interviews with 44 individuals, including residents who had their homes sampled, and other Black Eagle and Great Falls community members and leaders. The objectives of the interviews were: 1) find out how the interviewee or their family members may have been exposed to ACM Site related contamination; 2) assess community concerns about the ACM Site; and 3) determine the best methods for communication between EPA and the local residents/leaders.

Established Information Repositories

At the time of the proposed listing, EPA established a temporary location for the information repository at the Cascade County Courthouse Annex, located at 325 2nd Avenue North in Great Falls, (406) 454-6810. The County Annex is open between 8:00 am and 5:00 pm Monday through Friday, excluding holidays. As a result of the community interviews, the information repository for the ACM Site has been moved to the Black Eagle Community Center, located at 2332 Smelter Ave, in Black Eagle, (406) 453-4736. The Community Center is open from noon to midnight, seven days a week.

The full Administrative Record and site file is located at the EPA Montana Office, Superfund Records Center, located at 10 West 15th Street, Suite 3200 in Helena, (406) 457-5046 or (406) 457-5000. The Administrative Record contains all documents leading up to a remedial (cleanup) decision. The site file contains other records that are not necessarily related to the cleanup decision. The Records Center is open Monday through Friday, except holidays, from 8:00 am to 4:00 pm.

Public Meetings

EPA held public meetings at the Black Eagle Community Center on May 6, 2009, July 14, 2009, February 11, 2010, August 17, 2010, and April 28, 2011. The meetings were well attended and consisted of presentations of EPA's activities, sampling results, and

future plans, and also provided question and answer periods. The meeting in February 2010 also included a discussion of the potential placement of the ACM Site on the NPL.

Small Group Meetings

EPA has scheduled meetings with Cascade County Commissioners, Cascade County Health officials, government officials with the City of Great Falls, Black Eagle Civic Club, and private interests when requested.

Informational Mailings

To date, EPA has developed and distributed two informational fact sheets to the Black Eagle Community. The first fact sheet, dated July 2009, addressed the history of operations at the ACM Smelter and Refinery Facility, the resulting metals contamination, and the exposure assessment process. In addition, the fact sheet provided basic tips for gardening in Black Eagle to reduce the possibility of ingestion of lead via home-grown vegetables. The second fact sheet, dated January 2010, addressed placement of the ACM Smelter and Refinery Facility and adjacent areas on the NPL. This fact sheet included a description of the Superfund investigation and cleanup process, addressed potential health risks associated with exposure to metals such as arsenic, lead, and cadmium, and provided information describing how interviews are used to solicit community concerns and input.

Both fact sheets are available in Adobe Acrobat pdf format on the internet at: <http://www.epa.gov/region8/superfund/mt/acmsmelterrefinery/>, and in Appendix I of this CIP.

Mass Media

EPA has provided press releases to both the print media (primarily the Great Falls Tribune and the Black Eagle Newsletter) and television (KRTV and KFBB) in the event of newsworthy actions such as the proposed NPL listing and final listing.

Display Advertisements

EPA routinely publishes display ads to inform the public of upcoming meetings or opportunities for public input. EPA also advertises upcoming public meetings in the Black Eagle Newsletter. This newsletter is hand-delivered to all residents of Black Eagle.

Information on the Internet

EPA maintains a webpage specific to the ACM Site at: <http://www.epa.gov/region8/superfund/mt/acmsmelterrefinery/>

3.0 COMMUNITY BACKGROUND AND CONCERNS

3.1 *Black Eagle Community Background*

The region of Great Falls began to formulate as a settled community in the late 1800's, inhabited by pioneers of the Great Northwest. Many of the early settlers came from Minnesota and the Dakotas. Prior to the establishment of the Black Eagle community, development began in the Great Falls vicinity as early as 1881. The first school, store, and hotel were built by 1885, and the population reached approximately 100. By 1886, the first church had been built, and a second hotel was constructed. Cascade County was organized in 1887, as the population grew to approximately 1,200, and the first train arrived. The late 1880's saw the incorporation of Great Falls, the start of construction of the Black Eagle Dam, and a growth in population to nearly 4,000. In 1891, construction of the smelter stack had begun for the Great Falls Refinery (Furdell and Furdell, date unknown).

The community of Black Eagle was founded in 1892 by workers at the nearby Great Falls Refinery. The community was originally known as Martinville, and apparently was later named Black Eagle based on a black eagle's nest that sat on an island below the falls. The older established section of Black Eagle lies between U.S. Highway 87 and the former smelter and refinery facility. The community was known as a melting pot of the area's immigrants. Black Eagle was home to immigrants from as many as 20 nationalities who proudly proclaimed they had come to America in the late 1800s and early 1900s. The European mix came from Yugoslavia, Czechoslovakia, Italy, Greece, Norway and countries in between. Most worked at the Anaconda Co. metals refinery that was part of their neighborhood. A platted addition, called Little Chicago because of its industrial and ethnic nature, later was assimilated into Black Eagle. Residents were famous for their camaraderie. Black Eagle was considered a diverse neighborhood. The community members were known for loyalty to their families, friends, community, and the Anaconda Company, where most of them worked (Great Falls Tribune 2007).

3.2 *Population and Demographics*

Population

According to data obtained in 2007, Black Eagle has a total land area of 1.55 square miles. The population of Black Eagle was 931, and the population density was 601 persons per square mile. The median resident age was 38.4, and the estimated median household income for 2009 was \$25,208, with an estimated per capita income of \$17,441 (City-Data.com 2007).

Demographics

Ethnicity statistics for residents of Black Eagle are: White (87.1%), Native American (7.1%), Hispanic (2.5%), two or more races (2.5%), African American (0.5%), and Asian (0.2%). Percentages of ancestries are: Irish (18.3%), German (11.8%), Norwegian (10.4%), French (8.8%), Italian (8.8%), and English (7.9%) (City-Data.com 2007).

Of those 25 years of age and older in Black Eagle, 83.1 % had high school education or higher, 9.0 % had attained a bachelor's degree or higher, and 1.2% had attained a graduate or professional degree (City-Data.com 2007).

Employment

The most common industries for males between 2005 and 2007 in Black Eagle were: Manufacturing (25%), Construction (21%), Transportation and Warehousing (8%), Public Administration (8%), Accommodation and Food Services (8%), Other Services, except Public Administration (7%), and Retail Trade (6%) (City-Data.com 2007).

The most common industries for females between 2005 and 2007 in Black Eagle were: Other Services, except Public Administration (28%), Health Care and Social Assistance (22%), Finance and Insurance (15%), Educational Services (12%), Retail Trade (10%), Administrative Support and Waste Management Services (7%), and Transportation and Warehousing (5%) (City-Data.com 2007).

Religious Affiliation

Approximately 43% of the population of Black Eagle is affiliated with religious organizations. Churches in Black Eagle include the Blessed Sacrament Catholic Church at 1325 Smelter Ave NE, and the Immaculate Heart of Mary Church at 2200 Smelter Avenue NE.

3.3 Area Activities

Recreational Opportunities

The Great Falls/Black Eagle area provides numerous recreational activities, including state parks and museums. A few of the main attractions are listed below:

Giant Springs State Park

First recorded by the Lewis and Clark Expedition in 1805, the Giant Springs State Park has one of the largest freshwater springs in the world., It flows at 156 million gallons of water per day. The park features trails along the Missouri River, a fish hatchery and visitor center, the Rainbow Falls overlook, and the Lewis and Clark Interpretive Center operated by the U.S. Forest Service. Giant Springs State Park is located approximately five miles east of downtown Great Falls along River Drive North.

Montana State Fair

The Montana State Fair will be celebrating its 80th anniversary in 2011 at Montana Expo Park in the city of Great Falls. The fair will be open July 29 through August 6, 2011 and will feature live entertainment, exhibits, midway carnival, and Professional Rodeo Cowboys Association rodeo entertainment. Information is available at <http://www.montanastatefair.com/>.

Great Falls Ice-Plex

The Great Falls Ice-Plex provides open skating, figure skating, and hockey for youth, women, and men. The mission of the Great Falls Community Ice Foundation is to

provide recreational, figure, and hockey skating for the greatest number of citizens, young or old, and at all skill levels. The Ice-Plex is located at 4001 29th St. SW, Great Falls, MT 59405. Information is available at <http://www.gf-ice.org/>.

Lewis and Clark National Forest

The Lewis and Clark National Forest lies in central and north-central Montana within the upper Missouri River system. The forest's elevation ranges from 4,500 feet to 9,362 feet at the top of Rocky Mountain Peak in the Rocky Mountains. Landscapes range from broad prairies to rugged ridges and mountain peaks. Beautiful grassy parks and mountain meadows are surrounded by forests of Douglas fir and lodge pole pine. The Lewis and Clark National Forest is located approximately 20 miles south of Great Falls on US Highway 89. More information can be found at: <http://www.fs.fed.us/r1/lewisclark/>

The River's Edge Trail

The Trail is the result of a cooperative partnership effort by the City of Great Falls, Cascade County, the Montana Fish, Wildlife & Parks, the Montana Department of Transportation, electric utility PPL Montana, a volunteer trail advocacy group RTI, and a supportive community. The trail began in the 1990s, and now covers 45 miles, including 17 miles of paved pathways, 8 miles of gravel and another 19 miles of dirt paths. The trail offers varied terrain and scenery, with splashy features including: Black Eagle Falls, Rainbow Falls, Crooked Falls, five reservoirs and the “great falls of the Missouri.” Each year, about 100,000 people use the trail as it follows the Missouri River from the Warden Bridge at 10th Avenue South north and east to the wild approaches of Missouri River Breaks country.

C M Russell Museum

The C M Russell Museum is dedicated to keeping the Old West alive through the artwork of Charles M. Russell, as well as that of other artists who used a similar style to depict the landscapes, the spirit, and the culture of the West during the late 1800s and early 1900s. The museum is located at 400 13th Street North, Great Falls, MT 59401, (406) 727-8787. Additional information about current exhibits, art classes, and events may be found at: <http://cmrussell.org> .

Children's Museum of Montana

The Children's Museum of Montana focuses on encouraging a lifelong passion for learning by providing children with fun and affordable educational opportunities in Great Falls. The museum offers hands-on exhibits and activities appropriate for children ages 4 months to 12 years with content areas ranging from history and culture to science and technology, to health and nutrition. The museum, located at 22 Railroad Square, Great Falls, MT 59401-4003, is open 9:30 to 5 Monday through Saturday, and is closed on Sundays. The telephone number is (406) 452-6661. More information can be found at <http://www.childrensmuseumofmontana.org> .

The History Museum

This free museum hosts a permanent exhibit on the history of Cascade County and North Central Montana, as well as frequent temporary exhibits on topics ranging from Montana history to local art. The facility also houses the collection of the Cascade County Historical Society, has historical archives open to the public for research, and offers space for rent to host private events. The Museum is located at 422 2nd Street South, Great Falls, MT 59405. The telephone number is: (406) 452-3462. Website information about current museum events and exhibits is located at:

<http://www.thehistorymuseum.org> .

