Appendix B – Statement of Work
Anaconda Aluminum Co. Columbia Falls Reduction Plant Superfund Site

This Statement of Work describes the removal actions including excavation and onsite consolidation of the soil/sediment that exceeds the Preliminary Remediation Goals (PRGs) for the South Percolation Ponds (Figure 1) in the River Area Decision Unit (RADU) of the Anaconda/CFAC Superfund Site. Soil/sediment exceeding the PRGs will be removed from the South Percolation Ponds and relocated to an existing onsite repository --Industrial Landfill) located in the upland portion of the Site; followed by the removal of the sheetpile wall and riprap bank, historically installed to divert the river and protect the ponds from erosion, to allow the river to resume flowing in its original channel that occupied this area prior to construction of the infrastructure. The remaining infrastructure located between the side channel and main Flathead River will also be removed to allow natural lateral migration to occur unimpeded.

These removal actions will be conducted under two construction phases:

- Phase I – Construction and Excavation
  - Closure of the piping infrastructure from which stormwater flows and enters the South Percolation Pond system;
  - Excavation of impacted soils/sediment in the South Percolation Ponds that contain barium at concentrations exceeding PRGs; and
  - Disposal of the excavated soils/sediments at an onsite repository (i.e., Industrial Landfill located in the northern portion of the Site).
- Phase II – Removal and Post Removal Response Action
  - Removal of infrastructure (e.g., sheetpile wall, riprap bank); and
  - Removal of further infrastructure (e.g., access roads, culverts, well house, overhead power poles, monitoring wells, and debris as appropriate), with final grading and sloping, and reclamation of the construction-disturbed areas as may be required.

Additional details regarding each phase of construction, in addition to planning activities, are provided below. Site- and project-specific considerations used in developing this statement of work for the removal action generally include: surveying activities; removal and volume estimates; environmental controls during removal; repository design; transportation and disposal; post excavation sampling; and restoration.

Pre-Phase I Activities

Prior to construction activities, CFAC will conduct outreach to interested stakeholders including interested Federal, State and local governmental agencies, to consult with them regarding the work to be completed. CFAC will comply with substantive regulatory requirements and consult with various agencies but, pursuant to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 129(e), will not require permits to implement the project.

The following agencies have/are anticipated to provide input on the Work, in addition to EPA and DEQ:

- Montana Fish, Wildlife and Parks (Montana FWP)
- Flathead County Conservation District
- Montana Department of Natural Resources
- U.S. Fish and Wildlife Service (USFWS); and
- U.S. Army Corps of Engineers (USACE)

Conceptual Design

Prior to construction, conceptual designs for the repository, haul road, soil/sediment removal, and sheetpile and riprap removal will be generated. CFAC's consultants will utilize the topographic survey data collected during the Phase II Site Characterization to evaluate the limits of excavation based on existing data and PRGs for South Percolation Pond sediments, and the remaining capacity for placement of waste within the Industrial Landfill. Design plans will be included in the Removal Work Plan (RWP), as described in the following sections.

Surveying Activities

An initial survey of the project area will be completed to survey the existing infrastructure that will be required for various design and planning efforts, and to supplement the existing Light Detection and Ranging (LiDAR) survey. Field survey of the existing infrastructure will include pipe outlets, culverts, buildings, and other infrastructure identified in the field. Survey of the as-built conditions following Phase I construction will be completed with drone equipment for earthwork volume verification and use in the final design of Phase II.

Wetland and waterway delineation will be completed in the project area based on the methods presented in the 1987 USACE Manual and subsequent modifications outlined in the 2010 USACE Regional Supplement (Western Mountains, Valleys and Coast). The ordinary high-water mark (OHWM) of the Flathead River will be delineated either during the wetland delineation field work or at a separate time when river water levels allow accurate identification of the OHWM. The data will be incorporated into a Wetland Delineation Report.

During the wetland delineation field effort, the project area will be investigated for migratory bird and eagle nests. In coordination with the USFWS and Montana FWP, the work will be completed in compliance with the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. This information will be included in a Biological Assessment (BA).

A BA for all Threatened, Endangered, Proposed, and Candidate Species known to occur within Flathead County will be completed. The BA will identify threatened and endangered species which are likely to be affected by the proposed action. At a minimum, this will address bull trout, for which a critical habitat has been identified within the project area. The BA will require communication with the USFWS and Montana FWP to provide Site-specific conservation and

coordination measures such as timing restrictions or construction methods to mitigate potential impacts to Threatened and Endangered species.

An assessment of the groundwater seeps on the bank of the Flathead River north of the South Percolation Ponds will be performed prior to implementation of the removal action, as well as for the duration of the removal action. If seeps are identified, interim measures consisting of straw bales, straw waddles, or a temporary ditch, or any combination thereof, may be implemented in consultation with EPA. Additional measures including sampling of the seep or sampling of the surface water in the Flathead River may be performed if the seep is identified and shows concentrations of COCs above PRGs identified in the FSWP.

