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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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**August 18, 2021**

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**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.**

Dear Agency Representatives:

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 #3 (FSP Package #3) includes Unreclaimed (UR) Sites UR-06, UR-07, UR-20, UR-22, UR-35, and UR-36. 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 8, 2021
2	UR-24, 26, and 40	June 30, 2021	TBD
3	UR-06, 07, 20, 22, 35, and 36	July 2, 2021	TBD
4	UR-16 and 21	TBD	TBD
5	UR-12, 13, 33, and 38	TBD	TBD
6	UR-05, 27, 28, 29, 30, and 34	TBD	TBD
7	UR-01, 02, 03, 04, 15, and 17	TBD	TBD

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

Element	Reference Location	
	FSP	UR Sites 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 #3 at 6 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 6 UR Sites are made up of 5 sites less than an acre and 1 site that is 1.8 acres. UR-6, UR-7, UR-20, UR-22, and UR-35 are vacant lots that are near businesses and residential areas with pedestrian traffic. UR-36 is the south Parrott slope site and contains steep slopes that drain into public roadways approximated at 1.8 acres. Each of the sites is discussed separately below. The attachments at the end of this document include figures for each site showing the proposed soil sampling locations.

## Site: UR-06 Capri Motel Parking Lot

### Background

Site UR-06 is approximately 0.22 acres and is located at the northwest corner of East Granite and North Arizona Streets, adjacent to Capris Motel – Arctic Dump (BRES No. 100), in uptown Butte (Figure 1). It is on the east end of the uptown business district, in an area of mixed commercial and open space use. Site UR-06 is owned by LXS Hospitality, LLC. A motel is located on the same parcel where UR-06 is located. Parts of site UR-06 are sometimes used for parking and part of it is a driveway into an underground portion of the motel building (perhaps a former parking garage).

The ground surface at Site UR-06 is mostly gravel containing iron staining with very little vegetation. Currently there are engineered beams being stored along the west boundary. Runoff from Site UR-06 generally flows to the south into a storm drain (ID: AB-I-5964) located in the southeast corner outside of the boundary. Site UR-06 is in the Anaconda Road / Butte Brewery drainage basin and sits north of the Belmont Diversion structure. Storm water drainage appears to be directed to the Belmont Diversion structure, which discharges to the Berkeley Pit, and does not impact Silver Bow Creek.

### Previous Sample Efforts

Data obtained from the Geocortex web-based database at <https://eis2.woodardcurran.com/Html5Viewer/index.html?viewer=BPButte.BPSOU> contains the records for the previous soil samples near Site UR-06. The approximate sample locations are included on Figure 1 with results provided in Table 1 below. Some of the results listed, shown in highlighted cells, show exceedances of BPSOU action levels for copper, lead, and zinc. The BPSOU action levels are listed in Tables 1 and 2 of the Atlantic Richfield Company UR Sites QAPP.

**Table 1: Previous Sampling Results from BPSOU Soil Sampling  
(units are milligrams per kilograms)**

	Sample Station ID	
COC	BF-010	FSUA-21
Arsenic	133 J	68
Cadmium	14	NA
Copper	1,260	870
Lead	2,790	740
Zinc	2,940	4,760
Sample Date	7/23/87	10/27/95

COC: contaminant of concern. NA: not analyzed.

## Site: UR-07 SW Corner of E Granite St. and Covert St.

### Background

Site UR-07 is approximately 0.75 acres and is located at the southwest corner of East Granite and Covert Streets in uptown Butte (Figure 2). It is on the east edge of the uptown area, just west of the Berkeley Pit in an area of mixed residential and commercial use. There are many vacant lots in the area. Site UR-07 itself consists of several vacant parcels. Ownership of Site UR-07 includes Cote Family LLC, Butte-Silver Bow, and Montana Resources. Site UR-07 appears to have moderate vegetation, but the northwest one-third of the site contains a significant bare area that appears to be impacted soil.

Runoff from Site UR-07 generally flows to the south. Site UR-07 is in the Anaconda Road / Butte Brewery drainage basin of BPSOU.

