Summer 8-19-2022

Butte Priority Soils Operable Unit (BPSOU) Final Insufficiently Reclaimed Sites - Field Sampling Plan (FSP) BRES No. 16 - Curry.

Mike McAnulty

Atlantic Richfield Company

317 Anaconda Road
Butte MT 59701
Direct (406) 782-9964
Fax (406) 782-9980

August 19, 2022

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: 8ORC-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) Final Insufficiently Reclaimed Sites - Field Sampling Plan (FSP) BRES No. 16 - Curry.

Dear Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to submit the Butte Priority Soils Operable Unit (BPSOU) Final Insufficiently Reclaimed Sites - Field Sampling and Investigation Plan (FSP) BRES No. 16 – Curry. Agency comments provided in the approval letter dated February 22, 2022, have been addressed below. The Agency approval letter can be accessed at the following link:

https://pioneertechnicalservices.sharepoint.com/:b:/s/submitted/Eb0abhB6gcpFhjsgE11xucUBiyP2R35c4gYTD1sq_cdMuw[1].

As described in Appendix D, Attachment C to the 2020 BPSOU Consent Decree (CD) (available at https://www.co.silverbow.mt.us/2161/ButtePriority-Soils-Operable-Unit-Conse), sites listed as Insufficiently Reclaimed Solid Media Sites within the BPSOU were reclaimed prior to the establishment of the Butte Hill Revegetation Specifications (BHRS), which is Appendix B of Appendix E to the U.S. Environmental Protection Agency (EPA) 2006 Record of Decision (ROD) contained in the CD. Since additional reclamation work may be required to bring the sites into compliance with the BHRS, the sites will be evaluated to assess past actions and to identify any site-specific conditions that fail to meet the BHRS.

The site evaluation will include a review of available previous Butte Reclamation Evaluation System (BRES) field evaluations and site construction completion reports along with on-site evaluation and sampling. The site evaluation will include sampling within the existing site boundary performed according to the Atlantic Richfield Company *2022 Final Insufficiently Reclaimed Areas Quality*

[1] Please note that the link provided is valid for one year from the date of this submittal.

Assurance Project Plan (QAPP) (referred to as IR QAPP), which is a component of the BPSOU Solid Media Management Project Plan. The IR QAPP is available at the following link:

https://pioneertechnicalservices.sharepoint.com/:f:/s/submitted/Eid2SfSSinhOsfQXY5CXGEoBe5IIf5IQO01hBO43ZROgpg[2].

Field sampling within the existing boundary will be performed to determine whether contaminants are present, whether growth media is adequate, and whether there are previously unidentified sources contributing to site deficiencies.

Additional sampling performed in adjacent areas outside of the existing site boundary to characterize gap zones where site characterization may be unknown or incomplete will be conducted according to the Atlantic Richfield Company *Final Unreclaimed Sites Quality Assurance Project Plan (QAPP)* (referred to as the Unreclaimed Sites QAPP) which also is a component of the BPSOU Solid Media Management Project Plan available at the following link:

https://pioneertechnicalservices.sharepoint.com/:f:/s/submitted/Ev1dhUeMuUdLjU8tnuV5RioBvJZRYc2HpgEjM9KzT-PpjQ.[3]

Sample results in the areas outside of the existing site boundary will be evaluated to determine if contaminants are present beyond the site boundary at concentrations exceeding action levels listed in Table 1 or Table 2 in the Unreclaimed Sites QAPP. Final sampling data will be used to assist in determining the final site declaration.

This FSP provides details related to the field evaluation of the Insufficiently Reclaimed Site BRES No. 16 – Curry. Proposed soil sampling locations and areas of known deficiencies are shown on Figure 1.

The site evaluation is anticipated to be completed in 2022. A site summary and declaration will be prepared to present all available site data and describe which, if any, BHRS criteria are not met. A remedial action work plan (RAWP) describing actions that will be implemented at the site will be provided for Agency review and approval.

