

**Smurfit-Stone Mill Frenchtown Site - Response to Public
Comments on the**

**August 2021 Smurfit-Stone Frenchtown Mill Site Natural
Resource Draft Damage Assessment Plan**

**Prepared by the Smurfit-Stone Mill Frenchtown Site
Trustees**

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Comment Summary and Response

The State of Montana through the Natural Resource Damage Program (NRDP), on behalf of the Smurfit-Stone Mill Frenchtown Site Trustees published the draft Smurfit-Stone Frenchtown Mill Site Natural Resource Damage Assessment Plan (Assessment Plan) on September 26, 2021. A public comment period was held for the Assessment Plan in accordance with 43 CFR § 11.32 and § 75-10-713, MCA, from September 26, 2021, through November 26, 2021. In total, 36 individual comments were received. The majority of comments were from private citizens (25 comments). Comments were also received from Missoula City-County Health Department, Missoula Conservation District, Westslope Chapter of Trout Unlimited (TU), Montana TU, Bitterroot TU, the Frenchtown Smurfit Community Advisory Group (CAG), the Clark Fork Coalition (CFC), the Potentially Responsible Parties (PRPs) represented by Integral Consulting Inc. (Integral) and NewFields, Hellgate Hunters and Anglers, and the Missoula County Commissioners. A list of individual comments is included as Appendix A- List of Comments. The individual comments are included as Appendix B – Individual Comments.

In accordance with 43 CFR § 11.32 “Any comments concerning the Assessment Plan received from identified potentially responsible parties, other natural resource trustees, other affected Federal or State agencies or Indian tribes, and any other interested members of the public, together with responses to those comments, shall be included as part of the Report of Assessment, described in §11.90 of this part.” We encourage all interested parties to review these comments.

Comments on the Assessment Plan generally fall into two categories; comments in support of the Assessment approach as presented in the Assessment Plan, and comments not in support of the approach.

The Trustees appreciate the support of the Assessment Plan. The Trustees encourage any individuals, organizations or stakeholders who are not involved with the Smurfit-Stone Community Advisory Group (CAG) to become involved. The Smurfit-Stone CAG is a diverse representation of area residents, nearby landowners, and community interests. All CAG meetings are open to the public and any interested party is welcome to participate in the CAG. The purpose of the CAG is to provide a public forum for community members to present and discuss their needs and concerns related to activities at the Smurfit-Stone Site. For more information on the Smurfit CAG and to become involved please visit:

<https://www.facebook.com/FrenchtownCAG/>

On November 24, 2021, Integral and NewFields (Integral Consulting and NewFields, 2021) jointly submitted comments on behalf of the PRPs. They included two attachments: an Integral Consulting (2021) report on polychlorinated biphenyl (PCB) source evaluation, prepared for the PRPs (specifically, WestRock and International Paper) in June; and a NewFields technical memorandum to Allie Archer of the U.S. Environmental Protection Agency (EPA) on the adequacy of remedial investigation surface water and groundwater data.

In the following sections, the comments are shown in italics, with the response following each comment. The comments from the PRPs were not numbered. Many comments included multiple

bullets; the bullets and bullet levels are reproduced herein. We have added comment numbers so we can refer to earlier responses when addressing redundant comments. The references from Integral Consulting and NewFields (2021) have not been copied into this response to comments.

1. Responses to General Comments

The comments from Integral and NewFields include general comments in a cover letter, followed by comments labeled as, “technical comments.” This section provides responses to the general comments.

- *Comment 1 (p. 1): The NRDA Plan is premature and deficient. The Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) NRDA regulations are intended to provide a procedure for determining compensation for injuries to natural resources that “have not been nor are expected to be addressed by response actions conducted pursuant to the NCP” (43 Code of Federal Regulations [CFR] § 11.10). If conducted prior to the U.S. Environmental Protection Agency’s (EPA) record of decision for the Site, an NRDA cannot properly reflect the effects of any remedy.*

Natural resource damages incorporate past, present, and continuing future injuries to natural resources until the resources are restored to baseline, as well as injuries resulting from the remediation. While a final determination of damages may be premature when the Trustees do not know the remedy, nothing precludes the Trustees from assessing past and current hazardous substance releases and injuries while the remedial investigation (RI) and feasibility study (FS) are ongoing. In fact, it can be cost-effective to conduct an injury assessment when the RI is ongoing. Regulators can use the Trustees’ data to inform their remedial decisions, just as the Trustees use the RI data to inform the injury assessment.

- *Comment 2 (p. 1): Even if there are some situations where early assessment may be warranted, the remedial investigation (RI) for the Site is not sufficiently advanced to support the NRDA.*

The Trustees agree that the RI for the Site does not sufficiently support the NRDA. Therefore, additional studies are required. The EPA and the potentially responsible parties (PRPs) have not proposed work plans to address the ongoing data gaps identified by the Trustees. If such studies were to occur as part of the RI, and the Trustees were invited to participate in the design and oversight of the studies, they would reconsider conducting the studies proposed in the Assessment Plan.

- *Comment 3 (p. 1): In addition, the NRDA Plan was clearly developed prior to and without reasonable consideration of EPA’s final Site baseline ecological risk assessment (BERA) or baseline human health risk assessments (BHHRAs). A stated goal of the NRDA Plan is to increase efficiency by coordinating with the remedial investigation and feasibility study (RI/FS) process. Proposal of additional studies without full consideration of the RI nature and extent evaluations, or without consultation of the final risk*

assessment conclusions, and before a feasibility study has been performed, is contrary to this goal.

The RI/FS will not address the data gaps that the Trustees have proposed to address. The Trustees remain engaged with the PRPs and the cleanup agencies (EPA and Montana DEQ) in the RI process. If any of the data gaps identified in the Assessment Plan are addressed in future RI studies, and the EPA and the PRPs coordinate sufficiently with the Trustees to ensure that the studies will address the data gaps that the Trustees identified, the Trustees will not conduct a redundant study. Thus far, the Trustees have seen no indication that the data gaps identified in the Assessment Plan will be addressed in the RI/FS.

