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Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites -Draft Final Field Sampling Plan (FSP) #4: UR-16 and UR-21

Mike McAnulty

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September 7 , 2021

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Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites -Draft Final Field Sampling Plan (FSP) #4: UR-16 and UR-21

Dear Agency Representatives:

The Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Final Field Sampling Plan (FSP) #4: UR-16 and UR-21 is provided per the approval letter provided by the Agencies on August 30, 2021.

As described in Appendix D, Attachment C to the 2020 Consent Decree, areas listed as Unreclaimed Solid Media Sites within Butte Priority Soils Operable Unit (BPSOU) may have potentially been impacted by historic mining and therefore may pose a threat to human health, contribute metals-impacted sediments to existing or planned wet weather control features, or contribute to the degradation of surface water quality. There are a total of 39 unclaimed sites, multiple sites will be organized in a package for approval. Field sampling plan (FSP) package #4 (FSP Package #4) includes Unreclaimed (UR) Sites UR-16, and UR-21. Site evaluations will be performed using means and methods provided in the Atlantic Richfield Company Final Unreclaimed Sites Quality Assurance Project Plan (QAPP) published October 12, 2018, which was prepared in accordance with U.S. Environmental Protection Agency (EPA) guidance documents EPA QA/R-5 and EPA QA/G-5 for QAPP development. The QAPP was updated in 2021 (referred to herein as UR Sites QAPP) as a component of the BPSOU Solid Media Management Project Plan. Results from site evaluations will be used to prepare site declarations and assist with determination of site remediation requirements. Site evaluations will begin in 2021 and are anticipated to be completed 2022, or as site access allows. Site declarations for sites sampled in 2021 are anticipated to be provided for Agency review and approval by the end of 2021. Declarations of sites sampled after 2021 will be provided as soon as



feasible. Remedial action will be performed following Agency approval of pertinent site-specific remedial action work plans.

A preliminary list of FSP packages, provided below, will be updated to record the status and progress related to FSP package submittals.

Package	Sites	Submittal Date	Approval Date
1	UR-31, 32, and 39	May 19, 2021	June 10, 2021
2	UR-24, 26, and 40	June 30, 2021	August 27, 2021
3	UR-06, 07, 20, 22, 35, and 36	July 2, 2021	August 27, 2021
4	UR-16 and 21	August 20, 2021	August 30, 2021
5	UR-12, 13, 33, and 38	August 23, 2021	August 30, 2021
6	UR-05, 27, 28, 29, 30, and 34		TBD
7	UR-01, 02, 03, 04, 15, and 17		TBD

The crosswalk list provided below references where pertinent field sample collection and documentation elements are discussed.

Element	Reference Location	
	FSP	UR QAPP
Title page and approval authority.		Page i
Introduction and appropriate Agency-approved UR Sites QAPP reference.	X	
Goals and objectives of sampling.		Section 2.4, 3.2
Proposed schedule for field work.	X	
Site figure including sampling locations, number and depth of samples to be collected, and sample field identification.	X	Section 3.2.1
Field activity methods and procedures, standard operating procedures.		Section 3.2, Table 4
Sample labeling and shipping.		Section 3.2.5, Appendix C
Sample analysis, specifying X-ray fluorescence (XRF) vs. laboratory analysis and laboratory name.		Section 3.3
Figure showing the site and/or area represented by a sample, sample ID, and aliquot locations for composite samples.	X	

Soil sampling is proposed for FSP Package #4 at 2 UR Sites located in the northern area of Butte, Montana, southwest of the Berkeley Pit. The results of the soil sampling will be used to support the site declaration and potential future remediation requirements for each site. This FSP is consistent with Section 3.0 Data Acquisition protocol described in the UR Sites QAPP. These 2 UR Sites are each larger than 1.5 acres. Sites UR-16 (N&S) and 21 are in residential/commercial areas with daily potential of exposure.

Site: UR-16 S Warren Avenue and Garden Avenues

Background

Site UR-16 is approximately 1.5 acres and is located at the southwest corner of Garden and Shields Avenues. In consultation with Butte-Silver Bow, the site has been divided into 2 sites for evaluation (UR-16N and UR-16S) (Figure 1). The site is bound on the east side by Garden Avenue. Site UR-16 is bound on the south by 2 businesses and on the west by Warren Avenue. The majority of Site UR-16N is owned by Pegasus One LLC. Site UR-16N appears to have generally good vegetation. There are bare areas at the base of the slope coming from the railroad grade and along the vacated alignment of Jefferson Street. The northern section of UR-16N contains bare areas with visible manganese staining.

The southern section of UR-16S is bound by Warren Avenue on the west and Chicago Street to the south. The area is owned by Carroll David and Jean Mosmen and Mining City Services. The area appears to be used for storage and contains cars, recreational vehicles, trailers, a cargo container, and debris. There is a road along the east boundary of the southern section that looks to be used often by motor travel. Site UR-16N and UR-16S are in the Warren Avenue drainage basin.

