



November 27, 2018

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

RE: DEQ Comments on Revised Cleanup Criteria and Risk Assessment Report, Units 1&2 Area

Gordon:

DEQ has reviewed the above-referenced document and conditionally approves the Report with the understanding that the following comments 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 16, Section 3.0, Table 3-3 (please add a footnote to this table)
 3. Page 59, Section 10.5, last paragraph
 4. Page 60, Section 10.5, last paragraph
 5. Page 68, Section 13.4, last paragraph
2. Page 57, Table 10-7: Please change "Plant Site CCR Wells" and "Plant Site CCR Background Wells" to "Units 1&2 CCR Wells" and "Units 1&2 CCR Background Wells". If the concentrations associated with these rows are incorrect, please edit accordingly.

If you have any questions, please feel free to contact me at 406-444-6797 or 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)