Paris Gibson Square Museum of Art

The Paris Gibson Square Museum of Art is dedicated to fulfilling the artistic needs of the general public. Admission to the museum is free, a gift to the community of Great Falls from Farmers Union Insurance. Seven different galleries of contemporary art, along with an outdoor sculpture garden allow patrons to enjoy exhibits intended to explore issues, spark humor, and inspire contemplation. The historic building, dedicated in 1896 as Central High School, is located at 1400 1st Avenue North, Great Falls, MT 59401. The museum telephone number is (406) 727-8255. For additional information about hours of operation, exhibits and events, visit the museum's website at: <http://www.the-square.org> .

3.4 Community Concerns, Comments, and Issues

To develop a CIP that accurately reflects community interests and concerns, EPA depends heavily upon information obtained during "Community Interviews." From January 24th, 2011 through January 28th, 2011, EPA conducted interviews with a wide spectrum of area residents and representatives, such as community leaders, elected officials, business representatives, and community service workers. Based on the responses, some additional interviews were conducted over the phone. The interview questions are contained in Appendix H. The responses from these interviews are grouped below according to similar themes. EPA has made every effort to include all the responses from the interviews, as well as information from residents that has been shared after the initial interviews were completed.

It is important to emphasize that this section presents the opinions and concerns of residents and other interviewees rather than those of EPA, the state, or any PRP. The information obtained in the interviews and subsequent conversations is summarized in this section. It reflects interviewees' responses and residents' concerns regardless of whether those responses or perceptions are factually precise.

The following general areas of concerns, comments, and issues have been identified from the community interviews and other sources:

- Health Risks
- Degree of Contamination
- Locations of Priority Areas
- Future Land Use
- Property Values

- Local Roads and Access
- Dust
- Communication
- Timeframe
- Impacts to Local Recreation

Question: Are you aware of the sampling and cleanup at and around the former Anaconda Copper Mining Company Smelter and Refinery? What do you know about it?

The majority of the interviewees were aware of activities at the ACM Site and primarily informed regarding soil sampling or testing that had been previously performed on their or a neighbor's property. Others indicated that they were aware because of concerns of the effects on property values and future land usage. Community members also had learned about the activities from reading the Great Falls Tribune. Some people responded that they had "heard it was a Superfund Site." Others indicated that they were informed by attending meetings in Black Eagle, and some had learned via working with the GFWS.

Question: How did this information come to your attention?

Approximately half of those interviewed reported that they had read about the ACM Site in the Great Falls Tribune. Others were informed via the Black Eagle Newsletter, EPA's and MDEQ's public meetings at the Community Center, or from the GFWS. Some were aware as a result of attending the Black Eagle Civic Club meetings. Less frequently people identified EPA Fact Sheets, television, sampling activities, and conversations with neighbors as their sources of information. Other interviewees indicated that they were aware because "EPA and DEQ contacted me," or "I had spoken with EPA."

Question: Do you have concerns or questions about sampling and cleanup activities?

Several respondents identified concerns regarding future land use of the refinery area, including recreation along the river. In addition, several people were significantly concerned about the Smelter Avenue road work as well as EPA's ability to coordinate with the Montana Department of Transportation (MDT) for this work. The community of Black Eagle has already waited a long time for the Smelter Avenue road work to begin. Those interviewed also questioned the timeliness of the cleanup activities. Black Eagle has a very large gardening community, and several community members indicated that they were worried about gardening with soil contamination. There were others interviewed that indicated no major concerns, and trust that the problems will be addressed.

Questions heard at the interviews:

- How will this affect future land use?
- How will property values be affected?
- What will happen to trails and recreational areas?
- What are the contaminants of concern?
- If asbestos is found, how will it be handled?
- What is the degree of contamination?
- What levels of metals contamination in soils are "high" or "low"?

- What are the long term health effects?
- How long will it take to cleanup?
- When might cleanup begin?
- How will residents be affected by a cleanup?
- Will EPA help to defray costs to Black Eagle from the investigation and cleanup? (such as utility locating costs)
- What are the priority areas?
- Will EPA need access from private property owners?
- Will people be liable if contamination is found in their yard?
- Where will the boundaries of the cleanup be?

Question: Do you have concerns or questions about public health issues related to contaminated soils on or near the smelter site?

Responses to this question were primarily focused on gardens. Some people were apprehensive regarding dust control and potential airborne contamination during cleanup and disturbance of soil. People wanted enough clearly written information to distinguish what areas of their yard had the highest levels versus areas that were lower in metals contamination. Less frequently, there were people that indicated no concerns.

Question: If you have community health concerns, where do you go for information?

Most interviewees identified the CCHD, MDEQ, as well as the EPA contacts they have met. Some community members mentioned their local doctor or health clinic, while others identified internet or e-mail access to the CCHD. Some people were not sure or had not thought about this, and there was also concern that Black Eagle residents may feel that they are not adequately served by local government agencies.

Question: Where do you think the contamination could have come from?

Primarily those interviewed identified the smelter, smelter stack, and wind dispersal of contaminants as the most likely, if not obvious, source. Several people identified the refining processes and chemicals used to produce copper, as well as the associated slag dumps. Others interviewed mentioned issues such as the railroad, fill dirt, and the wire mill.

Question: What have you heard about any activities that may have caused contamination and where did the activities occur?

Interviewees most often identified the historic refining and smelting processes, chemicals from the rinsing operations, and acids and salts. The dumping of slag, spills into the river, and activities along the railroad tracks were frequently cited. Respondents also mentioned the smelter stack, airborne contamination and smoke.

Question: Was there concern about pollution associated with smelter activities or other activities in the area?

Community members who remembered back to the 1960's, for example, recalled the windless days that stack emissions would fall on Black Eagle, leaving a sulfur taste in the mouth. Others recalled that they couldn't go outside due to cloud inversions. People reported that groundwater seeps flowed into pools, and caused a burning sensation to the skin if contacted. Some respondents indicated that people were not concerned about contamination at the time, that nobody was in those days, and now things are different. More recently, many residents are concerned whether they should still garden, and sense there may be a negative image of the area until people understand what will happen next or it gets cleaned up. Other people are concerned about the health of the river and fish, and the effects on recreational users. One person mentioned that initially, the cleanup process was negatively perceived because people did not trust the representation. However, publicity has changed this because people want the problem addressed. Others interviewed identified occasional, anecdotal information about the pollution, or hadn't heard conversations about it, while another person responded with more concern for the current economy than for this issue.

Question: Do you have stories (from personal experience or that others have told you) about people carrying materials (soil, compost, slag tailings, mold sand, wood) from any of the smelters to their properties?

Several community members recalled building materials (primarily brick and wood or timbers) that were taken from the smelter property. Some also said that slag was used in sidewalks and foundations, and bricks were used in foundations and retaining walls. People also indicated that they heard from others that if people needed fill dirt they took it for construction or gardens. Several recalled that items had to be taken discretely in small quantities, and that they had heard "lunch box" stories. One person called taking materials home an "urban legend."

Question: Do you know of anyone in the neighborhood who has worked at one of the area smelters in the past?

Responses to this question indicated that everyone interviewed had some relation to the smelters in the past. Those interviewed generated a long list of family members, friends, and acquaintances that worked at the smelter and refinery.

Question: Where do children play in Black Eagle?

Twenty responses identified Higgins Park (Art Higgins Memorial Park, also known as Black Eagle Park), along the railroad grade. Seven people answered "streets" and six mentioned "yards." Some responses noted the Catholic Church playground, and a few mentioned the coulee near the Moose Lodge, or the coulee near the railroad tracks, and the Black Eagle Memorial (Tailrace) Island area. Other areas identified include: the road at the end of Chicago Avenue, the ditch area on 22nd Avenue south of Smelter Avenue, the baseball diamonds that were formerly at the edge of the ravine, and the motocross track near Rainbow Dam Road.

Question: Would a community group, funded by EPA and including a scientific staff person to conduct a technical review of the work being done with regard to soil sampling and cleanup, be a good idea?

This question was followed with an explanation of a Technical Assistance Grant (TAG). This is a program that provides funding to a group in a community so that people can hire someone to review technical work and decisions reached during the study and cleanup of the site and make the information available to the broader public.

Twenty-one respondents said “yes”, and followed with statements such as: “Black Eagle is a well connected community”, “the more information, the better”, “would like to work with a formal group”, “need to ask Black Eagle community members”, and “what if TAG doesn’t agree with EPA’s findings?” Although there were no firm negative responses to this question, some community members were “on the fence”, and provided comments such as “a probable waste of taxpayer money”, “if someone truly works for the community it could be good”, and “EPA wouldn’t be doing what they’re doing unless they have our best interests in mind.” Still another person expressed “...wonder about the credentials of the technical advisor.”

As follow up to this concept, EPA told interviewees that the Agency would host a public meeting in the near future to discuss the TAG program regulations and potential for creation of a TAG for a community group at the ACM Site.

Question: Do you want to be involved in site related activities that EPA and other agencies conduct?

At least one dozen people answered “yes.” Some people wanted to be involved as part of a civic club, while several others wanted to be involved with regard to recreational aspects and trails. Interviewees also wanted to be involved because they live nearby, and non-residents of Black Eagle also expressed interest. There were others interviewed that said they might be interested, depending on the time commitment required. Two persons responded that they would not want to be involved.

Question: If so, how do you want to be involved?

Several different responses included: quarterly informational meetings, direct e-mail, TAG group, community outreach, and through the Great Falls Development Authority.

Question: What kinds of information do you want to get about EPA’s activities in your neighborhood?

Several interviewees said that they want to be informed about “upcoming actions”, or “when something happens”, and “would like to be briefed periodically”, or “when something goes to the Black Eagle newsletter”, “when public meetings occur”, and “when EPA is in town.” Others requested being informed of more direct impacts, such as sewer or water cutoffs and road closures, and public use information for trails and the golf course. Some people indicated they would like to know about the timeline of the cleanup, while others would like to know about redevelopment and future

possibilities. Still others shared concerns of being informed of the health implications, explanation of health issues, plans and testing.

Question: How do you currently get most of your information about what's going on in your neighborhood?

The most identified sources were the Great Falls Tribune and the Black Eagle Newsletter, followed by civic club meetings and residents' word-of-mouth. Also cited were the community center, local TV, public information posts, letters from EPA, neighborhood councils, local businesses, and local community groups.

Question: What do you think is the best way to get information to area residents?

The majority of responses identified the Black Eagle Newsletter and the Great Falls Tribune, followed by local TV, meetings, e-mail, and the EPA webpage. Several responses cited direct mail or post cards to zip 59414, residents' word-of-mouth, civic clubs and organizations, inserts in the monthly water bill, senior center, Chamber of Commerce newsletter, and the volunteer fire department.

This question also resulted in a comment that (typically) younger persons in the community do not read newspapers. One suggestion included placing information on a facebook page.

Question: What are good places to put flyers advertising meeting or other events?

Responses most often identified the Black Eagle community center, the post office, local restaurants, and the Moose Lodge. Additional suggestions included grocery stores, WalMart, the civic center, the hospital, Blessed Sacrament Church, the Mountain View Co-op, the fire department, and the library.

Question: Is there a good location in the community for EPA to put copies of documents and fact sheets about the site? The location must have accessible hours and people must have the ability to copy documents at the location.

Predominantly people suggested the Black Eagle Community Center. Several responses suggested the Great Falls Public Library and the post office. Other suggestions included local elementary schools, North Middle School, and Charles Russell High School, the fire department, the Moose Lodge, and the Cascade County Annex.