### Previous Sample Efforts

Data obtained from the Geocortex web-based database at <https://eis2.woodardcurran.com/Html5Viewer/index.html?viewer=BPButte.BPSOU> contains the records for the previous soil samples at Site UR-07. The samples were collected in 1995 as part of the Field Survey of Unreclaimed Areas program. The approximate sample locations are included on Figure 2 with results provided in Table 2 below. Some of the results listed, shown in highlighted cells, exceeded BPSOU action levels for arsenic, copper, lead, and zinc. The BPSOU action levels are listed in Tables 1 and 2 of the UR Sites QAPP.

**Table 2: Previous Sampling Results from BPSOU Soil Sampling  
(units are milligrams per kilograms)**

	Sample Station ID	
	FSUA-26	FSUA-27
COC		
Arsenic	312	262
Cadmium	NA	NA
Copper	1,270	1,130
Lead	3,560	1,130
Zinc	1,460	409
Sample Date	11/16/95	11/16/95

COC: contaminant of concern. NA: not analyzed.

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

### Background

Site UR-20 is approximately 0.74 acres and is located at the northwest corner of East Park and Covert Streets in uptown Butte (Figure 3). It is on the east edge of the uptown area, just west of the Berkeley Pit in an area of mixed residential and commercial use. There are many vacant lots in the area. Site UR-20 is a vacant parcel owned by Daniel and Melody Rice. A small portion of UR-20 along the alley on the north side of the site may be owned by Butte-Silver Bow. Site UR-20 has moderate grass cover with what appears to be impacted soil along the northern boundary. There are multiple bare areas throughout the site.

Runoff from Site UR-20 generally flows to the south. Site UR-20 is in the Anaconda Road/ Butte Brewery drainage basin and sits north of the Belmont Diversion structure.

### Previous Sample Efforts

Data obtained from the Geocortex web-based database at <https://eis2.woodardcurran.com/Html5Viewer/index.html?viewer=BPButte.BPSOU> contains the records for the previous soil sample within Site UR-20 collected in 1995 as part of the Field Survey of Unreclaimed Areas program. The approximate sample locations are included on Figure 3 with results provided in Table 3 below. The BPSOU action levels for human health and storm water screening criteria are listed in Tables 1 and 2 of the UR Sites QAPP. Some of the results listed, shown as highlighted cells, exceeded BPSOU storm water screening criteria for copper and zinc.

**Table 3: Previous Sampling Results from  
BPSOU Soil Sampling  
(units are milligrams per kilograms)**

	Sample Station ID
COC	FSUA-34
Arsenic	60
Cadmium	NA
Copper	2,040
Lead	174
Zinc	1,770
Sample Date	11/17/95

COC: contaminant of concern. NA: not analyzed.

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

### Background

Site UR-22 is approximately 0.68 acres and is located at the northeast corner of East Granite and North Arizona Streets in uptown Butte (Figure 4). It is on the east end of the uptown business district, in an area of mixed commercial and open space use. Bordering UR-22 on the east are two residences. Site UR-22 is vacant land. Ownership of Site UR-22 includes Thorton Properties LLC and Butte-Silver Bow. Site UR-22 has established grasses throughout the site with scattered weeds. The southwest corner of the site has a small gully with iron and manganese staining. There are bare areas located throughout the site that contain Iron staining. There are small piles that appear to be dumped material. The portion of the site belonging to Butte-Silver Bow is an east-west trending unpaved alley that is used by the residences.

The south edge of UR-22 is a retaining wall and the ground surface sits approximately 8 feet above Granite Street. Runoff from Site UR-22 generally flows to the south.

### Previous Sample Efforts

Data obtained from the Geocortex web-based database at <https://eis2.woodardcurran.com/Html5Viewer/index.html?viewer=BPButte.BPSOU> contains the records for the previous soil sample near Site UR-22. The approximate sample location is included on Figure 4 with results provided in Table 4 below. The BPSOU action levels for human health and storm water screening criteria are listed in Tables 1 and 2 of the UR Sites QAPP. Some of the results, shown as highlighted cells below, exceeded BPSOU storm water screening criteria for copper and zinc.

<b>Table 4: Previous Sampling Results from BPSOU Soil Sampling (units are milligrams per kilograms)</b>	
	<b>Sample Station ID</b>
COC	02-03
Arsenic	84
Cadmium	7
Copper	1,340
Lead	993
Zinc	2,125
Sample Date	4/19/94

COC: contaminant of concern.

