

409 Missouri Avenue, Suite 201
Deer Lodge, Montana 59722

Applicant Information Sheet

FY26 Brownfields Cleanup

RFA No: EPA-I-OLEM-OBLR-25-07

Powell County, Montana

For the Milwaukee Roundhouse Area

1. Applicant Identification

Name: Powell County

Address: 409 Missouri Ave.

Deer Lodge, MT 59722

2. Website URL: <https://www.powellcountymt.gov/planning-department/page/milwaukee-roundhouse-area-mra>

3. Funding Requested

a. Grant Type: Single Site Cleanup

b. Federal Funds Requested: **\$3,979,986.00**

4. Location

City of Deer Lodge, Powell County, Montana

5. Property Information

Property Name: Milwaukee Roundhouse Area

Site Address:

6. Contacts

a. Project Director:

Name: Amanda Cooley

Position: County Planning Director, Certified Floodplain Manager

Phone: (406)-846-9729

Email: acooley@powellcountymt.gov

Mailing Address: 409 Missouri Ave. Ste 114 Deer Lodge, MT 59722

b. Chief Executive/Highest Ranking Elected Official:

Daniel G. Sager

Position: Presiding Officer – Powell County Board of Commissioners

Phone #:

Email: dsager@powellcountymt.gov

Mailing Address: 409 Missouri Ave. Ste 114 Deer Lodge, MT 59722

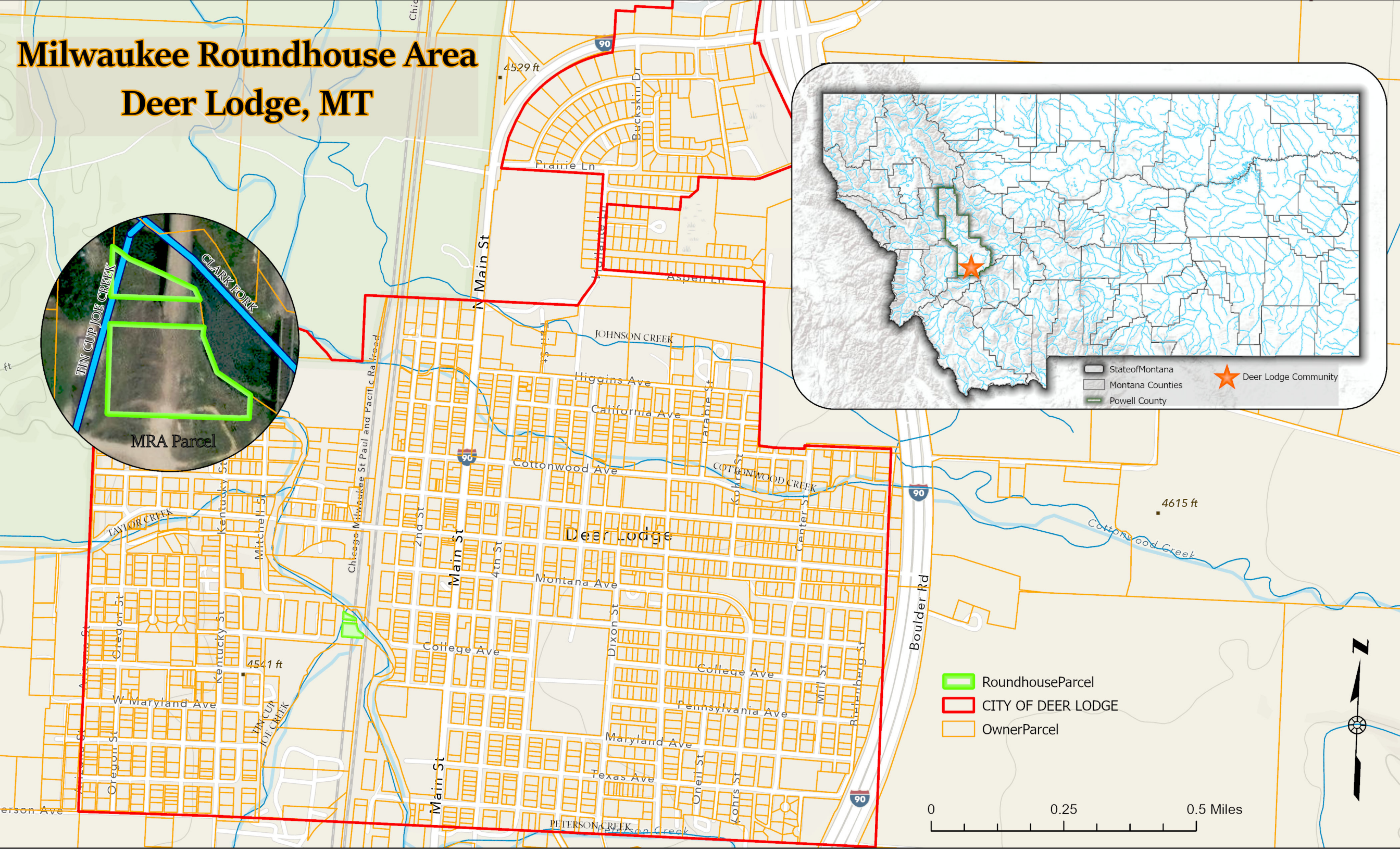
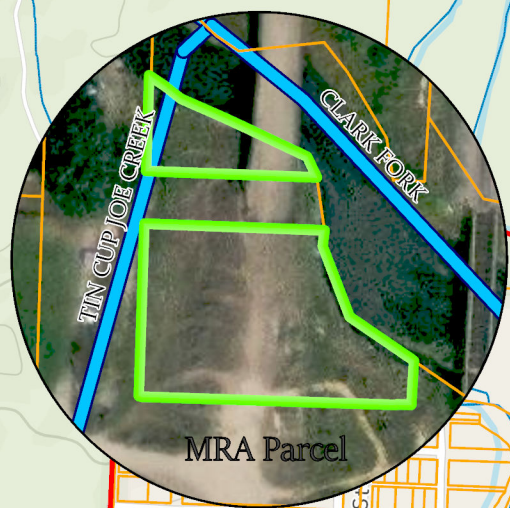
7. Population: 2,938 (City of Deer Lodge) Source: census.gov

8. Other Factors:

Other Factors	Page #
Community population is 15,000 or less	5
The proposed site is adjacent to a body of water	2
(A portion of) the proposed site is in a federally designated flood plain.	2
The reuse of the proposed cleanup site will facilitate renewable energy from wind, solar, or geothermal energy.	3
The proposed site will incorporate energy efficiency measures	3-4
The proposed project will improve local climate resilience to the impacts of extreme weather events and natural disasters.	3

9. Releasing Copies of Applications: This application does not include confidential business information (CBI). Not applicable.

Milwaukee Roundhouse Area Deer Lodge, MT



C. Narrative Criteria:

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfield Challenges and Description of Target Area

Deer Lodge, the target area for this grant, is a town of under 3,000 people in southwest Montana bisected by the Clark Fork River. Surrounded by farm and ranch lands, Deer Lodge is nestled beneath the world-renowned “Crown of the Continent” and 1.4 million-acre protected Bob Marshall Wilderness Complex that cross the top third of Powell County. Back in town, the stone walls of the Old Montana Prison built in **1871** tower over the southern entrance to Historic Main. Today the Prison joins “the largest collection of museums” in Montana, which includes an excellent auto collection. The north entrance to Main is bound by the Grant-Kohrs **National Historic Ranch** and **the County Fairgrounds**. A freeway plaza and hospital round out essential services. Stuffed between, is a lively though dilapidated historic Main Street business district. The town is half-way between Glacier and Yellowstone National Parks and is a forty-minute drive to the nearest town of more than 10,000 people.