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

Submittal	Site	Submittal Date	Approval Date
1	BRES No. 104 – Colorado Dump Shaft	9/29/2021	11/5/2021
1R	BRES No. 104 – Colorado Dump Shaft, Final Revised	12/2/2021	12/6/2021
2	BRES No. 154 – Clark Mill Tailings NE	12/1/2021	12/6/2021
3	BRES No. 30 – Atlantic-1	1/12/2022	2/22/2022

[2] Please note the link provided is valid for one year from the date of this submittal.
[3] Please note the link provided is valid for one year from the date of this submittal.

Submittal	Site	Submittal Date	Approval Date
4	BRES No. 16 – Curry	1/12/2022	2/22/2022
5	BRES No. 8 – Belle of Butte	3/11/2022	
6	BRES No. 38 – Sister Dump	6/16/2022	
7	BRES No. 32 – Corra 2 Dumps	6/20/2022	6/30/2022
8	BRES No. 158 – Waste Rock Dump	6/20/2022	7/11/2022
9	BRES No. 50 – Zelia	6/22/2022	6/30/2022
10	BRES No. 93 – Soudan Dump	6/23/2022	6/30/2022
11	BRES No. 96 – Washoe Dump	6/23/2022	7/11/2022
12	BRES No. 133 – Dexter Mill	7/14/2022	7/26/2022
13	BRES No. 37 – Josephine Shaft	7/20/2022	7/26/2022
14	BRES No. 34 - Eveline	7/22/2022	8/2/2022

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

	Reference Location		
Element	**FSP**	**IR Sites QAPP**	**Unreclaimed Sites QAPP**
Title page and approval authority.		Page i	Page i
Introduction and appropriate Agency-approved QAPP reference.	X		
Goals and objectives of sampling.		Section 2.4, Section 3.2	Section 2.4, Section 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	Section 3.2.1
Field activity methods and procedures, standard operating procedures.		Section 3.2, Table 4	Section 3.2, Table 4
Sample labeling and shipping.		Section 3.2.5, Appendix C	Section3.2.5, Appendix C
Sample analysis specifying X-ray fluorescence (XRF) vs. laboratory analysis and laboratory name.		Section 3.3	Section 3.3
Figure showing the site and/or area represented by a sample, sample ID, and aliquot locations for composite samples.	X		

Background

The Curry (BRES No. 16) is approximately 0.14 acres located near Knob Hill Road and 3rd Street in Walkerville, Montana. Reclamation completed by ARCO in 1991 consisted of removing about 500

cubic yards of waste. Grading was performed on the south and west sides to a 4 Horizontal:1 Vertical (H:V) slope. The site was then capped by applying 350 tons per acre of lime rock, followed by 18 inches of cover material. Compacted areas were ripped with a chisel plow, and 11-52-0 (%nitrogen-%phosphorous-%potassium) mixture of fertilizer was applied at a rate of 300 pounds per acre. The site was then revegetated with the Walkerville EPA (WEPA) seed mixture applied at 20 pounds per acre with a double-disc drill seeder and straw spread at a rate of 2 tons per acre.

Previous Evaluation Findings

The site was evaluated in 2017 during the recurring BRES site evaluation process. A review of previous site evaluations will be incorporated into the site evaluation, sampling, and future remedial action. A preliminary review of the 2017 evaluation findings indicates issues with vegetation, weeds, and site edges. Active erosion rills were developing across barren areas that may have consisted of mining waste. The site was dominated by cheatgrass, spotted knapweed, white top, and salsify.

Previous Sampling Efforts

Data obtained from the Geocortex web-based database at https://eis2.woodardcurran.com/Html5Viewer/index.html?viewer=BPButte.BPSOU contain the records for previous soil samples collected near BRES 16 Curry. The approximate sample locations are included on Figure 1 with results provided in Table 1 below. Sample results do not exceed ROD Solid Media soil screening criteria. The BPSOU action levels are listed in Table 1 and Table 2 of the IR Sites QAPP, Section 2.4.