- *Comment 4 (p. 1): The NRDA Plan states that studies done to address exposure and injury determination should also be useful for injury quantification and damage determination. The latter requires identification of the natural resources services that may be impaired and selection of indicators of (metrics for) those services. Without specification of services and their metrics, it is not possible for Trustees or stakeholders to determine if the proposed studies are necessary or appropriate to support decision-making regarding any restoration that may be needed. The NRDA Plan is incomplete by failing to identify the impacted natural resource services (and associated metrics) and failing to specify how the proposed analyses and studies will inform potential service loss and restoration planning.*

In a NRDA, the Trustees follow the process outlined in 43 C.F.R. Part 11, which consists of three phases: injury determination, injury quantification, and then damage determination. This process is clearly outlined in the Assessment Plan. The Trustees must determine sequentially if a release of a hazardous substance has occurred, there is a pathway from the release site to Trustee natural resources, those resources have been exposed to the hazardous substances, and the exposure has caused injuries. After the Trustees determine that an injury has occurred, they then quantify the spatial and temporal extent of that injury (including a baseline service determination and resource recoverability analysis), the natural resource services that were lost, and the restoration and damages required to make the public whole. At this Site, the Trustees still need to address data gaps in releases, pathways, exposure, and injury. Specifying lost services and metrics for quantifying those services before these data gaps are addressed is premature.

2. Responses to Technical Comments

2.1 Comments on Source Pathways, Receptors, and Baseline Conditions

The NRDA Plan contains presumptive statements about the fate and transport of contaminants, linking the Site to the Clark Fork River. Source, pathway, and receptor evaluations are underway and will be reported in the Site RI. Therefore, the presumptive statements are premature, potentially misleading and inaccurate, and additional data collection as part of an NRDA Plan is not necessary at this stage.

- *The NRDA Plan is premature/unwarranted prior to completion of the RI/FS and finalization of the BERA and BHHRA.*

- *Comment 5 (p. 2): As shown in the RI Workplan, 10 subsequent workplan addenda, and numerous data summary and data analysis reports (USEPA 2021a), EPA has evaluated and addressed data gaps in the RI data set and approved these data for use in the RI. These data and analyses are in progress as part of the RI report. The Trustees' presentation of the sources and pathways in the NRDA Plan are premature and should instead incorporate the RI findings.*

The Trustees have reviewed and commented on the RI Work Plan and the addenda. To date, the existing data and work plans do not address the data gaps that the Trustees identified in the Assessment Plan.

- *Comment 6 (p. 2): As provided in 43 CFR § 11.13(e)(1), injury determination includes determining the pathway, or route, through which the hazardous substances were transported from sources to the injured resource. This assessment is currently being evaluated as part of the RI/FS process.*

The Trustees intend to use all available data from the RI. To date, the existing data and work plans do not address the data gaps that the Trustees identified in the Assessment Plan.

- *Comment 7 (p. 2): The NRDA Plan does not include consideration of the sources, pathways, and receptors presented by EPA in the final BERA or draft BHHRA nor the risk assessment conclusions. The NRDA Plan presents or proposes to perform separate, duplicative analyses, which is in opposition to NRDA regulations to avoid duplication and reduce costs as stated in 43 CFR § 11.31(a)(3). For instance, hazardous substances, as defined by the Trustees in Table 3.1, misrepresents the current understanding of chemicals of potential concern (COPCs) at the Site. EPA's final BERA (USEPA 2021b), the previous draft BERA (USEPA 2020a), nor the draft BHHRA (USEPA 2020b,c) were consulted/cited in the creation of this table.*

The Trustees disagree that the proposed studies are duplicative. The Trustees have reviewed all RI documents and provided comments on work plans in an attempt to have the Trustees' identified data gaps addressed in the RI. The Trustees have also coordinated the proposed Assessment Plan with the RI/FS and other investigations, per 43 CFR § 11.31(a)(3). If the Trustees receive data originating from the RI process that are otherwise proposed to be collected in the Assessment Plan, and these data were collected using the methods specified in the Plan, the Trustees will re-evaluate the need for the study.

The goals of a risk assessment and a NRDA are different, and the questions that the cleanup Agencies need to answer when determining a remedy are often different than the questions Trustees need to answer to address natural resource damage liability. It is common for Trustees to conduct additional studies beyond the RI process.

Table 3.1 of the Assessment Plan provides a list of hazardous substances detected at the Site. It is not a list of COPCs from the risk assessment. It cites several documents that were published before the BERA, including the Screening Level Ecological Risk Assessment (SLERA) and the OUI Human Health Risk Assessment (HHRA). The Trustees did not consult or cite the final

BERA because it was released two months after the publication of the draft Assessment Plan. However, the Trustees reviewed and commented on the draft BERA. The conclusions of the final BERA are substantially the same as the draft.

- *Comment 8 (pp. 2–3): Surface water data collected show that: 1) the quality of the Clark Fork River is not degraded (as defined by State law) by the Site, and 2) the quality of the Clark Fork River meets all beneficial uses above, adjacent, and downstream of the Site (NewFields 2021a).*

Surface water data are from grab samples that do not provide the detection limits or time integration that can be achieved with passive sampling devices. The Trustees have determined that the grab sample data are not definitive for the assessment of compounds such as coplanar PCBs and dioxins.

- *Comment 9 (p. 3): EPA stated in the draft BHHRA: “Exposure to sediments and surface waters of on-Site creeks or the CFR [Clark Fork River] appear to be influenced significantly by either naturally occurring concentrations or other anthropogenic sources as evidenced by statistical tests that found concentration distributions between Site and upstream samples to be equivalent” (USEPA 2020c, p. 61).*

The Trustees reviewed and commented on the draft BHHRA. The Trustees believe that existing data gaps need be addressed before such conclusions can be made. It is possible that the Trustees will reach a similar conclusion after addressing the data gaps. The proposed NRDA studies do not presuppose an outcome.

- *The NRDA Plan does not acknowledge all data or Site information collected to date.*
 - *Comment 10 (p. 3): Numerous shallow and deep monitoring wells are located downgradient of the former wastewater system and along the length of the Clark Fork River boundary (NewFields 2021a,b). Monitoring results show that dioxins, arsenic, manganese, and iron are the primary COPCs in shallow groundwater. Polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and other metals are not present in shallow groundwater onsite at concentrations above risk-based standards or background levels (NewFields 2021b; USEPA 2020a,b,c). Despite the presence of certain COPCs in shallow groundwater, only manganese has been observed in the CFR at concentrations above a secondary maximum contaminant level (SMCL). SMCLs are not enforceable and are used to provide guidance for aesthetic reasons (i.e., taste and color). Manganese has been observed elsewhere upgradient and downgradient from the mill at levels above the SMCL (NewFields 2020; Brumbaugh et al. 1994).*

The Trustees analyzed the available data from the EPA SCRIBE database and presented the data in the Assessment Plan. Concentrations of dioxins exceed state water quality standards in shallow groundwater, using grab sampling. The Trustees have proposed sampling groundwater using passive sampling devices, which are designed to provide a time-integrated sample with lower detection limits. These data should be collected and analyzed before concluding that

coplanar PCBs and dioxins are not being released to the Clark Fork River at concentrations sufficient to cause injury.