In 1908, a catastrophic flood washed millions of tons of mine tailings down the Clark Fork River floodplain through town. The town recovered and prospered for a time, but today, the Clark Fork watershed encompasses the largest Superfund site in America. Recovery efforts within the heavily contaminated floodplain are ongoing, and continue to elevate health and exposure risks.

For much of the 20th century Deer Lodge was a critical station on the Chicago, Milwaukee, St. Paul, and Pacific Railroad (CMSPP), where eastbound trains switched from electric power to diesel, and “the Milwaukee Road” was the town’s largest employer. In 1979 the Milwaukee Road went bankrupt. The line was shuttered, with aftershocks that Deer Lodge is still feeling today. The town’s population has decreased by over 40% from its peak, and Brownfields – identified and unidentified litter Deer Lodge’s Main Street. A decrepit housing inventory and abandoned buildings downtown discourage the establishment of new businesses, the attraction of younger families, and the retention of Deer Lodge’s youth. The median household income in Deer Lodge is **\$53,676** (2023), which is **32%** lower than the national median household income¹. Deer Lodge residents struggle with a greater than **16.8%** poverty level due to the lack of economic opportunities and financial barriers of starting new businesses in a disadvantaged rural community that desperately needs a service-based expansion to tap into Montana’s largest growing industry: tourism, leisure, and hospitality. Most importantly, the lack of safe sidewalks and connected public greenspaces a) affects the mental and physical welfare of Deer Lodge’s most vulnerable (the young and old) age groups, and b) limits access to Deer Lodge’s downtown corridor and Clark Fork River.

When the Milwaukee Road went bankrupt, the town of Deer Lodge, the target area, involuntarily received both an untapped asset and a liability; a 51-acre brownfield along **Tin Cup Joe Creek’s** confluence with the **Clark Fork River**, headwaters to the larger Columbia River Basin. **Powell County owns an 11-acre portion of the site: The Milwaukee Roundhouse Area (MRA)** that historically accommodated approximately half of an old railroad roundhouse. Hazardous materials and historic petroleum contamination at this State Superfund site directly threaten community health, restrict community access to the Clark Fork River, and bar development opportunities both within and adjacent to the site.

This site is a key to new commercial development, job opportunities, restoration of historic wetlands, and a long-envisioned safe pedestrian connection from the east to west side of town. Slow, inefficient, incremental cleanup actions will continue, unless **\$3,979,986** is secured to complete soil remediation activities so the site may be redeveloped. 2024 Site revisioning anticipate the creation of 5 leasable lots for light industrial or manufacturing uses, with a preferred opportunity for developments and investments that support the adjacent Sun Mountain lumber-mill. The area’s largest employer, Sun Mountain is critical to the public/private partnership for the region’s wildfire mitigation planning.

b. Description of the Proposed Brownfield Site(s)

The **11-acre Milwaukee Roundhouse Area (MRA)**, separates the west-side of town from the Clark Fork River. The Milwaukee Road operated the full MRH site as a 51-acre active Railyard from 1900 to the 1980s and included a depot, the historic **Roundhouse**, switching yards, track, and repair/refueling operations. **The site has remained underutilized and inaccessible /vacant/restricted access since the railroad shut down operations.** A high-

priority State Superfund site enrolled in the **Montana DEQ-administered Voluntary Cleanup Plan (VCP)** the MRA has been extensively characterized and partially remediated.

Former CMSPP Railroad Facility maintenance operations, spills and leaks from fuel piping, underground storage tanks (USTs), and aboveground storage tanks (ASTs) contaminated the on-site soils, groundwater, surface water, and sediments with metals, semi-volatile organic compounds (SVOCs), volatile organic compounds (VOCs), and other hydrocarbon fractions. These railroad operations were performed at the site from 1908 until the railroad's bankruptcy in 1980. In 1984 all above ground infrastructure was demolished and removed from the site. In 1987 Hydrometrics, Inc. led the initial environmental site investigation at the site.

15,000 cubic yards of petroleum-contaminated soil and sediments from historic fueling, degreasing, and cleaning activities remain in and adjacent to the federally regulated Tin Cup Joe floodplain. These issues of surficial contamination, deteriorating building materials, and fugitive dust require the County to restrict access to the entire 11-acre site, thus halting the development of important east-west traffic and pedestrian improvements. Resources are generally available for these sorts of minimal infrastructure improvements, but remediation is currently prioritized for safety reasons.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plan

Today, the site is vacant, but the BNSF and Union Pacific railroad both operate rail-lines that directly border the western perimeter of the site, making it ideal for manufactured products needing boxcar transport.

Redevelopment of the MRA is Powell County's greatest economic development priority. The County has facilitated multiple ground-up planning efforts to ensure that the redevelopment of the former railyard aligns with community's revitalization goals and land use plans. In **2024**, the County, in a joint effort with the City of Deer Lodge, supported by Montana DEQ Brownfields funding, held a series of public meetings to review redevelopment ideas initially envisioned shortly after site-acquisition, in 2006. Sessions yielded engaged and interesting feedback, especially from youth participants. The City owns the companion 24-acre (Passenger Refueling Area (PRA) site, which youth envision becoming a mountain bike and nature park, since its adjacent to the Grant-Kohrs Ranch NPS Site. The resulting plans restore and preserve previously impacted wetlands while protecting the adjacent, federally-designated Tin Cup Joe and Clark Fork River floodplains. The wetland restoration plans create nature trails on both sites. At the MRA, trail connections will provide public access and a pedestrian river crossing on the Clark Fork River. The plan received strong public support for creating up to six leasable lots for light industrial or manufacturing on the leasable portion of the site, which could result in the creation of dozens of jobs. The City of Deer Lodge has identified redevelopment as an objective in their last two long-range planning **Growth Policies (2017, 2024)**.

The report found that cleanup of the 11-acre Milwaukee Roundhouse Area (MRA) will:

- 1) enable development and community access to an 11-acre riverside greenspace that has been off limits for a century,
- 2) enable the lease of up to 5 lots for light industrial or manufacturing
- 3) support BIOCHAR/related energy
- 4) support a long-envisioned pedestrian connection: The town is only 1.5 miles across, but is divided by a river and rail-line, and the lower-income west side is physically disconnected from downtown.

Federally designated floodplain

The site is bordered on the west by Tin Cup Joe Creek and to the north and east by the Clark Fork River. Both are federally-designated floodplains, though only the Tin Cup Joe Creek floodplain lies within project boundaries. The eastern Clark Fork River floodplain is separated from the MRA by a BNSF rail-line. The City Floodplain Administrator remains closely involved with project activities, and a Floodplain Development Permit was secured in 2024 for excavation work within the Tin-Cup Joe floodplain. The floodplain and surrounding habitat will be restored with natural vegetation and trails to protect and enhance areas vulnerable to flooding.

d. Outcomes and Benefits of Reuse Strategy

At heart, cleanup of the MRA is part of a larger effort to restore the link between Deer Lodge and its backyard, which will have enormous environmental health and economic benefits for the community. Implementing the 2024 Milwaukee Roundhouse Area revitalization plans will:

Stimulate economic development:

Montana Tourism statistics show that history continues to be an important draw for travelers through Deer Lodge and the southwest Montana region. This project focuses on redeveloping historically impacted assets while using the unique historical connections to railroad and transportation history to further interest the **millions of visitors** that travel from Yellowstone to Glacier National Parks every year. **51% of the County** is public *forested* land, an asset that draws its own loyal visitor base.