## Site: UR-35 Steward Parking Lot – South of Site

### Background

Site UR-35 is approximately 0.12 acres and is located 300 feet northwest of the intersection of North Main and Woolman Streets in uptown Butte (Figure 5). It is an irregular-shaped bare area, part of which is a gravel turn-around area used by local residents. It is essentially an area in the backyard of homes that face North Main Street. Ownership of site UR-35 includes Atlantic Richfield, Butte-Silver Bow, and Edgar Scott. Site UR-35 is vacant; that is, there are no structures within the boundaries of the site. However, the parcel owned by Edgar Scott has a residence and there are other residences close to UR-35. Site UR-35 is poorly vegetated with homogenous soil that is yellow in color mixed with gravel. Due to size and representation, only 3 sample locations are proposed. Storm water runoff from Site UR-35 generally flows to the south. Site UR-35 is in the Buffalo Gulch drainage basin of BPSOU.

### Previous Sample Efforts

Data obtained from the Geocortex web-based database at <https://eis2.woodardcurran.com/Html5Viewer/index.html?viewer=BPButte.BPSOU> contains the records for the previous soil samples near Site UR-35. The samples were collected in 1995 and 1996 as part of the Field Survey of Unreclaimed Areas program. The approximate sample locations are included on Figure 5 with results provided in Table 5 below. The BPSOU action levels for human health and storm water screening criteria are listed in Tables 1 and 2 of the UR Sites QAPP. Some of the results, shown as highlighted cells below, exceeded BPSOU storm water screening criteria for arsenic, lead, and zinc.

	Sample Station ID	
COC	FSUA-20	FSUA-122
Arsenic	443	301
Cadmium	NA	NA
Copper	908	902
Lead	2,070	2,860
Zinc	3,900	2,740
Sample Date	10/27/95	6/20/96

COC: contaminant of concern. NA: not analyzed.



## Site: UR-36 S. Parrot Slope

### Background

Site UR-36 is approximately 1.8 acres. It is located along the south side of Anaconda Road, just west of the Berkeley Pit and northeast of the uptown Butte business district (Figure 6). Site UR-36 is crescent shaped and wraps around the flat hilltop where the former Parrot mine is located. The majority of Site UR-36 is owned by Butte-Silver Bow and a minor portion is owned by AFFCO. Site UR-36 is vacant land in a light industrial area. There are a few residences located approximately 450 feet to the south.

The south-facing portion of the site is almost entirely bare and appears to consist of mine waste. The north-facing portion of the site has areas with moderate vegetation but also has very steep bare areas. There is some exposed bedrock in the north portion of UR-36. There is some fencing on the north side; it does not restrict access, but it denotes the AFFCO property boundary. Site UR-36 is in the Anaconda Road/Butte Brewery drainage basin and drains into the South Parrot Channel.

### Previous Sample Efforts

Data obtained from the Geocortex web-based database at <https://eis2.woodardcurran.com/Html5Viewer/index.html?viewer=BPButte.BPSOU> contains the records for the previous soil samples in the vicinity of Site UR-36. Approximate sample locations are included on Figure 6 with results provided in Table 6 below. The BPSOU action levels for human health and storm water screening criteria are listed in Tables 1 and 2 of the UR Sites QAPP. Some of the results, shown as highlighted cells below, exceeded BPSOU storm water screening criteria for arsenic, copper, lead, and zinc.

	Sample Station ID			
COC	WD-087	WD-088	FSUA-145	FSUA-146
Arsenic	101	342	97	334
Cadmium	12	10	NA	NA
Copper	3,640	1,720	1,180	1,050
Lead	271	403	1,040	744
Zinc	1,110	771	2,610	731
Sample Date	6/22/87	6/22/87	6/19/96	6/16/96

COC: contaminant of concern. NA: not analyzed.

## Unreclaimed Sites QAPP

All field work and soil analysis will be completed in accordance with the UR Sites QAPP. The QAPP will be reviewed annually and updated as needed on Agency review and approval. Soil sampling will be conducted at the 6 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 Figures 1 through 6.

