

**Public Meeting
January 13, 2021**

Idaho Pole Superfund Site

Meeting Agenda

- Recap of December 3 meeting
- Institutional Controls
- Five Year Review Overview
- Feasibility Study Overview
- Redevelopment Concerns

Meeting is structured to allow for ample time to ask questions or provide feedback

December 3 Recap

Redevelopment Concerns

- Infrastructure Installation
 - Excavations that reach groundwater (water and sewer installation)
 - Excavations that do not reach groundwater (i.e., building foundations, streets)
 - Construction Equipment and the Treated Soils Area
- Insufficient soil samples taken
- Depth of samples recently collected do not represent excavations anticipated for redevelopment
- What do existing soil sample results mean with regard to redevelopment?
- If residential use is allowed what does the process look like to allow this use?
- Zoning designation M1 and M2 have permitted uses that are incompatible with the Institutional Controls. Which take precedence?
- Why were Institutional Controls lifted to allow residential use on properties north of I90?
- Future liability considerations

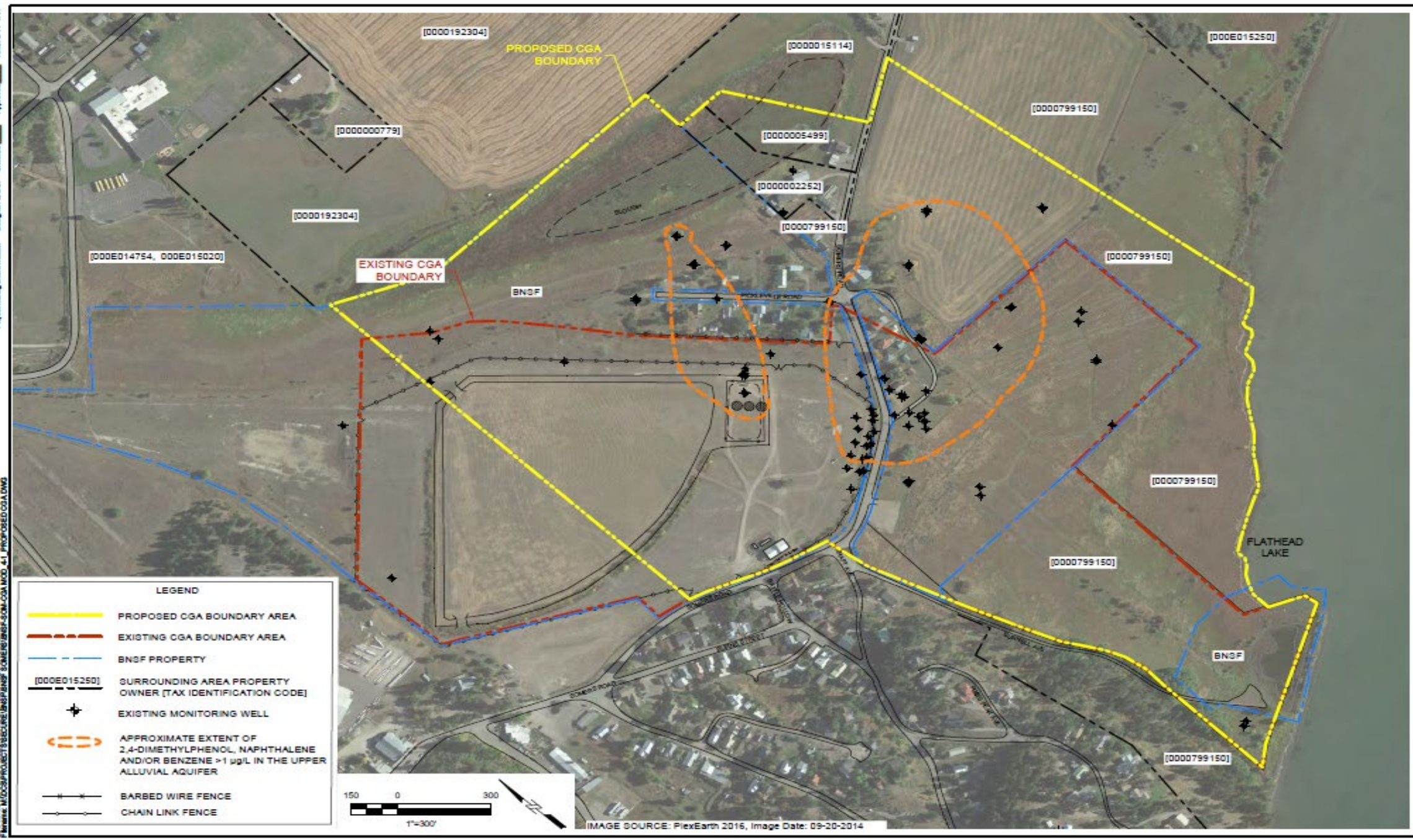
Institutional Controls

- Are you aware of any instances where EPA Institutional Controls fail?
 - Residential yard cleanups or vapor mitigation systems involving multiple residences where Agency cannot obtain access to sample and/or remediate
 - Requires notification be placed on title to alert any potential buyer of circumstance
 - Seller does not allow divulge this
 - Property owner not always amenable to working with Agency
 - Not a failure per se rather not working as intended

Institutional Controls (continued)

- Institutional Controls are periodically evaluated at a minimum every five years. Montana site examples of Institutional Controls modified based on Five Year Review Recommendations
 - Mouat Industries 2008 (1st Five Year Review)
 - Town of Columbus, MT responsible for ICs
