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Residential Metals Abatement Program – Interior School Dust - Remedial Action Work Plan – East Middle School

Mike McAnulty

Atlantic Richfield Company

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RE: Residential Metals Abatement Program – Interior School Dust - Remedial Action Work Plan – East Middle School

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to submit the Draft 2022 Residential Metals Abatement Program *Remedial Action Work Plan – East Middle School* for indoor dust abatement within a basement.

The plan may be downloaded at the following link:

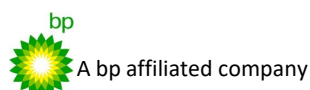
https://theermgroup-my.sharepoint.com/:f/g/personal/thomas_beckman_erm_com/Ej_TVPOvaOBAjrAwb7INc9gB1jxLMOBo6akIJmdL5bIPpg?e=aULfQ6

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

Sincerely,



Mike McAnulty
Liability Manager
Remediation Management Services Company
An Affiliate of **Atlantic Richfield Company**





Atlantic Richfield Company

Remedial Action Work Plan

East Middle School

7 December 2022

Project No.: 0643586

Signature Page

7 December 2022

Remedial Action Work Plan

East Middle School



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Acronyms and Abbreviations

ERM	ERM Alaska, Inc.
HEPA	High-Efficiency Particulate Air
ICIAP	Institutional Control Implementation and Assurance Plan
QAPP	Quality Assurance Project Plan
RA	Remedial Action
RAWP	Remedial Action Work Plan
RMAP	Residential Metals Abatement Program

1. INTRODUCTION

This Remedial Action Work Plan (RAWP) was developed to outline a portion of the remedial action (RA) work resulting from the 2022 Residential Metals Abatement Program (RMAP) indoor school dust sampling events completed in June and July 2022. The sampling events were conducted in accordance with the Final Residential Metals Abatement Program (RMAP) Quality Assurance Project Plan (QAPP) (Non-Residential Parcels) (Butte-Silver Bow County and Atlantic Richfield Company, 2021).

2. SCHOOL SOIL REMEDIATION SCOPE

The scope of work covered by this RAWP includes East Middle School, located at 2600 Grand Avenue in Butte, Montana (**Table 1, Figure 1**).

Table 1: East Middle School Property Information

Count	Res-ID	Geocode	Name	Physical Address	Owner	Construction Date
1	S-0008	01119820229010000 01119820121010000 01119820122010000 01119820211010000 01119820101010000 01119820109010000 01119820110010000 01119820102010000 01119820103010000	East Middle School	2600 Grand Avenue, Butte, MT 59701	School District #1	1957

3. SCHOOL DUST REMEDIATION SCHEDULE

This scope of work is anticipated to be completed between December 2022 and March 2023. Coordination work is on-going with relevant stakeholders. Anticipated deadlines for remedial action are as follows and are contingent on the timing of United States Environmental Protection Agency approvals:

- Planning and access coordination – December 2022
- Remedy implementation – December 2022/February 2023
- Reporting – February 2023/March 2023

4. REMEDIAL ACTION WORK PLAN

4.1 East Middle School Remedial Action

Remediation at East Middle School will target the inaccessible basement storage area outlined in **Figure 2**. This area has been previously referred to as the “basement boiler room”, however field sampling efforts have confirmed that it is not a boiler room, rather a basement storage area. Lead was detected in exceedance of the Butte Priority Soils Site-Specific Residential Action Level for surface dust in the floor

surface dust sample and associated duplicate sample collected from the basement storage area, prompting the need for remedial action.

Access to the basement storage area is adjacent to the south gym on the first floor. Access is currently restricted to engineering and janitorial staff. The basement storage room consists of an approximately 1,400 square foot rectangular area. The room contains equipment for the upstairs gym, including nets, balls, cones, and other recreational equipment. Steel utility conduits run throughout the basement storage area. There is a crawl space area with exposed soil to the west (no door), and a hallway crawl space with exposed soil through a doorway on the east side. In November 2022, soil from both crawl spaces were sampled, and no constituents were detected above the Butte Priority Soils Site-Specific Residential Action Levels. See Appendix A for photographs of the basement storage area.

