



July 7, 2021

Duc Nguyen, Federal On-Scene Coordinator
US EPA – Region 8
Emergency Response Unit (8SEM-EMR)
1595 Wynkoop St.
Denver, CO 80202-1129

RE: DEQ letter of support for proposal of the 2021 Time Critical Removal Action at the Susie Mine, Upper Tenmile Creek Mining Area NPL Site in Helena, Montana

Duc,

The Montana Department of Environmental Quality (DEQ) appreciates the EPA's accelerated response to DEQ's concerns over the accumulated liquid sludge in the Susie mine adit in Rimini. This is a DEQ letter of support for EPA's efforts to gain approval and funds for the proposed time critical removal action (TCRA) that will address potential threats to public health and the environment from the Susie mine. It is our understanding that the proposed response plan/schedule consists of four general steps:

1. Dewater to the extent possible.
2. Raise the berm on the basin along Rimini Road, and provide a pump and frac tank for sludge storage back-up.
3. Expose the drainpipe at the adit level and attempt to unplug the drainpipe and drain sludge to the enlarged basin. If the drainpipe cannot be unplugged, then remove the sludge via a vacuum hose. Transport the sludge to the Luttrell repository for disposal.
4. When the sludge has been removed, then stabilize the adit and the surrounding area and install a steel bar gate at the entrance to allow free flow of water from the adit.

Also, it is our understanding that EPA has developed a detailed plan as of early July 2021 for the four-step removal action and anticipates field work by mid-July 2021. The DEQ supports the proposed four step response plan outlined above. If the EPA's efforts are successful, DEQ requests to assist with the development of the EPA Action Memo, including identifying ARARs for final EPA approval. Again, DEQ appreciates your attention to this issue and looks forward to our continued work to stabilize the Susie mine site adit.

Thank you.

A handwritten signature in blue ink that reads "Dick Sloan".

Dick Sloan
DEQ State Project Officer
Waste Management and Remediation Division
Federal Superfund and Construction Bureau
Federal Superfund Section

cc: Jess Wilkerson, DEQ Legal
Carolina Balliew, DEQ, Federal Superfund Section Supervisor
Joe Vranka, EPA Montana Superfund Unit Supervisor
Tillman McAdams, EPA Remedial Project Manager