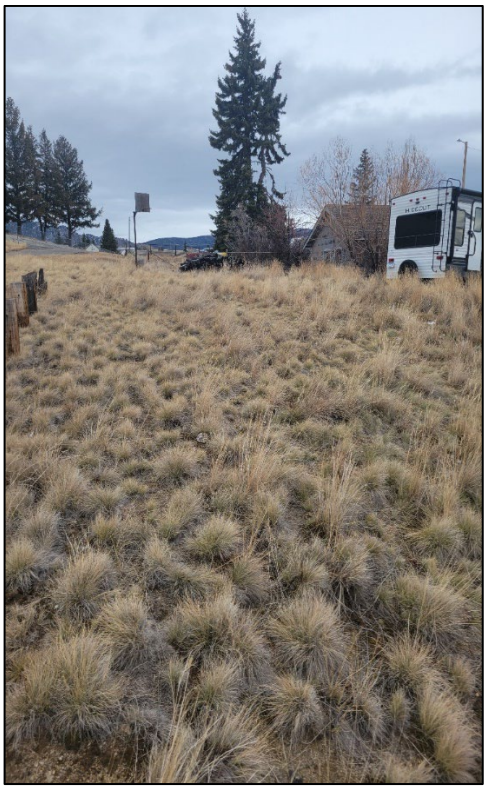
Table 1: Previous Sampling Results from BPSOU Soil Sampling

COCs	Sample ID: **TB-SO-05**
Arsenic	73 mg/kg
Cadmium	4 mg/kg
Copper	137 mg/kg
Lead	1,190 mg/kg
Zinc	815 mg/kg
pH	4.6 S.U.

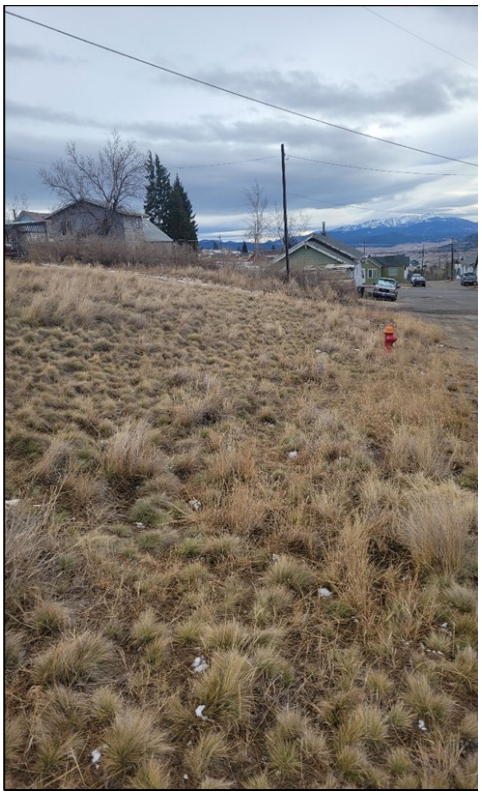
COC: contaminants of concern. mg/kg: milligrams per kilogram. S.U. Standard Unit

Preliminary Site Evaluation

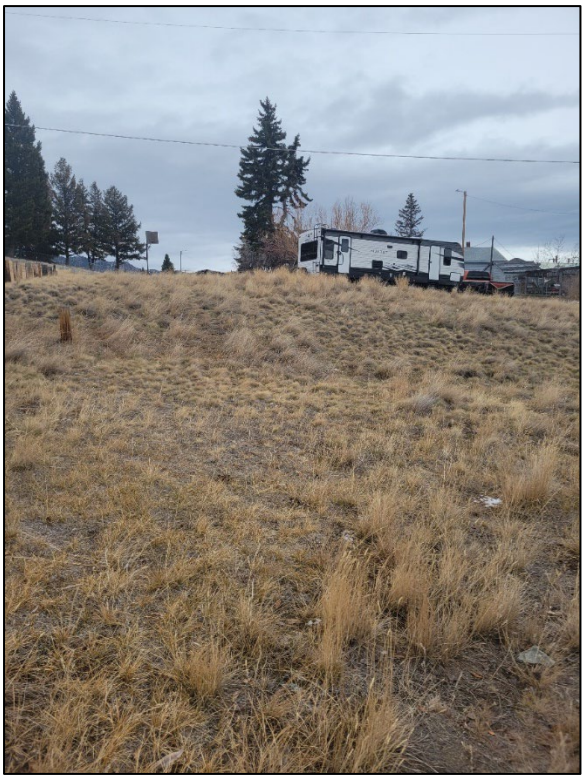
A preliminary site visit was conducted to better qualify existing site conditions and identify areas of focus for additional evaluation. Site photographs were taken during the preliminary site evaluation to capture site conditions. The photographs are included in this section for reference. The site appears to be well vegetated with minor areas of bare ground around the base of grasses. Although weed identification is difficult in winter months, it appears the site has limited weed establishment.



