

Harbage, Rebecca

From: Roll, Robert
Sent: Wednesday, April 8, 2020 10:02 AM
To: Cynthia Brooks; Chambers, Jenny
Cc: Martin, Denise; Jennifer Roberts; Bob Anderson; Blaine Cox; Harris, Harley
Subject: RE: UBMC COVID-19 Response Plan

Cynthia,

Thank you for providing DEQ with the April 3, 2020, UBMC WTP COVID-19 Contingency Plan. Please see DEQ's responses below regarding METG's suggestions for WTP operations and the safety of the operator during this COVID-19 pandemic.

DEQ agrees that taking necessary precautions to limit the WTP primary operator's travel and interactions is essential. With regard to the sampling frequency requirements, please follow the sampling requirements contained within the current monthly discharge monitoring report(s) but with the following modifications:

- DEQ approves of METG's recommendation for the temporary change of sample frequency to only collect samples for the required metals on a bi-weekly frequency. Please note the following:
 - Currently, the only items requiring a weekly sampling frequency are TSS, cadmium, manganese, and zinc. DEQ notified METG of this change in sample frequency in December 2013. All other metals only require bi-weekly (copper, iron, and lead) or monthly (aluminum and arsenic) sampling.
 - When weekly planned activities at the WTP can coincide with the operator setting the auto-collector to collect a weekly sample for cadmium, manganese, and zinc, please collect this weekly sample and save it (put on hold). The reasoning for having or holding this data is primarily due to the cadmium effluent limits. While the WTP effluent has not had a "daily" exceedance of cadmium in recent years, there have been exceedances of the "monthly" discharge limit. In the past when one of the weekly samples has exceeded the monthly limit, the other weekly samples assist in lowering the monthly average effluent discharge to meet the required limit. The held samples can be discarded once results for the bi-weekly sampling demonstrate effluent compliance.
- A detection of TSS above the laboratory detection limit of 10 mg/L has not been observed for nearly 7 years. For this reason, DEQ approves of METG's recommendation to collect a sample for TSS for the bi-weekly and monthly samples that are submitted to the laboratory during this period of limited non-essential travel.
- Due to the 180-day holding time on metals analyses, DEQ would also be willing to temporarily change the TSS sampling to monthly. This could limit the operator's travel to the laboratory in Helena to once a month, and he would still be able to deliver both bi-weekly samples. In order to limit travel, the held weekly samples could also be delivered at that time and analyzed by the laboratory if the monthly average exceeds treatment requirements.

If the Custodial Trust anticipates other difficulties meeting the operational requirements of the WTP due to the COVID-19 pandemic, please inform DEQ as soon as possible so that further considerations that limit negative effects to the environment can be discussed.

If you have any other questions, please feel free to contact me.

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From: Cynthia Brooks [mailto:cb@g-etg.com]
Sent: Friday, April 03, 2020 2:12 PM
To: Chambers, Jenny <JChambers@mt.gov>
Cc: Roll, Robert <RRoll@mt.gov>; Martin, Denise <demartin@mt.gov>; Jennifer Roberts <jr@g-etg.com>; Bob Anderson <RANDERSON@hydrometrics.com>; Blaine Cox <bc@mtenvironmentaltrust.org>; Harris, Harley <HarleyHarris@mt.gov>
Subject: [EXTERNAL] UBMC COVID-19 Response Plan

Jenny

I hope you are well. I am forwarding the attached memo for MDEQ information and feedback that sets forth the Custodial Trust's plans for operation of the Upper Blackfoot Mining Complex/Mike Horse Water Treatment Plant in light of the COVID-19 pandemic.

Please let me know if you have any questions.

Take care
Cindy

Cynthia Brooks
President
Greenfield Environmental Trust Group, Inc.
Montana Environmental Trust Group LLC, Trustee of the Montana Environmental Custodial Trust
Greenfield Environmental Multistate Trust LLC, Trustee of the Multistate Environmental Response Trust
Greenfield Environmental Savannah Trust LLC, Trustee of the Savannah Environmental Response Trust