- *Comment 11 (p. 3): The Trustees' pathway assessment is incomplete and does not include consideration for the Site's distinctive physical features. For example, the NRDA Plan states, "In addition, hazardous substances in ponds, the industrial area, landfill areas, the land farm area, and contaminated soils may be transported to the Clark Fork River and nearby creeks by surface runoff during spring snowmelt, seasonal precipitation, and storm events." Misleading statements like this imply that surface water simply transfers COPCs into the Clark Fork River with no consideration of the impact from the Site's distinctive physical features such as berms, settling ponds, or other Site features, which collectively make overland transport an incomplete or insignificant potential pathway. Furthermore, the treated water stored in the holding ponds adjacent to the Clark Fork River met all Montana Pollution Discharge Elimination System (MPDES) criteria for discharge to the Clark Fork River during prescribed times of year (SSC 2010).*

The comment quotes a section from the Assessment Plan that concludes, "the extent of downstream transport and exposure is not yet known." The Trustees are aware that the floodplain is a former water treatment system with berms and settling ponds, and that existing data may not confirm a pathway to the Clark Fork River. The Trustees disagree that the existing floodplain pathway data are conclusive and therefore no additional data should be collected.

The MPDES permit criteria included color and temperature. The permit did not require the monitoring of dioxins/furans or coplanar PCBs. When EPA and the paper industry conducted their study of 104 kraft paper mills in the late 1980s (U.S. EPA, 1990), they detected 2,3,7,8-tetrachlorodibenzo-*p*-dioxin (TCDD) in the Frenchtown Mill effluent. This study indicates that it is certainly possible, and even likely, that dioxins/furans and/or coplanar PCBs will be found at this site.

- *The analyses presented in the NRDA Plan misinterpret the data and mischaracterize the Site habitat and features.*
 - *Comment 12 (pp. 3–4): The Trustees' potential identified pathways (Figure 5.1 and associated text) appear to ignore and are inconsistent with the findings of the comprehensive BERA process that has already taken place, and do not match EPA's final BERAs for OUI (USEPA 2017) or OU2 and OU3 (USEPA 2021b) (e.g., compare to Figures 2.7A and 2.7B in the OU2/3 BERA and Figure 2-4 in the OUI BERA). As an example, the Trustees suggest groundwater as a potential pathway while final BERAs indicate a lack of any complete groundwater pathways at the Site.*

The Trustees reviewed and commented on the pathways analyses in the BERA and disagree with some of the conclusions. None of the groundwater data from the Site were collected using passive or high-volume sampling. The grab samples are not sufficient to characterize the potential transport of hydrophobic compounds such as dioxins and coplanar PCBs. Despite the limitations, dioxins have been detected above water quality standards in numerous groundwater

samples in the floodplain, suggesting that a complete groundwater pathway to the Clark Fork River may exist.

- *Comment 13 (p. 4): Statements such as “The highest concentrations of both arsenic and manganese are downgradient of the primary and secondary water treatment ponds (NewFields 2017), suggesting that the Site wastewater stream is the source of the contamination” are misleading, given that no Site wastewater stream has been generated or discharged for more than 10 years. When used out of context, this statement grossly oversimplifies the source, transport and fate of arsenic and manganese at the Site. The source, transport, and fate of these COPCs are detailed in NewFields (2020).*

The Assessment Plan did not make definitive statements about sources and pathways. The Trustees merely summarized existing information about the location of elevated arsenic and manganese concentrations, consistent with NewFields (2020, p. 25): “Groundwater with arsenic concentrations elevated above background is predominantly confined to Unit 1 groundwater underlying the west-central portion of OU2 near NFMW15 and NFMW16 and downgradient of the primary and secondary treatment ponds.” Arsenic concentrations are not above background upgradient of the treatment ponds and are above background downgradient of the treatment ponds. The Trustees do not agree that it is misleading to suggest that the arsenic may have come from the treatment ponds.

- *Comment 14 (p. 4): Fish tissues are not appropriate for forensic analyses because fish: 1) take up different congeners into their tissues at different rates, and 2) metabolize congeners at different rates. Rates of uptake vary among individual dioxins and furans and dioxin-like PCB congeners by both vertebrates and invertebrates. These rates are controlled to a large extent by the size of the molecule, whereby smaller, lower-chlorinated congeners are taken up more readily across gill and gut membranes that are the larger, more chlorinated congeners (Opperhuizen and Sijm 1990). Dioxins and furans and dioxin-like PCBs can also be metabolized and excreted, and this also occurs at different rates for different congeners (Hu and Bunce 1999; Nichols et al. 1998). Elimination rates of tetrachlorinated congeners are lower than those of more chlorinated congeners (e.g., Niimi 1996). Finally, dioxins and furans do not biomagnify, unlike PCBs (Naito et al. 2003; Wan et al. 2005; Broman et al. 1992). These factors taken together make fish tissue a poor medium for source valuation of dioxins and furans and other dioxin-like PCBs. Therefore, any analysis based on congener profiles in fish tissue may not match the congener profile to which they were exposed.*

The Trustees are aware of both the utility and limitations of congener analyses in fish tissues. As noted in the Assessment Plan, the Trustees are evaluating multiple lines of evidence to determine potential sources, pathways, and injuries from coplanar PCB and dioxin/furan releases into the Clark Fork River. The Trustees also note that in some cases sources and pathways can be confirmed through observed differences in congener patterns, when these differences align with expected congener-specific differences in uptake, metabolism, excretion, and other factors described in the comment.