## 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 spring 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-06 Proposed Sample Locations
- Figure 2 Unreclaimed Site UR-07 Proposed Sample Locations
- Figure 3 Unreclaimed Site UR-20 Proposed Sample Locations
- Figure 4 Unreclaimed Site UR-22 Proposed Sample Locations
- Figure 5 Unreclaimed Site UR-35 Proposed Sample Locations
- Figure 6 Unreclaimed Site UR-36 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

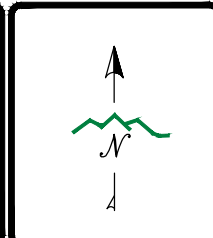
David A. Gratson / Environmental Standards / email  
Mave Gasaway / DGS - email  
John Davis / PRR - email  
Joe Vranka / EPA - email  
David Shanight / CDM - email  
Curt Coover / CDM - email  
James Freeman / DOJ - email  
John Sither / DOJ - email  
Jenny Chambers / DEQ - email  
Dave Bowers / DEQ - 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-06 IS 0.22 ACRES



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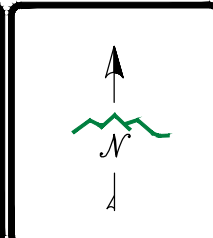
FIGURE 1 UNRECLAIMED SITE  
 UR-06  
 PROPOSED  
 SAMPLE LOCATIONS

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

DATE: 5/2021



LEGEND:  
 ● PROPOSED SOIL SAMPLE LOCATION  
 ▲ PREVIOUS SOIL SAMPLE LOCATION  
 UR-07 IS 0.3 ACRES



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

SCALE IN FEET  
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FIGURE 2 UNRECLAIMED SITE  
 UR-07  
 PROPOSED  
 SAMPLE LOCATIONS

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

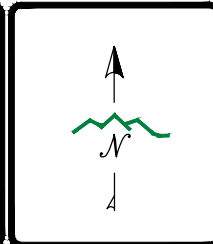
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**LEGEND:**

- PROPOSED SOIL SAMPLE LOCATION
- PREVIOUS SOIL SAMPLE LOCATION

UR-20 IS 0.74 ACRES



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COORD SYS/ZONE: MSP

DATUM: NAD 83

UNITS: FEET

SOURCE: PIONEER

SCALE IN FEET

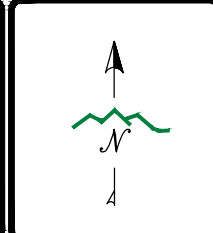
**FIGURE 3** UNRECLAIMED SITE  
UR-20  
PROPOSED  
SAMPLE LOCATIONS

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

DATE: 5/2021



LEGEND:  
 ● PROPOSED SOIL SAMPLE LOCATION  
 ▲ PREVIOUS SOIL SAMPLE LOCATION  
 UR-22 IS 0.67 ACRES



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

SCALE IN FEET  
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FIGURE 4 UNRECLAIMED SITE  
 UR-22  
 PROPOSED  
 SAMPLE LOCATIONS

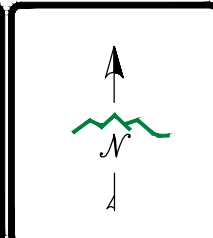
**PIONEER**  
 TECHNICAL SERVICES, INC.  
 1101 SOUTH MONTANA  
 BUTTE, MONTANA 59701  
 (406) 782-5177

