



Snowy Mountain Development Corporation

October 26, 2012

Wendy Thomi
Brownfields Project Manager
US EPA, Region 8
10 W. 15th St., Suite 3200
Helena, MT 59626

Dear Wendy,

This memo addresses the analysis of Brownfield cleanup alternatives (ABCA) at the former Berg Lumber Mill site, now owned by the City of Lewistown, Montana. The property is in Fergus County, Montana, and the City of Lewistown was approved for a loan for cleanup from the Central Montana Brownfields Coalition's (CMBC) Revolving Loan Fund. This RLF loan (0% for five years with deferred payments) assisted with soil cleanup and removal and clean-up oversight. The project was also assisted directly by EPA and the Montana Department of Natural Resources and Conservation (DNRC). The entire project involved removal of debris and asbestos from two buildings that were demolished; these activities did not, however, involve the CMBC's RLF.

The 31-acre former Berg Lumber site was home for various lumber-mill related activities between 1970-1994 at the site just north of Lewistown. The City of Lewistown acquired the property from George Berg's Bankruptcy Estate in June 2009.

A complaint was filed with Montana DEQ's Enforcement Division in April 2001 by a former Berg Lumber Mill employee about improper disposal of petroleum hydrocarbons, PCP and transformer fluids, and the openly burning sawdust pile. DEQ required a Phase 1 Environmental Assessment. The EA required by DEQ was completed by Pioneer Technical Services, Inc., Oct. 16, 2001. Surface soil samples indicated the presence of petroleum contamination exceeding DEQ's Risk-Based Screening Levels (RBSLs) and PCP contamination exceeding EPA's Preliminary Remediation Goals and Soil Screening Levels. During the period of Aug. 16-19, 2004, sampling of surface water, sediment, groundwater and soil was conducted under the Berg Lumber Phase II Site Investigation Sampling and Analysis Plan. The results of this sampling event indicated that surface soil samples and subsurface soil samples contained PCP, dioxins, and petroleum constituents above the Regional Screening Levels (RSLs). However, VPH, solvents and semi volatile contaminants weren't found at levels above DEQ's RBSLs or RSLs and were removed from the contaminants of concern list.

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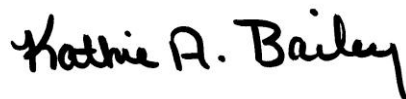
The site is also known as the Lewistown Groundwater Investigation and is filed under this name in the Montana Department of Environmental Quality's Groundwater Remediation Program files. This Final Supplemental Data Report was filed in August 2008. The investigation by DEQ showed that concentrations of numerous organic compounds at the Berg site exceeded EPA Regional Screening Levels (RSLs) 2 and/or Montana Risk-Based Screen Levels (RBSLs). In visually stained surface soils, petroleum hydrocarbon fractions exceeded residential RBSLs and were threatening beneficial uses, human health, and potentially, groundwater. Based on sampling results, soils outside of visually stained areas were not believed to harbor petroleum contaminants that exceeded RBSLs. In its final supplemental data report for the Berg Lumber Mill Site (BLMS) released in August 2008, DEQ said that the Berg Lumber site "in its current condition may pose an unacceptable risk to potential residential use, industrial and/or commercial workers, and recreational users of the property. Evaluation and eventual cleanup of BLMS will mitigate risk to acceptable levels, thus allowing ownership of the property to be transferred and BLMS to be used."

Preliminary remedial alternatives and their associated costs were identified based on the contamination types and concentrations in the 2008 DEQ report. Some alternatives weren't considered appropriate, effective or practical for the site contaminants and weren't discussed (for example, bioremediation and soil washing). Alternatives that were considered to have some merit included capping/on-site repository, stabilization/solidification, chemical oxidation, soil incineration, and excavation and disposal of contaminated soils to a subtitle D disposal facility, and a Subtitle C disposal facility.

Based on this alternatives review, the City of Lewistown developed a clean-up plan that was approved by DEQ and funded by a DNRC Renewable Resource grant, EPA Brownfields grant to the City of Lewistown, RLF funds for cleanup from the Central Montana Brownfields Coalition. Total project costs were \$602,571, with \$91,005 awarded by the Central Montana Brownfields Coalition (CMBC). CMBC funded contaminated soil cleanup and disposal at High Plains Landfill.

For this project, CMBC believes that the intent of the ABCA has been met. Barring any concerns on your part, CMBC will include this letter in the administrative record for this project, as it satisfies the ABCA.

With Thanks,



Kathie A. Bailey
SMDC Executive Director