



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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Ref: 8EPR-ER

MAY 30 2018

**ACTION MEMORANDUM AMENDMENT**

**SUBJECT:** Request for a Ceiling Increase for Removal Action at the Big Seven Mine Abandoned Chemicals Site, part of the Carpenter-Snow Creek Mining District NPL Site, near the Town of Neihart in Cascade County, Montana

**FROM:** Craig Myers *Craig Myers*  
Federal On-Scene Coordinator *for Craig Myers*

**THRU:** Laura Williams, Unit Leader *Laura Williams 5/22/18*  
Emergency Response *David Ostrander 5/22/18*

David Ostrander, Director  
Emergency Response & Preparedness Program

**TO:** Betsy Smidinger  
Assistant Regional Administrator  
Office of Ecosystems Protection and Remediation

Site ID #: 089X-OU2

**I. PURPOSE**

The purpose of this Action Memorandum Amendment is to request and document approval of a ceiling increase for the on-going removal action described herein for the Big Seven Mine Abandoned Chemicals Site (Site) located near the Town of Neihart in Cascade County, Montana. This Action Memorandum Amendment also provides the rationale for the increased estimated costs for this removal action.

This time-critical removal action involves the demolition of a powder magazine and on-site treatment and disposal of degraded dynamite and dynamite-contaminated soil. This action will be initiated because conditions at the Site present an endangerment to human health and the environment and meet the criteria for conducting a removal action under 40 CFR 300.415(b)(2) of the National Contingency Plan (NCP). Awarding subcontracts for recently obtained proposals for demolition of the magazine and removal of the dynamite and dynamite contaminated soil will exceed the ceiling in the original emergency Action Memorandum (attached). Based on updated and more complete cost data, the estimated ceiling increase necessary to complete remediation at the Site is approximately \$135,600.



This removal action involves no nationally-significant or precedent-setting issues. This removal action will not establish any precedent for how future response actions will be taken and will not commit the United States Environmental Protection Agency (EPA) to a course of action that could have a significant impact on future responses or resources.

## **II. SITE CONDITIONS AND BACKGROUND**

Site Name:	Big Seven Mine Abandoned Chemicals, part of the Carpenter-Snow Creek Mining District NPL Site
Superfund Site ID (SSID):	089X-OU2
CERCLIS Number:	MT0001096353
Site Location:	Cascade County, Montana
Lat/Long:	46.948667/-110.705691
Potentially Responsible Party (PRP):	See Enforcement Addendum
NPL Status:	Carpenter-Snow Creek NPL, OU 2
Removal Start Date:	9/8/17

### **A. Site Description**

#### **1. Removal Site Evaluation**

Refer to Action Memorandum dated December 11, 2017, for the initial Removal Site Evaluation (Attachment 1). As part of the emergency removal action that was initiated on September 8, 2017, the EPA's Emergency Response and Removal Services (ERRS) contractor lab-packed all stable chemical containers from the Site and stored them at the Cascade County maintenance yard. Chemical containers at the Site deemed to be too unstable for transportation and off-site disposal were detonated on-site by a Malmstrom Air Force Base Explosive Ordinance Disposal (EOD) Team in September, 2017. The ERRS contractor also drained the oils from all transformer casings found at the Site into a 55-gallon steel drum and stored it at the Cascade County maintenance. All waste was then transported for off-site disposal to an appropriate facility in February 2018. The empty transformer casings were transported to an appropriate recycler in September 2017.

As stated in the December 11, 2017, Action Memorandum, the magazine building was partially collapsed and overgrown with vegetation. The majority of the entrance to the structure was buried from the collapse; however, degraded sticks of dynamite were observed in and around the entrance. Any contents within the structure were buried. It is unknown how much dynamite is contained in this structure, but the Chief of the Neihart Volunteer Fire Department informed the EPA that he observed five boxes of dynamite in the magazine building before the structure collapsed, approximately two years ago. Considering the age and weathering that has occurred, the dynamite and dynamite-contaminated soil at the Site is likely unstable and presents a reactive hazardous waste (D003). Additional Site photographs are presented in Attachment 2.

In September 2017, Malmstrom Air Force Base EOD evaluated the magazine

building and were unable to conduct a thermal detonation of the unexploded dynamite or dynamite-contaminated soil because they did not have the appropriate equipment (i.e., armored excavation equipment). In October 2017, EPA, through its ERRS Contractor held a bid walk for unexploded ordinance firms to assess the magazine area and develop proposals to safely dispose of the dynamite and dynamite-contaminated soil from the Site. EPA plans to conduct on-site thermal destruction and disposal of the magazine, dynamite, and dynamite-contaminated soil. By mid-October 2017, any further actions at the Site were suspended due to winter weather conditions.

## **2. Physical Location**

Refer to Action Memorandum dated December 11, 2017 (Attachment 1).