 - Land use controls (modified weight requirements on repository to facilitate redevelopment)
 - Controlled Groundwater Area Revision
 - Idaho Pole 2010 (3rd Five Year Review)
 - Land use controls (deed notification to enforceable deed restriction)
 - Somers Former Tie Treating Plant 2017 (5th Five Year Review)
 - Land use controls (deed notification to enforceable deed restriction)
 - Controlled Groundwater Area Revision

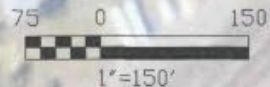




Institutional Controls (continued)

- What could Institutional Control failure look like for the Idaho Pole site—in other words, what is the worst-case scenario that we need to prepare for?

Spreading Treated Soils outside of 4.5 acre boundary and/or compromising the integrity of the Treated Soils cap during redevelopment



PROPOSED ENVIRONMENTAL COVENANT BOUNDARY

POINT ID	EASTING	NORTHING
1	1,579,020.77	528,277.92
2	1,579,082.01	528,196.76
3	1,579,185.98	528,336.49
4	1,579,223.07	528,421.69
5	1,579,188.60	528,480.84
6	1,579,100.64	528,205.82
7	1,579,209.85	528,233.85
8	1,579,270.10	528,167.14
9	1,579,330.00	528,230.68
10	1,579,406.33	528,346.74
11	1,579,403.53	528,417.64
12	1,579,351.27	528,523.73
13	1,579,281.04	528,550.27
14	1,579,254.18	528,409.29
15	1,579,404.83	528,497.27
16	1,579,480.38	528,474.55
17	1,579,514.63	528,577.92
18	1,579,440.97	528,606.62
19	1,579,373.58	528,551.92
20	1,579,405.13	528,586.27
21	1,579,427.37	528,617.85
22	1,579,399.51	528,674.03
23	1,579,342.27	528,671.00
24	1,579,322.20	528,628.37
25	1,579,360.98	528,600.70
26	1,579,348.40	528,583.37
27	1,579,336.02	528,518.38
28	1,579,348.53	528,546.71
29	1,579,318.30	528,609.94
30	1,579,303.12	528,598.64
31	1,579,552.91	528,766.87
32	1,579,616.09	528,817.68
33	1,579,636.47	528,886.31
34	1,579,419.63	529,063.08
35	1,579,393.67	529,036.18
36	1,579,431.57	528,953.51
37	1,579,524.07	528,906.11
38	1,579,465.37	528,889.50
39	1,579,437.31	528,845.10
40	1,579,479.66	528,776.40