Up to five site leases adjacent to a long-standing lumber mill will be available for redevelopment and compatible use. More importantly the site-leases could support dozens of jobs. Forest and fire mitigation is a very high priority for western states. In Montana, effective fire and forest management depends on operational lumber mills. Significantly-elevated wildfire activity necessitates multi-level, multi-agency coordination of partners and resources. All of these efforts identify the need to have a supply-chain partner for an effective wildfire mitigation strategy. The lumber industry is volatile, and one way the industry can stabilize, is to reduce operating costs and costs of byproduct offloading, which lessens the need for additional subsidy (ie regulatory burdens on industry). Additional benefits include the conversion of repurposed mill waste converted to beneficial products ie biochar. Two manufacturers are interested or pursuing investments. Completing soil remediation will enable site redevelopment in conjunction with other state and federal priorities for wildfire mitigation. Underscoring the need, was Montana's largest 2025 fire, Windy Rock, which encompassed 6,000+ acres, less than **20 miles** to the north of the MRA in Powell County. Having developable acreage for industries that could re-use mill waste products is an immediate and high priority.

Improve local resilience to the impacts of extreme weather events and natural disasters:

Facilitating re-use of this site directly supports a critical link in the federally-aligned strategy to address forest health and wildfire risk. Wildfire, is a deadly act of nature associated with extreme weather events largely impacting the Western U.S. Enabled and prioritized through Stafford Act funding, Montana has prioritized and structuralized wildfire mitigation through coordinated federal-state-local planning and funding. Enabled, Montana constructively developed a program to incentivize and fund updated Community Wildfire Protection Plans (CWPP) with heavily engaged stakeholder standards, and adopted a **2020 Forest Action Plan**. Traditional clear-cut logging practices have largely been replaced with strategically and collaboratively-developed timber sales that balance forest health and industrial logging & timber needs. Site re-use will accommodate the development of industries that compliment and stabilize the areas largest employer, which will strongly support Forest Service efforts to create regional resilience against wildfire as an extreme weather event.

Tin Cup Joe Creek is identified by the Montana DEQ as highly impaired and compromised. Directly upstream from the site, Tin Cup Joe is known to ice jam and flood the County Road and obstruct lumber mill rail access. Multiple state and federal realignment efforts (state Prison and local airport) are recently completed or planned for the near-future. The collective efforts will improve resilience against flooding and will complement upstream improvements..

Facilitate renewable energy from wind, solar, or geothermal energy and other innovative methods:

Energy independence, renewable energy, and innovative energy projects are supported by City (**2024**) and County (**2017**) Growth Policies. A **November** public meeting organized by County Commissioner Wortman discussed innovate wind generation projects ongoing in nearby Jefferson County and discussed feasibility for the MRA site. A Task Order executed with the County's engineering firm in **November 2025** directed the exploration of the site for **solar development**. The firm quickly found that the site reclamation must be complete before redevelopment can occur.

Incorporate energy efficiency measures.

Energy efficiency is a core feature of the companies and industries showing interest in the MRA in the last four years. Efficiency is sought throughout the lifecycle of the production process, from input to output in order to reduce process and profit losses and maximize outputs and gains.

Facilitate the creation of a pocket park and a greenway on undeveloped property.

Multiple City and County land-use plans, including the 2023 Re-Use planning efforts, envision a pocket park trailhead on a formerly reclaimed County-owned parcel adjacent to the northern boundary of the MRA. The primary feature of the park is a historic trestle bridge from the Old Yellowstone Auto trail to be installed across the Clark Fork floodplain. The bridge would replace an existing failed “bum bridge.” A 2007 effort attempted to complete trestle bridge placement and secured preliminary engineering, but was unable to overcome the regulation and cost burdens. Rich with history, pedestrian connectivity from the downtown core to a trail within walking distance along the Clark Fork River would immediately become an important amenity for residents and attractant for potential investors.

Strategy for Leveraging Resources

e. Resources Needed for Site Characterization

The MRA has a sufficient-level of site characterization, as determined by Montana DEQ, to complete the remaining soil remediation work. The only barrier is funding. A Remedial Investigation was completed in 2015 and a soil Remediation Proposal (RP) was completed and approved by Montana DEQ in 2023. A state-funded 2025 Data Gap Investigation is complete and confirms the extent of projected excavation areas. A state-funded 2025 Stormwater infrastructure investigation confirmed abandoned utility locations.

f. Resources Needed for Site Remediation

A QEP was competitively procured compliant with CFR-200 to oversee the implementation of the MRA’s 2023 DEQ- approved ABCA’s and soil Remediation Proposal. Time is of the essence to complete soil removal activities before an entire update and site review is required. Approximately \$4 million is needed to complete remediation.

g. Resources Needed for Site Reuse

Site reuse for commercial development will be feasible once EPA-funded soil remediation activities are complete. Groundwater monitoring activities will continue. Multiple private developers, primarily related to biochar and bioenergy production due to the close proximity of a lumber mill, have expressed interest in leasing the site.

Summary of Resources Needed for Site Remediation and Reuse

Name of Resource	Resource Type	Secured?	Additional Details
2021 DNRC <i>Reclamation and Development</i> Grant \$500,000	Construction	Secured	Grant funded; Complete
2023 <i>Reclamation and Development</i> Grant \$500,000	Construction	Secured	Grant funded; Complete
2023 MT Brownfields Grant \$150k	Construction	Secured	Grant funded; Complete
MT Brownfield Planning Grant	Re-use	Re-use	2024 Revisioning; Complete
2025 Data Gap Investigation \$59,802	Assessment	Secured	Grant funded; Complete
2025 Underground Infrastructure Investigation \$75,000	Assessment	Secured	Grant funded; Complete
2023 <i>Reclamation and Development</i> Grant \$500,000	Construction	Secured	Grant funded; Grant Contracting in-progress
MT Brownfield Revolving Loan Fund	Re-Use	Unsecured	Resource for redevelopment

h. Use of Existing Infrastructure

The remediated site will be a blank slate, ideal for light commercial, industrial, or recreational development. No utilities are in place. A 2023 site assessment with the City of Deer Lodge anticipated connection to the city’s wastewater system would be cost-prohibitive, requiring 1-2 lift stations. City Council proactively approved a variance to allow the site to use a septic system within city limits. A water main along College Ave. provides

capacity for basic restroom facilities that would accommodate the envisioned re-use strategies. College Ave. provides the primary and only legal access single to the site. The City Street will need to be re-paved and possibly widened depending on the proposed commercial use but the City does not have funds to complete repairs on a road that sees minimal use by City residents. The EPA-funded contract for soil removal will require the soil abatement contractor to include budget contingency for mitigating the impacts of soil removal and heavy equipment traffic to local roads.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need, supported by 2023 ACS Community Survey Data 5-year estimates