Following completion of the remedial action, a remedy completion report and operations and maintenance plan will be submitted to EPA.

4.1.1 Dust Containment

Containment of dust is necessary due to the lead concentrations detected in exceedance of the Butte Priority Soils Site-Specific Residential Action Levels for indoor dust in the floor surface sample and field duplicate location in the basement storage area. This containment is to prevent the migration of particulates and dust from the basement storage area to the occupied areas of the school.

All access to the basement storage will be restricted during the cleaning processes. Larger materials will be wrapped in heavy-duty plastic (6-milimeter plastic or similar sheeting that will resist puncture) and placed in a designated waste container. Smaller debris and materials will be placed directly into the designated waste container. After all materials are removed, a high-efficiency particulate vacuum (HEPA) will be used to clean all surfaces including ceilings, shelves, doors, and floors, working from higher to lower surfaces. Once vacuuming is complete, all surfaces will be wiped down with disposable towels and house-hold detergent. Once all surfaces are wiped down, cleaning will be suspended for an hour to allow for the surfaces to dry and any suspended dust to settle. After an hour, all surfaces will be cleaned again with the HEPA vacuum. At the conclusion of cleaning, the basement storage area will be visually inspected to ensure that all visible dust and debris has been removed. If dust is detected, the basement storage area will be cleaned again, following the same protocol as the prior cleaning. The outside of the waste container will be decontaminated with detergent cleaning material and disposable towels before being removed from the storage area.

4.1.2 Access Controls

Access to the basement storage area will be controlled by securing the entrance. The access door will be securely shut and locked, with access restricted to engineering personnel.

4.1.3 Post-Cleaning Monitoring

The basement storage area will be inspected and surface and floor dust sampled for lead analysis one year after the area is cleaned.

