



**SMURFIT-STONE COMMUNITY ADVISORY GROUP**  
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RE: Public Comments for Addendum No. 9 to the Remedial Investigation Work Plan – Supplemental Sampling, Baseline Ecological Risk Assessment

Thank you for the opportunity to comment on the Supplemental Sampling Work Plan for the Baseline Ecological Risk Assessment (BERA). The Community Advisory Group (CAG) makes the following recommendations.

Table 3-4 Data Quality Objectives, Sediment Porewater from Onsite Ponds

The sampling plan calls for deploying for four weeks Peepers and/or PushPoint Samplers with semipermeable membranes to analyze for dissolved and total metals in porewater sampling locations in onsite ponds. (See also Appendix A, page 11, 2.4.3 Porewater). The CAG recommends the porewater samples also be tested for dioxin/furan congeners, similarly to testing planned for surface water and sediments, macroinvertebrates, fish and small mammal tissue.

Appendix A, 2.3.1 LaValle and O’Keefe Creek Sampling

According to the Figure A-4 map, the two upstream sampling locations for LaValle Creek (34-LV and 35-LV) and the single upstream location for O’Keefe Creek (40-OK) are quite close to the mill Site. In particular, 35-LV is barely outside the Site. The CAG recommends the upstream sampling locations be further away from the Site’s potential “area of influence.” Concern exists for possible historic aerial deposition and/or high water contamination to these upstream locations so close to the mill Site.

Table 3-6 Data Quality Objectives, Fish Tissue from the Clark Fork River

The sampling of longnose dace is proposed, a minnow-like fish which has small home ranges and high site fidelity. Documented home ranges, though, have ranged from 14 meters in North Carolina to up to 500 kilometers in an Appalachian stream.<sup>1</sup> Researchers may want to ensure that occupied test locations are separated by at least several kilometers, perhaps as many as 10 kilometers, to ensure sampled

<sup>1</sup> [https://en.wikipedia.org/wiki/Longnose\\_dace](https://en.wikipedia.org/wiki/Longnose_dace)

populations are truly independent.<sup>2</sup> The CAG recommends at least one sample location be upstream as far away as up the Blackfoot River to increase the probabilities of obtaining verifiable differences in background measurements from a fish population adequately distanced from the mill.

Table 3-7 Data Quality Objectives, Small Mammal Tissue from the Upland Habitats of the Site

The Sampling Plan focuses on trapping small mammals such as shrews and deer mice on OU2 and OU3, with background samples trapped on OU1. Even though shrews (440-750 yards) and deer mice (1/2 – 4 acres) have small home territories, it is not inconceivable they could roam between the various operable units. Even the Sampling Plan notes the traps should not be set out for longer than four consecutive nights per week, for a maximum of two consecutive weeks because the population can be depleted and the community composition altered (Appendix B 2.3.9.3. Small Mammal Trap Deployment). The CAG recommends small mammal tissue for background purposes be collected further away than OU1.

General Comments

- What are the physical and biological attributes that guided the rationale for determining the sampling locations?
- The maps should better identify publicly known geographical locations (especially towns, bridges, fishing access points) to better understand the locations of various sampling sites.
- Wakefield Kennedy chose not to pay taxes on parcel 865200 which may have the most contamination (especially in holding ponds 13 and 13a). Is there data that shows high levels of contamination within this parcel? If so, is intensive sampling focused within this area to determine what level of restoration may be needed? Worry continues that the sampling strategies have not thus far identified areas of most concern which may be fairly limited in size but could pose considerable risks in the future if not addressed. A buried transformer or barrel(s) containing solvents or other contaminants slowly rusting away would be possible examples. It has been suggested using metal detectors or other technology to identify these problems be pursued so site specific sampling can be done.

In Summary

As a liaison between the EPA, Montana DEQ and concerned community groups, the Smurfit-Stone Community Advisory Group appreciates the opportunity to submit these public comments.

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<sup>2</sup> [http://explorer.natureserve.org/servlet/NatureServe?searchName=Rhinichthys cataractae](http://explorer.natureserve.org/servlet/NatureServe?searchName=Rhinichthys%20cataractae)