TREATED SOIL AREA

POINT ID	EASTING	NORTHING
A	1,579,009.22	528,276.25
B	1,579,370.36	528,797.96
C	1,579,556.23	528,606.93
D	1,579,499.51	528,478.59
E	1,579,286.09	528,147.16
F	1,579,183.15	528,218.19
G	1,579,080.16	528,182.24
H	1,579,392.37	528,827.95
I	1,579,446.40	528,909.90
J	1,579,386.47	529,031.90
K	1,579,431.50	529,125.85
L	1,579,697.35	528,942.78
M	1,579,569.25	528,641.91

BOUNDARY OF TREATED LIU SOIL
SOIL MANAGEMENT AREA



IDAHO POLE COMPANY
BOZEMAN, MONTANA
5029-200

TREATED SOIL AREA

FIGURE

1-2

Redevelopment and the Treated Soils Area

- An on-site Agency presence during construction is necessary to ensure the treated soils area is not impacted
- EPA and DEQ will also require best management practices (BMPs) are in place during any construction activities.
 - BMPs might include simple engineering controls such as signs to more complex controls such as placing additional road base on top of the 12-inch protective layer or fencing around the TSA

Five Year Review

Five Year Review

- The Five-Year Review is a regular checkup to ensure that cleanup decisions continue to protect people and the environment.
- The September 2020 Five Year Review represents the fifth Five-Year Review at the Idaho Pole Site.
- The review determined that the remedy currently protects human health and the environment because institutional controls are in place (deed restriction on IPC property and a controlled groundwater area restricting potable use of the groundwater).

Five Year Review (continued)

In order to be protective in the long term, the following actions were identified:

- 1) Revise the operation and maintenance plan which identifies a formal schedule for inspection and how any identified deficiencies will be addressed
 - Formal inspections ensure institutional controls are functioning as intended
 - Existing O&M Plan is based on active groundwater pump and treat system
- 1) Install and sample additional wells in the downgradient portion of the plume
- 2) Complete the Focused Feasibility Study and modify the remedy to address residual source area contamination

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

- Remediation cannot remove all residual compounds; therefore, institutional controls, monitoring, Five Year Reviews and periodic re-evaluation of the remedy ensure contaminants are being reduced and risks are adequately characterized and managed according to site cleanup goals and local land uses
 - Controlled Groundwater Use Area prohibits the use of groundwater beneath the site, preventing exposure
 - Permanent enforceable land use restrictions minimize potential for human exposure to contaminated soil and protect the integrity of the soil and groundwater remedies
 - Five Year Reviews are required as long as waste has been left in place on site

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

- Concentrations in samples will vary over time due to precipitation and groundwater levels
- EPA and DEQ continually evaluates sample data and site conditions and will take appropriate actions if information indicates significant changes over time
 - Installation of wells in October is most recent example
- Exposure to contaminated groundwater is restricted through the Controlled Groundwater Use Area and excavation restrictions

The five year review indicates the controlled groundwater remedy is functioning properly but there was a recommendation install more wells.

The review concluded that the groundwater remedy is protective in the short-term because the Controlled Groundwater Use Area (CGA) restricts groundwater use and there are no known uses of potable water immediately downgradient of the CGA boundary.

The review also identified the need to install additional monitoring wells at the boundary of the Controlled Groundwater Use Area since the most downgradient wells have recently had PCP concentrations above cleanup standards

