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Fall 11-30-2022

**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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Mike Mc Anulty

Liability Manager

November 30, 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 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

Mike Mc Anulty

Liability Manager

317 Anaconda Road

Butte MT 59701

Direct (406) 782-9964

Fax (406) 782-9980

- 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:

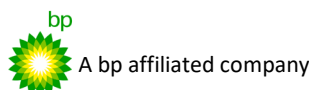
<https://pioneertechnicalservices.sharepoint.com/:f:/s/submitted/EnaxlsvwrYhPpnHglDhcSCMBLfsezOpiU15-sAaNAESqww>.

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

Mike Mc Anulty

Liability Manager

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
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
Amy Steinmetz / DEQ - email
Dave Bowers / DEQ - email
Carolina Balliew / 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
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Doug Brannan / 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



A bp affiliated company

Atlantic Richfield Company

Mike Mc Anulty

Liability Manager

317 Anaconda Road

Butte MT 59701

Direct (406) 782-9964

Fax (406) 782-9980

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
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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
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