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Summer 8-10-2023

Re: Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final Insufficiently Reclaimed Sites – Field Sampling Plan (FSP) BRES No. 66 – West Ruby Dump (dated July 25, 2023)

Nikia Greene

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

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Ref: 8MO

August 10, 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 Insufficiently Reclaimed Sites – Field Sampling Plan (FSP) BRES No. 66 – West Ruby Dump (dated July 25, 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 Insufficiently Reclaimed Sites – Field Sampling Plan (FSP) BRES No. 66 – West Ruby Dump (dated July 25, 2023)*. Please see additional comments to be addressed below. It is EPA's expectation that the following comments will be addressed prior to final distribution of this FSP. Please attach the Insufficiently Reclaimed Sites quality assurance project plan (QAPP) and the Unreclaimed Sites QAPP to this FSP and distribute once the comments have been addressed.

Comments

1. Figure 1: Please clarify where the West Ruby Dump engineered cover is located on the figure. "West Ruby Dump (Engineered Cover)" is written on the figure but lays on multiple boundary lines. The previous sample FSUA-24 and 038WA08-0 are not shown on Figure 1. Please revise Figure 1 to show these samples. Also, please add at least two sample stations at the south end of the original boundary and modify the tables and text accordingly. Previous BRES inspections have identified apparent exposed waste southeast of the intersection of Ruby St. and N. Alaska St.
2. Please confirm the naming convention for samples collected under the Unreclaimed Sites QAPP as all proposed samples begin with a prefix "IR" including the samples being collected under the UR Sites QAPP. Please 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
Chris Greco / Atlantic Richfield
Josh Bryson / Atlantic Richfield
Mike Mc Anulty / Atlantic Richfield
Loren Burmeister / Atlantic Richfield
Dave Griffis / Atlantic Richfield
Jean Martin / Atlantic Richfield
Irene Montero / Atlantic Richfield
David A. Gratson / Environmental Standards
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