## **3. Site Characteristics**

Refer to Action Memorandum dated December 11, 2017 (Attachment 1). When the emergency removal of the chemicals from the Site was performed in September 2017 the area was under drought conditions and the threat of fire originating from the unstable chemicals and spreading to the surrounding area was a concern. The Site was also unsecured and there were visible signs of trespassing (i.e., empty beer cans, empty soda cans, bullet holes, tire tracks, vandalism and graffiti) and wildlife disturbance (i.e., rodent droppings and nests).

During the winter, the area typically experiences over 63 inches of snowfall annually. The project strategy is to initiate and complete this portion of the response/removal actions by early summer 2018 after the snows have melted but prior to the area drying out. If actions are delayed until late summer, the dry, windy weather conditions typical in this area will prevent this action from being initiated until late fall 2018 during wetter conditions.

## **4. Release or Threatened Release into the Environment of a Hazardous Substance, Pollutant or Contaminant**

Dynamite in the magazine has degraded over time and contaminated the surrounding soil. The degraded dynamite and dynamite-contaminated soil are unstable and present reactive hazards (D003). These reactive wastes are shock sensitive and present an explosive hazard to humans and wildlife upon direct contact.

## **5. NPL Status**

Refer to Action Memorandum dated December 11, 2017 (Attachment 1).

## **6. Maps, Pictures & Other Graphic Representations**

Refer to Action Memorandum dated December 11, 2017 (Attachment 1). Additional photographs are provided in Attachment 2.

**B. Other Actions to Date**

**1. Previous Actions**

The emergency removal action was initiated at the Site on September 8, 2017. The ERRS Contractor lab-packed all stable chemical containers from the Site and stored them at the Cascade County maintenance yard until transported for disposal to an appropriate disposal facility in February 2018. On-site demolition of unstable chemical wastes was completed in September 2017, by a Malmstrom Air Force Base EOD Team. The ERRS Contractor also drained the oils from all transformer casings found at the Site into a 55-gallon steel drum and stored it at the Cascade County maintenance yard after which it was transported for disposal to an appropriate disposal facility in February 2018.

**2. Current Actions**

None other than those proposed in this document.

**C. State, Local and other Federal Authorities' Roles**

Montana Department of Environmental Quality is directly assisting the EPA with various portions of the Carpenter-Snow Creek NPL Site. Malmstrom Airforce Base EOD has provided technical assistance and will remain on standby during the remainder of the removal action.

**III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

Refer to Action Memorandum dated December 11, 2017 (Attachment 1). All known abandoned chemicals have been removed from the Site. However, conditions at the Site still present a threat to public health and the environment and meet the criteria for initiating a removal action under 40 CFR §300.415(b)(2) of the NCP.

EPA has considered all the factors described in 40 CFR §300.415(b)(2) of the NCP and determined that the following factors still apply at the Site.

(vi) *“Threat of fire or explosion;”*

When the emergency removal of the chemicals from the Site was performed in September 2017 the area was under drought conditions and the threat of fire originating from the unstable chemicals and spreading to the surrounding area was a concern. The Site was also unsecured and there were visible signs of trespassing and wildlife disturbance.

The dynamite and dynamite-contaminated soil in the magazine presents an explosive hazard. Trespassers walking through the Site or animals foraging through the magazine could cause an explosion by disturbing this area. Should a detonation occur during summer

months, it will very likely trigger a major wildland fire in the surrounding private land and national forest. During the winter, the area typically experiences over 63 inches of snowfall annually. The project strategy is to initiate and complete this removal action by early summer 2018 after the snows have melted but prior to the area drying out.

(vii) *“The availability of other appropriate federal or state response mechanisms to respond to the release.”*

Local and state governments do not have the capability to conduct this action in a timely manner.

#### **IV. SELECTED REMOVAL ACTIONS AND ESTIMATED COSTS**

##### **A. Planned Actions**

###### **1. Planned Action**

Via sub-contract, the EPA will bring in unexploded ordinance specialists to adequately and safely demolish the magazine and properly treat or dispose of the dynamite and dynamite-contaminated soil at the Site. This will be accomplished by on-site thermal treatment of the magazine area (i.e., open burning for an estimated period of 24 hours) with adequate safety precautions (i.e., fire breaks, fire watch and standby fire crews) after the winter snows have melted. Once the area has been stabilized, the remaining debris (i.e., sheet metal roof) will be removed for disposal.

Prior to initiation of the action, Malmstrom Air Force Base EOD, local fire departments and local law enforcement will be notified. Malmstrom EOD and the local fire departments will provide firefighting support as needed while local law enforcement will assist with security at the lower entrance to the Site to prevent trespassing during the action. No other public notifications will be made to minimize the number of potential trespassers.

###### **2. Contribution to Remedial Performance**

Refer to Action Memorandum dated December 11, 2017 (Attachment 1).

###### **3. Engineering Evaluation/Cost Analysis (EE/CA)**

An EE/CA is not required for a Time-Critical Removal Action.