Photograph 1: North Portion of Site is Well Vegetated



Photograph 2: Southwest Portion of Site is Well Vegetated



Photograph 3: East Portion of Site Contains Minor Barren Areas

Site Characterization Plan

Per the IR Sites QAPP, the site will be sampled at 2 depth intervals [(1) 0 to 6 inches and (2) 6 to 18 inches] to determine whether mining related waste is present and/or confirm the depth of previous reclamation efforts. Additional samples obtained outside of the existing site boundary will be obtained from 3 depth intervals [(3) 0 to 2 inches, (4) 2 to 6 inches, and (5) 6 to 12 inches] per the Unreclaimed Sites QAPP sampling protocol. Figure 1 illustrates the proposed sample locations. Opportunistic samples may be obtained in the field at the discretion of field sampling personnel or Agency oversight representative(s). The field team leader will be responsible for determining the appropriate sampling protocol as dictated by the location of the opportunistic sample(s).

Results will be used to prepare the site declaration and prescribe site remedial improvements. The overall site will be sampled following procedures in the IR Sites QAPP using a systematic procedure to determine the spatial characterization of waste, parameters of previous reclamation, and extent of transient material. Sampling performed outside of the existing boundary will be used to determine if waste extends beyond the existing boundary at concentrations which exceed levels listed in Table 1 or Table 2 of the Unreclaimed Sites QAPP and will be used to assist in the determination of the final site declaration.

Existing site grading and drainages will be evaluated to determine storm water flow patterns and identify if additional storm water controls will help prevent sediment migration. The location and condition of existing storm water features will be field-verified and recorded to be used in corrective actions. Contributing sources of stormwater upgradient and adjacent to the site will also be investigated.

Items identified below will be evaluated to determine whether they are adequate and to identify if additional remedial measures are necessary. The following provides the minimum potential site characterization items to consider. Additional items may be identified during the remedial design process.

- Investigate controlled site access requirements.
- Evaluate plant species cover to BHRS seed mix specifications.
    - Coordinate and confirm plant species with biology/plant ecologist or related subject matter expert.
- Evaluate site storm water controls to mitigate run-on/runoff.
- Identify remedial improvements to mitigate site erosion and vegetative areas to meet BHRS.
- Identify maintenance items for successful long-term operation.

Final remedial cap configuration (i.e., vegetative or engineered) will be coordinated with the landowner's end usage. A final RAWP will be provided for Agency review and approval.

Sampling Procedure

All soil sampling and characterization activities and procedures within the existing site boundary from the sample stations listed below will follow the IR Sites QAPP. The IR Sites QAPP also describes

the quality assurance/quality control policies and procedures that will be used during sample collection and analysis.

Sample Station	2 Depth Intervals (inches)
IR-16-SS01	(1) 0-6, (2) 6-18
IR-16-SS02	(1) 0-6, (2) 6-18
IR-16-SS03	(1) 0-6, (2) 6-18
IR-16-SS04	(1) 0-6, (2) 6-18
IR-16-SS05	(1) 0-6, (2) 6-18

All soil sampling and characterization activities beyond the existing site boundary at sample stations listed below will follow the Unreclaimed Sites QAPP.

