



November 27, 2018

Mr. Gordon Criswell  
Talen Montana  
PO Box 38  
Colstrip, Montana

RE: DEQ Comments on Revised Cleanup Criteria and Risk Assessment Report, Plant Site Area

Gordon:

DEQ has reviewed the above-referenced document and conditionally approves the Report with the understanding that the following comment will be addressed through replacement pages.

1. The discussion regarding radium that took place during the meeting between DEQ and Talen on October 15, 2018, resulted in radium not being designated as a COC due to the lack of radium in the paste and pond samples collected by Talen in July 2018. However, due to the small sample population of radium in groundwater, and the exceedances of DEQ-7 in some CCR wells, DEQ and Talen agreed to retain radium as a COPC and to continue sampling for radium under the AOC as well as under the CCR Rule. Please add text that specifies radium will be sampled under the AOC in addition to CCR Rule requirements, and that radium will be retained as a COPC until an appropriate number of samples (including background samples) have been analyzed. This comment applies to the following pages:
  1. Page xii, Executive Summary, last paragraph, last sentence
  2. Page 18, Section 3.0, Table 3-2 (please add a footnote to this table)
  3. Page 60, Section 10.4, last paragraph
  4. Page 61, Section 10.4, last paragraph
  5. Page 68, Section 13.4, last paragraph

If you have any questions, please feel free to contact me at 406-444-6797 or [sedinberg@mt.gov](mailto:sedinberg@mt.gov).

Sincerely,

A handwritten signature in black ink that reads "Sara Edinberg". The signature is fluid and cursive, with a long horizontal stroke at the end.

Sara Edinberg  
Hydrogeologist  
Montana DEQ

cc: Marietta Canty (electronic copy)  
Al Hilty, Hydrometrics (electronic copy)  
Aimee Reynolds, DEQ (electronic copy)