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Re: Approval letter for the Butte Priority Soils Operable Unit (BPSOU) 2023 Residential Metals Abatement Program Gold Hill Lutheran Church (containing the Creativity Factory Preschool) Soil Remedial Action Work Plan (RAWP) (dated August 8, 2023)

Nikia Greene

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

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Ref: 8MO

August 16, 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) 2023 Residential Metals Abatement Program Gold Hill Lutheran Church (containing the Creativity Factory Preschool) Soil Remedial Action Work Plan (RAWP) (dated August 8, 2023)

Dear Mike:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the *Butte Priority Soils Operable Unit (BPSOU) 2023 Residential Metals Abatement Program Gold Hill Lutheran Church (containing the Creativity Factory Preschool) Soil Remedial Action Work Plan (RAWP) (dated August 8, 2023)* with the following comments. Please address the following comments and distribute this RAWP submittal as final.

1. Section 4.0: Please be consistent on the naming convention for the polygons within the bullets in Section 4 and the polygon labeling on Figure 1.
2. Section 4.0: Gold Hill Lutheran Church Remedial Action Work Plan: Area for 934 Placer South Center Yard is listed as 1,426 square feet and Figure 1 has area adding to 1455 square feet, please verify which measurement is correct.
3. Section 4.0: Gold Hill Lutheran Church Remedial Action Work Plan: Area for 934 Placer SE Yard is listed as 1431 square feet and Figure 1 has area adding to 1402 square feet, please verify which measurement is correct.
4. Section 4.1: Excavation: Please clarify where garden components are located. During the walk through, gardens were observed on the west side of the church (x2), the middle west yard, and the west main church entrance (x2).
5. Section 4.1: Excavation: Please clarify on the ADA access, over-excavation, regrading, and improving drainage. During the walk through these aspects were discussed, but do not appear in the report or figures.

6. Section 4.1: Excavation: Please clarify if there will be removal of curb and gutter and prepping for concrete. During the walk-through, the church representative inquired about the potential for the boulevard area to be concrete or prepped for concrete for easier access for church members. Will this be part of the work-plan?
7. Section 4.1: During the walk-through there was mention of creating a community garden and BSB will provide materials for construction and soil of these gardens. If there will be a raised area garden set aside for community use, where will it be located? Please indicate on the Figure and create a cross section of the potential garden area.
8. Section 4.1: Excavation: Please clarify which garden area soils will be removed to 26-inches. On Figure 1 garden areas are listed to 14-inch removal.
9. Figure 1: Garden area not shaded. Please verify garden locations. Gardens were observed on the west side of the church (x2), the middle west yard, the west main church entrance (x2), as well as an elevated garden on the grass area on west main church entrance.
10. Figure 1: Should 934 SW Yard with area of 151 square feet be listed as a garden? If so, please correct figure and list in Section 4.0 as a site as well.
11. Figure 1: This figure, BV1 is listed three times. In Section 4.0 BLVD #1 is listed please revise Figure 1 to match site name.
12. Attachment A: Draft Gold Hill Lutheran Church Individual Site Work Plan: Site Plan Map measurements for 934 Placer South Center Yard and 934 Placer SE Yard do not match Figure 1. Please verify measurements and update accordingly.
13. Please advise if the RMAP (residential) will be performing additional sampling of neighboring properties.

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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Josh Bryson / Atlantic Richfield

Mike Mc Anulty / Atlantic Richfield
Loren Burmeister / Atlantic Richfield
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