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COMMUNITY SOILS MODIFICATIONS

This remedial action at the Community Soils Operable Unit addresses residential and commercial/industrial soils within the Anaconda Smelter NPL Site. The principal contaminant of concern at the Community Soils OU is arsenic in superficial soils from past aerial emissions and railroad beds constructed of waste material. This ROD establishes residential and commercial/industrial action levels for arsenic at the Anaconda Smelter NPL Site.

Major components of the remedy for residential soils include:

- Clean up all current residential soils that exceed the residential action level of 250 parts per million (ppm) soil arsenic concentration, through removal and replacement with clean soil and placement of a vegetative or other protective barrier;
- In areas where specific site conditions dictate that removal is not implementable, treatment or other measures (e.g., capping, tilling, Institutional Controls (ICs)) will be taken to reduce arsenic concentrations to below the 250ppm action level or to prevent exposure;
- Clean up all future residential soils at the time of development that exceed the residential action level of 250 ppm soil arsenic concentration, through the Anaconda-Deer Lodge County (ALDC) Development Permit System (DPS); and
- Implement ICs to provide educational information

to all residents describing potential risks, and recommendations to reduce exposure to residual contaminants in soils, and to ensure the long-term viability of this remedy.

Based on information collected during the remedial action for Residential Soils, EPA, in consultation with DEQ, has determined that the Residential Soils component of the Community Soils ROD should be revised. During the negotiations on the decision the county along with Kuipers and Associates has developed an interim plan for developers and home owners to follow. Proposed changes may include:

Add a lead action level of 400 ppm.

Currently no lead remediation protocols exist for residential soils in the Anaconda Smelter NPL site. This needs to be addressed to protect the health of Anaconda Deer Lodge County Citizens. Lead findings in the area are as follows:

- Lead was identified as a Contaminant Of Concern for the Anaconda Smelter Site in the Human Health Baseline Risk Assessment.
- Elevated lead concentrations are present at the site. A lead action level should be identified when addressing lead contaminated soils. The suggested model proposes 400 parts per million.

More information on lead and health assessment will be available in a future newsletter.

Change Implementation Methodology

Currently the county and EPA are re-evaluating much of the residential soil testing that took place due to the methodologies used in testing that soil. That method focused on a system that used averages and tested soil only from the top down. Based on soil sampling results during remedial action, portions of the site exhibit contamination at depth on a highly variable basis thus some areas are not completely remediated.

- The primary area of concern (Focus Area) for the Anaconda community will be revised, if appropriate, based on a complete review of the data and/or the collection of new data.
- Areas outside the revised Focus Area will continue to be addressed through a Community Protective Measures Program (CPMP).
- Sampling methodologies for residential yards will be consistent with protocols established for both the Clark Fork River Superfund sites investigations and EPA's Lead Handbook.
- Remediation methods will be revised to be consistent with actions taken at similar (mining/smelter) sites, including previous actions taken at the Anaconda Smelter Site.

It is also important changes in regard to vacant properties are addressed due to health risks for neighboring properties.