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Summer 6-28-2023

Re: Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final Residential Metals Abatement Program (RMAP) Park Field Sampling Plan (FSP) Submittal #9 [Covering Centerville Skating Rink, Belmont Senior Citizens Center, High Altitude Skating Rink, Missoula Gulch Ballfield Play Area, MAC Facilities, Butte Family YMCA, Church of Christ, and Montana Tech South Campus] (dated June 22, 2023)

Nikia Greene

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE**

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Ref: 8MO

June 28, 2023

Mr. Mike McAnulty
Liability Manager
Atlantic Richfield Company
317 Anaconda Road
Butte, Montana 59701

Re: Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final Residential Metals Abatement Program (RMAP) Park Field Sampling Plan (FSP) Submittal #9 [Covering Centerville Skating Rink, Belmont Senior Citizens Center, High Altitude Skating Rink, Missoula Gulch Ballfield Play Area, MAC Facilities, Butte Family YMCA, Church of Christ, and Montana Tech South Campus] (dated June 22, 2023)

Dear Mike:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the *Draft Final Residential Metals Abatement Program (RMAP) Park Field Sampling Plan (FSP) Submittal #7 [Covering Centerville Skating Rink, Belmont Senior Citizens Center, High Altitude Skating Rink, Missoula Gulch Ballfield Play Area, MAC Facilities, Butte Family YMCA, Church of Christ, and Montana Tech South Campus] (dated June 22, 2023)*. Please distribute this FSP submittal as final after addressing the following minor comments.

General Comments

- According to the facility manager at the High Altitude Skating Rink there is a geomembrane liner below the sand cover on the skating rink, it is believed the geomembrane is 12 inches or less below existing grade. Discussion with Pioneer thus far has been to engage the risk assessors and determine an alternate sampling method for the 6-to-12-inch sampling interval in this area. The owner has showed concern that the sampling efforts would puncture the liner. There is also considerable underground piping in the area for the water and glycol distribution system that should not be impacted in any way. Consideration should be given to these components of the facility and ultimately reflected in the FSP. Similar investigation should be done at the Centerville Skating Rink to determine if a geomembrane liner exists at that facility as well.
- Figures 2 and 5 depict proposed boundary adjustments that have yet to be agreed upon by EPA and DEQ. This general comment is being made here to document that, at the time of this letter, no boundary adjustments at BRES sites have been approved.

Specific Comments

- 4.2.1; Centerville Skating Rink; second sentence. Please revise “Remediation” to “Reclamation”
- Missoula Gulch Ballfield. Please confirm if irrigation system is in place and take precautions to protect during sampling.
- Section 4.2.8, Montana Tech South Campus. Please make the second sentence regarding Land Use Category #2 a separate bullet.
- Figure 7. Why is parking lot sample HA1 so small? Is it because of the fence? The other three parking lot samples are not at maximum allowed size. Please explain in the text the size discrepancy or make any necessary adjustments to the text, figures, and tables.
- Table 2; Belmont Senior Center. Polygon area is stated to be 48,300, however Figure 2 states 48,307. Please confirm and revise as appropriate.

If you have any questions or concerns, please call me at (406) 457-5019.

Sincerely,

Nikia Greene
Remedial Project Manager

Butte File
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