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**Butte Priority Soils Operable Unit (BPSOU) Final 2022
Insufficiently Reclaimed Sites Field Sampling Plan (FSP) BRES No.
38 – Sister Dump**

Mike McAnulty

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RE: Butte Priority Soils Operable Unit (BPSOU) Final 2022 Insufficiently Reclaimed Sites Field Sampling Plan (FSP) BRES No. 38 – Sister Dump

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company (Atlantic Richfield) to distribute the Final 2022 Insufficiently Reclaimed Sites Field Sampling Plan (FSP) BRES No. 38 – Sister Dump per the Agency approval letter dated September 26, 2022. Atlantic Richfield's responses to Agency comments included in the approval letter are provided below.

Comments:

- 1. Please update the FSP tracking table included in this FSP.*

Atlantic Richfield Response: The tracking table was updated in the Final FSP.

- 2. On Figure 1, there is a portion of the property that indicates that exposed waste was identified during the BRES inspection. Will or has this portion of the site been sampled under the RMAP and is this exposed waste area located on private property? If this area has not been sampled, it may be proactive to sample this potential area of exposed waste area under this FSP or appropriate program.*

Atlantic Richfield Response: The area of exposed waste called out by the BRES inspection is located within private property; further sampling efforts will not be executed under the Insufficiently Reclaimed Sites Project. Butte-Silver Bow (BSB) reported data collected at the residential site was below action levels. Additional information regarding the residential sampling results may be available from the BSB Residential Metals Abatements Program.

Atlantic Richfield Company

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- 3. Please provide as-built information for the area that was recently reclaimed by BSB during the 2021 field season. While the photo does provide evidence that site work was completed at portion of the site, the EPA does not have work plans or corrective action plans for these work areas. The as-builts and remedial action narrative will be helpful in determining if additional sampling should be completed in this area.*

Atlantic Richfield Response: Please refer to the attached Sister Dump Corrective Action Plan approved by Daryl Reed (Montana Department of Environmental Quality) and Figure provided by BSB.

- 4. It may be prudent to perform an engineering evaluation to determine which best management practices that could be deployed to prevent uncontrolled sediment runoff from site, specifically where storm water and runoff flows onto O'Neill Street. In addition, an engineering evaluation and sampling in the channel where the banks and nearby areas are actively eroding may be an appropriate step. Again, UR-38 should be visited by the Source Area Work Group.*

Atlantic Richfield Response: Evaluation of site runoff and active erosion will occur during the sampling event following the site characterization plan described in the FSP. Note that heavy erosion onto O'Neill Street appears to be caused by the dirt alleyway to the northeast, not from sediment runoff originating from the Sister Dump. The site's propensity to discharge sediment to existing infrastructure will be included in the site evaluation.

End of Comments

The Final FSP may be downloaded at the following link:

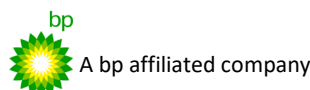
<https://pioneertechnicalservices.sharepoint.com/:f:/s/submitted/EnaxlsvwrYhPpnHglDhcSCMBLfsezOpiU15-sAaNAESqww>.

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

Sincerely,

Mike McAnulty

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



Atlantic Richfield Company

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Curt Coover / CDM - email
James Freeman / DOJ - email
John Sither / DOJ - email
Amy Steinmetz / DEQ - email
Dave Bowers / DEQ - email
Carolina Balliew / DEQ - email
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Harley Harris / NRDP - email
Katherine Hausrath / NRDP - email
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Ted Duaine / MBMG - email
Gary Icopini / MBMG - email
Becky Summerville / MR - email
John DeJong / UP - email
Robert Bylsma / UP - email
John Gilmour / Kelley Drye - email
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