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# Butte Priority Soils Operable Unit (BPSOU) Final Insufficiently Reclaimed Sites - Field Sampling Plan (FSP) BRES No. 34 – Eveline and Response to Agency Comments

Mike McAnulty

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September 28, 2022

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RE: Butte Priority Soils Operable Unit (BPSOU) Final Insufficiently Reclaimed Sites - Field Sampling Plan (FSP) BRES No. 34 – Eveline and Response to Agency Comments.

#### Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to submit responses to comments included in the Agency approval letter dated August 2, 2022, to the Butte Priority Soils Operable Unit (BPSOU) Final Insufficiently Reclaimed (IR) Sites - Field Sampling and Investigation Plan (FSP) Butte Remediation Evaluation System (BRES) No. 34 – Eveline. Responses have been incorporated into the Final FSP as appropriate.

#### Agency Comment #1

Page 2, 5<sup>th</sup> paragraph, 3<sup>rd</sup> sentence: The waste identification criteria are not land use specific. Please modify this as follows: "The site will be evaluated following the recreational action levels and waste identification criteria provided in the IR Site and Unreclaimed Sites QAPPs."

Atlantic Richfield Company Response: The text has been updated as requested.

Agency Comment #2

<u>Page 2-3, in text table:</u> A majority of the FSPs identified in this table have been approved by agencies. Please update the FSP approval dates for the FSPs.

Atlantic Richfield Company Response: The table has been updated as requested.



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Agency Comment #3

<u>Page 4, Previous Sampling Efforts:</u> Please include additional details regarding the previous soil sampling results for BRES No. 34 presented in Table 1. Specifically, indicate if these samples represent pre/post-removal conditions, the sampling date, the sampling depth, the sampling method (i.e., discrete grab, multi-point composite), the analytical method, and any data qualifiers on the results).

**Atlantic Richfield Company Response:** The text was revised as follows to include additional details regarding previous sampling results. "Previous soil sample results for WD-020 and WD-021 were reported in Butte Soils Screening Study (CDM, 1988) Appendix C and results for TB-SO-23 and TB-SO-23 were reported in Report of Sampling Activities, Butte Priority Soils (EE, Inc., 1990) Table 2, Appendix E are indicative of pre-remedial activities. These sample results are indicative of pre-remedial activities."

#### **End of Comments**

The report and appendices may be downloaded at the following link:

 $\frac{https://pioneertechnicalservices.sharepoint.com/:f:/s/submitted/Eg\_sTHhCq9FDnHOVh1cyqo8BWmHRfmjaoguPeZJIWynQ4A}{}$ 

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

Sincerely,

Mike Michaelty

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

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Cc: Patricia Gallery / Atlantic Richfield - email

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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

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

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