

November 26, 2019

The Honorable Steve Bullock Governor
State of Montana
P.O. Box 200801
Helena, MT 59620-0801

Shaun McGrath, Director
Montana Department of Environmental Quality
P.O. Box 200901 Helena, MT 59620-0901

RE: Billings PCE Groundwater State Superfund Site

Dear Governor Bullock and Director McGrath:

On behalf of the City of Billings, we are requesting your support for adding the site referenced above to the Environmental Protection Agency's National Priorities List (NPL). It is our understanding the State has limited resources and funding to mitigate potential risks and to clean up the site. The City is also under the impression this site will have a favorable ranking on the NPL due in part to the number of potentially impacted residential and business properties from PCE vapor intrusion. In addition, initial steps toward remediation of the site may begin as early as 2020.

In 1992, the area, located in east and southeast Billings, was designated a State Superfund Site resulting from earlier investigations confirming groundwater chlorinated solvent contamination. In 2008, the Environmental Protection Agency (EPA) conducted an aggressive contaminant removal and treatment near Big Sky Linen property.

Following the EPA remediation work, the Montana Department of Environmental Quality (DEQ) performed additional remedial investigation to determine the nature and extent of contamination. The investigation revealed the contaminants moved from the groundwater through the soil and is now entering overlying structures by vapor intrusion. The contaminants of concern include the chlorinated solvent tetrachloroethylene (PCE) and trichloroethylene (TCS) and other compounds.

An EPA Superfund designation is the appropriate mechanism to address this large and complex site, like the Billings PCE Groundwater State Superfund Site. Sites on a National Priorities List (NPL) warrant additional assessment, evaluation of site risks associated with the contamination, clean up and the availability of federal funding. The City of Billings believes that adding this site to the NPL will ensure that investigations and clean up moves forward in an appropriate and timely manner.

Also of critical importance, is the coordination of EPA and DEQ for additional investigations and proposed remediation with the City and affected home and business owners. The City requests that an informational package listing potential site mitigation options be drafted as soon as possible to alleviate any home and business owner concerns and confusion when the area becomes a listed Federal Superfund site.

The clean-up must be completed with effective oversight and public involvement. A Federal, State, Local, and private partnership is needed to effectively address the remediation this site.

Thank you again for your assistance in this important project. Please support the listing of this site on the National Priorities List so the remedial investigation and cleanup process can begin as soon as possible.

Sincerely,

Chris Kukulski, City Administrator

Attachment: Map