



November 13, 2012

Richard Opper, Director
Montana Department of Environmental Quality
1520 E. Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901

RE: Former Smurfit-Stone mill

Dear Director Opper,

Missoula City-County Water Quality Advisory Council has reviewed the final Analytical Results Report for a Combined Site Inspection and Removal Assessment at the former Smurfit-Stone Mill in Missoula County. We appreciate your support in requesting that the U.S. Environmental Protection Agency initiate this important investigation.

The Site Inspection documents contamination of soil, stream sediment, and groundwater at the former mill site. Contaminants include dioxins, furans, arsenic, chromium, lead, and several Volatile and Semi-Volatile Organic Compounds. We are especially concerned that there are large sludge ponds and landfill areas with soil and groundwater contamination located within the floodplain of the Clark Fork River and these areas are at risk of catastrophic release by a large flood. Contamination at the site needs to be managed now, before a large flood creates a more wide-spread problem. Extensive groundwater contamination at the area is documented and additional characterization of groundwater is needed. Fish and aquatic animals in adjacent creek and river have not been sampled for contaminants and these potential exposure pathways to humans and bioaccumulation need to be investigated.

Additional remedial investigation, risk assessment, and cleanup is needed at the former mill site. This will require extensive resources, cooperation between the site owners, responsible parties, and State or Federal agencies. We request the site be included on the Superfund National Priorities List. Superfund designation is the appropriate mechanism to ensure that efforts at the site move forward in an appropriate manner and timely schedule.

Thank you again for your assistance in this important project. We ask that you support the listing of this site on the National Priorities List so that the remedial investigation and cleanup process can begin as soon as possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'I. Magruder', written in a cursive style.

Ian Magruder
Chair, Missoula City-County Water Quality Advisory Council