- *Comment 15 (p. 4): The NRDA Plan improperly suggests that data for chemicals in fish tissue from the Noxon Reservoir indicate exposure from Site-related chemicals, while failing to acknowledge the uncertainties associated with interpreting congener profiles in fish tissue. As previously mentioned, fish tissue data are not appropriate for forensic analysis. The NRDA Plan additionally fails to establish a pathway from the Site to the Noxon Reservoir or to any locations in the Clark Fork River downstream of the Site. Conclusions presented in the NRDA Plan using congener profiles in fish tissues to establish a connection to the Site are not supportable.*

The Trustees did not present conclusions about the Site as a source of coplanar PCBs and/or dioxins/furans. If the Trustees had sufficient data to reach these conclusions, additional studies would not be included in the Assessment Plan. The data presented in the Assessment Plan simply provide a context for why the Trustees determined that additional assessment work is required. In addition, as noted in the previous comment, the Trustees disagree with statements that imply that fish tissue congener data are categorically not useful.

- *Comment 16 (pp. 4–5): The NRDA Plan attempts to establish a gradient of tissue concentrations of dioxins and furans and PCBs that are higher downstream of the Site than upstream. This is not technically defensible for the following reasons:*
 - *First, there is no meaningful analysis presented that demonstrated concentration levels are statistically different between sample areas.*
 - *Second, Abt uses data on chemical concentrations in fish tissues sampled from populations of fish species with substantial home ranges. With this information, it cannot be concluded that fish with elevated tissue concentrations collected at a given location represent solely the concentration at the collection point. The movement of fish and their integration of exposure as they migrate confound interpretations of chemical spatial gradients and undermines this method for establishing the Site as a source.*
 - *Third, confounding factors such as differences in rates of uptake, metabolism, and depuration of chemicals by fish are not considered. Lastly, chemical bioaccumulation rates within fish are highly influenced by fish age, size, species, food web, home range, and dietary sources of contaminants. Integral Consulting Inc. (Integral) evaluated spatial patterns of PCBs in the rainbow trout tissue data generated by EPA’s Team in 2018 and 2019.1 Spatial patterns of PCBs in rainbow trout show that total PCB concentrations in both fillet and carcass tissue are higher in Missoula, Council Grove, Frenchtown, and St. Regis than in the locations upstream of Missoula (Clinton and Greenough), and in locations upstream of the confluence of the Bitterroot River and Clark Fork River (Florence). The highest concentration of PCBs in rainbow trout fillet tissue was in 2018 at Council Grove (Integral 2021). However, many of the PCB concentrations in upstream samples are above fish consumption advisory (FCA) thresholds, indicating that other sources exist and that there is no incremental effect of the Site on indicators of injury. Integral’s “Potential Sources of PCBs in Clark Fork River Fish” report*

(Integral 2021) provides additional analyses and discussion of potential spatial trends in fish tissue PCB concentrations.

The comment notes that the Trustees should not draw conclusions about sources of contaminants from the existing fish data, because the fish sampled have substantial home ranges. The Trustees agree that the existing data are inconclusive, for multiple reasons. The commenter also concludes that other contaminant sources exist and that there is no incremental effect from the Site. The Trustees disagree and as noted, have determined that the existing data are insufficient to draw such a conclusion. Additional data are required, which the Trustees have proposed to collect in this Assessment Plan.

- *Comment 17 (p. 5): The NRDA Plan states: "...the 2019 data generally show an increasing trend in TEQ concentrations, including higher dioxins/furans and higher dioxin-like PCBs in trout from St. Regis downstream of the Site [see Figure 4.10]."* A similar statement appears on page 69: "fish tissue data suggest an increase in both dioxins/furans and coplanar PCBs downstream of the Site, near St. Regis." Discerning trends from individual congeners that have been summed based on a toxicity equivalency are fraught with interpretational challenges and are misleading. Furthermore, evaluation of fish tissue impacts by toxicity equivalence for dioxins and furans (TEQD/F) concentrations was considered in the BHHRA and hazards were found to be less than the EPA threshold of 1 for both the recreational and tribal fisher receptors. Specifically, the report indicates: "As was observed for the recreational fisher, non-cancer hazards from ingesting TEQ in fish tissues are not above the USEPA guidelines ($HQ \leq 1E+100$) when based only on dioxin/furan congeners" (USEPA 2020b).

The Trustees agree that the interpretation of the existing data is challenging. Therefore, the Trustees have proposed collecting additional data to try to understand why the concentrations of PCBs and dioxins increase downstream of the Site.

The Trustees reviewed and commented on the draft BHHRA. The risk to a recreational fisher is not relevant to the observation that dioxin/furan toxic equivalency (TEQ) concentrations increase downstream of the Site.

- *Comment 18 (pp. 5–6): The NRDA Plan contains inaccurate and contradictory descriptions of Site pond habitats and characteristics. For example, the NRDA Plan defines surface water as "the waters of the United States, including the sediments suspended in water or lying on the bank, bed, or shoreline... This term does not include ground water or water or sediments in ponds, lakes, or reservoirs designed for waste treatment" [43 CFR § 11.14 (pp)]. The NRDA Plan further asserts: "Hundreds of acres of holding ponds in the OU3 floodplain received Site water after the point of compliance for wastewater treatment. Water and sediments in these OU3 holding ponds meet the definition of surface water resources." However, no justification is given as to why some ponds should be considered surface water while other ponds should not. In fact, the EPA screening level ecological risk assessment (SLERA) does define OU3 uplands as wastewater treatment ponds (USEPA 2017). Without clear delineation on which ponds meet the definition of wastewater treatment, these statements are misleading.*

The Trustees are evaluating trusteeship of surface water resources in OU2 and OU3 and any appropriate changes to the definition of surface water will be made in the Plan, however, any biota exposed to hazardous substances in the ponds are Trustee resources regardless of whether the treatment system was operational. Similarly, the ponds may have been a pathway for contamination to the groundwater and need to be described in the Assessment Plan for this reason.

- *Comment 19 (p. 6): The Trustees refer to several Site ponds as seasonal wetlands; however, EPA has not identified any jurisdictional wetlands onsite. The BERA does state: “Ponds containing water for most or all of the year currently are occupied by early successional stage wetland plant communities, including algae, and some floating and some emergent aquatic plants. Ponds are used by a variety of ducks, geese, and other waterfowl (e.g., grebes). They may also seasonally attract wading birds and shorebirds, amphibians, and reptiles” (USEPA 2021b). However, these ponds are manmade and have generally low quality habitats with low benthic macroinvertebrate populations and limited vegetation and, therefore, low service value.*

The description of the ponds as seasonal wetlands is consistent with the quote from the BERA cited in the comment. The Assessment Plan contains no discussion of habitat quality or services. If the Trustees find hazardous substance exposure and injuries to natural resources in the ponds, they will determine the habitat quality and lost services after the assessment planning phase, which is consistent with the CERCLA Natural Resource Damage Assessment and Restoration regulations at 43 CFR Part 11.