Data Type		Deer Lodge Target Area	Powell County	Montana	United States
VETERAN STATUS	Civilian veterans 18 years and over	19.5%	13.2%	9.4%	6.4%
DISABILITY STATUS	Total Civilian Population - With a disability	28.1%	22.6%	14.3%	13.0%
	18 to 64 years - With a disability	26.4%	19.4%	11.8%	10.7%
	65 years and over - With a disability	45.2%	41.6%	32.7%	32.9%
SEX AND AGE	Total population - Under 18 years	15.8%	14.7%	21.3%	22.2%
	Total population - 62 years and over	35.7%	25.5%	23.9%	20.6%
	Total population - Median age (years)	53.20	43.30	40.0	38.70
EDUCATION COMPUTER & INTERNET USE	Population 25 years and over - Bachelors degree	15.6%	13.8%	22.8%	21.3%
	Total households - With a computer	82.3%	86.5%	93.9%	94.8%
	" " - With a broadband Internet subscription	74.9%	78.4%	88.2%	90.7%
INCOME & BENEFIT	Total households - Median household income (dollars)	53,676	61,354	69,922	78,538
	Total households - With Social Security	46.7%	43.1%	34.6%	31.2%
	" " - Food Stamp/SNAP benefits in the past 12 months	14.8%	10.7%	83.0%	11.8%
POVERTY LEVEL	All people		16.80%	11.8%	12.4%

a. The Community’s Need for Funding

Median household income Deer Lodge is **\$53,676** (compared to US \$78,538). **16.8%** of the total population is living below poverty compared to U.S. 12.4%. **Deer Lodge is a low-income town** embedded in a county (Powell) about the same size as Delaware but with a tiny population of **fewer than 3,000 inhabitants**. The liability the contaminated MRA property represents to the community of Deer Lodge undermines social cohesion, economic stability, and property values, which in turn, reduces local tax revenues even further. With little to no income generated through sales tax and diminished property values, the City has no room in its dwindling budgets for anything other than basic services. Nonetheless, City and County governments have dedicated thousands of hours of paid staff time over the last several decades to see the former Milwaukee Road sites reclaimed. Asking each Deer Lodge resident to contribute funding for the remaining cleanup for the site is infeasible. Grant funds will expedite reclamation of a heavily polluted site to allow economic development, safe pedestrian transport, and protection of the natural floodplain at the Milwaukee Roundhouse Area.

b. Health or Welfare of Sensitive Populations

A significant challenge in the County and City is an aging population. **35.7%** of the population is over 62, compared with the national average of **21.3%**. To compound the challenge, only **15.8%** of the population is under 18 years, versus a national average of **22.2%**. The high disabled population, *discussed further below*, compounds the challenges of an aging population with high rates of adult disability. Fewer youth in town create downstream gaps in social and healthcare workforce availability to care for impacted residents. These populations are more vulnerable if there are unintended environmental exposures to site contaminants.

The 2022 *DLMC Assessment* notes 25% of the population is physically inactive, compared to 20% statewide and 23% nationally. During *Assessment* focus groups and public surveys, DLMC found that: 26.4% of respondents identified “Overweight/obesity” as a top community health concern and 37.6% indicated that “healthy behaviors and lifestyles” are key components of a healthy community. Focus groups also expressed interest in more fitness opportunities, as well as more health, wellness, and weight loss programs. This declining and aging community

struggles to provide its low-income families and seniors with safe and adequate recreational amenities that would allow them to practice critical preventative exercise. Restoration of the MRA will 1) remove contaminants; reduce the risk of senior and youth exposure to contamination and 2) support an increased tax base and enable fair-wage job opportunities directly impacting a target area with a high rate of low-income residents and poverty 3) enable the development of a quarter-mile safe pedestrian access to the downtown services, over the Clark Fork River to be developed as a much needed health/recreational outlet for sensitive residents.

Greater Than Normal Incidence of Disease and Adverse Health Conditions

High Disability Rates and Poverty: Powell County and the City of Deer Lodge have an aging population with **extremely high rates of disability. 22.6% of residents have a disability, with high reliability in the dataset. 28.1% of non-institutionalized residents in the City of Deer Lodge have a disability. Approximately 41.6% of people aged 65+ have disability!**

Chronic Health Conditions: Cancer Risk: Limited health data is available for the rural target area but Cancer-related deaths are the second leading cause of death in Montana. Powell County has **the 7th highest cancer rate statewide** of 56 counties, with 525.5 cancer deaths per 100,000 people (CDC).

Proximity to Hazardous Sites: America's largest superfund complex, a former railroad maintenance state VCP site, and multiple Brownfields sites scar the small square-mile town. the proximity to hazardous sites compounds risks presents an increased risk to vulnerable populations.

Park and trail improvements will create a quarter-mile path and river crossing along with a pocket park. This will be an asset for vulnerable populations and will help reconnect the low-income dominated west-side of town to downtown businesses and services. This directly addresses the higher-than-average physically inactive population found in Deer Lodge and provides fitness opportunities identified through DLMC surveys as "desirable." The cleanup of the contaminated MRA will be transformative for the environment, the physical and mental health of neighboring residents, and the future of this community.

c. Economically Impoverished/Disproportionately Impacted Populations

The per capita income for Powell County, **\$30,316**, is **23.9% less** than the state per capita income of **\$39,842**. The Median Household Income in Powell County, **\$53,676** is **31% lower** than the US Median Household Income, and **13.5% less** than Montana's. **The poverty rate for the County is 16.6%**, compared to a national average of **12.5%** and a state average of **11.8%**. Three out of the City area's four census tracts are more than 58% Low to Moderate Income. The educational attainment of a Bachelor's degree is only 13.8% in the County, compared to a state and U.S. average of over **20%**, according to *2023 ACS Community Survey Data 5-year estimates*.

The low-income youth and elderly within the target area are disproportionately exposed to health impacts from the historic MRA and substandard housing conditions prevalent in Deer Lodge. The absence of community planning efforts in the early 1900s, which permitted the siting of the Milwaukee Road on the City's prime Clark Fork riverfront property has impacted residents of Deer Lodge. The contaminated shorelines of Tin Cup Joe Creek and the Clark Fork River are an active nuisance, health threat, and are frequently trespassed due to their central location, proximity to downtown, and natural splendor. The grant will enable the restoration of safe use for commercial and recreational purposes to a formerly contaminated.

Community Engagement

The County and DEQ's Brownfields Program have been working with the community closely on the cleanup of the MRA since the early 2000s. Headwaters RD&C's Regional Brownfields Program brings added support to recent efforts: **April 23, 2024**, Headwaters turned required public outreach into a celebratory Groundbreaking: celebrating the kick-off of the first remedial activities on-site in nearly a decade. The fanfare attracted attendance from local and state officials, the Powell County Chamber of Commerce, Montana Department of Commerce, the children of former railyard employees, and local press. Headwaters also supported local staff in the concurrent to the development of the 2024 Revisioning Plan.

Project Involvement & Project Roles

Organization	Mission/Purpose	Point of Contact	Involvement
Powell County	Local government	Amanda Cooley	Grant and Project Manager
Powell County Parks Board	County-Funded Volunteer-Staffed Board with County-staff administrator	Andy Fischer	Build & Maintain Parks & Trails
City of Deer Lodge	Provide essential, services, meet community needs	Mayor Jim Jess	Mitigate impacts to City & assist with public outreach
Headwaters RC&D	Economic Development & Regional Brownfields	Melissa Wanamaker	Grant, Brownfields, and <i>redevelopment</i> support
Montana DEQ & Brownfields	Environmental oversight Brownfields Redevelopment	Hannah McDermott Jason Seyler	Hazard safety & mitigation; State Brownfields support
Silver State Post	Regional Newspaper	Luke Ulatowski	Weekly publication for public notices and press releases
Sun Mountain Lumber	Largest regional employer, forest products fire mitigation	Sean Steinbach	Adjacent employer and industrial use with good opportunities for co-production.
Big Sky Bioenergy	Create energy surplus while replacing inefficient old boiler heating systems & using mill waste products	Adam Bennet	Biochar company interested co-location with the Lumber Mill & site re-use.
Roundhouse Biochar	Produce biochar & renewable energy from byproducts of the adjacent lumber mill.	Patrick Browne	Biochar company interested at locating on the redeveloped site.

d. Incorporating Community Input

Quarterly stakeholder meetings with Montana DEQ, Montana DNRC, Headwaters, City and County staff, and the QEP are held virtually to ensure project coordination and grant compliance.