As a result of the community interviews, the information repository for the ACM Site has been moved to the Black Eagle Community Center, located at 2332 Smelter Ave in Black Eagle, phone number (406) 453-4736. The Community Center is open from noon to midnight, seven days a week.

Question: Have you attended any meetings at the Black Eagle Community Center about the ACM Smelter and Refinery Site?

Nine answers indicated "yes", with 8 of the 9 responding that the meeting was useful. Seven answered that they did not attend but were aware of the meeting.

When questioned why people thought the meeting was useful, some thought it was a good opportunity to meet and converse with residents, regulators, and legislators. Some enjoyed listening to questions and concerns, while others liked that it was informative. Those that did not attend either didn't feel the need to attend or did not know whether it was relevant to them.

Question: Are there other places EPA and DEQ should hold public meetings?

Predominantly the meeting place suggested was the Black Eagle Community Center. Other suggestions, if needed, included: 3D restaurant meeting room, Chamber of Commerce, Gibson Room at the Civic Center, fire department, Blessed Sacrament Church, and the Moose Lodge.

Question: Do you read the community newsletter? How do you get it? Do you know who produces it?

All Black Eagle residents that were questioned said "yes", while some Great Falls residents indicated that they were not aware of the newsletter. Several Great Falls residents indicated that they would like to receive the newsletter by mail.

Most respondents said they receive the newsletter via door-to-door delivery. Others get it at Weed and Seed or pick it up at the Community Center. Out of 21 respondents, 13 knew who produced the newsletter and 8 did not.

Question: How often would you like to receive information?

Primarily responses were "as things change and there is new information", or "as often as needed." Others stated "at least quarterly", or "when things affect people", and requested "periodic summaries, not too many e-mails."

The following five questions are similar but were asked in order to identify information networks or community leaders. All individuals whom were identified will be added to EPA's mailing list.

Question: When you want to know what's going on in your neighborhood or have questions, whom do you contact?

Those interviewed indicated they would contact the County Commissioners or EPA, followed by their neighborhood coordinator and council. Others identified community individuals, the civic club, and Great Falls city commission meetings.

Question: When you get information, who do you share it with?

The main responses included neighborhood councils, followed by family and neighbors, the civic club, and friends.

Question: Are there people to whom you regularly talk about what's going on in the community?

Neighbors, neighborhood council members, the civic club, and local groups (such as GFWS, and the Rivers Edge Trail Group) were mostly identified.

Question: Who always seems to know what's going on?

People indicated the neighborhood council members, as well as a few individuals.

Question: Who do you trust for advice and information?

Respondents named the Great Falls Tribune, while several others mentioned various local individuals, community groups, and neighbors. Others replied that it depended on the issue.

4.0 COMMUNITY INVOLVEMENT PLAN OBJECTIVES AND STRATEGIES

Based upon interviews with local community members and other interested parties, as well as other relevant information, the EPA has developed the following list of objectives for community involvement and communication for the ACM Site:

- Use a Proactive Approach
- Define and Communicate Roles
- Formally Involve Local Officials and Other Community Representatives; and
- Comply with CERCLA/SARA Requirements.

A discussion of each of these objectives and the strategies that the EPA will use to implement the objectives follows.

4.1 *Proactive Approach*

The EPA's objective is to use a proactive approach to sharing information with the public. The Agency will try to provide information to as many people as possible, listen to their concerns, and answer their questions. To achieve this objective, the EPA will ensure that public health and safety issues and opportunities for public participation in site decisions are well publicized. The EPA will provide information on the Superfund process that is relevant to decisions at the site. The EPA will make certain that periodic, easy-to-read information regarding the status of site activities is provided to the community. The information will enable the community to stay updated and be well-informed about site activities.

The EPA will use various techniques, including some suggested by the community, to provide site information to the public. One effective way to share information with area residents is providing updates for the newspapers and radio. The Black Eagle Newsletter, in particular, appears to be one of the most effective ways to reach Black Eagle residents. The EPA will continue to produce fact sheets and flyers when appropriate, and use direct mail and local distribution routes to get information to residents and other interested parties. The EPA will hold public meetings and periodically attend established community organization meetings. The EPA will also maintain a webpage dedicated to the ACM Site to update people on activities, decisions, and issues regarding the site. This webpage will also provide contact information so community members can communicate issues and concerns back to the EPA.

4.2 *Define and Communicate Roles*

The EPA's objective is to clearly define and communicate plans, schedules, responsibilities, costs, and relationship with other agencies and potentially responsible parties (PRPs). The EPA wants to be clear about the roles of various groups involved in ACM Site activities. It is important to community understanding that the EPA clearly explains the role and authorities of each group, and how their activities are coordinated, especially concerning MDEQ, which is the EPA's primary governmental agency partner and Atlantic Richfield Company, the successor company to the Anaconda Copper Mining Co. who operated the plant.

4.3 Formally Involve Local Officials and Other Community Representatives

The EPA's objective is to formally involve local officials and other community representatives in the Superfund process and maintain ongoing, two-way communication with the community. Community leaders, local governmental, and non-governmental organizations have each expressed an interest in the EPA communicating regularly with them in order to inform them in advance of major decisions or events and formally inviting them to public meetings and other public activities. To accomplish this objective, the EPA will make an effort to formalize communication of EPA site activities. The EPA will continue to offer the community opportunities to participate.

4.4 Comply with CERCLA/SARA Requirements

The EPA's objective is to comply with the CERCLA/SARA requirements. In addition to the above activities, others will be planned specifically to meet the community relations requirements under CERCLA/SARA. A detailed description of these activities is found in the Section 5.0 of this CIP.

5.0 COMMUNITY INVOLVEMENT ACTIVITIES

This section describes the community involvement activities that the EPA plans to conduct during the course of the Superfund cleanup actions. These activities are designed to provide information to community members and provide opportunities for them to be involved in the decision-making process. The EPA is currently the lead government agency in the investigation and possible remediation of the ACM Site. Therefore, it is the EPA's responsibility to ensure full public participation in the Superfund cleanup process. Many of the activities listed below have been implemented prior to the publication of this CIP. These activities include those required by CERCLA/SARA. In addition, other site-specific support activities are important tools for keeping the community informed and involved. These site-specific activities will be modified and implemented in response to community input and requests.

5.1 *Activities Required by CERCLA/SARA*

Designate a Spokesperson

The EPA Remedial Project Manager is the designated spokesperson for all actions regarding this federal superfund site. The RPM may often delegate this responsibility to the EPA Community Involvement Coordinator.

Notify Affected Citizens

The RPM and the CIC will inform the community, state, and local officials of plans, decision-making processes, and actions taken in a timely manner. They will respond to inquiries and provide information concerning the ACM Site. Their contact information is located in Appendix A of the CIP.

Establish Information Repository

The EPA temporarily established the Information Repository at the Cascade County Annex. As a result of the community interviews, the information repository for the ACM Site has been moved to the Black Eagle Community Center, located at 2332 Smelter Ave in Black Eagle, MT, phone number (406) 453-4736. The Community Center is open from noon to midnight, seven days a week.

Conduct Community Interviews

The EPA interviewed the residents and local officials in January 2011. The results of interviews are presented in Section 3.4.

Prepare and Revise the Community Involvement Plan

This CIP is developed for public review and use by the community, and is intended to be updated and revised as the ACM Site investigation and cleanup progresses.

5.2 *Site-Specific Support Activities*

In addition to the community involvement activities described above, the EPA considers the following community involvement activities important in helping the public provide meaningful input to the

ongoing site activities. The full extent of these site-specific support activities will depend on resources available. A brief discussion of each of these activities follows.

Prepare Fact Sheets and Site Activity Updates

The EPA's Community Involvement Coordinator will produce a variety of fact sheets for publication and distribution. These fact sheets may vary from an informal paragraph for a school or church flyer, to a multi-page summary of a specific topic. In all cases, the EPA and other stakeholders will benefit from having a thorough review of the fact sheets for accuracy, readability, and visual appeal. The EPA may, at times, ask community members to review fact sheets to ensure they are clear and convey relative information. The EPA is open to suggestions from potentially affected interests on topics to write about, based on their relevancy to the ACM Site activities and their importance to the general public. These materials will be distributed to those on the mailing list and will also be available to the general public through the information repository, the EPA's website, and by request.

Issue Press Releases and other informational ads to news outlets

The EPA will issue press releases to make official statements at milestones in the Superfund process, such as key project dates, major decisions, or completion of cleanup actions. It is The EPA's policy not to negotiate the timing or content of a press release. However, in an effort to communicate openly with affected stakeholders, EPA will send all press releases related to the ACM Site to interested parties at the same time it sends the release to the press.

The EPA will try to alert community members about current events that may generate media interest and/or a press release. Anyone whose name is given to the press about any issue will be notified immediately. The EPA will, at times, also provide notices of events in the form of a display ad in the Black Eagle Newsletter and in the Great Falls Tribune.

Coordinate Workshops, Small Group Meetings, Large Public Meetings, and Meetings with Individuals

Meetings with the community provide a forum for presentation and exchange of information. The EPA will make an effort to present materials in a non-technical format and provide opportunities for interaction with meeting attendees to ensure that the information is understood. Such meetings also could be used to present a wide variety of information updates or to give slide shows or videotape presentations on site activities.

If necessary, specialized information such as sampling or sample results, risk assessment, cleanup status etc., will be presented in workshops, small group meetings, and large public meetings. Meetings make it possible for the EPA to get immediate feedback from the public on site specific issues. The EPA staff remains available for interested parties to discuss their concerns on a person-to-person basis. When possible, the EPA will share information directly with residents at their homes, particularly during field work such as sampling or cleanup.

Brief Local Officials

The EPA will inform local officials of key events and activities. Formal notification of key events and activities and advance information on decisions and events are important to local officials. The EPA's recent efforts in this regard have been effective according to interviewees and, therefore, should be continued.

Maintain an Accurate Mailing List

EPA will continuously look for ways to build its mailing list of people interested in receiving information on the investigation and cleanup of the area affected by the ACM Smelter and Refinery and related information. The EPA will also maintain a list of e-mail addresses for those that prefer to be notified by electronic mail.

6.0 REFERENCES

- AR, 2000. Montana Voluntary Cleanup and Redevelopment Act Application, Former Great Falls Refinery Site, Great Falls, Montana. June 26.
- City-Data.com, 2007. Black Eagle, Montana. <http://www.city-data.com/city/Black-Eagle-Montana.html>
- Furdell, William J., and Furdell, Elizabeth Lane, (date unlisted). *Great Falls – A Pictorial History*” <http://100megsfree3.com/mickmc/1800.html#top>
- Great Falls Tribune, 2007. “*Fall of the Big Stack, 25 Years Later*”. Reprint of Article Originally Published September 18, 2002.
- Montana Department of Environmental Quality, 2002. “Remediation Division Site Inspection Report. May 28.
- Pacific Western Technologies (PWT), 2011. “Black Eagle Railroad Bed Subsurface Investigation Final Data Summary Report, Revision 1.” March 2011.
- Tetra Tech, 2004. Final Analytical Results Report for Expanded Site Inspection. Anaconda Minerals Company, Great Falls Refinery, Black Eagle, Cascade County, Montana. June.
- URS Operating Services, Inc., 2008. Analytical Results Report for CERCLA Expanded Site Assessment, AMC Great Falls Refinery, Cascade County, Montana. December 31.
- U.S. Environmental Protection Agency (EPA), 2010. Anaconda Minerals Company, Great Falls Refinery, Proposing Superfund Cleanup Fact Sheet. January.