5. REFERENCES

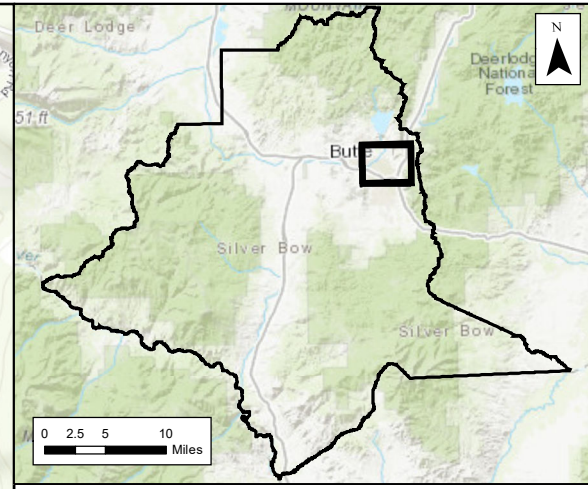
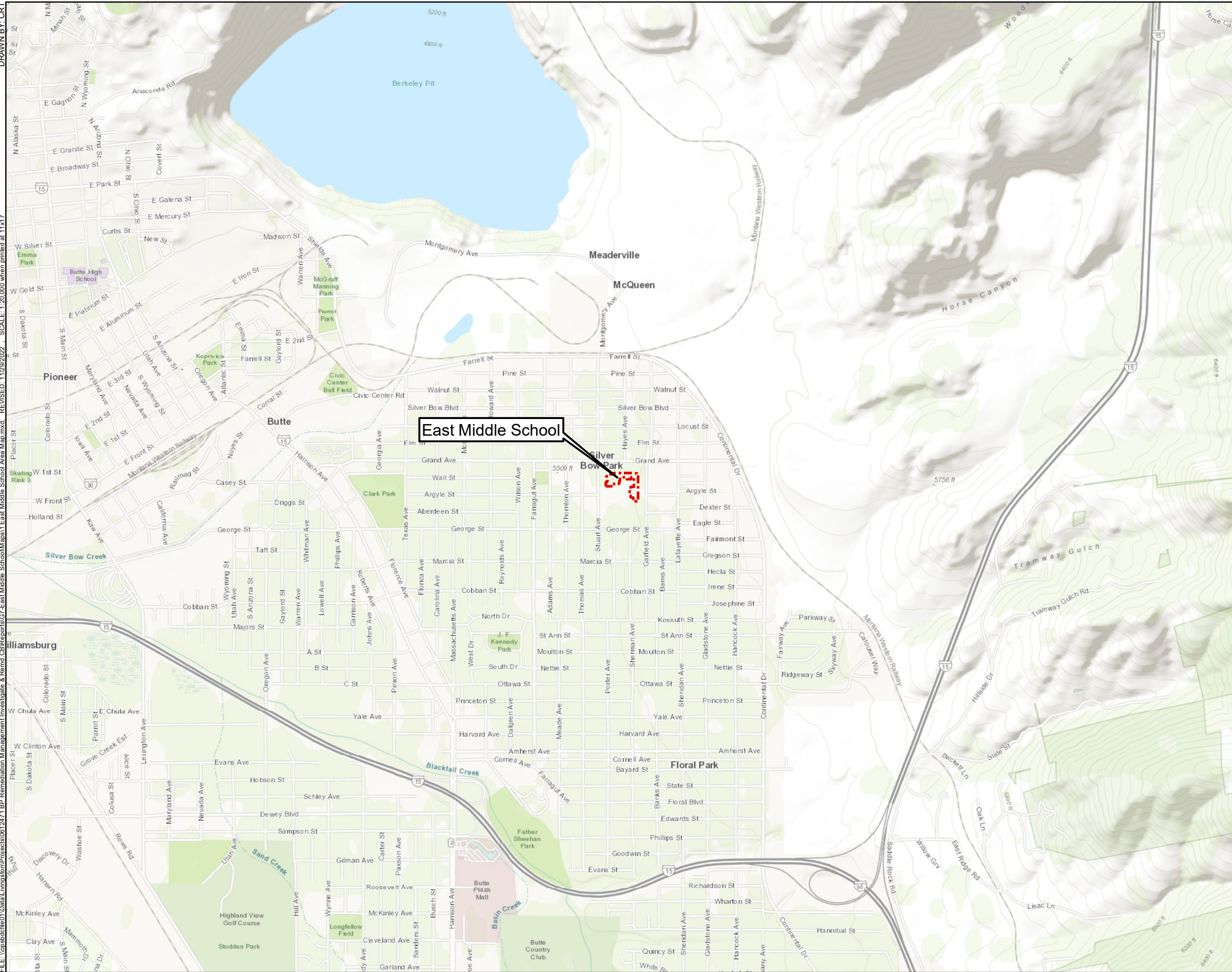
Atlantic Richfield Company, 2019. Silver Bow Creek/Butte Are NPL Site Butte Priority Soils Operable Unit Final Institutional Controls Implementation and Assurance Plan. October 2019.

Atlantic Richfield Company, 2022a. Residential Metals Abatement Program Quality Assurance Project Plan (Non-Residential Parcels – Indoor Dust). February 2022.

Atlantic Richfield Company, 2022b. Residential Metals Abatement Program Field Sampling Plan Butte High School – Indoor Soil. March 2022.

FIGURES

FILE: \\opabdc\01\Data\Livingston\Projects\0612471 BP Remediation Management Investigate & Remd\CBIR\Reports\G7-East Middle School\Map\1-East Middle School Area Map.mxd . SCALE: 1:20,000 when printed at 11x17
DRAWN BY: CRT
REVISED: 11/29/2022



