



COALITION for a
CLEAN
CFAC

Press Release for immediate release –

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The Coalition for a Clean CFAC (Coalition) board recently announced its tentative findings from its first “Deep Dive” into the massive 10,000 + page documents that underlie the proposed Columbia Falls Aluminum Company (CFAC) Superfund Cleanup Plan. These finding were presented at public meetings on August 20th and 21st. The proposed EPA (the Federal Environmental Protection Agency) Cleanup Plan for the CFAC site identified, evaluated, and ranked 6 possible alternatives for the cleanup of the toxic waste at the CFAC site. In late June of 2023 the EPA and CFAC announced that they were recommending their choice of Alternative #4 and opened a public comment period on this recommendation in the summer of 2023. EPA is tasked with making the final decision on which Alternative is chosen. That decision is still pending.

Alternative #4 calls for essentially leaving the waste in place and constructing a slurry wall around two of the CFAC’s 7 existing landfills to contain some of the highest levels of toxic wastes, including chemicals like cyanide and fluoride, within the slurry wall boundaries. This alternative describes a multi-phase, \$57.5 million project to consolidate toxic waste from elsewhere on the site at these landfills and to build the slurry wall around it. The Coalition reviewed many of the research findings underlying this proposal, but concluded that a slurry wall is not a reliable solution in the unpredictable glacial till soils of the CFAC plant site¹ nor does the slurry wall and Alternative #4 provide a timely and long-term solution to current and future protection of the Flathead Valley’s water quality, human health, and environment as long as this waste is simply left in place.

The Coalition, however, has come to a different conclusion on the proposed alternatives based on our first “Deep Dive.” The Coalition is instead tentatively recommending Alternative #6. Alternative #6 calls for “excavated and consolidated [toxic waste to be placed] in a newly constructed on-site repository meeting substantive RCRA Subtitle C requirements² for modern

¹ CFAC’s own report shows that a study performed by Roux on Slurry Wall Effectiveness found that of (48) sites studied, ¼ were considered ineffective after (5) years of use. Most from not being properly tied in at the bottom. The key weakness to the slurry wall’s success at the CFAC site hinges on it not being able to reach bedrock and thus rather being tied into the little studied aquitard (a thick clay layer) that may or may not be continuous and which is 125 to 150 feet below the ground’s surface. The Coalition found that research shows this depth is pushing the known limits of this technology. EPA provided (4) examples of slurry walls reaching these types of depths, (3) of which were tied at the bottom into bedrock, not an aquitard. Limited data on slurry wall long term effectiveness is available due to it being a more recent technology. As proposed with little to no treatment of the toxic waste, a slurry wall would likely have to retain the toxic chemicals at this site for up to or more than one hundred years, before it would meet the cleanup standards set by the EPA for Superfund sites to be judged protective of human health and the environment.

² RCRA Subtitle C establishes federal standards for the generation, transportation, treatment, storage, and disposal of hazardous waste in the United States.

hazardous waste impoundments.” As opposed to our initial recommendation where the Coalition, as well as the City Council of Columbia Falls supported off-site transportation of the highly toxic waste left behind at the CFAC site to an off-site commercial hazardous waste facility, we are now tentatively advocating for Alternative #6 which calls for building an on-site certified and highly regulated hazardous waste facility within the 1,340 acre Superfund site, as called for in Alternative #6. An article in the Hungry Horse News recently stated the Coalition supported the building of an “Industrial Landfill” on the CFAC site, but the proper term is more accurately described as a Hazardous Waste Landfill.³ We say tentative, because we want to hear feedback from the community on Alternative #6 and do additional research on this option. We still believe that off-site removal is the best long-term solution, but it has, to date, been dismissed by the EPA as too costly and for other reasons that we are still trying to understand.

We also say tentative, in that we will likely call for some additional conditions including that only toxic waste found on the CFAC site, and absolutely no other out of area hazardous waste, could be entombed in this new on-site hazardous waste landfill facility. Additional studies will be needed to also determine the safest location for this facility on the site, and the actual volume of waste that would be contained as current studies of the site provide only estimates of the volume of toxic waste. We have been told by CFAC officials that studies to date have not looked closely at the safest location for an on-site hazardous waste landfill facility or at the number of acres needed for the on-site hazardous waste landfill called for in Alternative #6 .