7.0 RESOURCES

This section summarizes the information contained in the appendices attached to this report. These appendices contain specific reference information that will be used by the EPA when conducting community involvement activities for the ACM Site. They are as follows:

- *Appendix A - Contacts:* This appendix contains the information necessary to contact parties associated with the investigation and clean-up activities in the vicinity of Black Eagle. Contact information includes the available addresses, telephone numbers, fax numbers, and e-mail addresses of various contacts. Contacts include such parties as federal, state, and local agency officials.
- *Appendix B - Elected Officials:* This appendix contains the names, addresses, telephone numbers, facsimile numbers, and e-mail addresses of federal, state and local elected officials representing the community of Black Eagle.
- *Appendix C - Information Repositories:* This appendix lists the addresses of the administrative record and information repositories.
- *Appendix D – Great Falls Neighborhood Councils:* This appendix lists the contact information of Neighborhood Councils 1 and 3 associated with Black Eagle.
- *Appendix E - Community Resource Centers:* This appendix contains address and contact information for various local resources centers. Resource centers include such facilities as information outlets, public assistance, and resources for seniors.
- *Appendix F - Local Media:* This appendix contains essential local media information, such as the address, contact, and publication schedule information.
- *Appendix G - Public Meeting Locations:* This appendix contains information on available meeting locations, such as meeting place capacity, hours of availability, location, and cost.
- *Appendix H - Community Interview Questionnaire:* This appendix contains the community interview questionnaire form used by the EPA to identify the Black Eagle communities' concerns associated with investigation and cleanup activities.
- *Appendix I – EPA Fact Sheets, ACM Site:* This appendix contains the Fact Sheets which the EPA has previously distributed regarding the ACM Site.

Appendix A

ACM Site, Montana: Contacts

Contact Name/ Contact Title	Mailing Address	Phone Number/ Fax Number	Email Address
Charles Coleman Remedial Project Manager (RPM) US Environmental Protection Agency (EPA)	US EPA Region 8 10 W. 15 th St., Suite 3200 Helena, MT 59626	(406) 457-5038 (fax)(406) 457-5056	coleman.charles@epa.gov
Wendy Thomi Community Involvement Coordinator US Environmental Protection Agency (EPA)	US EPA Region 8 10 W. 15 th St., Suite 3200 Helena, MT 59626	(406) 457-5037 (fax)(406) 457-5056	thomi.wendy@epa.gov
Dick Sloan State Project Officer Montana Department of Environmental Quality (MDEQ)	Montana DEQ Remediation Division 1100 N. Last Chance Gulch Helena, MT 59601	(406) 841-5046 (fax)(406) 841-5050	rsloan@mt.gov
Dan Strausbaugh, MPH Capt., U.S. Public Health Service Agency for Toxic Substances and Disease Registry (ASTDR)	ATSDR/DRO/R8 10 W. 15 th St., Suite 3200 Helena, MT 59626	(406) 457-5007 (cell)(406)441-1125	strausbaugh.dan@epa.gov
Steve Helgerson, MD, MPH State Medical Officer Montana Department of Public Health and Human Services (MT DPHHS)	1400 Broadway Helena, MT 59620	(406) 444-1286 (fax)(406) 444-6943	shelgerson@mt.gov
Carol Ballew, PhD Senior Public Health Epidemiologist MT DPHHS	Office of Epidemiology and Scientific Support, 1400 Broadway, Helena, MT 59620	(406) 444-6988 (fax)(406) 444-7465	cballew@mt.gov
Sandy Johnson Sanitarian Cascade City-County Health Department	115 4 th Street South Great Falls, MT 59401	(406) 454-6950	sjohnson@cascadecountymt.gov
Alicia Thompson Health Officer Cascade City-County Health Department	115 4 th Street South Great Falls, MT 59401	(406) 454-6950	athompson@cascadecountymt.gov
Luke Pokorny Associate Project Manager Atlantic Richfield Company	317 Anaconda Road Butte, MT 59701	(406) 723-1832	luke.pokorny@bp.com
Steve Dischler, P.E. Strategy Manager Atlantic Richfield Company	150 W. Warrenville Rd MC 200 – 1E Naperville, IL 60563	(630) 420-5541	steve.dischler@bp.com

Appendix B

ACM Site, Montana: Elected Officials

Contact Category	Association or Department	Contact Name/ Contact Title	Mailing Address	Phone Number/ Fax Number	Email Address
Federal Government	U.S. Congress	Jon Tester/ U.S. Senator	724 Hart Senate Office Building Washington, DC 20510	(202) 224-2644	http://tester.senate.gov/
			119 First Avenue North Suite 102 Great Falls, MT 59401	(406) 452-9585 (fax)(406) 452-9586	cheryl_ulmer@tester.senate.gov
	U.S. Congress	Max Baucus/ U.S. Senator	511 Hart Senate Office Building Washington, D.C. 20510	(202) 224-2651	http://baucus.senate.gov/
			113 3rd Street North Great Falls, MT 59401-2525	(406) 761-1574 Toll Free: (800) 332-6106 TTYD: (406) 452-1117 (fax)(406) 727-3726	bonnie_keller@baucus.senate.gov
	U.S. Congress	Dennis Rehberg U.S. Representative	2448 Rayburn House Office Building Washington, DC 20515	(202) 225-3211	http://rehberg.house.gov/
			105 Smelter Avenue Northeast Suite 16 Great Falls, MT 59404	(406) 454-1066 (fax)(406) 454-1130	mike_waite@mail.house.gov
State Government	Governor of Montana	Brian D. Schweitzer Governor	Montana State Capitol Building Post Office Box 200801 Helena, MT 59620-0801	(406) 444-3111 (fax)(406) 444-5529	http://governor.mt.gov
	Montana State Senate	Mitch Tropila State Senate District 12	Post Office Box 929 Great Falls, MT 59403-0929	(406) 452-9554	tropila@mt.net
	Montana State Congress	Brian E. Hoven State House District 24	1501 Meadowlark Drive Great Falls, MT 59404-3325	(406) 761-8533	brian@hovenequipment.com

Contact Category	Association or Department	Contact Name/ Contact Title	Mailing Address	Phone Number/ Fax Number	Email Address
County Government	Cascade County Commissioners	Bill Salina, Chair County Commission District Two	325 2 nd Ave. North, #111 Great Falls, MT 59401	(406) 454-6815	bsalina@cascadecountymt.gov
	Cascade County Commissioners	Joe Briggs County Commissioner District One	325 2 nd Ave. North, #111 Great Falls, MT 59401	(406) 454-6816	briggs@cascadecountymt.gov
	Cascade County Commissioners	Jane Weber County Commissioner District Three	325 2 nd Ave. North, #111 Great Falls, MT 59401	(406) 454-6814	jweber@cascadecountymt.gov
City Government	Mayor of Great Falls	Michael Winters Mayor	P.O. Box 5021 Great Falls, MT 59403	(406) 452-5679 (406) 455-8451 (fax)(406) 452-5679	http://www.greatfallsmt.net/people/offices/boards_commissions/winters.php
	Commissioner	Bill Bronson Commissioner	P.O. Box 5021 Great Falls, MT 59403	(406) 452-5921 (fax)(406) 727-0005	http://www.greatfallsmt.net/people/offices/boards_commissions/bronson.php
	Commissioner	Fred Burow Commissioner	P.O. Box 5021 Great Falls, MT 59403	(406) 727-0930	http://www.greatfallsmt.net/people/offices/boards_commissions/burow.php
	Commissioner	Mary Jolley Commissioner	P.O. Box 5021 Great Falls, MT 59403	(406) 727-2829 (fax)(406) 727-0005	http://www.greatfallsmt.net/people/offices/boards_commissions/jolley.php
	Commissioner	Bob Jones Commissioner	P.O. Box 5021 Great Falls, MT 59403	(406) 453-5005	http://www.greatfallsmt.net/people/offices/boards_commissions/jones.php

Appendix C

ACM Site, Montana: Information Repositories

Information Repository Name	Street Address	Contact Name/ Contact Title	Phone Number/ Fax Number	Hours of Operation
U.S. EPA Records Center EPA Montana Office	EPA Montana Office, Superfund Records Center 10 West 15th Street, Suite 3200, Helena, MT 59626	Lori Hallauer	(406) 457-5046 or (406) 457-5000	Monday - Friday 8:00 am - 4:00 pm (excluding holidays)
Black Eagle Community Center	2332 Smelter Avenue Black Eagle, MT	Nancy Brown	(406) 453-4736	Noon to Midnight Seven Days per Week

Appendix D

ACM Site, Montana: Great Falls Neighborhood Councils

Neighborhood Council	Council Chair	Address	Phone Number/ Email	Regular Meeting Location/Time
Neighborhood Council Coordinator	Patricia Cadwell	Civic Center Room 4 PO Box 5021 Great Falls, MT 59403	(406) 455-8496	(See Individual Councils Below)
Council #1	Fred Rauch	1200 Alpine Drive Great Falls, MT 59404	(406) 453-0263	Second Tuesday of the month Meadowlark School Library 2204 Fox Farm Road 7:00 pm
Council #3	Lori Fay	308 Riverview 4W Great Falls, MT 59404	(406) 454-1476 lorijf@hotmail.com	First Thursday of the month Riverview Elementary Library 100 Smelter Avenue NW 7:00 pm
Council #4	Sandra Guynn	PO Box 7047 Great Falls, MT 59404	(406) 453-4662 bgskygen@mt.net	Fourth Thursday of each month Heritage Baptist Church, 900 52nd Street North 6:30pm
Council #7	Kenny Volk	926 7th Avenue North Great Falls, MT 59404	(406) 781-4993 kennyvolk@gmail.com	Second Monday of each month Civic Center, #2 Park Drive South 7:00pm

Appendix E

ACM Site, Montana: Community Resource Centers

Resource Center	Street Address	Phone Number/ Fax Number	Contact Name/ Contact Title	Resource(s) Provided	Hours of Operation
Opportunities Incorporated	905 1 st Ave North PO Box 2289 Great Falls, MT 59401	(406) 761-0310 (fax) (406) 761-0363	Patricia Campbell Executive Director	Section 8 Housing Low-income Energy Assistance	Emergency Services Center 9:00 am – 4:00 pm Mon-Fri
Benefis Hospital	101 26th Street South, Great Falls, MT 59405	(406) 455-5000 (406) 455-5463(Karen)	Karen Ogden KarenOgden@benefis.org	Medical Care, Health and Community Relations	24 hours/day Every day
Boys and Girls Clubs of North Central Montana	18 6th Street North Suite 26 Great Falls, MT 59401	(406) 453-5521 bbbsgfalls@3rivers.net .	Call for information	Education, Career Skills, Leadership, Arts, Health	9:00am – 5:00 pm Mon-Fri
Great Falls Chamber of Commerce	100 1st Ave North Great Falls, MT 59401	(406) 761-4434 (fax) (406) 761-6129	Roxy Perez, Office Manager rperez@greatfallschamber.org	Advocate, promote, network, and support businesses	8:00 am – 5:00pm Mon-Fri
City County Health Department	115 4th St South Great Falls, MT 59401	(406) 454-6950	Alicia Thompson Executive Director	Achieve and maintain health, safety, and self-sufficiency	8:00 am – 5:00pm Mon-Fri
Great Falls-Cascade County Historic Preservation Advisory Commission	325 2 nd Avenue North Courthouse Complex Room 111 Great Falls, MT 59401	(406) 454-8435	Ellen Sievert esievert@greatfallsmt.net	Local Historic and cultural resource information	8:00 am-5:00pm Mon-Fri
Great Falls Housing Authority	1500 Chowen Springs Loop Great Falls, MT 59405	(406) 453-4311 (TDD) (406) 453-6327	Joseph Boyle Chairman	Safe, basic, affordable housing	8:30 am – 4:30 pm Mon-Fri
Meals on Wheels	1620 12 Ave N Great Falls, MT 59401	(406) 454-6990 (fax) (406) 454- 6991	Nancy Wilson	Meals for seniors at least 60 years of age and homebound	8:00 am – 5:00 pm Mon-Fri Excluding legal holidays
Montana Dept of Public Health and Human Services	201 First St. South Suite #1 Great Falls MT 59403	(406) 454-5640 (fax) (406) 454 5697	Nancy Loncki, County Director	Health Well-being Self-reliance	8:00 am – 5:00 pm Mon-Fri

