



December 30, 2016

Steven A. Petrin  
STIMSON LUMBER COMPANY  
520 SW Yamhill, Suite 700  
Portland, Oregon 97204-1330

**RE: DEQ Approval of the Final Remedial Action Report – Phase 4 – Compressor Building Area Soil Removal, Bonner Mill Cooling Pond and Vicinity, Bonner, Montana**

Dear Mr. Petrin:

This letter serves to inform Stimson Lumber Company (Stimson) that the Montana Department of Environmental Quality (DEQ) approves the final version of the Final Remedial Action Report – Phase 4 – Compressor Building Area Soil Removal, Bonner Mill Cooling Pond and Vicinity submitted by Stimson to DEQ on November 30, 2016. All DEQ requested changes were made to the draft construction completion report and DEQ considers the report now final and the Phase 4 removal action completed. At this time it appears that Stimson has fulfilled the final report requirements of the Administrative Order on Consent (AOC), Section VIII, paragraph 82. DEQ reserves its rights, consistent with Sections XXI (Reservation of Rights by DEQ and DOJ) and XXXII (Termination and Satisfaction) to require additional Work at the Stimson Bonner Mill Property.

A Declaration of Institutional Controls on Real Property was filed with Missoula County in September 2016 and DEQ received a copy of that final signed document for the DEQ files in October 2016. This action fulfills the requirements of the AOC, paragraphs 87 and 88.

The Long-Term Operation and Maintenance (O&M) Plan was approved by DEQ in 2013 after the completion of Phase 3 removal action construction activities, and that O&M plan will be in effect until the requirements stated in that plan are fulfilled. Additionally, the approved O&M plan provides for a period of monitoring of groundwater (GW) wells to continue until four consecutive sampling events show no exceedances of DEQ-7 standards, twice a year during high and low GW elevation (June and December).

DEQ would also like to remind Stimson of the record retention requirements in Section XI, paragraphs 93 and 94 of the AOC, which requires Stimson to keep for a period of 10 years after DEQ's determination that all work has been fully performed in accordance with the AOC, not only all records and documents that relate in any manner to performance of the Work, but also all records or documents that relate to "the liability of any person under CECRA or CERCLA with respect to the Stimson Bonner Mill property."

DEQ would like to thank Stimson Lumber Company for a job well done regarding the removal of the Cooling Pond from the Blackfoot River and PCB contaminated soils at the Bonner Mill site located in Bonner, Montana. DEQ would also like to note that Stimson staff and Stimson representatives working the project did so in a safe manner and no-time-loss was achieved during the course of this 11 year project. Thank you.

Please feel free to write or call regarding any questions or concerns that may arise from this letter.

Respectfully Yours,

  
Keith K. Large  
DEQ State Project Officer

cc: Jon Morgan – DEQ Legal  
Tom Stoops – DEQ  
Jenny Chambers – DEQ  
Doug Martin – NRD  
Mary Capdeville – NRD  
Jeanette Schuster – Tonkon Torp LLC  
Peter Neilson – Missoula County