In addition to special public meetings for planning or notification purposes, The Powell County Parks Board meets monthly. Meetings are noticed on the County website and the MRA is a standing agenda item. Project updates are discussed and public feedback is considered and incorporated as reflected in meeting minutes approved by the Board and posted on the County website. The County Commission reviews MRA activities about once per quarter as a public meeting agenda item. Feedback from these meetings becomes County record, is published on the County website, and comments are responded to following engagement with project staff and subsequent meetings. Local news outlets, particularly the Silver State Post and the Montana Standard newspapers, follow County meetings and work with County staff to publish benchmark updates at least twice per year. A project page on the County website is updated quarterly.

Updates are publicized on a local social media pages, and through the Deer Lodge App, a community-based event and notification app. Residents directly affected by project activities are contacted by letter and/or phone call. A **public celebration** will be held once grant activities are complete, to celebrate the near-term redevelopment of the site.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

The Milwaukee Roundhouse Area is currently enrolled in the Montana DEQ Voluntary Cleanup Program. Powell County completed a VCP-Remediation Proposal (RP) for soils contaminated with heavy metals and petroleum at the MRA, which included an Analysis for Brownfields Cleanup Alternatives (ABCA). The plan was approved by the appropriate state environmental authority, Montana DEQ, in May 2023. A QEP was contracted to implement the plan following a federally compliant procurement process in 2023.

The cleanup method for the contaminated soils will be the excavation, transportation, and hauling of contaminated soils to the Butte-Silver Bow Landfill which is approved by the State of Montana to accept these soils. Soils will be screened with a portable XRF and Photoionization Detector (PID) in the field to guide excavation extents. Although most of the soil excavation activities are in the top 2-3 feet, there are limited areas where contaminated soils may reach groundwater located approximately 8 feet below ground. Groundwater dewatering will not be necessary as part of this project. Confirmation samples will be collected and submitted for analytical testing to verify that all contaminated soils have been removed prior to placing clean backfill. Since this cleanup method has been used extensively at this site, the methods, disposal requirements, and costs are well defined for this project grant. Completion of the MRA soil remediation will clear an additional 11-acres of the 51-total acre site, adding to the City's nearly-completed 24 acres. Although additional remediation on private properties must be completed prior to a no-further action letter being issued for the site, the accomplishment will mark the completion of remediation for the publicly-owned sites in the complex.

Description of Tasks/Activities, Schedule, Roles and Outputs

<p>Task 1: Grant Contracting, Administration and Public Outreach</p> <p>b. Implementation: County staff will facilitate EPA grant contracting. Staff will work with Headwaters for regional public outreach, with support from the Headwaters' Regional Brownfield program. Grant administration will be provided by the County's on-call engineer, or competitively procured. EPA-Funded activities: <i>Direct Administrative Costs</i> for grant reporting and administration Non-EPA grant resources needed to carry out tasks: County staff to facilitate grant contracting, public/community outreach, and grant administration</p> <p>c. Schedule: Grant contracting and begin grant administration: July 2026. Management and reporting will be ongoing throughout the 4-year implementation period.</p> <p>d. Roles: Powell County will facilitate EPA Cleanup grant contracting, and will execute contract amendments with QEP and Grant Administrator. Powell County and the Headwaters Regional Brownfield program will create a press release announcing the grant award and project kick off, and will celebrate project completion.</p> <p>e. Outputs: Executed grant with the US EPA, 1 contract amendment with QEP & 1 contract or amendment with grant administrator, 34 monthly public meeting agendas and minutes from the Powell County Parks Board, two news highlights per year, 12 QPRs, ACRES Updates (ongoing), 1 completion celebration</p>
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<p>Task 2: Construction Management and Confirmation Sampling</p> <p>b. Implementation: 1. Project Management 2. Project Design (removal boundaries) 3. Quality Assurance Project Plan (QAPP) 4. Contract Document Preparations, Bidding, Award and Permitting 5. Soil Excavation, Disposal, and Backfill 6. Final Construction Report QEP will monitor Davis Bacon & Buy American Build America Compliance. EPA-Funded activities: <i>Contractual</i> all of the above under Task 2. Non-EPA grant resources needed to carry out tasks: none</p> <p>c. Schedule: October 2026 – June 2029</p> <p>d. Task Lead/Roles: QEP to complete all items under Task 2.</p> <p>e. Outputs: 1. QAPP approved by EPA, 1 completed bid procurement, Successful oversight of the remediation of 15,000 cy of contaminated soils 1. Cleanup Completion Report</p>
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<p>Task 3: Soil Remediation</p> <p>b. Implementation: 1. Mobilization, Bonding and General Requirements 2. Surveying 3. Construction Best Management Practices for Storm Water 4. Provide Water for Dust Control 5. Temporary Signage and Traffic Control 6. Clear and Grub Vegetation 7. Debris/Waste Removal 8. Excavate, Handle and Disposal of Contaminated Soil 9. Foundation Removal 10. Well Abandonment 12. Permitted Temporary Stream Diversion for Contaminated Soil Removal 13. Confirmation Sampling - Analytical Testing 14. Handling Clean Excavation Material 15. Import of Clean Backfill Materials 16. Import of Clean Topsoil Materials 17. Backfill Soil Excavation Areas 18. Site Restoration EPA-Funded activities: <i>Construction:</i> all of the above under Task 3.</p>
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Non-EPA grant resources needed to carry out tasks: None.
c. Schedule: May 2027 – April 2029
d. Task Lead/Roles: TBD by competitive procurement process to complete all above items under Task 3.
e. Outputs: Approximately yards of reclaimed soil. An 11-acre site ready for redevelopment

f. Cost Estimates

Budget Categories		Task 1	Task 2	Task 3	Administrative	Total
Direct Costs	Personnel	\$ -	\$ -	\$ -		\$ -
	Fringe Benefits	\$ -	\$ -	\$ -		\$ -
	Travel	\$ -	\$ -	\$ -		\$ -
	Equipment	\$ -	\$ -	\$ -		\$ -
	Supplies	\$ -	\$ -	\$ -		\$ -
	Contractual	\$ -	\$814,981.00			\$ 814,981.00
	Construction	\$ -		\$3,015,005.00		\$ 3,015,005.00
Total Direct Costs		\$ -			\$ 150,000.00	\$ 150,000.00
Indirect Costs		\$ -	\$ -	\$ -	\$ -	\$ -
Total Budget		\$ -	\$814,981.00	\$3,015,005.00	\$ 150,000.00	\$3,979,986.00

Task 1: Grant Contracting, Administration and Public Outreach

Contracting and Outreach will be completed with non-EPA-funded resources

Direct Costs: Grant Administration: \$50,000 per year for a 36-month project period