Resource Center	Street Address	Phone Number/ Fax Number	Contact Name/ Contact Title	Resource(s) Provided	Hours of Operation
Salvation Army	1000 17th Ave S. Great Falls, MT	(406) 453-0391	Major Joseph Huttenlocker	Basic Human Needs Holiday Assistance Senior Programs	9:00 – 4:30 pm Mon-Fri (closed Wednesdays)
Senior Citizens Center	1801 Benefis Court Great Falls, MT 59405	(406) 454-6990 (fax) (406) 454-6991	Bob Meyers	Health Education Recreation	8:00 – 4:00 pm Mon-Fri 8:00 – 5:00 pm Thursday 8:00 – 2:00 pm Weekends
United Way of Cascade County	417 Central Avenue, Suite 320 P O Box 1343 Great Falls, MT 59403	(406) 727-3400 (fax) (406) 727-3403	Gary Owen President Lewis Card Director	Education Income Health	8:00am – 5:00 pm Mon-Fri

Appendix F

ACM Site, Montana: Local Media

Name	Mailing Address	Phone Number/ Fax Number	Media Type
Great Falls Tribune	205 River Drive South Great Falls, MT 59405 http://www.greatfallstribune.com/	Switchboard (8am-5pm): (406) 791-1444 or (800) 438-6600 Newsroom Fax: (406) 791-1431	Daily Newspaper
Black Eagle Newsletter	Jim Helgeson 1705 Colorado Avenue Black Eagle, MT 59414	(406) 452-6212	Community Newsletter
Prairie Star	518 2nd St S, Suite 500 Great Falls, MT 59401	(406) 727-7244	Local Agriculture and Business News Twice per month
KFBB TV 5	3200 Old Havre Highway Black Eagle, MT 59414 http://www.kfbb.com/	(406) 453-4377	Local Television ABC Affiliate
KRTV TV 3	PO Box 2989 Great Falls, MT 59403 http://www.krtv.com/home/	(406) 791-5400	Local Television CBS Affiliate
KQDI 1450 am	1300 Central Ave West PO Box 3129 Great Falls, MT 59403	(406) 761-2800	Local Radio News Talk
KMON 560 am	#20 3rd Street North Suite 231 Great Falls, MT 59401	(406) 761-7600	Local Radio Music ABC News

Appendix G

ACM Site, Montana: Public Meeting Locations

Facility	Address	Phone	Capacity (# persons)	American Disabilities Act (ADA) Compliant?	Availability - Remarks
Black Eagle Community Center	2332 Smelter Avenue Black Eagle, MT 59414	(406) 453-4736 (406) 231-0396	400	Yes	Variable depending on booking; schedule 3 days or more in advance
Chamber of Commerce	100 1st Ave North Great Falls, MT 59401	(406) 761-4434	40	Yes	Minimum three weeks notification; fee is \$35 per hour
3D Restaurant	1825 Smelter Ave Black Eagle, MT 59414	(406) 453-6561	100	Yes	Advance notification requested; open 7 days per week
Gibson Room Great Falls Civic Center	2 South Park Drive Great Falls, MT 59401	(406) 455-8510	80	Yes	Advance notification requested fee is \$150 per day
Black Eagle Fire Department	660 21st St Black Eagle, MT 59414	(406) 452-7883	40 - 50	Hall – yes Restrooms - no	Minimum one week notification
Blessed Sacrament Church	1325 Smelter Ave NE Black Eagle, MT 59414	(406) 453-8425	150	Yes (restroom access unknown)	Minimum one week notification
Moose Lodge	401 21st Street Black Eagle, MT 59414	(406) 452-5420	250	No	Two weeks to one month notification

Appendix H

ACM Site, Montana: Community Interview Questionnaire

COMMUNITY INTERVIEW Superfund Program ACM Smelter and Refinery

Interview Number

Interviewer

Date

1. Are you aware of the sampling and cleanup at and around the former Anaconda Copper Mining Co. Smelter and Refinery? What do you know about it?
2. How did this information come to your attention?
3. Do you have any concerns or questions about sampling and cleanup activities?
4. Do you have any concerns or questions about public health issues related to contaminated soils on or near the smelter site?
5. If you have community health concerns where do you go for information?
6. Where do you think the contamination could have come from?
7. What have you heard about any activities that may have caused contamination and where did the activities occur?
 - Was there concern about pollution associated with smelter activities or other activities in the in the area?
8. Do you have stories (from personal experience or that others have told you) about people carrying materials (soil, compost, slag tailings, mold sand, wood) from any of the smelters to their properties?
9. Do you know of anyone in the neighborhood who has worked at one of the area smelters in the past?
10. Do you know of anyone in the *Black Eagle* area who has a private well?
11. Where do children play in *Black Eagle*? Parks? Vacant lots? Alleys? Railroad areas?

12. Would a community group, funded by EPA and including a scientific staff person to conduct a technical review of the work being done with regard to soil sampling and cleanup be a good idea?

- Explain the TAG program--A program that provides funding to a group in a community so that the group can hire someone to review technical work and decisions reached during the study and cleanup of the site and make the information available to the broader public. (Provide them with TAG brochures.)
- Can you suggest someone who would be a good member of such a work group?

13. Do you want to be involved in site related activities that EPA and other agencies conduct?

- If so, how do you want to be involved?

14. What kinds of information do you want to get about EPA's activities in *your neighborhood*?

15. How do you currently get most of your information about what's going on in *your neighborhood*?

16. What do you think is the best way to get information to area residents?

- | | |
|---------------|-----------------------------|
| 1. Newspaper | 4. Civic Organizations |
| 2. Newsletter | 5. Meetings |
| 3. Radio | 6. Other (please describe): |

17. What are good places to put flyers advertising meetings or other events?

18. Is there a good location in the community for EPA to put copies of documents and fact sheets about the site? (Administrative record?) The location must have accessible hours and people must have the ability to copy documents at the location.

19. Have you attended any meetings at the Black Eagle Community Center about the ACM Smelter and Refinery site? If so, was it useful? Why or why not?

- Are there other places EPA and DEQ should hold public meetings?

20. Do you read the community newsletter?

- How do you get it?
- Do you know who produces it?

21. How often would you like to receive information?

22. When you want to know what's going on in your neighborhood or have questions, whom do you contact?

23. When you get information, whom do you share it with?

- Are there people to whom you regularly talk about what's going on in the community?
- Who always seems to know what's going on?
- Who do you trust for advice and information?
- Can you recommend someone for us to talk to who is involved in neighborhood affairs and who only speaks Spanish?

24. Who are your community's leaders?

25. Are there other people we should talk with?

26. Is there anything else you would like to add?

27. ACTION ITEMS

- Would you like to be on the mailing list? Y N

Appendix I

EPA Fact Sheets for ACM Site



Anaconda Minerals Company Great Falls Refinery

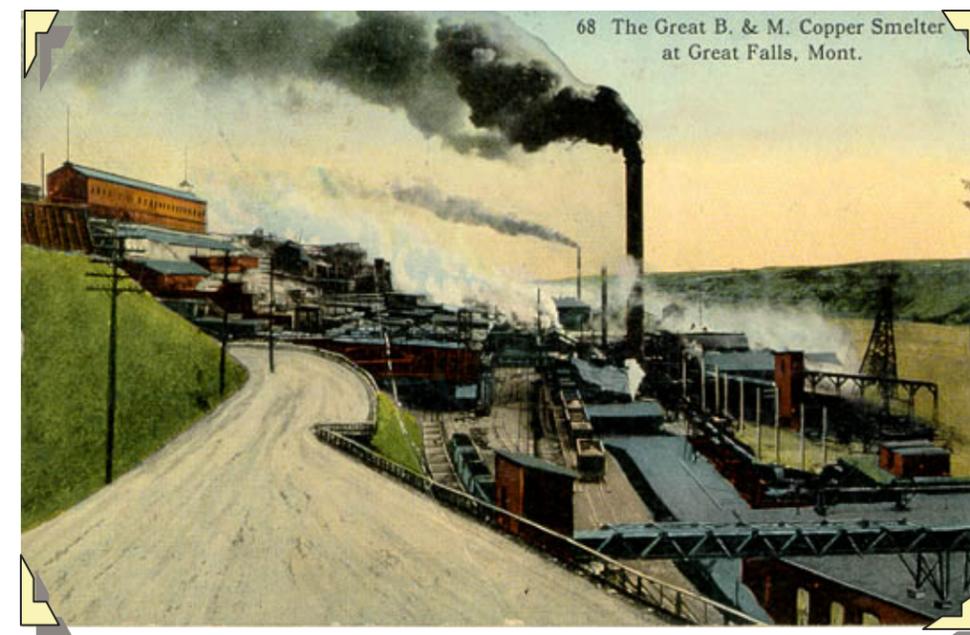


July 2009

History of Operations, Contamination and Cleanup

INSIDE

- Refinery Closure and Demolition
- Metals Contamination
- Assessing Risk
- Past, Present & Future
 What Now?
 What Next?
- Timeline
- Gardening Tips
- Common Questions
- Contacts



68 The Great B. & M. Copper Smelter at Great Falls, Mont.

The Boston & Montana Consolidated Copper and Silver Mining Company began construction of the first smelter at the refinery site in 1892. Operations began in 1893 when copper ore from mines in Butte, Montana was concentrated, smelted, and refined into blister copper. In time, this refinery came to construct and operate the tallest plant stack in the world, more than 502 feet high. Electrolytic and furnace refineries also operated at the site.

The property was acquired by Anaconda Copper Mining Company in 1910 and renamed the Great Falls Reduction Department. Copper was made into commercially useful shapes. Smelting activities continued at the facility until the early 1970s. The property again changed hands in 1977, when these holdings were purchased by Atlantic Richfield Company (ARCO). Primary products from activities at the site were copper, zinc, arsenic, and cadmium.

The community of Black Eagle was founded in 1882 by workers at the nearby Great Falls Refinery. The community was originally known as Martinville. The older established section of Black Eagle lies between U.S. Highway 87 and the Anaconda Minerals Company (AMC) Great Falls Refinery.

