

Idaho Pole Company Public Meeting Notes

Jan. 27, 2021

January 13, 2021 Meeting Recap

- Periodic evaluation and modifications to Institutional Controls
- What could Institutional Control failure look like for the Idaho Pole site?
 - o If the contaminated soils spread beyond the site.

Five Year Review

- Waste is left in-place at the site; therefore, a Five-Year Review is required by EPA, in consultation with DEQ. The review is a regular checkup to ensure the cleanup decisions continue to protect human health and the environment.
- September 2020 the Fifth Five-Year Review was issued and is available on the EPA website at: <https://semspub.epa.gov/src/document/08/100008842>
 - o Attachments to the Fifth Five-Year Review are available here: <https://semspub.epa.gov/src/document/08/100008843>
- This Five-Year Review determined that sediment, soil and groundwater remedies currently protect human health and the environment.
- In order to be protective long term, the following actions were identified:
 - o Revise the operation and maintenance plan with a formal schedule for groundwater inspection, especially with prospect of redevelopment. The former operations and maintenance plan is based on the pump and treat system and may need other revisions.
 - o Install and sample additional wells in the downgradient portion of the plume due to a downgradient well having an exceedance. Samples over time at these wells will help us determine if contamination is leaving the boundary of the Controlled Groundwater Area.
 - o Complete the focused feasibility study and modify the remedy to address residual source area contamination.

Question: Please explain why the soil remedy currently protects human health and the environment despite the fact that residual soil contamination is feeding the plume?

- Generally, when we are looking at risk from groundwater to human health, we look at who might be encountering the contamination. Contamination could occur without someone encountering contamination due to restrictions at the site such as a controlled groundwater use and land restrictions. The groundwater can exceed potable standards, but not have human exposure. There are also land use restrictions to ensure human exposure to deep soil is limited.

Question: Groundwater samples collected from monitoring wells north of I-90 show PCP levels are above the cleanup levels for the site.

- The data is reflective of the date and time when the samples are collected. Contamination concentrations can vary based on groundwater movement or precipitation. Therefore, EPA looks at the data over time as the samples can show seasonal variation etc.
- If the samples indicate significant increases or decreases of contamination over time, EPA will take action. For example, the recently installed wells were the result of looking at a collection of data over time and determining more data is needed.

Question: The Five-Year Review indicates the controlled groundwater remedy is functioning properly but there was a recommendation to install more wells?

- The review concluded that the groundwater remedy is protective because it is removing human exposure to groundwater.
- However, based on data over time, EPA saw heightened contamination that warranted more downgradient data. EPA installed wells beyond the current downgradient well to get more data to drive future decision making. All wells downgradient have come back with contamination below cleanup

levels, but more samples over time are needed to be certain contamination is not leaving the controlled groundwater area.

Focused Feasibility Study

- The Superfund process includes an assessment and investigation and then it gets listed on the National Priorities List. EPA does a remediation investigation and feasibility study and then issues a Record of Decision (ROD). After the ROD, the EPA designs the remedy and completes remedial action. Once construction is complete, the site moves to post construction completion, that includes Five Year Reviews. The site can then be deleted, or partially deleted, off the National Priorities List and then can be considered for reuse. We are at the reuse point for soils and jumping back to the feasibility study section for groundwater.
- The Focused Feasibility Study evaluates remediation alternatives for groundwater at the site, including knowledge we already have from the ROD and old studies. The groundwater Focused Feasibility Study will consider residual soil contamination.
- The Pump and Treat System removed approximately 350 pounds of contaminants and treated 624 gallons of groundwater in total.
 - o In the last few years of the pump and treat system, the remedy was only removing a small amount of contamination so in 2010 EPA started evaluating other alternatives. The original remedy served its purpose to remove most contaminant mass.
 - o In 2014 and 2015 EPA began a groundwater pilot test by injecting microbes to consume the remaining contaminants (In-Situ Treatment)
 - o The Focused Feasibility Study is looking at three alternatives:
 - No action
 - In Situ Treatment (biological or chemical) and monitored natural attenuation with Institutional and Engineering Controls.
 - This would inject chemicals to break down contaminants, or nutrients to allow microbial community to break down contaminants as referenced above in the test.
 - Monitored Natural Attenuation and contingency In Situ Treatment with Institutional and Engineering Controls.
 - This uses the natural process to decrease concentration in contaminations in soil and groundwater. This would include farming indigenous microbes to foster further contaminant breakdown.