Task 2: Construction Management and Confirmation Sampling

Contractual Costs: QEP Project Management (QEP Tasks) **\$814,981.00**

Task 1. Project Management \$55,326.00

Task 2. Updating the 2023 Remediation Proposal \$28,389.00

Task 3. Quality Assurance Project Plan (QAPP) \$16,107.00

Task 4. Contract Document Preparations, Bidding, Award and Permitting \$58,784.00

Task 5. Soil Removal Activities \$502,115.00

Task 6. Final Construction Report \$89,260.00

Contingency @ 10% \$50,000.00

Task 3: Construction: Soil Remediation

– *Construction Costs:*

Cleanup - Soil Remediation \$3,015,005.00

Mobilization, Bonding and General Requirements (<10% of total bid price) \$60,000.00

Site Preparation \$73,500.00

Remediate Approximately 15,000 cy contaminated soils; *detailed estimate available* \$2,673,650.00

Site Restoration \$57,855.00

Contingency & Inflation 5% \$150,000.00

g. Plan to Measure and Evaluate Environmental Progress and Results

Volumes of soil removed are tracked by weight, through load tickets to the landfill. Fill volumes are tracked by weight as fill is removed from the backfill source. These volumes are carefully tracked and compared by the contractor and QEP and are verified by Powell County. Contaminant concentrations are measured through confirmation sampling and analytical testing. Soil removal and excavation extents will be guided by soil screening performed in the field by utilizing a portable XRF unit and Photoionization Detector (PID). Final excavation limits will be confirmed by confirmation sampling which will include analytical testing and approval from MDEQ. The QEP ensures that project activities are executed within contract-defined timeframes. The QEP and the County will identify project deviations promptly so that corrective measures can be developed and implemented to ensure the project stays on schedule, on budget, and outcomes are achieved in a timely manner.

PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a. & b. Organizational Structure & Description of Key Staff

Powell County has the technical, administrative, financial systems in place to effectively manage this grant project as is demonstrated by their successful administration of similar grants. The **County Planning Department** facilitates and tracks all MRA-related business with oversight from the **Powell County Commission**. The County **Financial Officer, Treasurer, and Attorney** assist with payments, contracts, and grant documentation.

The MRA Team

Meets quarterly, virtually, and provides bi-yearly updates to the County Commission during public meetings:

Project Management: Amanda Cooley (**Powell County**, Planning Director, CFM) will oversee implementation of the Cleanup Grant. In 2023 she procured a QEP compliant with CFR-200 to oversee a County-owned VCP site. In 2024, she coordinated the successful reclamation of secured \$900,000 in State reclamation (DNRC RDG) funding and \$150,000 in EPA Brownfields funding toward the successful reclamation of 5,000 yards of contaminated soils and \$1,050,000 in mixed fundings sources for the County-owned VCP site.

QEP: Caitlin Smith (Hydrometrics); Hydrometrics Inc. has served Montana for over 40 years and was competitively procured to oversee soil reclamation activities in 2024,)

Grant Administration: Kasia Little (Great West Engineering) Compliance with state & federal Cooperative Agreement requirements: GWE, a competitively procured firm, has been providing contract planning, engineering, and administration services to the County for 20+ years.

State environmental authority: Hannah McDermott (Montana DEQ)

Regional Brownfield Coordinator: Melissa Wanamaker (Headwaters RC&D); Brownfields technical resources that support community outreach and ensure the public is kept informed of the cleanup project's status.

State Brownfields Coordinator since 2009: Jason Seyler (Montana DEQ); DEQ has assisted with numerous grant applications, as well as, overseeing the reuse planning efforts at the MRA.

c. Acquiring Additional Resources

The County will contract for any additionally-needed services or expertise utilizing its own procurement policy. The County's policy is compliant with federal requirements. The County keeps a meticulous procurement record for all grants; documenting outreach, federal policy compliance, cost/price analysis, rationale for decision, etc.

Past Performance and Accomplishments

e. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Financial Assistance Agreements

(1) Purpose and Accomplishments

Since the **early 2000s**, Powell County has partnered with state and federal grant partners to receive over **\$1.7** million in state Montana DNRC reclamation and development and DEQ Brownfield grants for assessment, cleanup, and restoration of the MRA. **2021, 2023, and 2025** DNRC Reclamation and Development Grants for **\$500,000** each were awarded by the Montana Legislature following competitive grant ranking. The 2021 and 2023 grant awards funded the reclamation of approximately 5,000 cubic yards of contaminated soil at the MRA. Grant closeout is not yet complete but all contract and grant requirements are met to-date. A 2023 DEQ Brownfield Grant awarded through Headwaters RC&D for **\$150,000** provided a match. Project closeout is complete. A website is still maintained for the project, and the draft remediation alternatives (ABCAs) were provided for public comment, presented in a public commissioner meeting and at a public event.

(2) Compliance with Grant Requirements

The County has consistently maintained compliance with all state and federal funding award terms and grant agreements, including following all appropriate procurement requirements, quarterly invoicing and progress reporting requirements, work plans approvals, meeting timelines, tracking budgets, reporting final project outcomes, and providing final reports with grant closeout documentation. All of the above grants have been implemented on time and within budget, making this project an excellent candidate for EPA Cleanup grant funding.

Nearly a Clean Slate: Reclaiming the Milwaukee Roundhouse Area (MRA) Site

THRESHOLD CRITERIA – FY26 Cleanup Grant Application Milwaukee Roundhouse Area (MRA)

1. Applicant Eligibility

- a. Powell County is eligible for FY26 EPA Cleanup Grant funding.
- b. Powell County is not exempt from Federal taxation under section **501(c)(4)** of the IRC.

2. Previously Awarded Cleanup Grants

The proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

Powell County does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

Powell County is the current owner of the site.

5. Basic Site Information

- a. Site Name: Milwaukee Roundhouse Area (MRA)
- b. Address: Park Street, T.7N, R.9W, SECTION 4 in Deer Lodge, MT 59722

6. Status and History of Contamination at the Site

- a. The site is contaminated by hazardous substances and petroleum.
- b. Operational history and current use of the site: The main source of identified contamination at the MRA is the former Chicago, Milwaukee, St. Paul, and Pacific (CMSPP) Railroad Facility. CMSPP and its subsidiaries operated a railroad roundhouse and refueling hub, which serviced steam, electric, and diesel locomotive engines in Deer Lodge from 1908 to 1980. Today, the site is vacant and partially reclaimed.
- c. Environmental concerns: Environmental concerns include heavy metal and petroleum contaminated soils, groundwater, and sediments. Current levels of contamination create conditions unsafe for human use or redevelopment. Table 1 of the *Voluntary Cleanup Plan (VCP) Remediation Proposal (RP)* shows that the majority of remaining soil contamination is non-petroleum and includes lead and arsenic. Levels of groundwater contamination are not of immediate threat to municipal water supplies and are expected to improve as soil remediation is completed. Groundwater monitoring wells are in-place.
- d. How the site became contaminated, the nature, and extent of the contamination: Milwaukee Road maintenance operations resulted in spills or leaks from fuel piping, underground storage tanks (USTs), and above ground storage tanks (ASTs), and contaminated on-site soils, groundwater, surface water, and sediments with metals, SVOCs, VOCs, and EPH/VPH fractions. All of the structures, including the historic roundhouse, USTs, ASTs and electrified line have been removed. What remains is petroleum contaminated soils from historic fueling, degreasing, and cleaning activities.