###### **4. Applicable or Relevant and Appropriate Requirements (ARARs)**

Removal actions conducted under CERCLA are required, to the extent practicable considering the exigencies of the situation, to attain ARARs. In determining whether compliance with an ARAR is practicable, the lead agency may consider appropriate factors including the urgency of the situation and the scope of the removal action to be conducted. A table containing potential Site-specific ARARs is provided as Attachment 3 to this Action Memorandum.

## 5. Project Schedule

On-site demolition of unstable chemical wastes was completed in September 2017 by a Malmstrom Air Force Base EOD Team. Assessment of the magazine was completed by un-exploded ordinance specialists in October 2017. Disposal of the abandoned chemicals and transformer oils from the Site was completed in February 2018. Depending on weather, final disposition of the magazine, dynamite and dynamite-contaminated soil is anticipated to be initiated and completed no later than early summer of 2018.

### B. Estimated Costs\*

	<b>Current Ceiling</b>	<b>Proposed Increase</b>	<b>Proposed Ceiling</b>
Contractor costs:			
START	\$35,000	\$0	\$35,000
ERRS	\$170,000	\$113,000	\$283,000
Contingency costs (20% of subtotal)	\$41,000	\$22,600	\$63,600
<b>Total Removal Project Ceiling</b>	<b>\$246,000</b>	<b>\$135,600</b>	<b>\$381,600</b>

\*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA.

## V. **EXPECTED CHANGE IN THE SITUATION SHOULD ACTIONS BE DELAYED OR NOT TAKEN**

Should this amendment not be approved, the dynamite will be left in an uncontrolled state and would increase the actual or potential threats to public health and the environment.

## VI. **OUTSTANDING POLICY ISSUES**

None.

## VII. **ENFORCEMENT**

A separate Enforcement Addendum has been prepared providing a confidential summary of current and potential future enforcement activities.

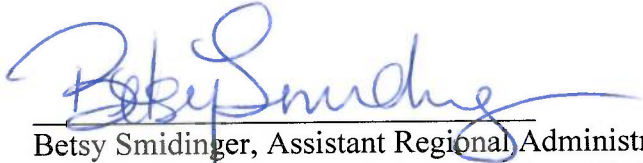
## VIII. **APPROVALS**

This decision document amends the selected Emergency Removal Action for the Big Seven Mine Abandoned Chemicals Site near the Town of Neihart, in Cascade County, Montana, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

Conditions at the Site meet the NCP section 300.415(b) criteria for a removal action, and I recommend your approval of the increase of \$135,600 from the original project ceiling of

\$246,000. The total project ceiling, if approved, will be \$381,600. This amount will be funded from the Regional removal allowance.

APPROVE



Betsy Smidinger, Assistant Regional Administrator  
Office of Ecosystems Protection and Remediation

5/30/18  
Date

DISAPPROVE

\_\_\_\_\_  
Betsy Smidinger, Assistant Regional Administrator  
Ecosystems Protection and Remediation

\_\_\_\_\_  
Date

Attachment 1: Big Seven Mine Abandoned Chemicals Site Action Memorandum, December 11,  
2017

Attachment 2: Additional Site Photographs

Attachment 3: Applicable or Relevant and Appropriate Requirements (ARARs)

Attachment 1

Big Seven Mine Abandoned Chemicals Site Action Memorandum,  
December 11, 2017





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Ref: 8EPR-ER

DEC 11 2017

**ACTION MEMORANDUM**

**SUBJECT:** Approval and Funding for an Emergency Removal Action at the Big Seven Mine Abandoned Chemicals Site, part of the Carpenter-Snow Creek Mining District NPL Site, near the Town of Neihart in Cascade County, Montana, pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104

**FROM:** Craig Myers  
Federal On-Scene Coordinator

**THRU:** Laura Williams, Unit Leader  
Emergency Response Program

David Ostrander, Director  
Emergency Response & Preparedness Program

**TO:** Betsy Smidinger  
Assistant Regional Administrator  
Office of Ecosystems Protection and Remediation

Site ID #: 089X-OU2

**I. PURPOSE**

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the Big Seven Mine Abandoned Chemicals Site (Site) located near the Town of Neihart in Cascade County, Montana. This emergency removal action involved the removal of numerous hazardous substances from a former mining site. Conditions existing at the Site presented a threat to public health and the environment and met the criteria for initiating a removal action under 40 CFR §300.415(b)(2) of the National Contingency Plan (NCP).

This removal action involved no nationally-significant or precedent-setting issues. This emergency removal action will not establish any precedent for how future response actions will be taken and will not commit the United States Environmental Protection Agency (EPA) to a course of action that could have a significant impact on future responses or resources.



