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Fall 9-18-2023

### **Butte Priority Soils Operable Unit (BPSOU) Unreclaimed and Insufficiently Reclaimed Sites Request for Change 2023-02**

Mike McAnulty

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# Atlantic Richfield Company

## Mike Mc Anulty

Liability Manager

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September 18, 2023

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**RE: Butte Priority Soils Operable Unit (BPSOU) Unreclaimed and Insufficiently Reclaimed Sites Request for Change 2023-02**

Agency Representatives:

On behalf of Atlantic Richfield Company, the Butte Priority Soils Operable Unit (BPSOU) Unreclaimed and Insufficiently Reclaimed Sites Request for Change (RFC) 2023-02 is being submitted for review and consideration. The referenced RFC describes the interim approach to submit all soil samples obtained for both Unreclaimed and Insufficiently Reclaimed sites in the BPSOU for laboratory analyses per methods listed in the project Quality Assurance Project Plans (QAPPs) in lieu of performing sample analysis using a field X-ray fluorescence (XRF) during the 2023 sampling season.

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

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Brooke Kuhl / BNSF – email  
Lauren Knickrehm / BNSF – email  
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Matthew Mavrinac / RARUS – email  
Harrison Roughton / RARUS – email  
Brad Gordon / RARUS – email  
Mark Neary / BSB – email  
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A bp affiliated company

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BPSOU SharePoint - upload

# ATLANTIC RICHFIELD COMPANY

## RFC - REQUEST FOR CHANGE

|  |   |  |               |
|--|---|--|---------------|
| DATE<br>September 18, 2023   | RFC NO.<br>RFC-UR-2023-02<br>RFC-IR-2023-02 | CONTRACTOR<br>Pioneer Technical<br>Services, Inc.  | RFP NO.<br>NA |
| CONTRACT DESCRIPTION:<br>Insufficiently Reclaimed Sites and Unreclaimed Sites Scope of Work, Appendix D, Attachment C, Section 7.0 and Section 8.0, respectively, of the BPSOU Consent Decree (EPA, 2020).   |   | ATTENTION OF:<br>Nikia Greene and Daryl Reed   |               |
| SUBJECT: 2023 UR QAPP and 2023 IR QAPP; Soil Analysis<br><input type="checkbox"/> ELECTRICAL <input type="checkbox"/> MECHANICAL <input type="checkbox"/> CIVIL <input type="checkbox"/> STRUCTURAL/ARCHITECTURAL <input type="checkbox"/> INSTRUMENTATION <input checked="" type="checkbox"/> ENVIRONMENTAL   |   |  |               |
| OPERABLE UNIT: Butte Priority Soils Operable Unit (BPSOU) MAJOR WORK TASK:<br>2023 Unreclaimed and Insufficiently Reclaimed Sites Soil; Sample Analysis  |   | REFERENCE DWG., P.O., TAG, SPECIFICATION NO. (FOR DEVIATIONS OR DEFICIENCIES) ETC:<br>BPSOU 2023 Final Unreclaimed Sites Quality Assurance Project Plan and BPSOU 2023 Final Insufficiently Reclaimed Sites Quality Assurance Project Plan |               |
| <b>PROBLEM DESCRIPTION:</b><br><br>Section 3.2 Investigative Soil Sampling Objectives describes confirmation samples to be submitted to the laboratory for arsenic, cadmium, copper, lead, zinc, and/or mercury (for Unreclaimed [UR] Sites only) based on field X-ray fluorescence (XRF) results meeting specific criteria further described in the <i>2023 UR Sites Quality Assurance Project Plan (QAPP)</i> and the <i>2023 Insufficiently Reclaimed (IR) Sites QAPP</i> (Atlantic Richfield Company, 2023a and Atlantic Richfield Company, 2023b, respectively). For previous soil sampling efforts performed at both UR and IR sites, both field XRF and laboratory analytical results were obtained and regression analyses are under development for future applications (Atlantic Richfield Company, 2023c). To allow additional time for Agency consideration of the proposed regression method and path forward, while also facilitating scheduled field remediation activities for 2023, this request for change (RFC) is proposed as described below.<br><br><b>2023 UR QAPP (SECTIONS 3.2 AND 3.3) AND 2023 IR QAPP (SECTION 3.2 AND 3.3) PROPOSED MODIFICATION:</b><br><br>In lieu of performing sample analysis using a field XRF analyzer as described in Sections 3.2.1 and 3.3.1, all soil samples collected will be submitted for laboratory analyses per methods listed in Section 3.3.2 of the corresponding QAPP. Field analysis of pH will be performed as described in Section 3.3.1 for all samples collected.<br><br>Upon Agency approval, changes described herein will be implemented for scheduled field sampling activities during the 2023 sampling season. Final data will be presented in site-specific evaluation summary reports.<br><br><b>REFERENCES:</b><br><br>Atlantic Richfield Company, 2023a. Butte Priority Soils Operable Unit (BPSOU) 2022 Final Unreclaimed Sites Quality Assurance Project Plan. Atlantic Richfield Company. June 14, 2023.<br><br>Atlantic Richfield Company, 2023b. Butte Priority Soils Operable Unit (BPSOU) 2023 Final Insufficiently Reclaimed Sites Quality Assurance Project Plan. Atlantic Richfield Company. June 14, 2022.<br><br>Atlantic Richfield Company, 2023c. Butte Priority Soils Operable Unit (BPSOU) Field XRF to Laboratory Correlation and Regression Analysis Procedure for Unreclaimed (UR) and Insufficiently Reclaimed (IR) Sites. Prepared by Pioneer Technical Services, Inc. July 3, 2023.<br><br>EPA, 2020. Consent Decree for the Butte Priority Soils Operable Unit. Partial Remedial Design/Remedial Action and Operation and Maintenance. U.S. Environmental Protection Agency. February 13, 2020. Available at <a href="https://www.co.silverbow.mt.us/2161/ButtePriority-Soils-Operable-Unit-Conse">https://www.co.silverbow.mt.us/2161/ButtePriority-Soils-Operable-Unit-Conse</a> . |   |  |               |



**ATTACHMENTS:**

None

- |  |  |
|--|--|
| <input type="checkbox"/> Design Deficiency                     | <input type="checkbox"/> Material Substitution       |
| <input checked="" type="checkbox"/> Engineering Change Request | <input type="checkbox"/> Vendor Material Deficiency  |
| <input checked="" type="checkbox"/> Agency Directive           | <input type="checkbox"/> Scope                       |
| <input type="checkbox"/> Construction Deficiency               | <input type="checkbox"/> Clarification/Information   |
| <input type="checkbox"/> Schedule                              | <input type="checkbox"/> Other Final Design Document |

**RESPONSE/DIRECTIVE**

Project Manager *Scott Long* Date 09/18/2023

Atlantic Richfield Co. Representative *Mike McNulty* Date 09/18/2023

EPA Representative \_\_\_\_\_ Date \_\_\_\_\_

DEQ Representative \_\_\_\_\_ Date \_\_\_\_\_

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 Leo Berry / BNSF – email  
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CTEC of Butte – email  
Scott Juskiewicz / Montana Tech – email

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RFC Logbook