7. Brownfield Site Definition

- a. The site is not listed or proposed for listing on the National Priorities List.
- b. The site is not subject to any unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA. The

THRESHOLD CRITERIA – FY26 EPA Brownfield Cleanup Grant

Nearly a Clean Slate: Reclaiming the Milwaukee Roundhouse Area (MRA) Site

site received a property-specific determination from the EPA in 2023 to be eligible for Brownfields funding, and an updated 2024 property-specific determination is attached for this grant application in **Appendix A**.

- c. The site is not subject to jurisdiction, custody, or control by the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

A Remedial Investigation, equivalent to a Phase II environmental site assessment, was completed and approved by Montana DEQ for the MRA in 2015. A Voluntary Cleanup Program (VCP) soil Remediation Plan (RI), required by the State prior to construction removal activities, was completed and approved by Montana DEQ in 2023. The Plan has a five-year lifespan for implementation, and a portion of the site has already undergone additional soil removal since RP approval but funding is needed to complete activities.

9. Site Characterization

(b) FY25 letter from the Montana Department of Environmental Quality affirming site enrollment and a sufficient level of site characterization is attached (Appendix A, page)

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

11. Sites Requiring a Property-Specific Determination

This site requires a Property-Specific Determination. (**Appendix A**)

12. Threshold Criteria Related to CERCLA/Petroleum Liability

The site is co-mingled with hazardous substances and petroleum contaminants. The predominant contaminant is hazardous substances, primarily lead and arsenic. Responses to all items under a and b. are included below. A petroleum determination letter is attached (**Appendix A**).

(a) Property Ownership Eligibility – Hazardous Substance Sites: Powell County is eligible for a Brownfields Grant to address hazardous substances at a brownfield property because it meets criteria i below:

12.a.i EXEMPTIONS TO CERCLA LIABILITY:

(3) Property acquired under certain circumstances by units of state and local Government:

(a) Circumstances under which the property was acquired:

Powell County acquired ownership of the MRA property as a tax-delinquent, abandoned property in 2005, to qualify for monetary grants from the EPA's Brownfield program to reclaim the site. Powell County then began working with the Montana DEQ to develop a Voluntary Cleanup Plan, but was unsuccessful in 2006 and 2007 because the plans did not "adequately characterize the Site's environmental hazards.

By 2010, the County had commenced remedial action to remove petroleum-contaminated soils, and it was around this time that the EPA discovered a UST leaking bunker C fuel. As a result, the EPA initiated a federal removal action to address the oil in the tank and surrounding soils. EPA issued the Final Pollution Report on May 14, 2014.

The federal government pursued a debt against Powell County, alleging that because the County owned the onshore facility that discharged the oil, it was a responsible party strictly liable for the costs. The County disputed this fact, stating that Powell County is a unit of government holding title conveyed by "bankruptcy,

THRESHOLD CRITERIA – FY26 EPA Brownfield Cleanup Grant

Nearly a Clean Slate: Reclaiming the Milwaukee Roundhouse Area (MRA) Site

foreclosure, tax delinquency, abandonment, or similar means per 33 U.S.C. SS 2701(26)(A)(iv). Further, it was argued that Powell County acquiesced to the title of this abandoned and tax-delinquent property by agreement instead of taking the property by bankruptcy, foreclosure, or eminent domain. Lastly, Powell County disputed that its liability was undoubtedly intended as an administrative duty to cooperate with the government in cleanup, and obligation with which it has fully complied.

- (b) Date on which the property was acquired: June 20, 2005.
- (c) Disposal of hazardous substances at the site occurred before Powell County acquired the property. The immediate past owners of the site, CMSPP, dispensed and disposed of petroleum at the site from 1908 to 1980.
- (d) Powell County has not caused or contributed to any release of hazardous substances at the site.
- (e) Powell County has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

12.b Property Ownership Eligibility – **Petroleum Sites:**

i. INFORMATION REQUIRED FOR A PETROLEUM SITE ELIGIBILITY DETERMINATION

(1) Current and Immediate Past Owners: Powell County is the current owner. The former Chicago, Milwaukee, St. Paul, and Pacific Railroad (CMSPP) filed bankruptcy in 1977. In 1985, the bankruptcy court discharged the site to CMC Real Estate Corporation. By 1991, site ownership transferred to CMC Heartland Partners. Powell County purchased the site from CMC Heartland Partners to qualify for monetary grants from the EPA's Brownfield Program to resolve the Site's environmental problems. USTs were on-site when the property was acquired but all have been removed.

(2) Acquisition of Site: Powell County acquiesced to the title of this abandoned and tax-delinquent property on June 20, 2005 by agreement instead of taking the property by bankruptcy, foreclosure, or eminent domain.

(3) No Responsible Party for the Cleanup of the Site:

(i) *Neither the current owner, Powell County, or the immediate past owner, CMC Heartland Partners dispensed or disposed of petroleum or petroleum product contamination at the site. USTs were a source of petroleum contamination as a result of activities throughout the 1900s by CMSPP, not CMC Heartland Partners, the immediate past owner. All USTs have been removed from the site.*

(ii) *CMSPP owned the site and USTs when dispensing or disposal of petroleum took place. No dispensing or disposal of petroleum took place under site current ownership by Powell County, or the immediate past owner, CMC Heartland Partners.*

(iii) *Powell County, the current owner, has taken reasonable steps with regard to the contamination at the site. The site was acquired with the explicit purpose and intention to secure Brownfields funding to remediate the site. Following site acquisition in 2005, Powell County oversaw more than a half-dozen planning and cleanup actions to reclaim the heavily-contaminated site for productive reuse. Steps taken include site characterization, test pit investigations, and sampling of surface water, surface soils, and sediment. A Human Health Risk Assessment was completed in 2011, along with an interim action to excavate metals and contaminated soils.*

Nearly a Clean Slate: Reclaiming the Milwaukee Roundhouse Area (MRA) Site

In 2011, the EPA oversaw the excavation of a UST containing Bunker C fuel tank. Adjacent petroleum contaminated soils were excavated through several removal actions from 2011-2013.

Following these actions, Powell County continued to take steps to reclaim the site. Montana DEQ completed a Data Summary Report (DSR) in 2013. A Remedial Investigation (RI) was completed for the site in 2015, followed by an Environmental Assessment (EA) in 2018 and a VCP soil Remediation Proposal (RP) in 2023. The VCP-RI was the final step required to commence removing the remaining contaminated soils.. All were approved by Montana DEQ. From 2021 to 2023, Powell County secured \$1 million in state-grant and \$150,000 in EPA Brownfields funding to implement the RP. The funding was expended in 2024 as a next-step in site reclamation. This work helped confirm the suspected remaining extents of contamination on-site. Finally, after over 30 years of disinvestment and industrial pollution from the Milwaukee Railroad, Powell County is now working to secure the roughly \$4mi needed to complete soil remediation so the site is safe and ready for redevelopment.

(4) Cleaned Up by a Person Not Potentially Liable: Powell County *did not* dispense or dispose of petroleum or petroleum products, or exacerbate the existing petroleum contamination at the site. Powell County, as evidenced by 13.b.i.(3)(iii), has taken reasonable steps with regard to the contamination at the site.

(5) Judgments, Orders, or Third-Party Suits: No responsible party, including Powell County, is identified as potentially liable for cleaning up the site:

(a) As detailed above, Powell County was subject to an administrative order under the Clean Water Act. While Powell County acquired the property through purchase, Powell County asserted, in settling the order: "...that the deed conveyed in 2005 may be void or voidable under Montana law. The record shows that Powell County entered into the agreement with CMC Heartland Partners only as a mechanism to obtain outside funding for the necessary environmental cleanup. Inadequate funding made it impossible to address the ever-expanding scope of remediation, at the time the order was issued. Powell County's liability was undoubtedly intended as an administrative duty to cooperate with the government in cleanup, an obligation with which it has fully complied." The case was settled and Powell County was not determined to be a liable party.