## II. SITE CONDITIONS AND BACKGROUND

Site Name:	Big Seven Mine Abandoned Chemicals, part of the Carpenter-Snow Creek Mining District NPL Site
Superfund Site ID (SSID):	089X-OU2
CERCLIS Number:	MT0001096353
Site Location:	Cascade County, Montana
Lat/Long:	46.948667/-110.705691
Potentially Responsible Party (PRP):	
NPL Status :	Carpenter-Snow Creek NPL, OU 2
Removal Start Date :	09/08/2017

### A. Site Description

#### 1. Removal Site Evaluation

The Site is the Big Seven Mine which is located within operable unit (OU) 2 of the Carpenter-Snow Creek National Priority List (NPL) Site (see Attachment 1 for Site location). This former mining site contains the remains of 17 man-made structures in various states of degradation.

On August 17, 2017, the EPA On-Scene Coordinator (OSC) mobilized a Superfund Technical Assessment and Response Team (START) to conduct a removal site evaluation of the structures at the Site. All of these structures were unsecured and visible signs of trespassers (i.e., empty beer cans, empty soda cans, bullet holes, tire tracks, vandalism and graffiti) and wildlife disturbance (i.e., rodent droppings and nests) were observed. During the evaluation, chemical containers were found in four of the structures: the lower maintenance building, the upper core house, the mill building and the chemical assay laboratory. None of the remaining structures housed any chemical containers. A second Site visit on August 31, 2017, conducted with the Cascade County Sheriff's Office revealed dynamite remnants in a previously unknown magazine building located in a heavily wooded area approximately 30 yards off one of the mine roads. Site photographs are presented in Attachment 2.

All suspect small containers were moved into the chemical assay laboratory. A list of the containers found and their corresponding Department of Transportation (DOT) hazard classifications are presented in Attachment 3. Seventeen of these containers contained chemicals that were either characteristically hazardous for corrosivity (D002) or were spent halogenated solvents (assumed F listed wastes). A number of additional amber jars observed in the chemical assay laboratory contained substances that had crystalized. The label remnants on two of these jars (i.e., ether-based chemicals) indicated that they were reactive wastes (D003). The remaining unlabeled jars contained dehydrated, crystalized material which must be assumed to be reactive as well as there is no way to safely sample and analyze them given the documented presence of ether in the chemical assay laboratory.

The magazine building was partially collapsed and overgrown with vegetation. The

or dynamite-contaminated soil because they did not have the appropriate equipment (i.e., armored excavation equipment). In October 2017, EPA, through its ERRS contractor held a bid walk for unexploded ordinance firms to assess the magazine area and develop proposals to safely dispose of the dynamite and dynamite-contaminated soil from the Site. EPA plans to conduct on-site thermal destruction and disposal of the magazine, dynamite, and dynamite-contaminated soil. By mid-October 2017, any further actions at the Site were suspended due to winter weather conditions.

## **2. Physical Location**

Refer to Action Memorandum dated December 11, 2017 (Attachment 1).

## **3. Site Characteristics**

Refer to Action Memorandum dated December 11, 2017 (Attachment 1). When the emergency removal of the chemicals from the Site was performed in September 2017, the area was under drought conditions and the threat of fire originating from the unstable chemicals and spreading to the surrounding area was a concern. The Site was also unsecured and there were visible signs of trespassing (i.e., empty beer cans, empty soda cans, bullet holes, tire tracks, vandalism and graffiti) and wildlife disturbance (i.e., rodent droppings and nests).

During the winter, the area typically experiences over 63 inches of snowfall. The project strategy is to initiate and complete this portion of the removal action by early summer 2018 after the snows have melted but prior to the area drying out. If actions are delayed until late summer, the dry, windy weather conditions typical in this area will prevent this action from being initiated until late fall 2018 during wetter conditions.

## **4. Release or Threatened Release into the Environment of a Hazardous Substance, Pollutant or Contaminant**

Dynamite in the magazine has degraded over time and contaminated the surrounding soil. The degraded dynamite and dynamite-contaminated soil are unstable and present reactive hazards (D003), which are CERCLA hazardous substances. These reactive wastes are shock sensitive and present an explosive hazard to humans and wildlife upon direct contact.

## **5. NPL Status**

Carpenter-Snow Creek Mining District Site became final on the NPL on 9/13/2001.

## **6. Maps, Pictures & Other Graphic Representations**

Refer to Action Memorandum dated December 11, 2017 (Attachment 1). Additional photographs are provided in Attachment 2.

**B. Other Actions to Date**

**1. Previous Actions**

The emergency removal action was initiated at the Site on September 8, 2017. The ERRS contractor lab-packed all stable chemical containers from the Site and stored them at the Cascade County maintenance yard until transported for disposal to an appropriate disposal facility in February 2018. On-site demolition of unstable chemical wastes was completed in September 2017 by a Malmstrom Air Force Base Explosive Ordnance Disposal Team. The ERRS contractor also drained the oils from all transformer casings found at the Site into a 55-gallon steel drum and stored it at the Cascade County maintenance yard after which it was transported for disposal to an appropriate disposal facility in February 2018.

**2. Current Actions**

None other than those proposed in this document.