Sample Station	3 Depth Intervals (inches)
IR-16-SS06	(3) 0-2, (4) 2-6, and (5) 6-12
IR-16-SS07	(3) 0-2, (4) 2-6, and (5) 6-12
IR-16-SS08	(3) 0-2, (4) 2-6, and (5) 6-12

Fieldwork is anticipated to be performed in 2022.

Site Summary Report and Declaration

After the site evaluation and data collection activities have been completed, a summary report will be prepared and submitted to Agencies for review and approval. The report will include a summary of all available site sampling data and a site declaration specifying any deficient BHRS criteria.

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

Sincerely,

Mike McAnulty

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

Attachments:

Figure 1 – IR Sites BRES – 16 Curry Proposed Sample Locations
Attachment 1: Document Links

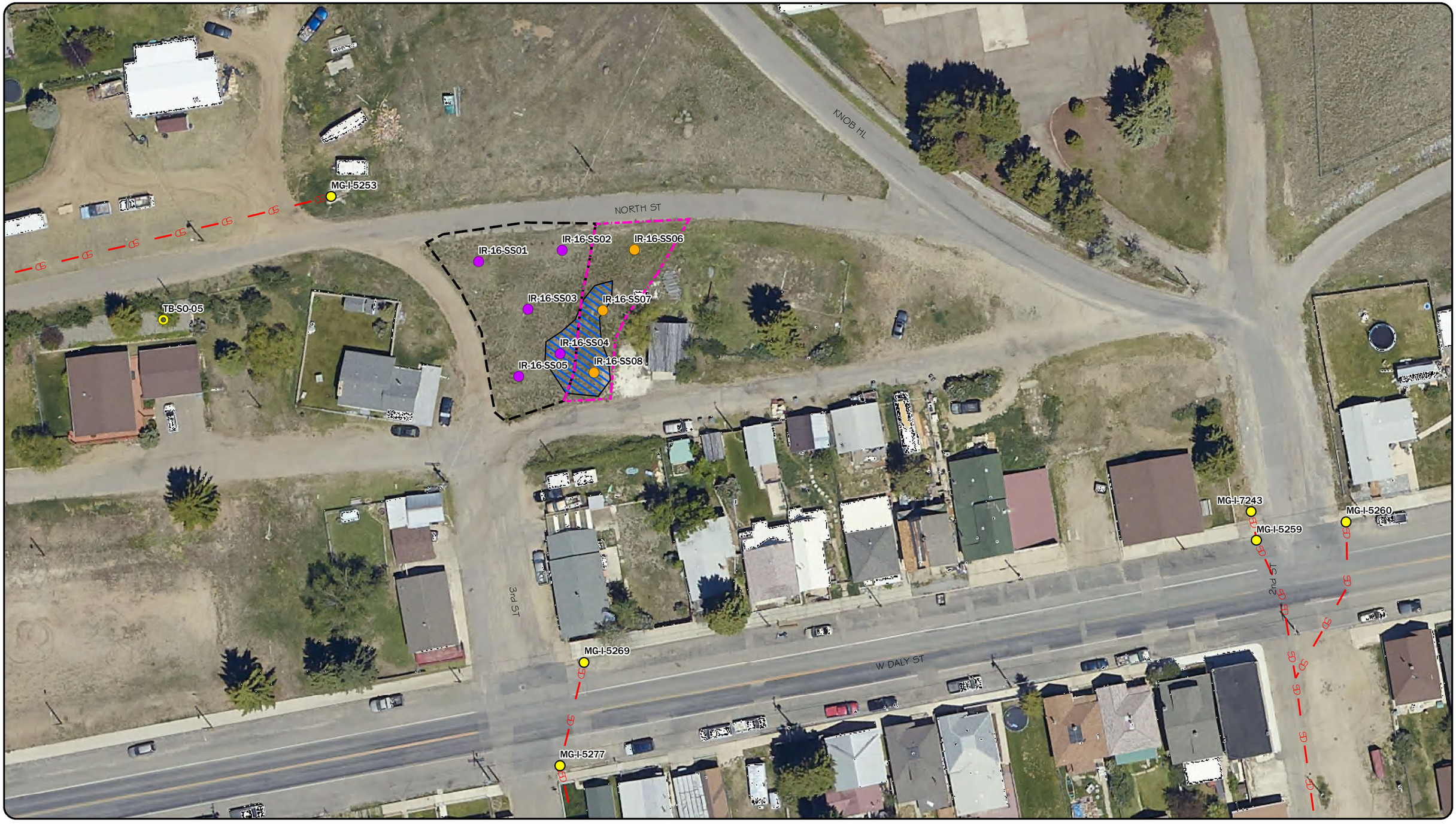
Cc: Patricia Gallery / Atlantic Richfield - email
Chris Greco / Atlantic Richfield – email
Josh Bryson / Atlantic Richfield - email
Loren Burmeister / Atlantic Richfield – email
Dave Griffis / Atlantic Richfield - email
Jean Martin / Atlantic Richfield - email
Irene Montero / Atlantic Richfield - email
David A. Gratson / Environmental Standards / email
Mave Gasaway / DGS - email
Brianne McClafferty / Holland & Hart - email
Joe Vranka / EPA - email
David Shanight / CDM - email
Curt Coover / CDM - email
James Freeman / DOJ - email
John Sither / DOJ - email
Dave Bowers / DEQ - email
Carolina Balliew / DEQ - email
Matthew Dorrington / DEQ - email
Wil George / DEQ - email
Jim Ford / NRDP - email
Pat Cunneen / 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
Lauren Knickrehm / 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
Karen Maloughney / BSB – email
Josh Vincent / WET - email
Craig Deeney / TREC - email
Scott Bradshaw / TREC - email
Brad Archibald / Pioneer - email
Pat Sampson / Pioneer - email
Joe McElroy / Pioneer – email
Andy Dare / Pioneer – email
Karen Helfrich / Pioneer - email
Leesla Jonart / Pioneer - email
Randa Colling / Pioneer – email
Ian Magruder/ CTEC- email
CTEC of Butte – email
Scott Juskiewicz / Montana Tech – email