Question: How do the 2020 Five Year Review finding of additional remedy measures needed for the groundwater contamination affect the redevelopment and the prospective purchaser? Perhaps this only applies to a purchaser of property north of the freeway.

- It would apply to both north and south of the freeway. In-Situ Treatment would be over a very small footprint. Part of the deed restriction in place protects the integrity of the remedial action.

Question: How often are you monitoring the wells and is that data available?

- The wells are monitored on a semi-annual basis in the spring and fall. The 2019 annual groundwater data report is available here: <https://semspub.epa.gov/work/08/100008841.pdf>

Question: Are you operating off trigger levels or are you operating off permit limits to initiate action?

- It would be above the cleanup standard and an order of magnitude. The EPA has particular wells identified to see if the contamination is going beyond the area. There will be fluctuation, EPA's concern is if we continue to see concentration increases over time and we will want to make some determinations. The site specific monitored natural attenuation workplan is available here: <https://semspub.epa.gov/src/document/08/100005340>

Question: Someone told me that there was a buyer who was interested in north of I-90 for battery storage. Do you know anything about that?

- Even if there was a prospective purchaser that would get a battery storage contract with NorthWestern Energy, a NorthWestern Energy employee who discussed this with Roger off record feels battery storage is a viable alternative technology but needs a few more years of development. If there is that consideration for purchasing Idaho Pole property, someone is being proactive.
- Follow-up from question asker: The neighborhood seems open to this type of use.

Pre-Submitted Questions

Question: Apparently there were dioxins near the railroad. The presence of dioxins are concerning. What are the health risks and what testing is being done for dioxins?

- EPA is looking at dioxins and looking at a screening level which could also potentially be used as a site-specific cleanup level for potential residential use. The EPA still needs to have discussions with DEQ about this proposed screening level. EPA offered to present specifically on dioxins and talk about the health risk and what is being proposed at a future meeting. Risk assessment would look at potential exposure for future residential use, future onsite workers and construction workers.
- Any potential change in land use would be accompanied by additional soil sampling plan that EPA would design and propose with external stakeholder input. There would also be a required work plan. A potential land-use change would also require an amendment to the Record of Decision with a minimum of a 30-day public comment period.

Question: We understand that no develop has come through with a plan to date. Many feel the time is right for a solar project or a Brightfield. City of Bozeman has stated its interest in energy development. Please comment on any grants that could help this project? Are there other sites that have been developed through a similar way?

- EPA raised this to subject matter experts, but they didn't have a chance to respond. The EPA would like to table this question and get back to it once there is more information to share.

Question: At the Dec 3 meeting, EPA stated that if the site is redeveloped, the site would require recharacterization since the current remedies and monitoring were developed for the current status as a vacant undeveloped parcel. What specifically would be required for a recharacterization and how would this be communicated to the public, the city and a developer? If recharacterization would indicate the need for additional steps, how would the process be monitored for compliance?

- This will depend on what is being proposed and the development; it is hard to say without a proposal in front of us. Would likely require soil sampling.
- Hypothetically if contamination is found between residential and industrial levels, the developer would be required to address this. If it's a small amount of soil, the developer could haul it off and dispose of it offsite or they may expand the footprint of the treated soils area.
- The site attorney is not on the call, but if the developer was moving forward with a redevelopment proposal and additional characterization, EPA has steps in place to make sure the developer does not worsen conditions. EPA has authority to make sure the developer doesn't spread contamination.
- Follow-up: An attendee suggests looking at the worst-case scenario for the site. Eg collected deep samples in what we suspect is the most contaminated area.
 - o EPA response: Who would collect the samples? It can be expensive. EPA in collaboration with DEQ could potentially calculate a site specific screening level and collect soil samples to compare. The work plan would have opportunity for public participation.

Future Meetings

Future meetings will address questions from residents who were not on the phone. EPA will consider advertisements in the paper and mailings for future meetings. If you'd like to get emails about future meetings contact Beth Archer at archer.elizabeth@epa.gov. Additional questions may also be sent to Beth to be answered at future meetings.

The next meeting will be Feb. 17 beginning at 6:00pm.