Wells were installed in early October 2020

Samples collected from these new wells are below cleanup standards

Wells will continue to be sampled going forward

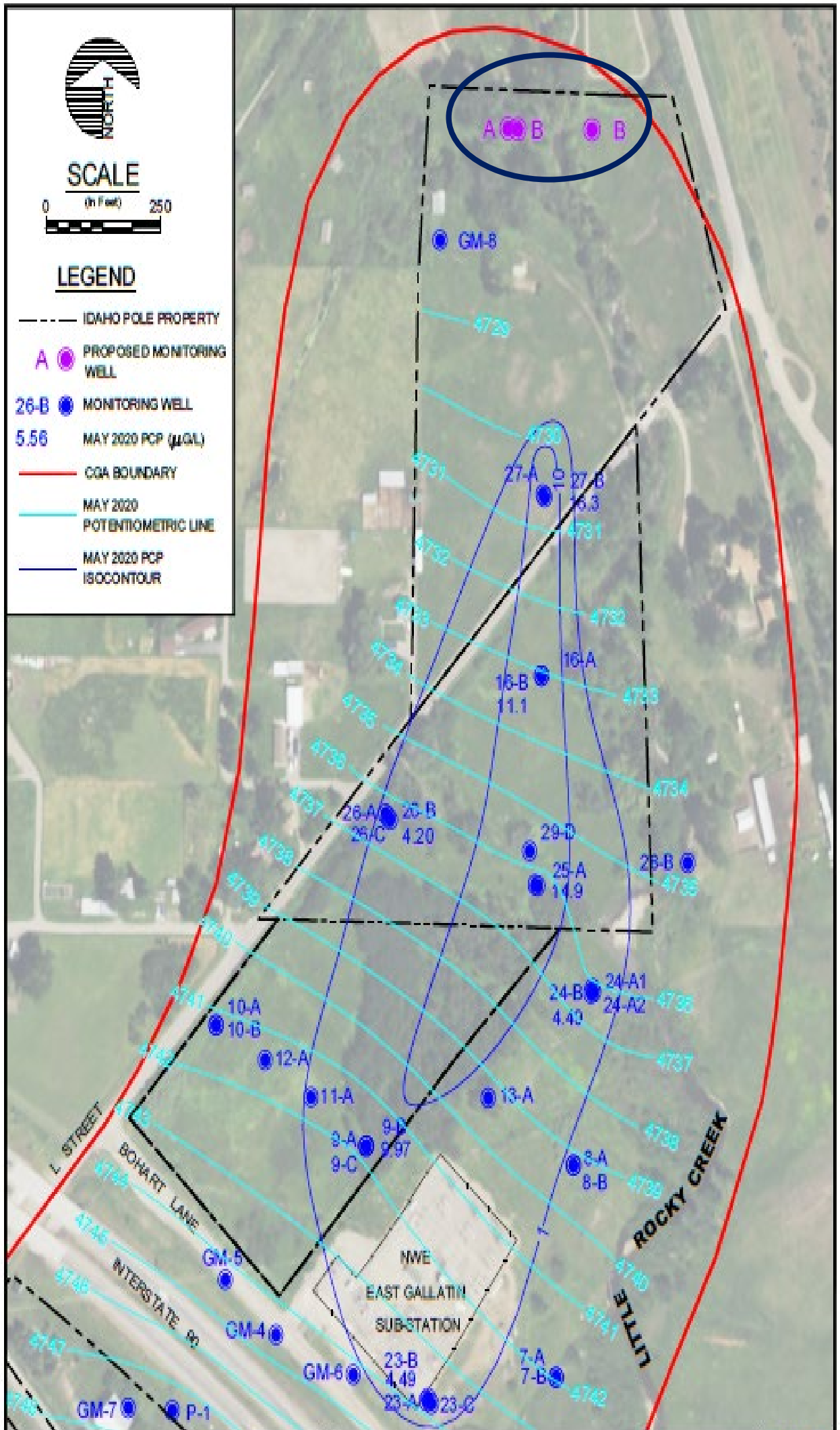


SCALE

0 (in Feet) 250

LEGEND

- IDAHO POLE PROPERTY
- A ● PROPOSED MONITORING WELL
- 26-B ● MONITORING WELL
- 5.56 MAY 2020 PCP (μGAL)
- COA BOUNDARY
- MAY 2020 POTENTIOMETRIC LINE
- MAY 2020 PCP ISOCONTOUR



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PROPOSED MONITORING WELL LOCATIONS

FIGURE

2

Focused Feasibility Study

Focused Feasibility Study

- Purpose: to assemble and evaluate remedial alternatives for groundwater at the site, including the residual soil contamination
 - Extracting and treating groundwater no longer deemed best alternative
- Three alternatives are being considered:
 - No Action (baseline to compare the other two alternatives against)
 - In Situ Treatment (biological/chemical) and Monitored Natural Attenuation with Institutional and Engineering Controls
 - Monitored Natural Attenuation and contingency In Situ Treatment with Institutional and Engineering Controls

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