Previous Sampling Efforts

No previous sampling data available within the site boundary.

Site: UR-21 E. Galena St. (300 Block)

Background

Site UR-21 is approximately 2.2 acres and is located southeast of the intersection of East Galena and South Ohio Streets (Figure 2). The site is in a mixed residential / commercial area. Site UR-21 is located in the 300 block of East Galena and East Mercury streets bounded by East Galena Street on the north, by East Mercury Street on the south, and Ohio Street to the west. Ownership of Site UR-21 includes Galena Street LLC (with Capgras as the contact buyer) and Mary Lou Faulkner, Cynthia Stark, Butte Public Housing, Butte-Silver Bow, Bill Maloney, and Candice Garmoe. Site UR-21 is vacant land with moderate vegetation, but also several distinct bare areas especially in the northern section. The west boundary is littered with trash.

Site UR-21 is in the Anaconda Road/Butte Brewery drainage basin and sits north of the Belmont Diversion structure.

Previous Sampling Efforts

No previous sampling data available for the site.

Unreclaimed Sites QAPP

All field work and soil analysis will be completed in accordance with the UR Sites QAPP. The UR Sites QAPP will be reviewed annually and updated as needed on Agency review and approval. Soil sampling will be conducted at the 2 UR Sites at depth intervals of 6 to 12 inches, 2 to 6 inches, and 0 to 2 inches. Sampling will take place in that order from the deepest interval (6 to 12 inches) to the shallowest interval (0 to 2 inches). Proposed sample locations for each site are shown on Figure 1 and Figure 2.

Sampling Procedure

All sampling procedures are to be followed according to the UR Sites QAPP, which describes the activities necessary to conduct soil sampling and characterization activities on UR Sites within BPSOU. It also describes the quality assurance/quality control policies and procedures to be used during collection and analysis. Implementation of this fieldwork will likely commence in the third quarter of 2021, assuming that access has been obtained for all subject parcels.

If you have questions or comments, please do not hesitate to call me at (907) 355-3914.

Sincerely,



Mike Mc Anulty
Liability Manager
Remediation Management Services Company
An affiliate of **Atlantic Richfield Company**

Attachments:

Figure 1 Unreclaimed Site UR-16 Proposed Sample Locations
Figure 2 Unreclaimed Site UR-21 Proposed Sample Locations

Cc: Patricia Gallery / Atlantic Richfield - email
Chris Greco / Atlantic Richfield – email
Josh Bryson / Atlantic Richfield - email
Mike Mc Anulty / Atlantic Richfield - email
Loren Burmeister / Atlantic Richfield – email
Dave Griffis / Atlantic Richfield - email
Jean Martin / Atlantic Richfield - email
Irene Montero / Atlantic Richfield - email
David A. Gratson / Environmental Standards / email
Mave Gasaway / DGS - email
John Davis / PRR - email

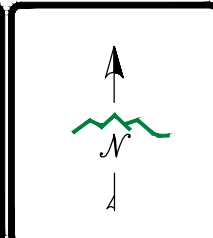
Joe Vranka / EPA - email
David Shanight / CDM - email
Curt Coover / CDM - email
James Freeman / DOJ - email
John Sither / DOJ - email
Jenny Chambers / DEQ - email
Dave Bowers / DEQ - email
Carolina Balliew / DEQ - email
Matthew Dorrington / DEQ - email
Jim Ford / NRDP - email
Ray Vinkey / NRDP - email
Harley Harris / NRDP - email
Katherine Hausrath / NRDP - email
Meranda Flugge / NRDP - email
Ted Duaine / MBMG - email
Gary Icopini / MBMG - email
Becky Summerville / MR - email
Kristen Stevens / UP - email
Robert Bylsma / UP - email
John Gilmour / Kelley Drye - email
Leo Berry / BNSF - email
Robert Lowry / BNSF - email
Brooke Kuhl / BNSF – email
Mark Engdahl / BNSF - email
Jeremie Maehr / Kennedy Jenks - email
Annika Silverman / Kennedy Jenks - email
Matthew Mavrinac / RARUS - email
Harrison Roughton / RARUS - email
Brad Gordon / RARUS - email
Mark Neary / BSB - email
Eric Hassler / BSB - email
Julia Crain / BSB - email
Chad Anderson / BSB - email
Brandon Warner / BSB – email
Abigail Peltomaa / BSB - email
Eileen Joyce / BSB – email
Sean Peterson/BSB – email
Gordon Hart / BSB – email
Jeremy Grotbo / BSB – email
Josh Vincent / WET - email
Craig Deeney / TREC - email
Scott Bradshaw / TREC - email
Brad Archibald / Pioneer - email
Pat Sampson / Pioneer - email
Mike Borduin / Pioneer - email
Joe McElroy / Pioneer – email