(6) Subject to RCRA: The MRA site is not subject to RCRA or any order under § 9003(h) of the Solid Waste Disposal Act.

(7) Financial Viability of Responsible Parties: The current owner, Powell County, and the immediate past owner, CMC Heartland Partners, are not identified as responsible for the contamination at the site. Powell County has, and will continue, to pursue grant funding resources until the site is ready for re-use. This benchmark is anticipated if an EPA grant is awarded.

13. Cleanup Authority and Oversight Structure

a. Overseen by the Montana DEQ, **the MRA is enrolled in the state voluntary response program.** Powell County coordinates as-needed and as-required with Montana DEQ, with regard to all planning and cleanup actions for the MRA. The 2023 RP, approved by DEQ, details the cleanup plan, cleanup standards, defines alternatives, and anticipates costs. The RP was followed by engineers and contractors during soil remediation activities in 2024. DEQ provided oversight and approval of soil sampling plans and confirmation samples. Coordination with DEQ will continue through remaining site remediation.

Nearly a Clean Slate: Reclaiming the Milwaukee Roundhouse Area (MRA) Site

MRA planning and construction activities are overseen by a QEP. Powell County coordinates regularly and as-needed with project managers, including engineers and contractors via phone calls, electronic mail, and in-person site visits. To ensure public safety, and provide site security for project oversight, the MRA site is fenced, gated, and the gate is kept locked. **Powell County will comply with all applicable federal and state laws and ensure that the MRA cleanup project protects human health and the environment.**

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives

A public meeting was held on **January 21 at 2:00** pm with the Powell County Commissioners to allow the community an opportunity to comment on the draft application, which included an attached draft Analysis of Brownfield Cleanup Alternatives (ABCA). The draft ABCA briefly summarizes information about:

- the site and contamination issues, cleanup standards, and applicable laws;
- the cleanup alternatives considered (for each alternative considered and the alternative chosen including information on the effectiveness, the ability of the applicant to implement, the resilience to address potential adverse impacts caused by extreme weather events, the cost, and an analysis of the reasonableness); and
- the proposed cleanup.

The draft ABCA submitted as part of the application is intended as a brief preliminary document.

a. Community Notification Ad

Powell County published a community notification ad in the local newspaper in the **January 7** and **January 14 2026** editions of the the Silver State Post, a local paper customarily used to communicate with the Deer Lodge area. Notice was also published on the Powell County Website on January 7 and was shared the same day on local social media pages.

The community notification ad clearly states:

- that a copy of the grant application, including the draft ABCA(s), is available for public review and comment;
- how to comment on the draft application;
- where the draft application is located; and
- the date, time, and location of the public meeting(s)

Deer Lodge, the target community, including community members with limited English proficiency and community members with disabilities, received the notification and have been provided flexible options to comment on the application.

The grant application and draft ABCAs were available for public review and comment in the Powell County Planning Department and on the County website from January 7 – January 28, 2026.

c. Public Meeting

A public meeting was held with the Powell County Commissioners on **January 21, 2026 at 2:00pm**, prior to the submittal of this grant application, to discuss the draft application and consider public comments prior to the submittal of this application. The public meeting was held in person, was available by teleconference, and was accessible to persons with limited English proficiency and persons with disabilities.

From the meeting, Powell County produced:

- The comments or A summary of the public comments received;
- A Response to Comments;
- A summary of the public meeting

THRESHOLD CRITERA – FY26 EPA Brownfield Cleanup Grant

Nearly a Clean Slate: Reclaiming the Milwaukee Roundhouse Area (MRA) Site

- Meeting sign-in sheet

d. Submission of Community Notification Documents

Attachment D includes the following items:

- A copy of the draft ABCA
- A copy of the newspaper ad and affidavit that demonstrates solicitation for comments on the application and that notification to the public occurred at least 14 calendar days before the application was submitted to EPA.
- The comments or a summary of the comments received;
- RSA's response to those public comments;
- A summary from the public meeting
- A meeting sign-in sheet

15. Contractors and Named Subrecipients

Contractors: Hydrometrics, a qualified environmental Montana-based engineering firm, was competitively procured in 2023 to implement the 2023 soil remediation proposal and ABCAs, approved by Montana DEQ. The Request for Qualifications was published in the Silver State Post, the regional newspaper on June 8, 2023, on the County website, and on the State's bid exchange site for twenty days. Four firms were solicited, and one firm submitted a competitive proposal. Powell County entered into a contract with Hydrometrics Inc. on July 24, 2023. A copy of the Request for Qualifications and the contract agreement are included in **Appendix A**.

Named Subrecipients: Not applicable



January 16, 2026

Amanda Cooley, CFM
Powell County Planning Director
409 Missouri Ave, Deer Lodge, MT 59722 Ste 114

Re: Letter of Support: Powell County's Brownfields Cleanup Grant Application for the Milwaukee Roundhouse Property

Dear Ms. Cooley:

I am writing to express the Montana Department of Environmental Quality's (DEQ's) support of Powell County's efforts to obtain a U.S. Environmental Protection Agency Brownfields Cleanup Grant. Like many rural communities in Montana, Powell County faces significant economic disadvantages due to its aging infrastructure, small population, high poverty rates, and low growth in wages and economic activity. The Milwaukee Roundhouse Property project is an excellent candidate for brownfields cleanup funding. Cleanup and revitalization of the property will achieve a number of goals important to the community such as removing safety hazards, creating jobs, and attracting new investment that can propel Powell County's revitalization efforts forward.

Powell County has developed an application requesting site-specific federal Brownfields Cleanup funding for the Milwaukee Roundhouse Property, which is located at Park Street, T.7N, R.9W, SECTION 4 in Deer Lodge, MT 59722.


DEQ affirms:

- i. Powell County has requested DEQ oversight for the site;
- ii. The site is eligible to be overseen by DEQ's Voluntary Cleanup and Redevelopment Act; and
- iii. Based upon the environmental site assessments DEQ and Powell County has performed to date and information provided by the applicant, the DEQ State Superfund Unit, which oversees the Voluntary Cleanup and Redevelopment Act, concurs that the site has had a sufficient level of site characterization for the remediation work to begin.

DEQ supports Brownfields efforts in Montana and wishes to promote assessment and cleanup activities that allow contaminated properties to be put into productive and beneficial use. Pending a successful proposal by Powell County, DEQ will continue to assist the County with technical, planning, and financial resources toward the achievement of their redevelopment goals.

If you have any questions or comments about the Milwaukee Roundhouse State Superfund Facility, please contact Hannah McDermott at (406) 444-6578 or at Hannah.McDermott@mt.gov. If you have any questions about petroleum or hazardous substance Brownfields sites, please contact Cort Walsh at (406) 444-6639 or Cortney.Walsh@mt.gov.

Sincerely,

DocuSigned by:

DB2E8B9096174A7
Amy Steinmetz, Administrator

DEQ Waste Management & Remediation Division

cc: Hannah McDermott, DEQ State Superfund, Hannah.McDermott@mt.gov
Cort Walsh, DEQ Brownfields Coordinator, Cortney.Walsh@mt.gov