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Butte Priority Soils Operable Unit (BPSOU) 2021- Unreclaimed Areas Quality Assurance Project Plan (QAPP), Request for Change (RFC)-01

Mike McAnulty

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Atlantic Richfield Company

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November 30, 2021

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RE: Butte Priority Soils Operable Unit (BPSOU) 2021- Unreclaimed Areas Quality Assurance Project Plan (QAPP), Request for Change (RFC)-01

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to submit the Butte Priority Soils Operable Unit (BPSOU) 2021- Unreclaimed Areas Quality Assurance Project Plan (QAPP), Request for Change (RFC)-01. The document is attached for review and comment. Upon approval, the changes will be incorporated into the referenced QAPP and used to prepare site declarations.

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

Sincerely,

Mike McAnulty

Mike Mc Anulty
Liability Manager & Global Risk Champion
Remediation Management Services Company
An affiliate of **Atlantic Richfield Company**

Atlantic Richfield Company

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Pat Sampson / Pioneer - email
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Connie Logan/ Pioneer – email
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CTEC of Butte – email
Scott Juskiewicz / Montana Tech – email

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

ATLANTIC RICHFIELD COMPANY

RFC - REQUEST FOR CHANGE

	RFC NO. BPSOU-UR-01	CONTRACTOR Pioneer Technical Services, Inc.	RFP NO.														
CONTRACT DESCRIPTION: BPSOU Unreclaimed Sites Scope of Work; Appendix D Attachment C to 2020 CD		ATTENTION OF: Nikia Greene															
SUBJECT: <input type="radio"/> ELECTRICAL <input type="radio"/> MECHANICAL <input checked="" type="checkbox"/> CIVIL <input type="radio"/> STRUCTURAL/ARCHITECTURAL <input type="radio"/> INSTRUMENTATION																	
OPERABLE UNIT: Butte Priority Soils MAJOR WORK TASK:		REFERENCE DWG, P.O., TAG, SPECIFICATION NO. (FOR DEVIATIONS OR DEFICIENCIES) ETC.: BPSOU Unreclaimed Sites QAPP															
PROBLEM DESCRIPTION:																	
<p>Table 1 (BPSOU Soil Action Levels for Human Health) of the Unreclaimed Sites Quality Assurance Project Plan (QAPP) (Atlantic Richfield Company, 2021) lists the residential human health action level for mercury as 10 milligrams per kilograms (mg/kg). We believe the action level in Table 1 was inadvertently carried over from Table 2 (BPSOU Soil Screening Criteria for Storm Water Contaminants of Concern [COCs]). Both tables are listed below. Consistent with the Waste Identification Criteria included in Appendix D to the 2020 BPSOU Consent Decree, the mercury action level of 10 mg/kg is intended to be used as a screening level target to be used as an indication of sediment potential contribution to degradation of stream quality and does not apply as a human health action level for residential land use.</p>																	
Table 1. BPSOU Soil Action Levels for Human Health																	
<table border="1"> <thead> <tr> <th>Analyte</th> <th>Solid Media</th> <th>Action Levels</th> </tr> </thead> <tbody> <tr> <td>Lead¹</td> <td>Non-Residential/ Residential</td> <td>2,300 mg/kg/1,200 mg/kg</td> </tr> <tr> <td>Arsenic¹</td> <td>Recreational/Commercial/Residential</td> <td>1,000 mg/kg/500 mg/kg/250 mg/kg</td> </tr> <tr> <td>Mercury²</td> <td>Residential</td> <td>10 mg/kg</td> </tr> </tbody> </table>				Analyte	Solid Media	Action Levels	Lead ¹	Non-Residential/ Residential	2,300 mg/kg/1,200 mg/kg	Arsenic ¹	Recreational/Commercial/Residential	1,000 mg/kg/500 mg/kg/250 mg/kg	Mercury ²	Residential	10 mg/kg		
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<ol style="list-style-type: none"> From EPA Record of Decision (ROD) BPSOU, Table 12-1 (EPA, 2006b). From Field Screening Criteria and Procedures Phase 7 and 8 Remedial Action, Streamside Tailings Operable Unit removal action levels (Pioneer, 2011). <p>mg/kg: milligrams per kilogram.</p>																	
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<p>Atlantic Richfield Company and Butte Silver Bow (BSB) proposes to use the mercury action level of 147 mg/kg for Unclaimed Sites designated as residential land use to be consistent with the Residential Metals Abatement Program (RMAP) and the 2020 RMAP Unilateral Administrative Order Amendment (UAO Amendment) for "Partial Remedial Design/Remedial Action Implementation and Certain Operation and Maintenance at the Butte Priority Soils Operable Unit/Butte Site" (EPA Docket No. CERCLA-08-2011-0011) (EPA, 2020) which states in Exhibit 1, Section 2.1.5 Residential Assessment and Remediation:</p>																	
<p><i>"One of the primary objectives of the RMAP is to remediate residential yard components to below the residential action levels of 1,200 mg/kg lead, 250 mg/kg, arsenic, and 147 mg/kg mercury to a minimum depth of 12 inches (with the exception of vegetable/flower gardens, which will be remediated to a depth of 24 inches) by removing and replacing soil, placing permanent covers, and/or ICs in a manner consistent with the 2006 ROD, the 2011 ESD, and 2020 RODA."</i></p>																	
The Unreclaimed Sites QAPP Table 1, BPSOU Soil Action Levels for Human Health, will be revised as indicated in red below:																	