Phase I – Construction and Excavation

Sediment Removal

The initial removal phase will include decommissioning of the discharge pipe to the South Percolation Ponds and associated soils/sediments removal. Data on the extents and depths of contaminated soils/sediments for removal was determined as part of the Remedial Investigation (RI) and risk assessments. This data will be utilized to generate removal plans and specifications for construction.

Presently, it is assumed that approximately 1-foot of impacted soils/sediments will be excavated from the South Percolation Ponds (approximately 10.2 acres). Soils/sediments sampling and verification of contamination removal will be completed either as part of pre- or post-excavation sampling as will be determined in the RWP.

Construction Considerations and Design

Preliminary design will include draft project specifications and plans for:

- Removal and volume estimates;
- Staging and access;
- Material removal sequencing;
- Erosion and environmental controls;
- Construction dewatering; and
- Infrastructure removal plans for the existing well house, monitoring wells, overhead power poles, roads, and any other man-made features.

The construction implementation during low water season is anticipated to eliminate or minimize the need for any dewatering, considering the anticipated shallow excavation depth.

Preliminary Repository Design

Excavated material from the South Percolation Ponds will be removed, drained of water if present, loaded into trucks, and transported and placed in an onsite repository. The Industrial

Landfill is the most viable option for an onsite repository, given that it is an existing onsite landfill that has not yet been closed and would also need grading material prior to cap construction. Based on the risk assessment results, soils/sediments in the South Percolation Ponds pose a moderate ecological risk but do not pose human health risk and are not a source to groundwater. Therefore, the material excavated from the South Percolation Ponds would be suitable for placement in the Industrial Landfill with a cap that complies with requirements promulgated pursuant to Resource Conservation and Recovery Act (RCRA) Subtitle D. Respondent will design and construct a repository to allow for acceptance of the excavated sediments and interim closure. Final cap design and landfill closure will be completed as part of the Site-wide remedy.

Other design considerations will include but not be limited to the haul road, coordination with Burlington Northern Santa Fe (BNSF) regarding the track crossings, and other improvements required to allow the material to be hauled to the north end of Site (roughly 2,400 feet north of the BNSF track crossing). It is anticipated that agency input will be limited to review comments at preliminary and 90% design levels.

Phase II –Removal and Post Removal Response Action

The objectives of Phase II are to return the RADU to conditions that existed prior to construction of the South Percolation Ponds by removing past sheet pile and riprap stabilization, removing the existing well house, monitoring wells, overhead power poles, roads, and any other man-made features, and revegetation of construction-impacted areas.

Removal and post removal response action design will consider the following:

- Staging and access;
- Earthwork for the side channel;
- Removal of the sheet pile and riprap stabilization;
- Sequencing of earthwork and infrastructure removal;
- Access road removal; and
- Reclamation / revegetation of areas disturbed by the construction activities.

The earthwork for Phase II will be designed to avoid any import or export of material other than infrastructure and bank stabilization materials.

Removal Work Plan

In addition to this SOW, CFAC and its consultants will prepare an RWP in accordance with "Guidance on Conducting Non-Time-Critical Removal Actions Under CERCLA" (EPA, 1993) as well as other appropriate EPA and DEQ guidance. The RWP will detail the considerations and logistics of onsite construction, traffic and haul route management, material management, sampling procedures and methods, as well as the removal actions mentioned in this SOW.

Provided below is a general outline of the considerations that will be included in the RWP:

- South Percolation Pond Background and Physical Setting

- Summary of Remedial Investigation
- Description of Removal Action
    - Summary of Removal Design
    - Summary of Repository Design
- Removal Action Considerations
    - Governing Documents
    - General Removal Construction Information
        - Project Organization; Construction Schedule; Site Security; Traffic Control; Worker Training and Monitoring; Agency Approvals; Removal Action Costs
    - Remedial Goals
    - Pre-Characterization/Post-Excavation Sampling
    - Estimated Materials Removal Quantities
    - Soils/Materials Management Plan and Erosion Controls Plan
    - Quality Control Plans (Health and Safety Plan, Sampling and Analysis Plan [Quality Assurance Project Plan and Field Sampling Plan])
- Removal Action Implementation Plan
    - Pre-Construction Considerations
        - Site and Haul Road Preparation; Surveying; Wildlife Assessments
    - Phase I – Construction and Excavation
        - Mobilization;
        - Erosion and Sedimentation Controls;
        - Equipment and Material Staging;
        - Construction Water Management for the South Percolation Ponds, as follows: 1) Movement of Water Within the Three Ponds, 2) Possible Transportation and Disposal of Water to an Agreed Upon Location on Site, and 3) Treatment of Any Such Water to be Discharged within the River Area Outside of the Three Ponds, or any combination thereof;
        - Sediment Removal;
        - Materials Transport and Disposal Onsite;
        - Surface Water/Porewater Monitoring; and
        - Demobilization
    - Phase II – Removal and Post Removal Response Action
        - Mobilization; Staging and Access; Earthwork; Infrastructure Removal; Access Road Removal; Revegetation; Surface Water/Porewater Monitoring; Demobilization
    - Reporting
- Post-Removal Site Control Activities
    - Site Security; Site Access; Post-Removal Monitoring; Landfill Interim Cover Inspections