- *The NRDA Plan cites data that do not meet EPA’s approved data quality objectives.*
 - *Comment 20 (p. 6): The Trustees acknowledge that the URS (2012) groundwater data were rejected by EPA (because the data did not meet data quality objectives as outlined in the EPA-approved quality assurance project plan [QAPP]); however, the Trustees later go on to cite findings from this report including elevated arsenic and manganese concentrations (that were discounted and excluded from the RI data set). In contrast, the Trustees do not cite the extensive RI data set that did comply with EPA data quality objectives.*

The assertion that the Trustees do not cite the extensive RI data set is false. The Assessment Plan extensively cites RI data and refers to the use of the data set in the EPA’s Scribe database in multiple locations. The vast majority of the data that are presented and cited in the Assessment Plan are data from the Scribe database that were collected after URS (2012).

The Trustees are aware of the data quality issues in URS (2012). However, subsequent RI studies did not collect new data at all of the locations where URS collected data, and some of these URS data identified potential contamination issues. The Trustees acknowledge that the URS data are less reliable than subsequent RI data, but they do not agree that all URS (2012) data should be ignored, particularly when those data identify potential contamination issues that were not subsequently confirmed or refuted with follow-up studies.

The NRDA Plan does not sufficiently discuss assessment of baseline and the available data already collected within the region for interpreting baseline conditions.

- *Comment 21 (p. 6): The definition of baseline is narrowly defined as non-chemical stressors. This is an incomplete definition and is not reflective of the CERCLA regulations, which include consideration of other natural and anthropogenic sources of chemicals within the region.*

Section 5.4.2 of the Assessment Plan provides the definition of baseline from the CERCLA NRDAR regulations and presents in detail the guidance for determining baseline conditions. However, in reviewing the comment, the Trustees noted that the entire definition of “baseline” was not included in the Assessment Plan, because “under investigation” was not included in the quotation. The full definition of “baseline” has been included in the Assessment Plan. Baseline is not defined as non-chemical stressors in the Assessment Plan. The Assessment Plan refers to conditions absent the releases of hazardous substances. Consistent with all damage assessments conducted pursuant to the CERCLA NRDAR regulations, this means absent the releases of hazardous substances from this Site, not the absence of hazardous substances globally. Having worked on the assessment of hazardous substances in the upper Clark Fork River basin for over 30 years, the Trustees are aware of the existence of other sources of hazardous substances.

- *EPA has identified appropriate baseline conditions for the RI; there is no discussion of these data in the NRDA Plan.*
 - *Comment 22 (pp. 6–7): The NRDA Plan relies heavily upon general references documenting conditions in the region and broader Site vicinity, implying the mill is responsible for those conditions, without Site-specific evidence. However, the mill complied with emission requirements pursuant to a Title V operating permit throughout its operating history. Also, EPA made conclusions to the contrary, for example, EPA’s “Smurfit Stone Mill Site Air Deposition Fact Sheet” (USEPA 2021c) states: “EPA has concluded that the potential impacts to the surrounding environment from past emission from the Mill are very low for the following reasons:” 1) extensive sampling in 2015 along the prevailing wind pathways from the boiler stacks indicated that “No pollutants were detected at concentrations of concern to human health”; 2) permitted burning of primary sludge materials was concluded by Montana Department of Environmental Quality to not result in adverse impacts to human health (MDEQ 1995); 3) boiler emissions comply with proposed standards for dioxin emission; and 4) dioxin and furans in soils surrounding Missoula are typical of rural areas elsewhere in the U.S. and well below other urban areas.*

The Trustees do not dispute the air deposition conclusions from EPA, which focused on whether past emissions posed a risk to human health. The Assessment Plan focuses on the assessment of waterborne pathways to natural resources.

- *Comment 23 (p. 7): Numerous sources of dioxins/furans, coplanar PCBs, and other contaminants have contributed to concentrations of these constituents in the Clark Fork River and elsewhere in the Site vicinity, which are evident in the background data set EPA compiled to support the draft BERA and BHHRA. For example, all 11 chemicals of potential ecological concern (COPECs) in sediment of the Clark Fork River were statistically similar to or less than concentrations upstream of the Site. Comparisons of creek sediments, surface (Clark Fork River*

and creeks) and OU2/OU3 soils also determined that Site COPEC concentrations were equal to or less than background for some constituents detected at the Site (USEPA 2020a). In EPA's final BERA (USEPA 2021b), comparison of Site samples to representative background data were removed but delayed to the RI. In the BERA response to comments (USEPA 2021d), EPA states: "Although conducting a comparison to background concentrations was included in the BERA Work Plan as part of the COPEC refinement (EPA 2018), upon further consideration of existing guidance it was determined that comparisons with background levels should not be used to remove contaminants of concern from further evaluation owing to the need to fully characterize site risks (EPA 2001). . . Comparisons of site concentrations to background concentrations should still be considered within the RI outside of the risk assessment to provide risk managers to better characterize the results presented in the risk assessment." Baseline anthropogenic conditions within the region must also be considered.

The comment cites the final BERA and responses to comments, which were published after the Assessment Plan. The comment appears to state that EPA requires further evaluation of COPECs that may have been released at the Site, even if the existing data do not show concentrations substantially higher than background. This would suggest that EPA recognizes that existing data may not adequately characterize the potential releases of these hazardous substances. The Trustees acknowledge that there are other potential sources of hazardous substances, including dioxins and furans, to the Clark Fork River. However, existing data are not sufficient to conclude that this Site did not in the past and does not currently release hazardous substances to the River. The concept of "background" also needs to be carefully evaluated to ensure that background locations are appropriately identified and that releases from the Site did not impact areas that are being identified as background.

- *Comment 24 (p. 7): The findings of the source and pathway analyses are at odds with EPA's conclusions from the draft risk assessments, concluding that concentrations of relevant chemicals of concern at the Site and in the Clark Fork River are similar to those upstream of the Site and exposures to most chemicals appear to be natural background or anthropogenic sources unrelated to the Site. EPA stated: "Exposure to sediments and surface waters of on-Site creeks or the CFR [Clark Fork River] appear to be influenced significantly by either naturally occurring concentrations or other anthropogenic sources as evidenced by statistical tests that found concentration distributions between Site and upstream samples to be equivalent" (USEPA 2020c, p. 61).*

The Trustees have determined that existing data based on grab samples are insufficient to draw conclusions about the sources and pathways of the relevant chemicals of concern. The Trustees believe that data need to be collected using methods designed to capture hazardous substances such as coplanar PCBs and dioxins/furans before definitive conclusions can be made. The upstream sample locations also need to be evaluated further to determine that they were not impacted by the Site aerial emissions.