The benefits of Alternative #6 -- the building of an on-site repository or new landfill meeting substantive RCRA Subtitle C requirements for modern hazardous waste impoundments/landfills, are many:

- It is the most protective of all onsite options.
- It is much less expensive than off site removal.
- The distance to move the material is very short and thus cost effective.
- It is the most protective of groundwater as an onsite solution as the waste is no longer in contact with groundwater.
- “High and Dry” on-site retention, in a certified protective hazardous waste containment facility, is less prone to failure than the slurry wall option.
- A certified protective hazardous waste containment facility provides a more secure location for other on-site excavated materials proposed in Alternative #4. Under Alternative #4 other toxic waste found on site would simply be added to existing landfills with, in almost all cases, no lined bottoms and side-wall liners and caps of questionable age and durability.
- The excavation of both the West Landfill and Wet Scrubber Sludge Pond Material is in EPA’s top (6) alternatives. Excavation would not have been considered if the explosive nature of the material made this option too dangerous to perform.
- A certified containment facility sits high and dry above ground water in a highly regulated and certified containment facility, thus providing a more immediate and permanent remedy for the toxic waste left behind at the CFAC site.

³ Industrial wastes (aka manufacturing wastes) include a potpourri of non-hazardous materials that are secondary to the production of goods and products. These are not hazardous wastes, which are those deemed to be endemically dangerous or harmful to human health or the environment.

- Waste-left in place, buried in the ground, and largely untreated results in long-term ongoing potential to harm water quality, human health, and the environment for perhaps hundreds of years.
- There is adequate space within the current already designated 1,340-acre Superfund site to locate a certified hazardous waste containment facility and to provide areas for pre-treatment of toxic waste before containment as may be required.

Alternative #6 made it to EPA's list of top (6) alternatives, but wasn't chosen apparently because it is more expensive than the slurry wall and ranked lower for short term effectiveness. We intend to look more closely at the rating system that EPA uses for ranking preferred alternatives, but at this point find aspects of it to be arbitrary. We do not find that cost should be allowed to be so determinative in the final decision of ranking over which is the best alternative to protect our water quality, health, and environment, as is currently the case. Additionally, short term effectiveness should not be given overriding consideration over long-term effectiveness and permanence in EPA's ranking system.

Over 2,000 residents and 13 organizations joined the Coalition for a Clean CFAC in petitioning and expressing their surprise at the EPA's choice of Alternative #4 (slurry wall). Together we have been requesting additional time to review data within the massive reports that EPA says best supports Alternative #4. Since 2021, the Columbia Falls City Council had called for off-site removal and a more complete cleanup of the CFAC site as has the Coalition since it was formed in 2023. Recognizing that community acceptance of the proposed Cleanup Plan is very lacking at this point and yet is a very important criteria for the EPA to achieve in making a final Record of Decision, the EPA is at least for now supporting independent community efforts to do more study in hopes, we understand, that more community consensus can be achieved in support of a final cleanup plan alternative.

It is important for the community and CFAC to understand that the independent advisor now working with the Coalition under a federal TASC⁴ program did not suggest or endorse any recommendations or conclusions made by the Coalition. The Coalition's conclusions and recommendations are solely our own and not in any way those of the TASC consultant. The sole role of the independent advisors under the TASC program is to help the Coalition/Community locate information on questions we have and to help us understand what some of the complex studies on the CFAC site are saying. Additionally, while a recent 8/14/24 letter from CFAC to the EPA complains of the EPA's delay in issuing a final decision, EPA is also tasked with assuring that there is community acceptance of proposed cleanup plans. Over 700 pages of comments to the EPA on its proposed cleanup plan in July of 2023 as well as petitions to EPA demonstrate that even marginal community acceptance has not been achieved to date. It should also be noted that on 8/13/24 the EPA was sent a letter from the Confederated Salish & Kootenai Tribes expressing their concerns with the proposed plan and the need for the EPA to provide more time for the Tribes to do additional research and provide comments on the proposed cleanup plan.

⁴ The national Technical Assistance Services for Communities (TASC) program provides independent assistance through an EPA contract to help communities better understand the science, regulations and policies of environmental issues and EPA actions. <https://www.epa.gov/superfund/technical-assistance-services-communities-tasc-program>

The Coalition has identified two more “Deep Dives” they hope to lead in September and October before releasing our final findings, and encourage the community at large to weigh in on these as well. Our next set of community engagement sessions are scheduled for September 18th-19th at a location still to be finalized.

The focus of the September “Deep Dive” will be a closer look at long-term contamination issues and how the six alternative cleanup plans address, or fail to address, the cleanup of the existing contaminated plume of groundwater at the site, and impacts to the Flathead River’s water quality, aquatic life, and other impacts to wildlife in the area. In October we are considering a deeper dive into a look at potential long-term health effects and potential future uses of the site. Meanwhile we welcome the community’s questions and as time permits would also welcome the opportunity to present and discuss our current findings with community groups. We hope to post a video of our recent community outreach session on our web site. Visit the Coalition’s web site at <https://cleancfac.org/> For more information, please email coalition@cleancfac.org