Table 1. BPSOU Soil Action Levels for Human Health

Analyte	Solid Media	Action Levels
Lead ¹	Non-Residential/ Residential	2,300 mg/kg/1,200 mg/kg
Arsenic ¹	Recreational/Commercial/Residential	1,000 mg/kg/500 mg/kg/250 mg/kg
Mercury ²	Residential	10 147 mg/kg

1. From EPA Record of Decision (ROD) BPSOU, Table 12-1 (EPA, 2006b).

2. From Exhibit 1, Section 2.1.5, UAO Amendment (EPA, 2020) (Field Screening Criteria and Procedures Phase 7 and 8 Remedial Action, Streamside Tailings Operable Unit removal action levels (Pioneer, 2011).
mg/kg: milligrams per kilogram.

The revised mercury human health action level for residential land use will be used for evaluating data collected under the Unreclaimed Sites QAPP (Atlantic Richfield Company, 2021).

Table 2. BPSOU Soil Screening Criteria for Storm Water COCs will not be revised. The screening level/action level for mercury will remain 10 mg/kg for potential contribution to degradation of stream quality.


References:

Atlantic Richfield, 2021. 2021 Final Unreclaimed Sites Quality Assurance Project Plan (QAPP). Atlantic Richfield Company, June 2021.

EPA, 2020. U.S. Environmental Protection Agency (EPA) Unilateral Administrative Order Amendment (UAO Amendment) for "Partial Remedial Design/Remedial Action Implementation and Certain Operation and Maintenance at the Butte Priority Soils Operable Unit/Butte Site" (EPA Docket No. CERCLA-08-2011-0011).

- | | |
|--|--|
| <input type="radio"/> Design Deficiency | <input type="radio"/> Material Substitution |
| <input checked="" type="checkbox"/> Engineering Change Request | <input type="radio"/> Vendor Material Deficiency |
| <input type="radio"/> Agency Directive | <input checked="" type="checkbox"/> Scope |
| <input type="radio"/> Construction Deficiency | <input type="radio"/> Clarification/Information |
| <input type="radio"/> Schedule | <input type="radio"/> Other |

RESPONSE/DIRECTIVE

Project Manager  Date 11/30/2021

Atlantic Richfield Co. Representative Mike McNulty Date 11/30/2021

EPA Representative _____ Date _____

DEQ Representative _____ Date _____

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