- *FCAs are discussed as the basis for injury, yet there is no discussion or acknowledgment of the baseline conditions. The FCA begins well upstream of the Site at the confluence of the Blackfoot River and Clark Fork River upstream of the city of Missoula.*
 - *Comment 25 (pp. 7–8): The Trustees do not discuss the baseline FCAs for the fish species they review. For example, they state that Northern Pike has a “do not eat” advisory, but fail to acknowledge that statewide there is a general advisory to “do not eat” Northern Pike over 28 inches and to eat only one meal per week for Northern Pike less than 20 inches (MFWP et al. 2021).*

In 2013, MFWP (a representative of the Montana Governor, a Trustee) determined that rainbow trout and northern pike in the vicinity of the Site had elevated concentrations of coplanar PCBs and dioxins, and they subsequently issued the FCAs based on these data. The same researchers helped to identify existing data gaps and design the proposed studies in the Assessment Plan.

The Trustees are aware that there are other potential sources of hazardous substances in the Clark Fork River, and that existing data are not sufficient to conclude whether this Site is a source of coplanar PCBs and/or dioxins found in northern pike and rainbow trout. The fact that there are FCAs for northern pike in other parts of the state does not explain why PCBs and dioxins are higher in fish collected near this Site.

2.2 Comments on “Injury Quantification”

The NRDA Plan suggests damage determination methods that are not appropriate and should not be considered further.

- *Comment 26 (p. 8): The NRDA Plan suggests that a valuation approach could be used, but does not specify that values would also be developed for restoration projects. The implied approach is to quantify injuries as a dollar loss using economic valuation methods, and then this amount would be spent on restoration. This generally leads to a biased estimate of NRDs. The value-to-cost methodology should be dropped unless a full analysis shows that service-to-service methods are not applicable, and valuation of restoration benefits is not feasible or cost-prohibitive.*

The Assessment Plan presents multiple approaches to damage determination, including service-to-service and resource-to-resource methods. Because damage assessment is sequential, the Trustees need to address the data gaps in sources, pathways, exposure, and injuries before reaching a conclusion about which method is most appropriate for determining damages.

- *Comment 27 (p. 8): The NRDA Plan states that contingent valuation can be appropriate for ecological services. The use of stated preference methods such as contingent valuation (mentioned in the NRDA Plan) has been demonstrated to be unreliable, especially when applied to non-use services of natural resources (McFadden and Train 2017). This method should be dropped from further consideration.*

Contingent valuation is a valid method of calculating damages [43 CFR § 11.83]. The Trustees are unlikely to rely on this method, but they need not preclude it. The Trustees will meet the

following criteria when choosing among the cost estimating and valuation methodologies and will document the determination in the Report of the Assessment. The selected methodologies will: (i) be feasible and reliable for a particular incident and type of damage to be measured; (ii) be performed at a reasonable cost, as that term is used in this part; (iii) avoid double counting or allow any double counting to be estimated and eliminated in the final damage calculation; and (iv) cost-effective, as that term is used in this part. 43 CFR § 11.83.

- *Comment 28 (p. 8): Exceedances of thresholds are not adequate metrics for establishing service loss in a habitat equivalency analysis (HEA). Habitats, specifically the services provided by habitats, are assessed in an HEA and individual receptor-based assessment, such as exceedances to thresholds, do not directly translate to service loss for the entire habitat and ignore all of the other services provided by the habitat (e.g., wetland habitats and services such as flood protection and water retention).*

The Trustees have used HEAs in many cases and are familiar with the method. If the Trustees select this method for damage determination, they will explain in detail what the service metric is and why it is an appropriate metric for service losses and gains.

- *Comment 29 (p. 8): The NRDA Plan suggests that a resource equivalency analysis (REA) may be used to address potential injury to groundwater. An REA assumes that all services move in proportion to the amount of the groundwater resource (e.g., volume or recharge rates or flux). This is not an appropriate assumption as groundwater services depend to a large degree on location relative to potential users (human and biological). Therefore, REA should not be used to address groundwater issues without adjustments for service provision.*

REAs have been used for groundwater on many other NRDA. The goal is to restore groundwater to baseline groundwater quality. includes equivalent services.

The NRDA Plan concludes that a “simplified assessment” is not appropriate for the Site because levels of contamination are high. This is a premature and inappropriate conclusion.

- *Comment 30 (p. 8): The need for NRDA studies as well as their design should be assessed considering their ability to increase the accuracy of the assessment and their cost. This is specified in the NRD regulations promulgated pursuant to CERCLA. This determination cannot be made at this time; it requires an evaluation of the ability of the study to inform restoration decisions, which has not been included in the NRDA Plan.*

The “simplified assessment” refers to a Type A assessment in the NRDA regulations [43 CFR § 11.33]. For multiple reasons described in Section 1.3 of the Assessment Plan, this Site is not appropriate for a Type A assessment.

- *Comment 31 (p. 9): The CERCLA NRD regulations define an assessment cost as “reasonable” when “the anticipated...benefits in terms of the precision or accuracy of estimates obtained by using a more costly...methodology are greater than the anticipated increment of extra costs of that methodology” (43 CFR §11.14(ee)). When proposing NRDA studies, the NRDA Plan makes no*

demonstration that incremental costs (above using already-available information) are reasonable according to this definition. The required analysis would need to show that proposed studies will lead to expected improvements in restoration decisions sufficient to justify study costs.

The existing data from the Site were not collected using methods that adequately characterize the potential sources of hazardous substances, pathways to natural resources, and natural resource exposure and injuries. The Trustees have shown in the Assessment Plan that dioxin/furan concentrations increase in biological resources downstream of the Site. Kraft mills that bleached their product are a known source of dioxins/furans. Analytical methods for detecting dioxins in grab samples lack the sensitivity necessary for detecting dioxin concentrations at levels sufficient to cause environmental injury. The assessment studies are designed to answer questions about past and ongoing releases of dioxins/furans from this Site, as well as potential biomagnification in high, trophic-level species. The existing data do not allow the Trustees to adequately determine and quantify natural resource and service injuries. Therefore, additional data collection is required to conduct the injury assessment.