To be added to or deleted from EPA's
Direct Mail List
Call toll free
1-866-457-2690 X 5034

Toll Free Numbers
DEQ Helena 1-800-246-8198
EPA Helena 1-866-457-2690
EPA Denver 1-800-227-8917

Do You Have Questions?

Please contact any of these individuals for additional information.

- **EPA**
 Gwen Christiansen, Site Assessment Manager 303-312-6463 christiansen.gwen@epa.gov
 Wendy Thomi, Community Involvement Coordinator 406-457-5037 thomi.wendy@epa.gov
- **Montana DEQ**
 Denise Martin, Site Response Section Supervisor 406-841-5060 demartin@mt.gov
- **Cascade County**
 Sandy Johnson, Sanitarian 406-454-6950 sjohnson@co.cascade.mt.us
 Alicia Thompson, Health Officer 406-454-6950 athompson@co.cascade.mt.us

Public Meeting

Please Attend
Tuesday, July 14, 2009
7:00 pm — 8:30 pm

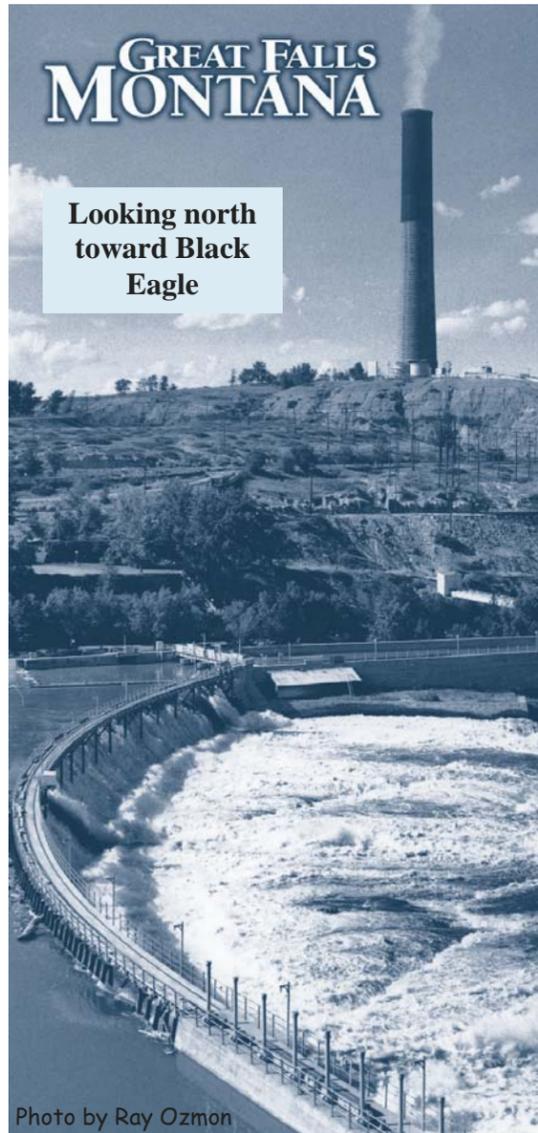
Black Eagle Community Center
1222 Main St.
Black Eagle, Montana

Refinery Closure and Demolition

Demolition of plant facilities had begun in 1972 and all operations at the Great Falls Refinery ceased in September 1980. ARCO began closure in 1981 completing the process in 1999. There are no records of any regulatory agencies overseeing the closure activities. Closure activities included building demolition and removal, basement substructure backfilling, salvaging and on-site waste burial of flue dust, granulated slag, asbestos-containing material, demolition debris, and other waste. Wastes were covered with anywhere between six inches and five feet of soil.

Metals Contamination

Over the years, wastes at the AMC site were placed in a landfill on-site or dumped directly into the Missouri River. Tailings and slag were dumped into the River from a tramway that ran along the riverbank below the Black Eagle dam raceway. An estimated 950,000 tons of slag and tailings were released to the river in 1907 alone.



Smelter operation at the Refinery site employed a 502-foot-tall plant stack for several years before pollution control technology was common. Such a stack allowed contaminants to be aerially dispersed over a wide area in the vicinity of the facility.

Analytical results (2003) documented the presence of metals on-site, in Missouri River sediments and surface water, and along the railroad bed, including antimony, arsenic, cadmium, chromium, cobalt, copper, iron, lead, manganese, mercury, nickel, silver, sodium, and zinc.

In 2007 and 2008 additional sampling was conducted to assess residential soils in the area. Elevated levels of arsenic, lead, and cadmium were found. The U.S. Environmental Protection Agency (EPA) is principally concerned with lead and arsenic in residential soils because of the effects they may have on human health.

Lead and arsenic levels found in residential yards were compared with screening levels of 400 mg/kg lead and 40 mg/kg arsenic. Any samples found with numbers above these screening levels indicates that further investigation needs to be done to determine the extent of contamination and the potential risk. This additional information will help determine if cleanup is warranted.

If highly elevated levels are found, EPA conducts a time critical removal using an emergency response team. The investigations so far have shown that residential soil metals are not high enough to cause immediate concern or warrant a removal action. A closer comprehensive look will be taken to determine if there may be long-term health risks.

Photo by Ray Ozmon

Common Questions

What is Superfund and how can it help address a contaminated site?

In response to growing concern over health and environmental risks posed by uncontrolled or abandoned hazardous waste sites, Congress passed the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) - also known as Superfund - in 1980. The Superfund program provides authority to thoroughly investigate and clean up contaminated sites. If an immediate human health or environmental threat is discovered the program provides for immediate action. If a more long-term cleanup is necessary, EPA and DEQ evaluate several alternatives, including removal, containment or treatment of the contamination, making sure the final decision meets strict criteria for a lasting remedy. Where possible, EPA works with communities to restore cleaned-up sites to productive use through the Superfund Redevelopment Initiative.

What is the State of Montana's Superfund Program?

The 1985 Montana Legislature passed the Environmental Quality Protection Fund Act. This Act, as amended in 1989, provided the Department with similar authorities as provided under Superfund. The name was changed to Montana Comprehensive Environmental Cleanup and Responsibility Act (CECRA) and the Voluntary Cleanup and Redevelopment Act (VCRA) was added.

Will the community lose control of cleanup decisions if Superfund takes over?

While Superfund is a national program, its impacts are local and EPA works hard to incorporate the community's and local and state government's priorities into the response. Throughout the process, EPA consults with DEQ and welcomes opportunities to meet with local officials and the public, soliciting input into major decisions. While EPA and DEQ have certain public involvement activities that are required by law, they can also be flexible, tailoring communications activities depending on the needs and interest of the community.

What if I would like my yard sampled?

EPA does not currently have additional sampling planned. If the site is proposed for Superfund, EPA will take additional samples to determine the nature and extent of contamination. Residents will have the opportunity to have their yard sampled at no cost to them at that time. It is important to note that recent sample results do not indicate an immediate health risk or support taking immediate action. EPA and DEQ are concerned about potential long-term exposure to contaminated soil; potential contact with water and sediments during recreation on the Missouri River below the Black Eagle dam, and effects on the food chain, i.e. fish and birds.

What will be the impact to the county or community (i.e. real estate values, historical values) if the smelter is listed as a Superfund site?

Studies show that it is the discovery of the problem, which generally predates NPL listing by several years, that causes home prices to decline, not placement on the NPL. Evidence suggests that placing sites on the NPL either has no effect on home prices, or may actually raise them. Because the listing of a site implies a federal commitment to clean up the site, this step reduces uncertainty and may act as a signal to real estate markets that property values will soon rise.



The large smokestack at the apex of "Smelter Hill." The complex below includes a dam and powerhouse, rail lines, wagon roads, water pipes and electrical lines.



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Gardening in areas that may be contaminated with lead

It is a possibility for lead to get into your body by eating certain vegetables grown in soil that contains lead. Health problems associated with lead ingestion could result, especially for pregnant women and small children.

When you grow vegetables, you can lower the amount of lead that gets into your body by taking some simple steps :

✔ Clean vegetables well before cooking or eating.

- Throw away old and outer leaves of vegetables.
- Wash all vegetables with cold water. Scrub vegetables with a brush to help remove dirt. Rinse vegetables well before eating.
- Scrub and peel root crops such as carrots, potatoes, turnips, and onions before eating them.

✔ Avoid planting root crops in contaminated soils. Try growing vegetables in raised beds or containers.

- Grow crops such as tomatoes, peppers, squash, cucumbers, peas, beans, or corn. They are less likely to absorb lead.
- Grow leafy vegetables such as lettuce and root crops (carrots, potatoes) in containers or raised beds filled with lead-free soil. You can purchase lead-free soil from nurseries or garden stores.

✔ Do...

- add peat moss, compost, or manure to your soil. These bind the lead in soil so that vegetables absorb less lead.
- keep soil pH at 6.5 or higher so that plants will absorb less lead.
- cover all bare soil in the garden with 2 to 4 inches of lead-free mulch such as wood chips, grass clippings, lead-free soil, or compost.

✘ Do not...

- grow vegetables in the drip zone. There may be lead dust on the roof shingles that drips down.



- grow vegetables around the foundation of older buildings. They may be painted with lead based paint.
- grow root crops and low-growing leafy vegetables in soil that contains more than 1,000 parts per million (mg/kg) of lead.
- garden in soil that contains more than 1,500 parts per million (mg/kg) of lead.



