

Montana Tech Library

Digital Commons @ Montana Tech

Silver Bow Creek/Butte Area Superfund Site

Montana Superfund

Fall 10-20-2022

**Butte Priority Soils Operable Unit (BPSOU) Final Insufficiently Reclaimed Sites - Field Sampling and Investigation Plan (FSP)
BRES No. 08 – Belle of Butte**

Mike McAnulty

Follow this and additional works at: https://digitalcommons.mtech.edu/superfund_silverbowbutte



Part of the [Environmental Health and Protection Commons](#), [Environmental Indicators and Impact Assessment Commons](#), and the [Environmental Monitoring Commons](#)

Mike Mc Anulty

Liability Manager

317 Anaconda Road

Butte MT 59701

Direct (406) 782-9964

Fax (406) 782-9980

October 20, 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 and Investigation Plan (FSP) BRES No. 08 – Belle of Butte.

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company (Atlantic Richfield) to submit Atlantic Richfield's responses to Agency comments provided September 26, 2022, to the *Butte Priority Soils Operable Unit (BPSOU) Draft Final Insufficiently Reclaimed Sites - Field Sampling and Investigation Plan (FSP) BRES No. 08 – Belle of Butte*.

Atlantic Richfield's responses to Agency comments are provided below.

Comments:

1. *The property ownership boundary of the southside of the site are difficult to see on Figure 1. Please make the property ownership boundary thicker in the area surrounding this IR site.*

Atlantic Richfield Company Response: The entire area where the site is located is owned by Atlantic Richfield Company. Private property ownership boundaries are included in the Final FSP to identify the evaluation areas.

2. *During the review of this revised FSP, EPA noted Atlantic Richfield Company's comment on the boundary revisions based on what is included in Appendix D, Attachment C, Figure UR-1. It appears that the UR boundary has been updated and boundary adjustments have not been approved at this time and this should be noted in the Evaluation Report for UR-39.*



Atlantic Richfield Company Response: Boundary adjustments will be identified as preliminary until all associated remedial action is complete. Final boundary adjustments will be subject to Agency review and approval.

- 3. Although this FSP is for sampling and data collection under the Insufficiently Reclaimed (IR) program, the EPA would like to meet with Atlantic Richfield Company and Butte Silver Bow County to talk about historic and future sampling activities of adjacent and downgradient residential and non-residential properties (near this IR site), under the Residential Metals Abatement Program (RMAP) residential program. During the review of the sampling locations included in this FSP, it was noted that the residential property downgradient of this site has not been sampled.*

Atlantic Richfield Company Response: Sampling of the adjacent property downgradient of the site was discussed extensively with the Agencies. The appropriate sampling program is under consideration by Atlantic Richfield and Butte-Silver Bow, and additional sampling will be performed by the Settling Defendants at a later date.

- 4. During the review of this FSP, it is noted that there is playground equipment located at the UR-39 site. This UR-39 site should be discussed during the next Source Area Work Group meeting.*

Atlantic Richfield Company Response: The UR-39 site was discussed extensively during the Source Area Work Group meeting conducted on October 4, 2022. Atlantic Richfield plans to remove the playground equipment as discussed.

End of Comments

The Final FSP may be downloaded at the following link:

https://pioneertechnicalservices.sharepoint.com/:f/s/submitted/EuWn_EQ9ouJGqz00moloBegBW_XWmut3_XX5Oh_YnFSnz5Q.

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

Sincerely,



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

Atlantic Richfield Company

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

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
Brienne McClafferty / Holland & Hart - email
Joe Vranka / EPA - email
David Shanight / CDM - email
Curt Coover / CDM - email
James Freeman / DOJ - email
John Sither / DOJ - email
Amy Steinmetz / DEQ – 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 Duaine / MBMG - email
Gary Icopini / MBMG - email
Becky Summerville / MR - email
John DeJong / 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
Doug Brannan / Kennedy Jenks - email
Matthew Mavrincac / RARUS - email
Harrison Roughton / RARUS - email
Brad Gordon / RARUS - email
Mark Neary / BSB - email
Eric Hassler / BSB - email

Atlantic Richfield Company

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

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
Dan Janosko / 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