- *Comment 32 (p. 9): The Trustees cannot make fair and informed decisions about the need for and design of potential NRDA studies without an assessment of the efficacy of existing and planned information (such as the BERA and other RI studies) for determining service losses, and without a preliminary estimate of the costs of potential restoration actions to address service loss.*

The Trustees recognize that 43 CFR § 11.38 provides, “Where possible, the authorized official should make the preliminary estimate of damages before the completion of the Assessment Plan as provided for in §11.31 of this part. If there is not sufficient existing data to make the preliminary estimate of damages at the same time as the assessment planning phase, this analysis may be completed later, at the end of the Injury Determination phase of the assessment, at the time of the Assessment Plan review.” The Trustees have reviewed and presented existing data from the BERA and other RI studies in the Assessment Plan. The existing data are not sufficient for a preliminary estimate of damages nor an injury assessment. The Trustees cannot make informed decisions about the injury assessment, service losses, or the cost of restoration to address service losses without first addressing the identified data gaps. This analysis of the preliminary estimate of damages will be completed by the end of the injury determination phase, if not sooner.

2.3 Comments on Proposed Data Collection

The NRDA Plan proposes several additional data collection efforts that are unsupported.

- *Comment 33 (p. 9): It is impossible to understand the value of additional data collection without a full assessment of data collected to date at the Site. Additionally, the RI data set has been deemed complete by EPA for the purpose of nature and extent and risk assessment.*
 - *EPA reports in the final BERA response to comments that sufficient data have been collected to evaluate any potential risks to human health or the ecosystem from the Site. EPA did not require or recommend additional*

sampling to address uncertainty discussed in the risk assessments (USEPA 2021d).

See response to Comment 10. The goals of the RI and the BERA are different than the goals of NRDA. The Trustees have a responsibility to assess whether or not releases of hazardous substances have occurred at concentrations sufficient to cause injuries. The Trustees do not agree with the conclusion that no additional data are necessary.

- *Comment 34 (p. 9): Additional data collection within the Clark Fork River for surface water or sediments is not warranted for evaluating impairment.*

The Trustees must evaluate both past and current releases and injuries. Dioxin/furan and coplanar PCB concentrations are higher in organisms downstream of this Site, and kraft pulp mills that bleached are known sources of dioxins. The Trustees have a responsibility to assess whether or not releases of hazardous substances have occurred at concentrations sufficient to cause injuries.

- *Comment 35 (p. 9): The NRDA Plan proposes additional data collection without fully defining metrics for evaluating service losses/gains and furthermore does not and cannot perform a proper data gaps assessment from which to develop additional sampling plans for those metrics.*
 - *Additional data collection at this phase is premature given injury assessment metrics have yet to be defined. It is impossible to know that the Site data collected to date are insufficient for injury assessment without first understanding the metrics and furthermore the relationship of those metrics to services.*

See response to Comment 4.

- *Comment 36 (pp. 9–10): Collection of additional data to support source and pathway analyses is premature given that this NRDA Plan has been developed prior to completion of the RI report. Data have been collected and analyzed for the RI, but in some cases have not yet been reported. For example, the Plan states: “While the data from the fish tissue studies confirm exposure of downstream biological resources to elevated dioxins/furans and coplanar PCBs, they may not be sufficient to determine the source of these contaminants. Trustees propose addressing some of these potential data gaps.” Detection of PCBs does not confirm exposure is Site-related (Integral 2021). It is also unclear how additional sampling downstream of the Site will address source of COPCs and resolve these data gaps.*

The Assessment Plan notes that fish downstream of the Site have been exposed to these hazardous substances. It does not state that the Site is the source. Additional data are needed before a source can be confirmed.

The Trustees regularly evaluate new data uploaded to the Scribe database. In the unlikely event that previously unreported data address the data gaps that the Trustees have identified, the Trustees would change their sampling plans.

- *Comment 37 (p. 10): It is not possible to understand the value of additional data collection without also understanding potential restoration opportunities and costs. The need for potential data collection to refine injury determination may be completely offset by identifying effective and efficient restoration opportunities.*

This comment assumes that the Trustees can scale restoration opportunities without knowing the extent of injuries. To identify and scale restoration opportunities without collecting additional data, the Trustees would need to assume that the Site is a source of dioxins/furans in the Clark Fork River.

- *Comment 38 (p. 10): The NRDA Plan for collecting additional data will not achieve the stated objectives.*
 - *For instance, additional fish tissue data collection as described would not achieve the stated goal of identifying fish contaminant sources.*
 - *As previously discussed, fish tissue data are inappropriate for forensic analysis due to differences in congener uptake and depuration rates, as well as confounding factors such as species, age, size of fish, and home range.*
 - *The identification of NRD injury has not established potential migration pathways from the Site to natural resources that would result in an observed injury.*
 - *The rationale for collection of depositional sediment data is unsupported. It would be inappropriate to use sediment depositional data in non-depositional areas as representative of potential exposure for the purpose of injury quantification, particularly in an HEA framework. Furthermore, the decision to collect sediment cores is based on fish tissue data, which as previously discussed are a poor indicator of localized concentrations. It is unclear how depositional sediment data will be used in the injury quantification.*

The first three bullets were noted and addressed in previous comments. The final bullet regarding sediment core data addresses hypotheticals that are not in the Assessment Plan. The Trustees did not design this study because of fish tissue data, and they do not intend to use the data in a HEA model with a spatial interpolation into non-depositional areas.

- *Comment 39 (p. 10): The proposed sampling does not consider the following:*
 - *The proposed fish sampling locations do not account for potential sources to the Clark Fork River downgradient from the Site, for example, the Flathead River, which joins with the Clark Fork River between two proposed sample locations.*
 - *The NRDA Plan includes no consideration of ecological characteristics of selected species. Fish home range, population dynamics, and other*

features can have significant impacts on reliability of using fish tissue as an indicator of a specific area's concentration.

The Trustees are aware of the Flathead River confluence, fish home ranges, and other variables that will need to be addressed as part of the injury assessment, if the additional data show that fish downstream of the Site are exposed to elevated levels of PCBs and dioxins/furans.

