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Silver Bow Creek/Butte Area Superfund Site

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Fall 10-19-2021

### **Butte Priority Soils Operable Unit (BPSOU) Revised Insufficiently Reclaimed Sites - Field Sampling and Investigation Plan (FSP) BRES No. 104 - Colorado Dump and Response to Comments**

Mike McAnulty

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**Mike Mc Anulty**  
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October 19, 2021

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**RE: Butte Priority Soils Operable Unit (BPSOU) Revised Insufficiently Reclaimed Sites - Field Sampling and Investigation Plan (FSP) BRES No. 104 - Colorado Dump and Response to Comments**

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to submit the (BPSOU) Revised Insufficiently Reclaimed Sites - Field Sampling and Investigation Plan (FSP) BRES No. 104 - Colorado Dump. Responses to Agency comments provided October 7, 2021, are included below. The plan may be downloaded at the following link:

[https://pioneertechnicalservices.sharepoint.com/:b:/s/submitted/EXiXy6\\_jlRFKgsFHw\\_pCTkEB9c-J1ilnqe2NSz5t9GquCg](https://pioneertechnicalservices.sharepoint.com/:b:/s/submitted/EXiXy6_jlRFKgsFHw_pCTkEB9c-J1ilnqe2NSz5t9GquCg)

#### General Comments:

1. *EPA and DEQ recommend adding an additional sample north of sample ID IR-104-SS-4 to encompass the bare driveway area and extending into the west alley south of the concrete foundation due to its differentiating definable feature.*

**Atlantic Richfield Response: An additional sample from location IR-104-SS09, north of sample ID IR-104-SS04, will be collected to encompass the driveway and alley south of the concrete foundation.**

2. *EPA and DEQ recommend extending the northern boundary to encompass the remainder of the parking lot area and including a sample that is representative of that particular definable feature.*

# Atlantic Richfield Company

**Mike Mc Anulty**  
Liability Manager

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**Atlantic Richfield Response:** The proposed boundary has been adjusted to encompass the parking area along the northern region of the site. Additional samples will be collected from this extended area (IR-104-SS10 and IR-104-SS11).

3. *It is unclear from Figure 1 if a sample(s) will be collected from the "possible mine waste" feature that is indicated on the figure. EPA request that a sample be collected from this potential waste pile.*

**Atlantic Richfield Response:** An additional sample location (IR-104-SS08) has been added to adequately ensure samples are collected from the area from the "possible mine waste" feature.

4. *Please attached the approved Reclaimed Monitoring and Maintenance Quality Assurance Project Plan to this FSP.*

**Atlantic Richfield Response:** Comment noted. The Reclaimed Areas Monitoring and Maintenance Quality Assurance Project Plan is cited in the revised FSP and a link is provided.

5. *Due to the proximity of this property to the Aware Early Head Start school, please consider using residential action levels to determine if remedial action is necessary at this site. This consideration is simply to suggest that the potential of the property to be expanded will save the effort to come back later.*

**Atlantic Richfield Response:** Atlantic Richfield is working with the property owner to determine future land use options to determine the appropriate action level to implement and will take the Agencies' recommendation regarding implementation of residential action level into consideration at that time.

6. *Please remove the private property owner names or business names from all figures.*

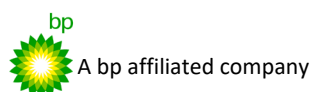
**Atlantic Richfield Response:** Private property owner names and business names have been removed from the text and figure.

If you have any questions or comments, please call me at (907) 355-3914.

Sincerely,

*Mike McAnulty*

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



# Atlantic Richfield Company

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