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Summer 8-18-2021

Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites – Final Field Sampling Plan (FSP) #3: UR-06, UR-07, UR-20, UR-22, UR-35, and UR-36

Mike McAnulty

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Mike Mc Anulty Liability Manager

August 18, 2021

Nikia Greene Remedial Project Manager US EPA – Montana Office Baucus Federal Building 10 West 15th Street, Suite 3200 Helena, Montana 59626 Erin Agee Senior Assistant Regional Counsel US EPA Region 8 Office of Regional Counsel CERCLA Enforcement Section 1595 Wynkoop Street Denver, CO 80202 Mail Code: 80RC-C

Daryl Reed DEQ Project Officer P.O. Box 200901 Helena, Montana 59620-0901 Jonathan Morgan, Esq. DEQ, Legal Counsel P.O. Box 200901 Helena, Montana 59620-0901

RE: Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites – Final Field Sampling Plan (FSP) #3: UR-06, UR-07, UR-20, UR-22, UR-35, and UR-36

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to submit the **Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Final Field Sampling Plan (FSP) #3** for review and approval. The plan has been revised to reflect the Agency comments on the Unreclaimed Sites Draft Final Field Sampling Plan (FSP) #3. Agency comments and Atlantic Richfield Company responses are provided below, and the final FSP is included in the email with this letter.

Response to Specific Comments

1. Site: UR-06 Capri Motel Parking Lot:

For previous sampling efforts it is stated that three previous samples have been collected and results are provided in Table 1. However, Table 1 only shows two sample results. Please correct text as appropriate and include additional sample results as necessary.

Atlantic Richfield Response: The text has been revised.

2. Site: UR-20 Park and Covert Streets (Northwest Corner):

For previous sampling efforts it is stated that three previous samples have been collected and results are provided in Table 4. However, Table 4 only shows one sample result. Please correct text as appropriate and include additional sample results as necessary.

Atlantic Richfield Response: The text has been revised.



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3. Site: UR-22 N. Arizona and E. Granite St. (Northeast Corner):

For previous sampling efforts it is stated that three previous samples have been collected and results are provided in Table 3. However, Table 3 only shows one sample result. Please correct text as appropriate and include additional sample results as necessary.

Atlantic Richfield Response: The text has been revised.

4. Site: UR-36 S. Parrot Slope:

An additional sample should be added to the eastern portion of the northern lobe to help fully characterize this area. Please add this additional sample location.

Atlantic Richfield Response: Atlantic Richfield believes this area is a natural feature consistent with native soil (such as rock outcropping) and additional sampling in this area is not warranted. Additional samples can be requested in the field by the Agency oversight representative or sampling team and recorded as opportunistic samples to fully characterize the site.

End of Comments

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

Sincerely,

Mike Mednulty

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

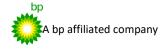


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Cc: Patricia Gallery / Atlantic Richfield - email Chris Greco / Atlantic Richfield – email Josh Bryson / Atlantic Richfield - email Mike Mc Anulty / Atlantic Richfield - email Loren Burmeister / Atlantic Richfield – email Dave Griffis / Atlantic Richfield - 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 Duaime / 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



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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

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