**C. State, Local and other Federal Authorities' Roles**

Montana Department of Environmental Quality is directly assisting the EPA with various portions of the Carpenter-Snow Creek NPL Site. Malmstrom Airforce Base EOD has provided technical assistance and will remain on standby during the remainder of the removal action.

**III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

Refer to Action Memorandum dated December 11, 2017 (Attachment 1). All known abandoned chemicals have been removed from the Site. However, conditions at the Site still present a threat to public health and the environment and meet the criteria for initiating a removal action under 40 CFR §300.415(b)(2) of the NCP.

EPA has considered all the factors described in 40 CFR §300.415(b)(2) of the NCP and determined that the following factors still apply at the Site.

*(vi) "Threat of fire or explosion;"*

When the emergency removal of the chemicals from the Site was performed in September 2017 the area was under drought conditions and the threat of fire originating from the unstable chemicals and spreading to the surrounding area was a concern. The Site was also unsecured and there were visible signs of trespassing and wildlife disturbance.

The dynamite and dynamite-contaminated soil in the magazine presents an explosive hazard. Trespassers walking through the Site or animals foraging through the magazine could cause an explosion by disturbing this area. Should a detonation occur during summer months, it will very likely trigger a major wildland fire in the surrounding private land and

national forest. During the winter, the area typically experiences over 63 inches of snowfall. The project strategy is to initiate and complete this removal action by early summer 2018 after the snows have melted but prior to the area drying out.

(vii) *“The availability of other appropriate federal or state response mechanisms to respond to the release.”*

Local and state governments do not have the capability to conduct this action in a timely manner.

#### **IV. PROPOSED ACTIONS AND ESTIMATED COSTS**

##### **A. Proposed Actions**

###### **1. Proposed Action Description**

EPA will bring in unexploded ordinance specialists to adequately and safely demolish the magazine and properly treat or dispose of the dynamite and dynamite-contaminated soil at the Site. This will be accomplished by on-site thermal treatment of the magazine area (i.e., open burning for an estimated period of 24 hours) with adequate safety precautions (i.e., fire breaks, fire watch and standby fire crews) after the winter snow melts. Once the area has been stabilized, the remaining debris (i.e., sheet metal roof) will be removed for disposal.

Prior to initiation of the action, Malmstrom Air Force Base EOD, local fire departments and local law enforcement will be notified. Malmstrom EOD and the local fire departments will provide firefighting support as needed while local law enforcement will assist with security at the lower entrance to the Site to prevent trespassing during the action. No other public notifications will be made to minimize the number of potential trespassers.

###### **2. Contribution to Remedial Performance**

Refer to Action Memorandum dated December 11, 2017 (Attachment 1).

###### **3. Engineering Evaluation/Cost Analysis (EE/CA)**

An EE/CA is not required for a Time-Critical Removal Action.

###### **4. Applicable or Relevant and Appropriate Requirements (ARARs)**

Removal actions conducted under CERCLA are required, to the extent practicable considering the exigencies of the situation, to attain ARARs. In determining whether compliance with an ARAR is practicable, the lead agency may consider appropriate factors including the urgency of the situation and the scope of the removal action to be conducted. A table containing potential Site-specific ARARs is provided as Attachment 3 to this Action Memorandum Amendment.

## 5. Project Schedule

On-site demolition of unstable chemical wastes was completed in September 2017 by a Malmstrom Air Force Base EOD Team. Assessment of the magazine was completed by un-exploded ordinance specialists in October 2017. Disposal of the abandoned chemicals and transformer oils from the Site was completed in February 2018. Depending on weather, final disposition of the magazine, dynamite and dynamite-contaminated soil is anticipated to be initiated and completed no later than early summer of 2018.

### B. Estimated Costs\*

	<b>Current Ceiling</b>	<b>Proposed Increase</b>	<b>Proposed Ceiling</b>
Contractor costs:			
START	\$35,000	\$0	\$35,000
ERRS	\$170,000	\$113,000	\$283,000
Contingency costs (20% of subtotal)	\$41,000	\$22,600	\$63,600
<b>Total Removal Project Ceiling</b>	<b>\$246,000</b>	<b>\$135,600</b>	<b>\$381,600</b>

\*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA.

## V. EXPECTED CHANGE IN THE SITUATION SHOULD ACTIONS BE DELAYED OR NOT TAKEN

Should this amendment not be approved, the dynamite will be left in an uncontrolled state and would increase the actual or potential threats to public health and the environment.

## VI. OUTSTANDING POLICY ISSUES

None.

## VII. ENFORCEMENT

A separate Enforcement Addendum was prepared providing a confidential summary of current and potential future enforcement activities.

## VIII. RECOMMENDATIONS

This decision document amends the selected Emergency Removal Action for the Big Seven Mine Abandoned Chemicals Site near the Town of Neihart, in Cascade County, Montana, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

Conditions at the Site meet the NCP section 300.415(b) criteria for a removal action, and I recommend your approval of the increase of \$135,600 from the original project ceiling of

#### 4. Applicable or Relevant and Appropriate Requirements (ARARs)

Removal actions conducted under CERCLA are required, to the extent practicable considering the exigencies of the situation, to attain ARARs. In determining whether compliance with an ARAR is practicable, the lead agency may consider appropriate factors including the urgency of the situation and the scope of the removal action to be conducted. A table containing potential Site-specific ARARs identified at the time of the response is provided as Attachment 4 to this Action Memorandum.