Less likely to absorb lead

tomatoes
peppers
squash
cucumbers
peas
beans
corn

More likely to absorb lead

carrots
beets
potatoes
turnips
onions

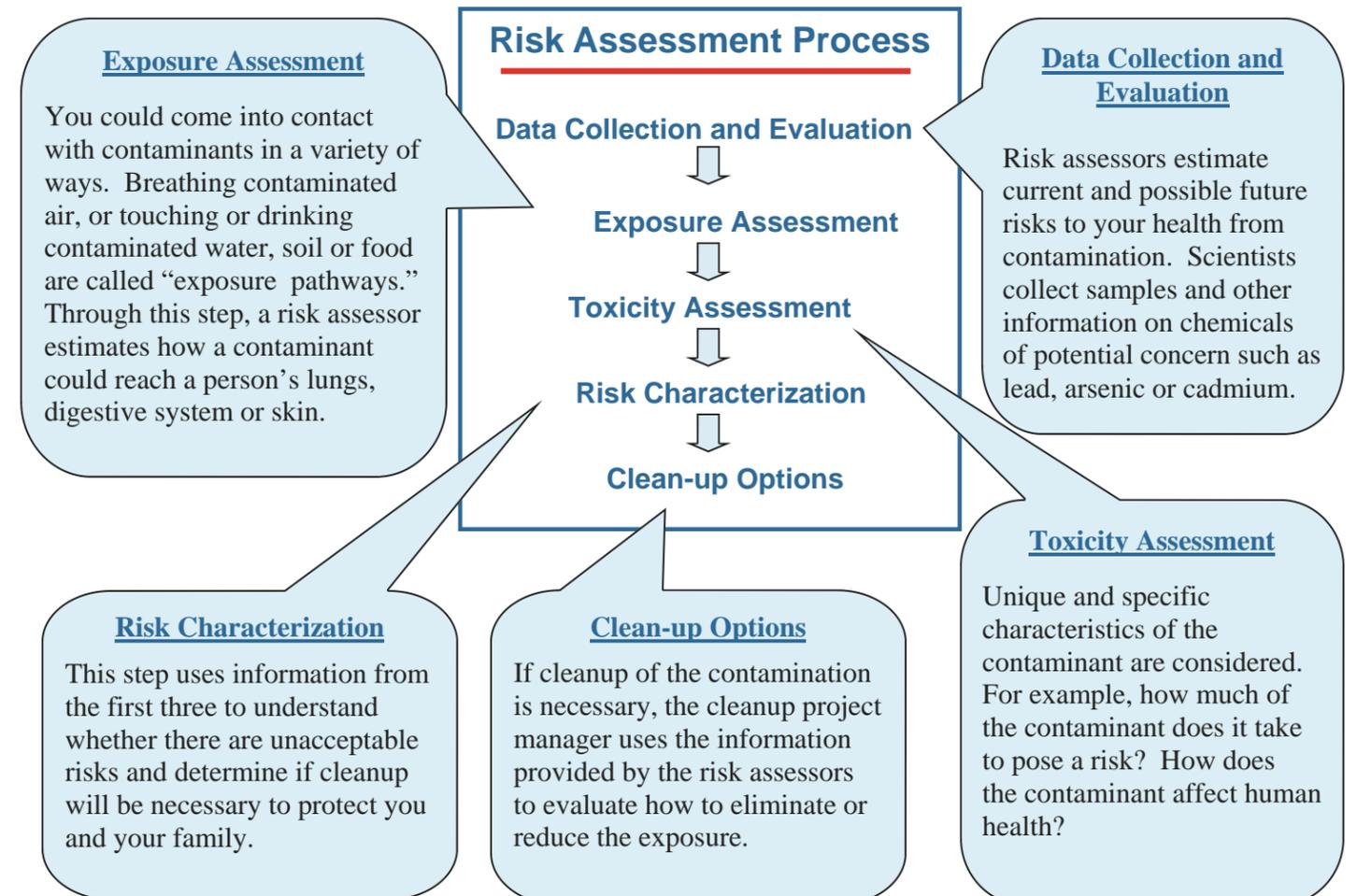


Assessing the Risk

Now that EPA has collected this data, the agency will do an “exposure assessment.” The levels of lead and arsenic found generally in the area do not appear to be at a level warranting an immediate EPA cleanup action. However, EPA and the Montana Department of Environmental Quality (DEQ) will look closer at potential risks for individuals exposed over a long period of time to elevated levels of metals that may be in or near their yards.

EPA compares soil sampling results to a *screening level* typically used for soil exposure assessments- 400 mg/kg for lead, 40 mg/kg for arsenic. These concentrations are based on assumptions about people’s exposure. To be protective, EPA makes assumptions, estimating high, about how often people are exposed; for how long they are exposed each time and for how many total years they are exposed. This ensures that the scientists don’t overlook the possibility of elevated risk. Using these protective exposure assumptions may point to a problem in some instances where a significant risk may not actually be present. In this way, EPA believes that they are being as protective as possible rather than possibly missing something.

If sample results are higher than the screening levels, an exposure assessment will need to be done. Meanwhile, EPA suggests limiting exposure to these soils and following the guidelines on page 6 of this fact sheet. EPA or DEQ will likely request additional samples on specific properties to further assess potential long-term risk. If results are below these thresholds, we will likely not need to re-sample the property. Remember, the screening levels are very protective.



Past, Present and Future

Why Now?

A post closure solid waste inventory was conducted in 1981 and identified 27 areas of concern (Anaconda Minerals Company (AMC) 1981). A preliminary assessment completed in 1982 recommended that further investigations be conducted at the site and, in 1983, a screening site investigation was conducted by ARCO documenting both on-site and off-site groundwater and surface water contamination. ARCO submitted a voluntary cleanup plan to the Montana Department of Environmental Quality in 2000, which the DEQ determined to be incomplete. DEQ requested that EPA review the site. EPA conducted an Expanded Site Inspection in April 2003 that involved collecting surface water, sediment, soil and source samples. This Site Inspection of the AMC Great Falls Refinery site documented elevated levels of arsenic, cadmium, chromium, lead, mercury and zinc both on and off-site. These contaminants are the result of various processes of site operations between 1893 and 1980.

EPA conducted a Superfund Site Assessment of residential soils during the summer of 2007. The assessment focused on neighborhoods in Great Falls, Montana, on the south bank of the Missouri River across from the former refinery site and in the community of Black Eagle, west and northwest of the former refinery site.

The investigation found an approximate area of 3,400,000 square feet (about 78 acres) encompassing 375 residences in Black Eagle to be contaminated with arsenic and lead above screening levels. Another Expanded Site Inspection was conducted during 2008 to further define areas of residential soil contamination. The investigation confirmed that Black Eagle residents may be exposed to levels of lead, arsenic, and cadmium in soil that are elevated from normal background levels of these metals. **EPA found no levels considered to pose immediate health risks. The levels indicate only that further investigation is needed.**

What Now ?

As a result of recent investigations, Montana DEQ is determining whether cleanup can be done under the State Superfund Program or should go to EPA for placement on the National Priorities List (NPL). In August, 2008 Cascade County wrote to the Governor to ask for the site to be addressed by either the State Superfund Program or Federal Superfund Program. The state has been exploring options and will make a decision this summer.

What Next?

With the current information, EPA will recommend adding the site to the National Priorities List (NPL) - also known as Superfund - pending DEQ making a decision to take the lead under the State Superfund Program.

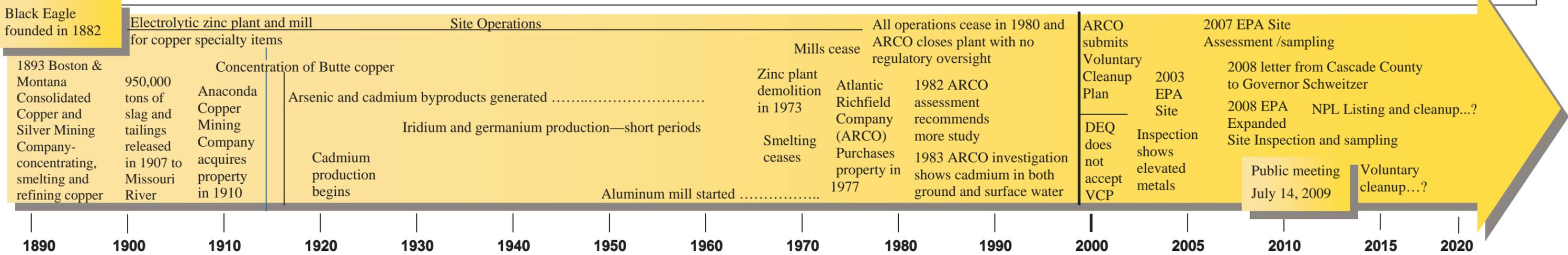
EPA and DEQ have met with local officials twice during the last year (May 6, 2009 and August 26, 2008) to provide information about possibilities for proceeding with investigation and cleanup, including listing the site on the Superfund List. Twice a year—every six months—EPA has a listing event to add sites from around the country to the NPL, or list of Superfund sites.

At the time a site is proposed, a public notice and news release are sent to local papers announcing the proposal. EPA will describe how the public can access the proposal in the Federal Register. There is a 60-day comment period during which the public may review the documents used to support the proposal and comment on the proposed action. If there are no significant comments, the site becomes officially listed during the next listing event.

After the comment period, the site will be assigned to a Remedial Project Manager with EPA and DEQ. Then, to prepare for sampling, EPA will reach out to residents in a variety of ways to ensure that people in the affected area have the opportunity to request sampling, express concerns and get answers to questions they may have about site activities. Throughout this process, EPA will provide opportunities to attend informational meetings, to learn about proposals and to ask questions and comment on what EPA is proposing.

EPA wants to hear from the stakeholders throughout the various stages of investigation and cleanup. Hearing from the public is one of the things that ensures EPA is working with the very best information in its decision-making process. We welcome your ideas about how we can best keep each other informed. Contacts are on last page!

Timeline of significant events related to the AMC Great Falls Refinery





Anaconda Copper Mining Co. Smelter and Refinery

January 2010

Proposing Superfund Cleanup

INSIDE

Contamination p.2

Health Risks p.3

Common Superfund
 Acronyms p.4

The Superfund Process
 and Timeline p. 4-5

Opportunities
 to be Involved p. 6

Common Questions
 and Answers p.7

Project Contacts

The U.S Environmental Protection Agency (EPA) and Montana Department of Environmental Quality (DEQ) are considering placing the ACM Smelter and Refinery and adjacent areas on the Superfund National Priorities List (NPL). Placement on this List ("Listing") would provide the resources to address site contamination and protect public health and the environment in and around Black Eagle, Montana.

Based on recent investigations, meetings with local officials and Black Eagle community members, EPA and DEQ determined that Superfund listing will be the best process to ensure a comprehensive risk assessment and cleanup. Cascade County, the Black Eagle community and the Governor of Montana have written letters of support for placement of the ACM Smelter and Refinery site on the NPL.

This fact sheet is intended to help interested parties understand the Superfund Listing Process. This information will help you provide input into the decision to move forward (or not) with listing the Site.

Background

The area being considered for Superfund cleanup has contamination from historic smelting and refining activities at Anaconda Copper Mining Company's Great Falls Reduction Department. Smelting and Refining of Copper from Butte mines and milling other specialty metals spanned more than 80 years. Primary products from activities at the site were copper, zinc, arsenic, and cadmium. The community of Black Eagle was founded in 1882 by workers at the nearby Great Falls Refinery.

The Site consists of 5 areas potentially needing cleanup:

- Residential soils
- The former smelter site
- Areas along the railroad bed
- Missouri River sediments and surface water
- Groundwater

To be added to or deleted from
 EPA's Direct Mail List
 Call toll free: 1-866-457-2690 X 5034
 Or email: thomi.wendy@epa.gov

Toll Free Numbers
 DEQ Helena 1-800-246-8198
 EPA Helena 1-866-457-2690
 EPA Denver 1-800-227-8917

Do You Have Questions?

Please contact any of these individuals for additional information.

- **EPA**
 Gwen Christiansen, Site Assessment Manager 303-312-6463 christiansen.gwen@epa.gov
 Wendy Thomi, Community Involvement Coordinator 406-457-5037 thomi.wendy@epa.gov
- **Montana DEQ**
 Denise Martin, Site Response Section Supervisor 406-841-5060 demartin@mt.gov
- **Cascade County**
 Sandy Johnson, Sanitarian 406-454-6950 sjohnson@co.cascade.mt.us
 Alicia Thompson, Health Officer 406-454-6950 athompson@co.cascade.mt.us

Public Meeting
 Please Attend
 Thursday, February 11, 2010
 7:00 pm — 8:30 pm
 Black Eagle Community Center
 2332 Smelter Ave.