Legend
[Red dashed box symbol] Site Area

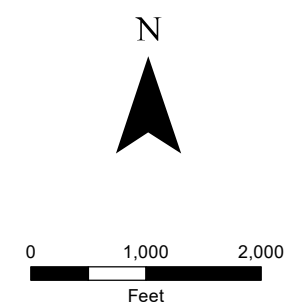
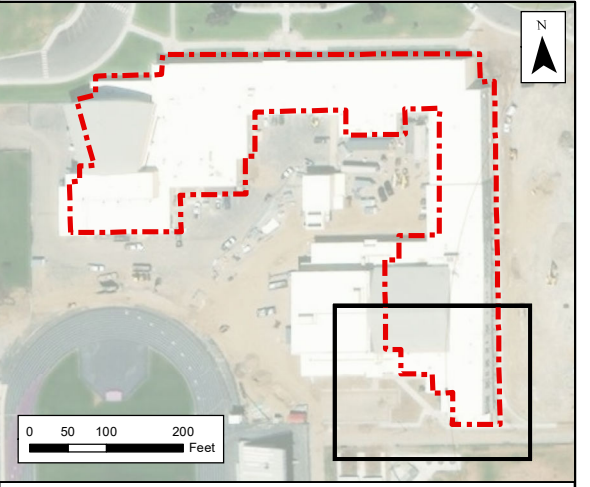
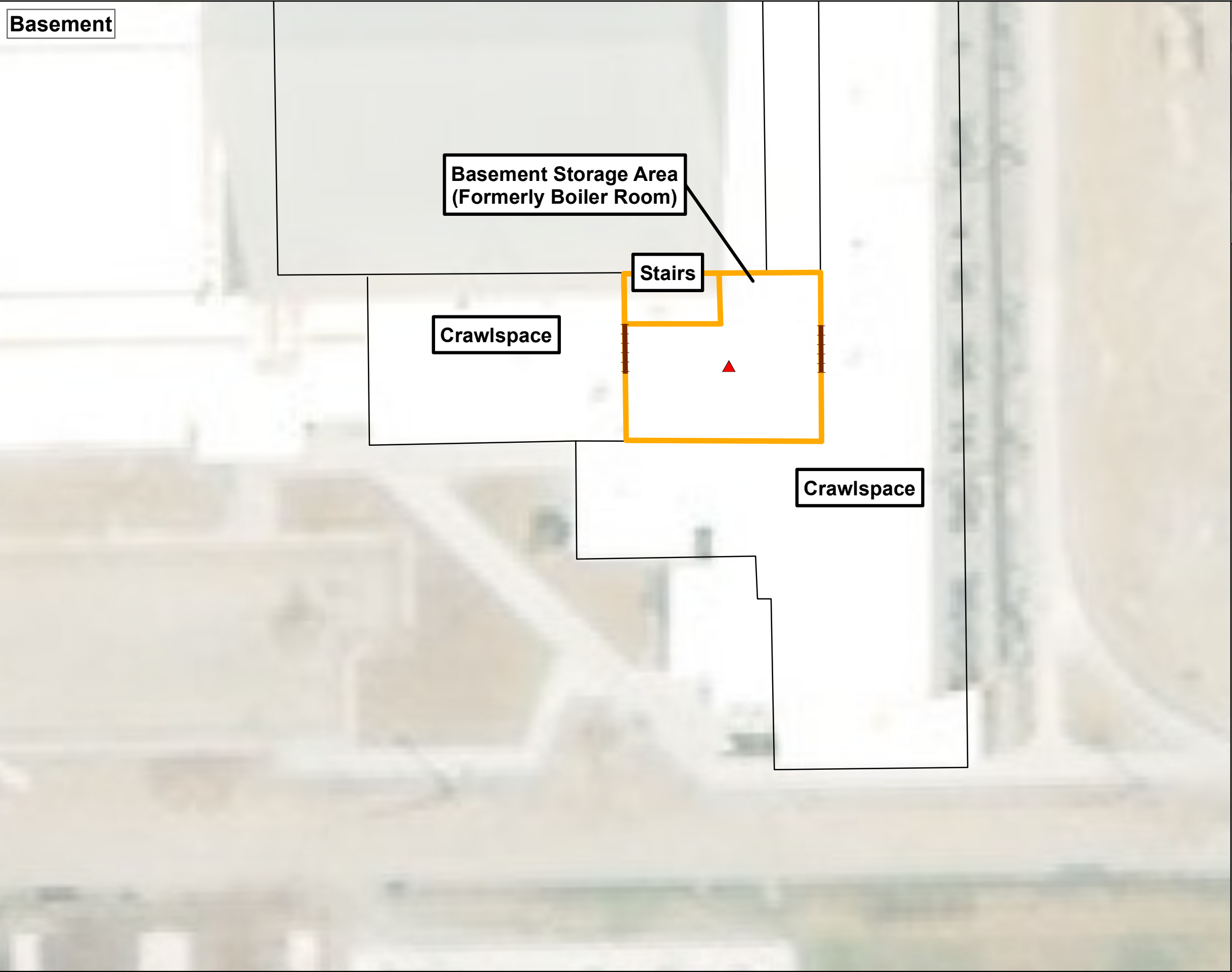