#### 5. Project Schedule

This emergency removal action was initiated on September 8, 2017. Waste transportation activities are anticipated to be completed by the end of the calendar year 2017, and final disposition of the dynamite/magazine is anticipated to be completed no later than early summer of 2018.

#### B. Estimated Costs\*

Contractor costs	
START	\$35,000.00
ERRS	\$170,000.00
Contingency costs (20% of subtotal)	\$41,000.00
<b>Total Removal Project Ceiling</b>	<b>\$246,000.00</b>

\*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA.

#### V. EXPECTED CHANGE IN THE SITUATION SHOULD ACTIONS BE DELAYED OR NOT TAKEN

A delay in action or no action at this Site would have increased the actual or potential threats to public health and the environment.

#### VI. OUTSTANDING POLICY ISSUES

None.

#### VII. ENFORCEMENT

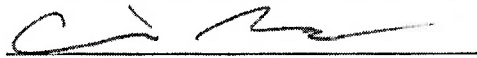
An investigation to evaluate potential enforcement options will be undertaken. A separate Enforcement Addendum will be prepared if appropriate providing a confidential summary of potential enforcement activities.

#### VIII. APPROVALS

This decision document represents the selected removal action for the Big Seven Mine Abandoned Chemicals Site near the Town of Neihart, in Cascade County, MT, developed in accordance with CERCLA as amended and is not inconsistent with the NCP. This decision is

based on the administrative record for the Site.

Conditions at the Site met the NCP section 300.415(b) criteria for a removal action and through this document, I am approving the proposed removal actions. The total project ceiling is \$246,000.00; this amount will be funded from the Regional removal allowance.



Craig Myers  
Federal On-Scene Coordinator



Date

Attachment 1: Site Location

Attachment 2: Site Photographs

Attachment 3: Hazard Classification List

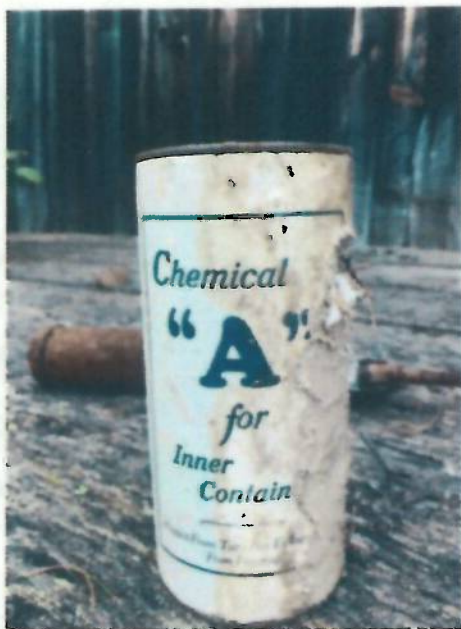
Attachment 4: Applicable or Relevant and Appropriate Requirements (ARARs)



Attachment I – Site Location



Attachment 2 – Site Photographs



Powdered additive for recharging fire extinguishers from lower maintenance building.



Nitric acid and unknown milky substance bottles from the upper core house.



Chemical assay laboratory.