- *Comment 40 (pp. 10–11): The proposal for collecting additional groundwater data is not supported.*
 - *Previous groundwater and Clark Fork River investigations have sufficiently evaluated the potential extent of COPCs present in groundwater discharge to the Clark Fork River.*
 - *Extensive monitoring results show that dioxins, arsenic, manganese, and iron are the primary COPCs in shallow groundwater. PCBs, VOCs, SVOCs, and other metals are not present in shallow groundwater onsite at concentrations above risk-based standards or background levels (NewFields 2021b; USEPA 2020a,b,c). Despite the presence of certain COPCs in shallow groundwater, only manganese has been observed in the Clark Fork River at concentrations above an SMCL, which is an aesthetic guideline.*

See response to Comment 10.

There is no evidence for potential injury to groundwater (as a resource) or Osprey at the Site; therefore, further investigations for the purposes of injury assessment are unsupported.

- *Comment 41 (p. 11): Extractive services of downgradient groundwater do not appear to be impaired. Ecological services of groundwater are included in other sections of the NRDA Plan. Groundwater as a resource should be dropped from the assessment.*
 - *Groundwater services include extractive services when groundwater is used for irrigation, industrial, or other uses now or in the future, and ecological services when groundwater services as a pathway by which contaminants reach other receptors.*
 - *The Trustees are addressing potential loss of ecological services of groundwater based on evaluations of habitats, biota, and human use. Therefore, a separate groundwater assessment would be duplicative.*
 - *The NRDA Plan states that a method such as an REA could be used to conduct an additional assessment for groundwater. This could lead to a double recovery of damages associated with ecological services.*
 - *There is no evidence of potential loss of extractive uses of groundwater at the Site.*

As noted in the response to Comment 10, existing data show that concentrations of dioxins in groundwater have exceeded state water quality standards. This is evidence of injury.

The goals of groundwater sampling using passive samplers are both to establish whether groundwater is a transport pathway linking dioxins on the Site to the Clark Fork River, and to determine whether groundwater as a standalone resource has been injured. Groundwater services are not exclusively extractive use and also include ecological services from upwelling. The Trustees have a responsibility to determine whether the groundwater as a separate natural resource has been injured.

The Trustees disagree that a groundwater REA would lead to double recovery. Groundwater that is still underground typically does not provide ecological services. In NRDA, groundwater injuries and damages are frequently calculated separately from and in addition to injuries and damages to aboveground resources.

- *Comment 42 (p. 11): There is no evidence that Osprey or similar passerine species are a potentially injured resource at the Site. Proposed collection of Osprey eggs has no basis and is unwarranted.*
 - *EPA's final BERA (USEPA 2021b) concluded no risks to Osprey or Kingfishers from any COPEC using conservative dietary exposure modeling assumptions and data collected in sediment, surface water, and rainbow trout compared with conservative literature-based toxicity data at the lowest-observed-adverse-effect-level.*
 - *The only COPEC to even exceed the no-observed-adverse-effect-level toxicity values for piscivores were mercury and methylmercury (hazard quotients of 1.9 and 1.5 respectively), which are known to have significant sources in the Clark Fork River upstream of the Site.*
 - *Previous Osprey egg research cited in the NRDA Plan did not find evidence for injury from measured (elevated) concentrations of polychlorinated compounds (Elliot et al. 2001).*

The risk-based Osprey model from the BERA would have benefited from ground-truthing using actual data. The Trustees have a responsibility to the public to evaluate potential injuries to high trophic-level species such as Osprey. Because researchers in Missoula are already monitoring Osprey along the Clark Fork River, these data can be collected cost-effectively. Therefore, the Trustees will aim to determine injuries based on data rather than models.

References

Integral Consulting. 2021. Potential Sources of PCBs in Clark Fork River Fish. Smurfit-Stone/Frenchtown Mill Site Remedial Investigation/Feasibility Study, Report for PCB Source Evaluation. Prepared for WestRock CP, LLC and International Paper Company. June.

Integral Consulting and NewFields. 2021. Natural Resource Damage Assessment Plan Review. Letter addressed to the Montana Natural Resource Damage Program. November 24.

NewFields. 2020. Groundwater Conceptual Site Model, Former Smurfit-Stone/Frenchtown Mill Site, Missoula County, Montana. Draft Version 3. June.

URS. 2012. Analytical Results Report for a Combined Site Inspection and Removal Assessment. Smurfit-Stone Mill, near Missoula, Missoula County, Montana. TDD Nos. 1105-09 and 1109-07. URS Operating Services, Inc., Denver, CO. August 20.

U.S. EPA. 1990. USEPA/Paper Industry Cooperative Dioxin Study: The 104 Mill Study. Summary Report. U.S. Environmental Protection Agency. July.

Appendix A - List of Comments

No.	Individual/Association	City/Area
1	Mark Sommer	Missoula County
2	Scott Charlie	Missoula County
3	Missoula City-County Health Department – Water Quality Advisory Council	Missoula, MT
4	Missoula Conservation District	Missoula, MT
5	Westslope Chapter Trout Unlimited	Missoula, MT
6	Montana Trout Unlimited	Missoula, MT
7	Robin Carey	Missoula, MT
8	Tim Berry	Missoula, MT
9	Ted Mead	
10	John Snively	Missoula, MT
11	John Lundt	
12	Danita Schoen	
13	Brent Dodge	Missoula, MT
14	Charlie Burk	Missoula, MT
15	Bitterroot Trout Unlimited	Hamilton, MT
16	Chris Spiker	Missoula, MT
17	Dennis and Kathy Terrazone	St. Regis, MT
18	Jeff Heffernan	Missoula, MT
19	Kathy Heffernan	Missoula, MT
20	Gary Fee	Alberton, MT

21	John A. Harris MD	
22	Josh McKown	Philipsburg, MT
23	Frenchtown Smurfit CAG	Frenchtown, MT
24	Todd Skibbe	Alberton, MT
25	Penny Ritchie	Florence, MT
26	Elmer W. Palmer	Lolo, MT
27	Clark Fork Coalition	Missoula, MT
28	Roger Furlong	Missoula, MT
29	Integral Consulting	Missoula, MT
29A	Integral-Potential Sources of PCBs in Clark Fork River Fish Report	Missoula, MT
29B	New Fields Technical Report	Missoula, MT
30	Hellgate Hunters and Anglers	Missoula, MT
31	Vicki Watson	Missoula, MT
32	Montana Trout Unlimited signatures	Missoula, MT
33	Missoula County Commissioners	Missoula, MT
34	John Beighle	Deer Lodge, MT
35	Eli Molloy	
36	Dennis Terrazone	

Appendix B – Individual Comments