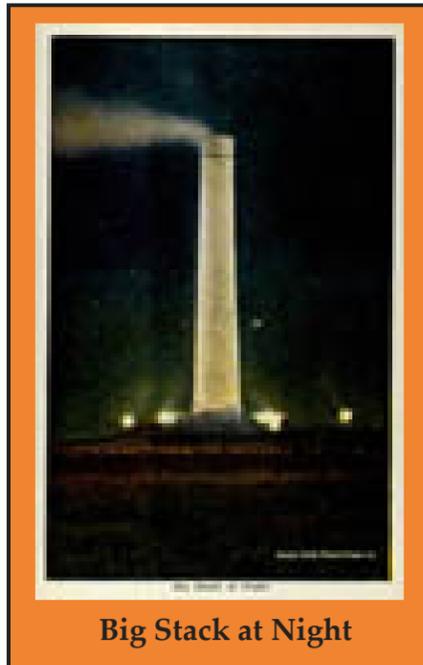
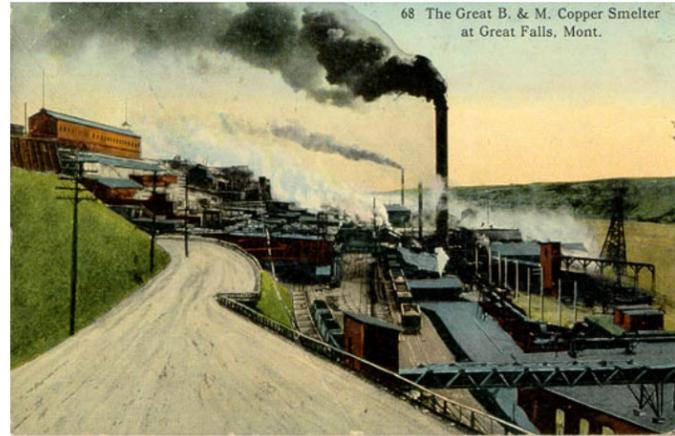
Metals Contamination

Over the years, wastes at the ACM site were placed in a landfill on-site or dumped directly into the Missouri River. Tailings and slag were dumped into the River from a tramway that ran along the riverbank below the Black Eagle dam raceway. An estimated 950,000 tons of slag and tailings were released to the river in 1907 alone. Smelter operation at the Refinery site employed a 502-foot-tall plant stack for several years before pollution control technology was common. Such a stack allowed contaminants to be aerially dispersed over a wide area in the vicinity of the facility.

Soil sampling in 2003 documented the presence of metals on the former smelter site, in Missouri River sediments and surface water, and along the railroad bed, including antimony, arsenic, cadmium, chromium, cobalt, copper, iron, lead, manganese, mercury, nickel, silver, sodium, and zinc.

In 2007 and 2008, additional sampling was conducted to assess residential soils in the area. Elevated levels of arsenic, lead and cadmium were found. EPA is concerned with lead and arsenic in residential soils because of the effects they may have on human health.

Lead and arsenic levels found in residential yards were compared with screening levels of 400 mg/kg lead and 40 mg/kg arsenic. Any samples found with numbers above these screening levels indicates that further investigation needs to be done to determine the extent of contamination and the potential risk. This additional information will help determine if cleanup is warranted.



For more background on site operations, please take a look at the July 2009 Fact Sheet:

History of Operations, Contamination and Cleanup.

Call Wendy Thomi toll-free at 1-866-457-2690 to have a copy mailed to you.

If highly elevated metals levels are found in soil during the next round of sampling, EPA will conduct a time-critical removal action using an emergency response team. The investigations so far have shown that residential soil metals are not high enough to cause immediate concern or warrant a removal action. A closer comprehensive look will be taken to determine what the long-term health risks may be.

Common Questions



What are the benefits of being on the NPL?

- Listing a site on the NPL increases the Superfund money available for cleanup. Without this funding, some sites will not be cleaned up.
- Listing a site makes funding available for cleanup if the party responsible for contamination –the potentially responsible party (PRP) - is not able to pay. It also eliminates delays in cleanup if negotiations with PRPs break down.
- Listing helps bring PRPs to the table, and enables EPA to legally oversee the cleanup.
- When a site is proposed for the NPL, other resources also become available: staff, TAGs, ATSDR, etc.
- The NPL process provides closure and certainty to PRPs, the local community and property owners.
- Listing a site makes it easier for trustees to pursue Natural Resource Damage claims.
- The availability of funding for cleanups coupled with the ability to recover three times the clean-up cost from non-cooperative PRPs, increases EPA's ability to get PRPs to participate.
- EPA can provide a greater degree of legal finality to responsible parties at NPL sites than at non-NPL sites.

Won't proposing a site for the NPL stigmatize the area?

Proposing the site for the NPL provides a means for addressing the risks at the site. The good news is that the problems will be addressed and the contamination problem controlled so that the site can be returned to productive, safe use. It is the presence of contamination in the area that makes it less desirable, not the NPL listing. NPL listing provides a means for reducing contamination and the threats it may cause permanently.

What will proposing a site for the NPL do to property values?

We have not observed a consistent correlation between NPL listing and property values. Many factors are important in determining property values. At some sites, property continues to sell and be developed. At others, property values take a temporary dip until the cleanup is completed. In our experience, the presence of contamination on a property, whether listed on the NPL or not, may affect the value of the property.

Superfund listing ensures the clean-up process will proceed. Once the cleanup is completed, EPA has found that property values improve. EPA has learned that there are things it can do to mitigate the impacts on property. Sometimes uncertainty about the status of a property is a concern to lenders. EPA can help property owners clarify the status of their property by sharing information with lenders and realtors. EPA provides property owners with comfort letters when their property is free of contamination and also assists with prospective purchaser agreements, which spell out the clean-up responsibilities of present owners and prospective purchasers.



Opportunities to Be Involved

EPA and DEQ have met with local officials four times during the last year (August 26, 2008; May 6, 2009; July 14, 2009; and October 21, 2009) to provide information about possibilities for proceeding with investigation and cleanup, including listing the site on the Superfund List. EPA and DEQ have also met with the public (May 6, 2009 and July 14, 2009) and attended a number of meetings to hear from the community. Meetings are a good opportunity to meet face-to-face to talk about site-related issues.

When proposed to the NPL, a public notice will advertise the proposal, website, and comment period. The ad will include how people can comment, where to send the comments, etc.

On February 11, 2010, EPA and DEQ in conjunction with Cascade County are holding a public meeting to discuss plans to move forward with proposing the ACM Smelter and Refinery to the National Priorities List and answer any questions people have about the process or its effect on the community.

On the date of proposal, EPA will create a site specific website where we will post relevant information about the site and any current activities such as the listing process.

After the comment period, unless any comments have caused the EPA to reconsider the listing, the site will be published as final in the Federal Register. Along with responses to the comments received. A Remedial Project Manager with EPA and the DEQ will be assigned. To prepare for sampling, the Project Managers will reach out to community members to ensure everyone has the opportunity to have their yard sampled and questions answered.

Community interviews are important in making sure that that project staff know community concerns and how people want to be involved in the process and activities.



EPA wants to hear from the stakeholders throughout the various stages of investigation and cleanup. Hearing from the public is one of the things that ensures EPA is working with the very best information in its decision-making process. We welcome your ideas about how we can best keep each other informed. Contacts are on the last page!

Potential Health Risks

EPA conducted a Superfund Site Assessment of residential soils during the summer of 2007. The assessment focused on neighborhoods in Great Falls, Montana, on the south bank of the Missouri River across from the former refinery site and in the community of Black Eagle, west and northwest of the former refinery site.

The investigation found an approximate area of 78 acres encompassing 375 residences in Black Eagle to be contaminated with arsenic and lead above screening levels which means further study is necessary. Another Expanded Site Inspection was conducted during 2008 to further define areas of residential soil contamination. The investigation confirmed that Black Eagle residents may be exposed to levels of lead, arsenic, and cadmium in soil that are elevated from normal background levels of these metals. Arsenic, lead and cadmium are naturally-occurring elements, however, mining, milling, or other processing can concentrate these elements to a level where they pose a risk to public health.

Potential Risks

Arsenic — Breathing high levels of inorganic arsenic can give you a sore throat or irritated lungs. Ingesting very high levels of arsenic can result in death. Exposure to lower levels can cause nausea and vomiting, decreased production of red and white blood cells, abnormal heart rhythm, damage to blood vessels, and a sensation of “pins and needles” in hands and feet. Ingesting or breathing low levels of inorganic arsenic for a long time can cause a darkening of the skin and the appearance of small “corns” or “warts” on the palms, soles, and torso. Skin contact with inorganic arsenic may cause redness and swelling.

Lead — The effects of lead are the same whether it enters the body through breathing or swallowing. Lead can affect almost every organ and system in your body. The main target for lead toxicity is the nervous system and can reduce I.Q. in both in adults and children. Long-term exposure of adults can result in decreased performance in some tests that measure functions of the nervous system. It may also cause weakness in fingers, wrists, or ankles. Lead exposure also causes small increases in blood pressure, particularly in middle-aged and older people and can cause anemia. Exposure to high lead levels can severely damage the brain and kidneys in adults or children and ultimately cause death. In pregnant women, high levels of exposure to lead may cause miscarriage. High level exposure in men can damage the organs responsible for sperm production. There is no conclusive evidence that lead can cause cancer in humans.

Cadmium—Cadmium can cause a number of adverse health effects. Ingestion of high doses causes severe irritation to the stomach, leading to vomiting and diarrhea. Inhalation of high doses leads to severe irritation of the lungs and long term inhalation can increase the risk of lung cancer. Such exposures are rare. The effects which may occur following long-term low-level exposure are of greater concern. Kidney damage can be caused by excess cadmium either through air or diet. Other tissues reported to be injured by cadmium exposure include the liver, the testes, the immune and nervous systems and the blood.

The Superfund Process / Listing Timeline

A basic understanding of the Superfund investigation and clean-up process (and associated acronyms) can be helpful in reviewing the past, current and future clean-up actions at the ACM Smelter and Refinery Site. The steps are listed here in the order they *usually* occur. Public participation occurs during many of these processes. There will be opportunities for public input in upcoming decisions.

The **Preliminary Assessment and Site Investigation (PA/SI)** is the initial investigation of site conditions.

A **Removal Action** is an immediate or short-term cleanup. These actions are taken to address releases or threatened releases of hazardous substances that may pose an immediate threat to human health or the environment. They often require cleanup before the remedial studies and documents can be completed.

EPA's **National Priorities List (NPL)** is a list of sites with the most serious threats, most complicated issues or largest scope. EPA has identified them as national priorities for long-term cleanup.

A **Risk Assessment** provides an estimate of current and possible future risks to your health from contamination. Scientists collect samples and other information on chemicals of potential concern such as lead, arsenic or cadmium.

The **Remedial Investigation (RI)** documents the nature and extent of contamination.

The **Feasibility Study (FS)** assesses the treatability of site contamination and evaluates the potential performance and cost of treatment technologies.

The **Record Of Decision (ROD)** is a decision document that explains which clean-up alternatives will be used at NPL sites. Conclusions from the RI/FS and Risk Assessment are summarized in this document.

Remedial Designs (RD) are the preparation and implementation of plans and specifications for carrying out Remedial Actions.

A **Remedial Action (RA)** is a long-term cleanup. The bulk of cleanup on NPL sites occurs during this phase. A site may have several Remedial Actions to fully address the contamination.

Construction Completion marks the end of a phase of physical clean-up construction, although this does not necessarily indicate whether final clean-up levels have been achieved site-wide.

National Priority List Deletion—Removes a site - or a part of a site - from the NPL after cleanup.