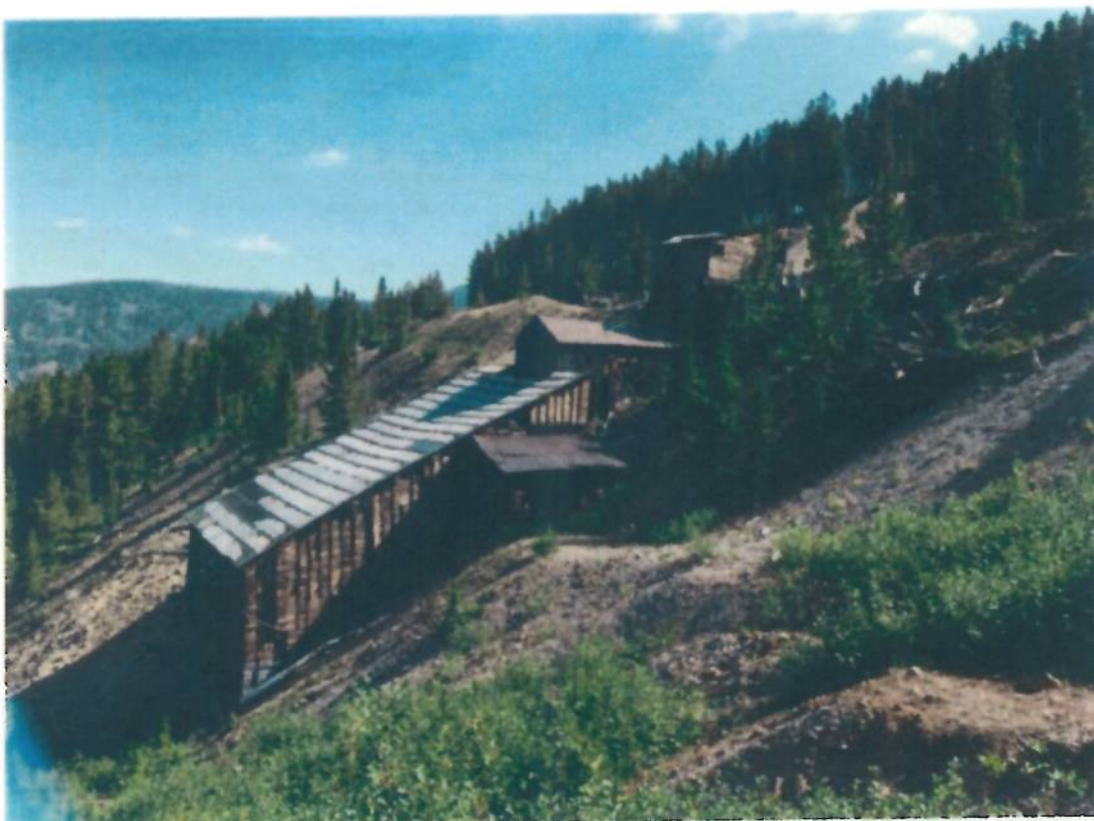




Unlabeled glass bottles in chemical assay laboratory.



Amber bottles that contain crystalized, dehydrated material in chemical assay laboratory.

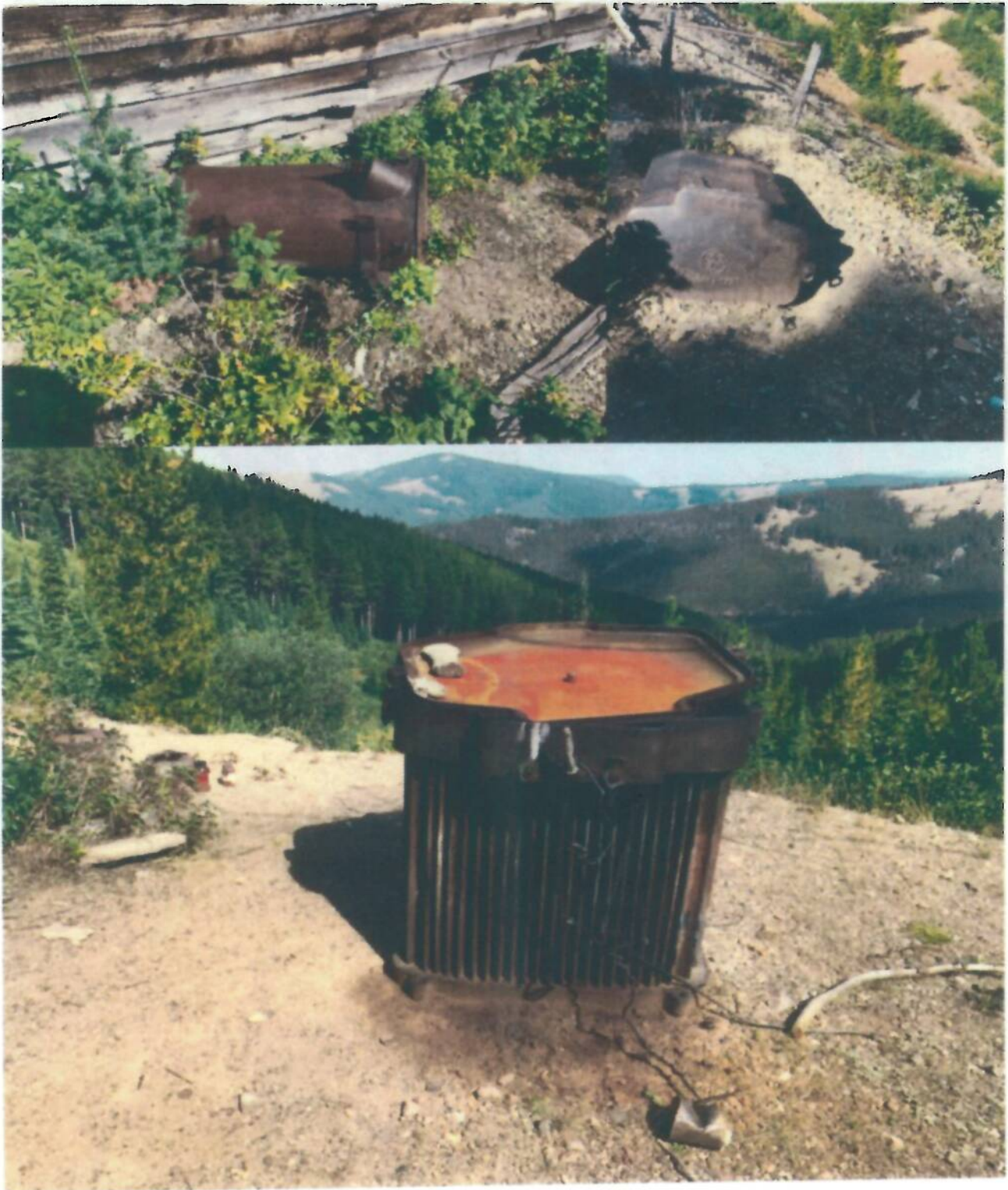


Mill building.