DATE: 5/2021





LEGEND:  
 ● PROPOSED SOIL SAMPLE LOCATION  
 ▲ PREVIOUS SOIL SAMPLE LOCATION  
 UR-35 IS 0.07 ACRES



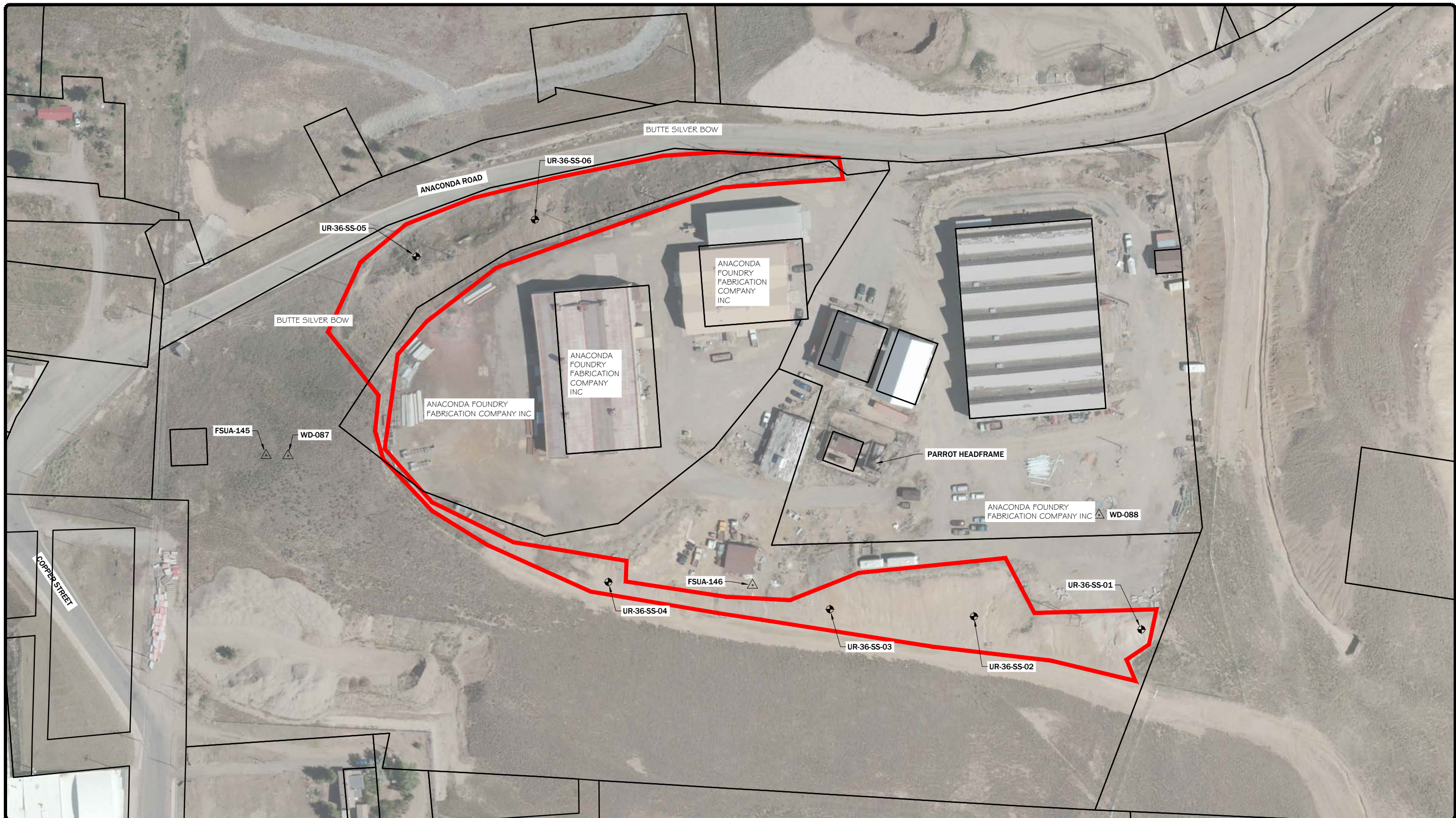
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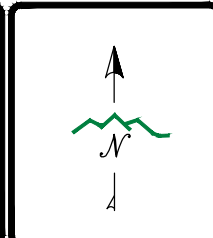
FIGURE 5 UNRECLAIMED SITE  
 UR-35  
 PROPOSED  
 SAMPLE LOCATIONS

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

DATE: 5/2021



LEGEND:  
 ● PROPOSED SOIL SAMPLE LOCATION  
 ▲ PREVIOUS SOIL SAMPLE LOCATION  
 UR-36 IS 1.8 ACRES



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

SCALE IN FEET  
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**FIGURE 6** UNRECLAIMED SITE  
 UR-36 PARROTT SLOPE  
 PROPOSED  
 SAMPLE LOCATIONS

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

DATE: 5/2021