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

Figures

Figure 1. Insufficiently Reclaimed Sites BRES-16 Curry Proposed Sample Locations



LEGEND

- SAMPLE UNDER IR QAPP
- SAMPLE UNDER UR QAPP
- HISTORIC SAMPLE LOCATION
- INSUFFICIENTLY RECLAIMED AREA
- PROPOSED IR SAMPLE BOUNDARY
- PROPERTY OWNERSHIP
- BRES EVALUATION VEGETATIVE IMPROVEMENT
- STORM WATER INLET
- STORM WATER LINE

THE PARCEL BOUNDARIES SHOWN ARE FOR REFERENCE USE ONLY AND DO NOT REPRESENT A LEGAL SURVEY

N

DISPLAYED AS:
PROJECTION/ZONE: MSP
DATUM: NAD 83
UNITS: INT'L FT
SOURCE: PIONEER/BSB/AR/QSI 2020

0 25 50 100
Feet

FIGURE 1

INSUFFICIENTLY RECLAIMED SITES BRES-16 CURRY PROPOSED SAMPLE LOCATIONS

PIONEER TECHNICAL SERVICES, INC.

DATE: 2/23/2022

Path: Z:\Shared\Active Projects\ARCO\BPSOU\LandSupport\SolidMedia\Insufficiently_Unreclaimed\IR_Sampling\IR16_Fig_011_21.mxd

Attachment 1
Document Links

Document Links

IR Sites QAPP:

https://pioneertechnicalservices.sharepoint.com/:f:/s/submitted/Eid2SfSSinhOsfQXY5CXGEoBe5IIf5IQO01hBO43ZROgpg[4].

Unreclaimed Sites QAPP:

https://pioneertechnicalservices.sharepoint.com/:f:/s/submitted/Ev1dhUeMuUdLjU8tnuV5RioBvJZRYc2HpgEjM9KzT-PpjQ.[5]

[4] Please note the link provided is valid for one year from the date of this submittal.
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