Figure 1
East Middle School
2600 Grand Ave
Butte, MT 59701

Source: Esri - USGS Topo Webservice; NAD 1983 StatePlane Montana FIPS 2500 Feet

FILE: \\OPS\BDC\FILE01\Data\Livingston\Projects\0612471_BP Remediation Management Investigation & Remed CB\Reports\G7-East Middle School\Maps\East Middle School RAP Basement.mxd, REVISED: 12/02/2022, SCALE: 1:240 when printed at 11x17



- Legend**
- ▲ Floor Surface Sample
 - Crawlspace Entrance
 - Inaccessible Area (1397 sq ft)

Notes:
Room ID's reflect verbiage used on site maps provided by Butte School District

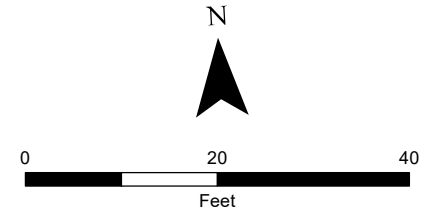


Figure 2
East Middle School RA Work Area
2600 Grand Ave
Butte, MT 59701

APPENDIX A PHOTOGRAPHIC LOG

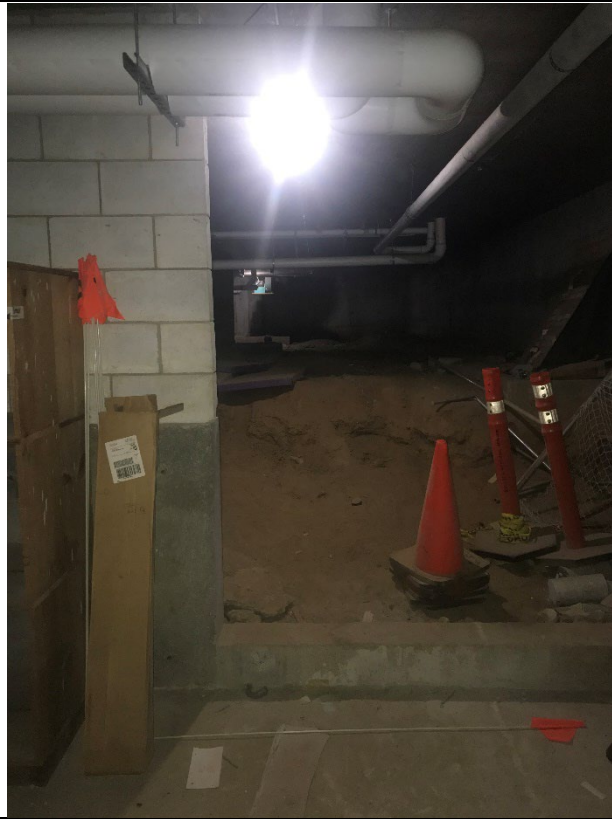


Photograph: 1 View of basement storage area, from bottom of stairwell, facing south.



Photograph: 2 View of basement storage area floor, facing towards doorway that leads to eastern crawl space, facing southeast.





Photograph: 3

View of entrance to western crawl space, taken from center of basement storage area, facing west.



Butte RMAP
East Middle School RAWP
ERM Project Number 0612471
12/1/2022