Andy Dare / Pioneer – email
Karen Helfrich / Pioneer - email
Leesla Jonart / Pioneer - email
Connie Logan/ Pioneer – email
Ian Magruder/ CTEC- email
CTEC of Butte – email
Scott Juskiewicz / Montana Tech – email

File: MiningSharePoint@bp.com - email
BPSOU SharePoint - upload



LEGEND:
 ● PROPOSED SOIL SAMPLE LOCATION
 ▲ PREVIOUS SOIL SAMPLE LOCATION
 UR-16 IS 1.98 ACRES



DISPLAYED AS: _____
 COORD SYS/ZONE: MSP
 DATUM: NAD 83
 UNITS: FEET
 SOURCE: PIONEER


SCALE IN FEET
 0 50 100

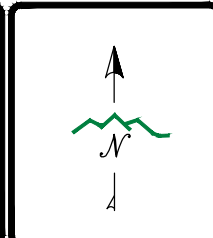
FIGURE 1 UNRECLAIMED SITE
 UR-16
 PROPOSED
 SAMPLE LOCATIONS

PIONEER
 TECHNICAL SERVICES, INC.
 1101 SOUTH MONTANA
 BUTTE, MONTANA 59701
 (406) 782-5177

DATE: 5/2021



LEGEND:
 PROPOSED SOIL SAMPLE LOCATION
 UR-21 IS 2.20 ACRES



DISPLAYED AS: _____
 COORD SYS/ZONE: MSP
 DATUM: NAD 83
 UNITS: FEET
 SOURCE: PIONEER

SCALE IN FEET
 0 30 60

FIGURE 2 UNRECLAIMED SITE
 UR-21
 PROPOSED
 SAMPLE LOCATIONS



PIONEER
 TECHNICAL SERVICES, INC.
 1101 SOUTH MONTANA
 BUTTE, MONTANA 59701
 (406) 782-5177

DATE: 5/2021



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE**

FEDERAL BUILDING, 10 West 15TH Street, Suite 3200
Helena, MT 59626-0096
Phone 866-457-2690
www.epa.gov/region8

Ref: 8MO

August 30, 2021

Mr. Mike McAnulty
Liability Manager
Atlantic Richfield Company
317 Anaconda Road
Butte, Montana 59701

**Re: Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites
Draft Final Field Sampling Plan (FSP) Submittal #4: Unreclaimed Sites UR-16 and
UR-21 (dated August 20, 2021)**

Dear Mike:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the *Unreclaimed Sites Draft Final Field Sampling Plan (FSP) Submittal #4*. Please distribute this FSP submittal #4 as final.

If you have any questions or concerns, please call me at (406) 457-5019.

Sincerely,

**NIKIA
GREENE**

Digitally signed by
NIKIA GREENE
Date: 2021.08.30
09:49:41 -06'00'

Nikia Greene
Remedial Project Manager

cc: (email only)
Butte File
Jenny Chambers; DEQ
Matt Dorrington, DEQ
Daryl Reed; DEQ
Jon Morgan; DEQ counsel
Carolina Balliew; DEQ
Harley Harris; NRDP
Katherine Hausrath; NRDP

Jim Ford; NRDP
Ray Vinkey; NRDP
John Gallagher; BSBC
Eileen Joyce; BSBC
Sean Peterson; BSBC
Eric Hassler; BSBC
Brandon Warner; BSBC
Chad Anderson; BSBC
Karen Sullivan; BSBC
Julia Crain; BSBC
Abby Peltomaa; BSBC
Jeremy Grotbo; BSBC
Anne Walsh; UP
Robert Bylsma; UP counsel
Leo Berry; BNSF and UP counsel
Mark Engdahl; BNSF
Brooke Kuhl; BNSF counsel
Jeremie Maehr; Kennedy Jenks for BNSF and UP
Annika Silverman; Kennedy Jenks for BNSF and UP
Bob Andreoli; Patroit/RARUS
Becky Summerville; counsel for Inland Properties Inc.
Robert Lowry, BNSF counsel
Loren Burmeister; AR
Josh Bryson; AR
Mike Mcanulty; AR
Dave Griffis; AR
Jean Martin; Counsel AR
Mave Gasaway; attorney for AR
Adam Cohen; Counsel for AR
Pat Sampson; Pioneer for AR
Scott Bradshaw; TREC
Mike Borduin; Pioneer for AR
Karen Helfrich; Pioneer for AR
Andy Dare; Pioneer for AR
Scott Sampson; Pioneer for AR
Brad Archibald; Pioneer for AR
Andy Dare; Pioneer for AR
Tina Donovan; Woodardcurran for AR
Don Booth; AR consultant
Ted Duaiame; MBMG
Gary Icopini; MBMG
David Shanight, CDM Smith
Curt Coover, CDM Smith
Chapin Storrar; CDM Smith
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Charlie Partridge; EPA
Jean Belille; EPA
Ian Magruder; CTEC (Tech Advisor)
Janice Hogan; CTEC
Kristi Carroll; Montana Tech Library