Metal containers in mill building.





Electrical transformers.



Magazine building.



### Attachment 3 – Hazard Classification List

Sample ID	Matrix	Solubility	pH	Oxidizer	Cyanide	Sulfide	Flamibility	Chlorinated
B7-01	Liquid	No	7	N/A	N/A	N/A	No	No
B7-02	Liquid	No	4	N/A	N/A	N/A	No	No
B7-03	Liquid	No	5	N/A	N/A	N/A	No	No
B7-04		Yes	5	No	N/A	N/A	No	No
B7-05		No	6	N/A	N/A	N/A	No	No
B7-06		No	5	N/A	N/A	N/A	No	No
B7-07		No	5	N/A	N/A	N/A	No	No
B7-08	Liquid	Yes	6	No	N/A	N/A	No	No
B7-09	Liquid	Yes	6	No	N/A	N/A	No	Yes
B7-10	Liquid	Yes	6	No	N/A	N/A	No	No
B7-11	Solid	No	6	N/A	N/A	N/A	No	No
B7-12		Yes	6	No	N/A	N/A	No	No
B7-13		Yes	5	No	N/A	N/A	No	No
B7-14		Yes	6	No	N/A	N/A	No	Yes
B7-15		Yes	6	No	N/A	N/A	No	Yes
B7-16	Solid	No	5	N/A	N/A	N/A	No	No
B7-17		Yes	6	No	N/A	N/A	No	No
B7-18	Solid	No	6	N/A	N/A	N/A	No	No
B7-19	Solid	No	5	N/A	N/A	N/A	No	No
B7-20		No	6	N/A	N/A	N/A	No	No
B7-21	Solid	Yes	5	No	N/A	N/A	No	No
B7-22	Not sampled.							
B7-23		No	6	N/A	N/A	N/A	No	No
B7-24		Yes	12	No	No	No	No	No
B7-25	Solid	No	5	N/A	N/A	N/A	No	No
B7-26		No	5	N/A	N/A	N/A	No	No
B7-27	Liquid	Yes	6	Yes	N/A	N/A	No	Yes
B7-28	Liquid	Yes	6	Yes	N/A	N/A	No	No
B7-29	Liquid	Yes	6	No	N/A	N/A	No	No
B7-30		Yes	6	No	N/A	N/A	No	No
B7-31		Yes	5	No	N/A	N/A	No	No
B7-32	Liquid	Yes	4	No	N/A	N/A	No	No
B7-33	Liquid	Yes	6	No	N/A	N/A	No	No
B7-34		Yes	5	No	N/A	N/A	No	No
B7-35	Liquid	Yes	6	Yes	N/A	N/A	No	Yes
B7-36		Yes	10	No	No	No	No	Yes
B7-37		Yes	7	No	N/A	N/A	No	No
B7-38		Yes	4	No	N/A	N/A	No	No
B7-39		Yes	5	No	N/A	N/A	No	No
B7-40		No	4	N/A	N/A	N/A	No	Yes
B7-41	Liquid	No	5	N/A	N/A	N/A	No	No
B7-42		Yes	6	No	N/A	N/A	No	No
B7-43 Fire Retardent		No	4	No	N/A	N/A	No	No
B7-44 Glue		No	7	No	N/A	N/A	No	No

Attachment 4 – ARARs

<u>Subject</u>	<u>Statute</u>	<u>Applicability</u>	<u>Attain/Comply</u>
Managing waste with polychlorinated biphenyls (PCBs)	Toxic Substance Control Act	Applicable	Comply to the Extent Practicable
Quality Assurance	40 CFR 46	Applicable	Comply to the Extent Practicable



Attachment 2: Additional Site Photographs



Collapsed magazine.





Entrance of magazine with degraded dynamite stick in the foreground.



Entrance to magazine with degraded dynamite stick at base of wood post

Attachment 3 – ARARs

<u>Subject</u>	<u>Statute</u>	<u>Applicability</u>	<u>Attain/Comply</u>
Revegetation for erosion or runoff control post removal action.	Montana Mine Reclamation Regulations: ARM 17.24.703	Relevant and Appropriate	Comply to the Extent Practicable
Revegetation for erosion or runoff control post removal action.	Montana Mine Reclamation Regulations: ARM 17.24.714	Applicable	Comply to the Extent Practicable