



JUL 01 2019

Update

June 2019

Background

The S&W Sawmill Facility is located approximately a half-mile north of Darby, Mont., at the intersection of U.S. Highway 93 and Bunkhouse Road. The Facility is being addressed by the Montana Department of Environmental Quality (DEQ) under the authority of the Comprehensive Environmental Response, Compensation & Liability Act (CECRA), which is the State Superfund law.

International Paper (IP) is designated as the lead liable party for investigation and cleanup. From approximately 1961 to 1998, portions of the Facility operated as a sawmill. From approximately 1961 to 1978, some portions of the Facility also operated as a wood treatment plant using the chemical pentachlorophenol (PCP) mixed with diesel as a wood preservative. The chemical mixture and its by-products (dioxins/furans) have contaminated soil and groundwater. The Facility, which is no longer in use, has been the subject of investigations and treatability studies since 1987. These studies have characterized the nature and extent of the contamination to enable cleanup that will protect human health and the environment and allow for redevelopment.

Site-Specific Cleanup Level Development

An August 2014 Risk Assessment (RA) completed by IP calculated Site-Specific Cleanup Levels (SSCLs) for surface and subsurface soils that are protective of human health. An addendum was completed in October 2016 to incorporate newly available toxicity and screening level information. Comparison of site contaminant concentrations to the SSCLs indicates where soil cleanup must occur to ensure protection of human health for various future uses, including residential or commercial use, depending on the property. In June 2016, IP completed a fate and transport study to calculate SSCLs that are protective of soil contamination leaching to groundwater. These SSCLs indicate where soil cleanup must occur to ensure that contaminants will not leach to, and contaminate, groundwater. SSCLs for groundwater contaminants are the Montana groundwater standards or groundwater screening levels for petroleum compounds without groundwater standards.

Recent Activities

DEQ and IP are currently working on the Feasibility Study Work Plan (FSWP), which serves as the roadmap for the evaluation of cleanup options appropriate for the Facility.

This is the preliminary document in the Feasibility Study portion of the superfund process and among other objectives, assists with determination of whether additional information is needed to assess cleanup options. Overall, the Feasibility Study process allows for identification of areas of the Facility and volumes exceeding SSCLs and evaluates the cleanup options appropriate to address them.

IP continues to evaluate the groundwater plume twice a year through the sampling of 28 groundwater monitoring wells. Two of these wells are residential drinking wells east and north of the Facility. Samples are collected when the groundwater table is at both its annual high and low levels. The dioxin/furan contamination exceeding groundwater standards in shallow groundwater extends off the former sawmill property to the east-northeast to approximately the vicinity of the Tjedt-Nicholson Ditch. PCP contamination exceeding the groundwater standard is located within the boundary of the IP-owned properties west of US 93 and does not extend past those properties.



Sampling Activities on the Waddell Ditch

Irrigation Ditch Investigation

Ditches located near the operating area of the S&W Facility have historically drained north and combined with the Waddell Ditch north of Bunkhouse Road. Soil and sediment samples within and adjacent to the ditches were collected and analyzed for PCP and dioxins/furans during previous investigations. Recently, questions presented to DEQ by the irrigation ditch users, resulted in DEQ requiring IP to perform additional sampling in the ditches and an investigation to determine whether there is interaction between the contaminated groundwater associated with the S&W Facility and irrigation ditches further from the former sawmill properties along the direction of ground-

-water flow. The question is whether groundwater is coming into the ditches as surface water or is surfacing and running into the ditches as surface water via overland flow. Necessary ditch survey work was conducted in January 2019, and some sampling activities were conducted in April 2019. Additional sampling activities associated with this work will continue throughout 2019 to evaluate the ditches at all water levels. The new information will be integrated into the Feasibility Study documents to allow continued progress through the superfund process.

Future Activities

DEQ anticipates that IP will complete the FS report in mid-2020 (after integration of new irrigation ditch information) at which point DEQ will prepare the Proposed Plan. The Proposed Plan identifies DEQ's preferred remedy for

cleaning up the S&W Sawmill Facility, and will be presented for public comment. DEQ anticipates completion of the Proposed Plan and the associated public comment period at the beginning of 2021. Upon completion of the Proposed Plan and public comment period, DEQ will evaluate public comments received, make any necessary changes to final remedy decision, and issue the Record of Decision (ROD). The ROD is DEQ's final selection of the remedy for cleaning up the Facility that IP is required to implement. Subsequent to the release of the ROD, IP will prepare the document(s) outlining the implementation strategy and specific engineering design work needed to implement DEQ's selected remedy.

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More Information

Additional information about the S&W Facility can be found online at DEQ's website:

<http://deq.mt.gov/Land/statesuperfund/swsawmill>

Information can also be found at DEQ's Waste Management and Remediation Division Helena Office at 1225 Cedar St. in Helena, Montana. Some of the documents are also available for review at the Darby Public Library in Darby Montana.



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