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Butte Priority Soils Operable Unit (BPSOU) New and Mahoney Remedial Action Work Plan (RAWP) Request for Change

Mike McAnulty

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Atlantic Richfield Company

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November 21, 2023

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RE: Butte Priority Soils Operable Unit (BPSOU) New and Mahoney Remedial Action Work Plan (RAWP) Request for Change

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to submit the attached Request for Change (RFC) related to the New and Mahoney Remedial Action Work Plan. The RFC will be implemented during upcoming remedial construction activities.

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

Sincerely,

Mike McAnulty

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

Atlantic Richfield Company

Mike Mc Anulty

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File: MiningSharePoint@bp.com – email
BPSOU SharePoint – upload

ATLANTIC RICHFIELD COMPANY

RFC - REQUEST FOR CHANGE

DATE November 21, 2023	RFC NO. UR-2023-RA-01	CONTRACTOR Pioneer Technical Services, Inc.	RFP NO. NA
CONTRACT DESCRIPTION: Unreclaimed Sites Scope of Work, Section 8.0, respectively, of the BPSOU Consent Decree (EPA, 2020).		ATTENTION OF: Nikia Greene (EPA) and Daryl Reed (DEQ)	
SUBJECT: Engineered Cap Material Substitute and Access Control Measures Addition <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: Final New and Mahoney Remedial Action Work Plan (RAWP)		REFERENCE DWG., P.O., TAG, SPECIFICATION NO. (FOR DEVIATIONS OR DEFICIENCIES) ETC: Butte Priority Soils Operable Unit (BPSOU) Final New and Mahoney Remedial Action Work Plan (RAWP)	
PROBLEM DESCRIPTION: <p>The New and Mahoney Remedial Action Work Plan (RAWP) (Atlantic Richfield Company, 2023) refers to engineered cap material as a 1.5-inch minus base course material. For end land use suitability concerns, an Agency-approved 3-inch minus material is being proposed (Attachment #1 – 2023 BPSOU Type B Borrow Submittal #1, dated November 13, 2023). As discussed during a site visit with Agency oversight personnel, the characteristics of the proposed 3-inch minus material suit the end land use of this area structurally better than the 1.5-inch minus base course. Additionally, there is a potential for undesired access to the Site via Curtis Street, New Street, and residential access routes. As a result, access controls are being evaluated and will be discussed with the property owner.</p> <p>Additionally, the southern boundary of the site depicted in the final RAWP terminates at the Butte-Silver Bow right-of-way. Mobilization of field equipment and site remediation activities are anticipated to begin on November 27, 2023.</p>			
PROPOSED MODIFICATION: <p>The 3-inch minus material is preferred over the 1.5-inch base course due to its superior structural characteristics and material availability. The 3-inch minus material is an Agency-approved material acquired from an Agency-approved source. Fully validated data will be included with the project construction completion report (CCR) provided for Agency review.</p> <p>Access control measures will include landscape boulders acquired from an Agency-approved source. These boulders will mitigate traffic through the Site and improve the longevity of the proposed engineered cap.</p> <p>The southern boundary of the site is proposed to extend to adjacent residential properties to provide a consistent engineered cap throughout the site and route storm water to the existing storm water inlet. The extended cap area will be graded to provide positive drainage away from the residential areas and toward the referenced storm water inlet.</p> <p>Changes described herein will be implemented for scheduled Remedial Action construction of this Project. Additional sites may be identified to substitute of 1.5-inch base course for a 3-inch minus material, and these will be communicated to the Agencies prior to implementation. As-built drawings will reflect these changes prior to their submittal.</p>			



REFERENCES:

Atlantic Richfield Company, 2023. Butte Priority Soils Operable Unit (BPSOU) Final New and Mahoney Remedial Action Work Plan (RAWP). Atlantic Richfield Company. September 15, 2023.

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 <https://www.co.silverbow.mt.us/2161/ButtePriority-Soils-Operable-Unit-Conse>.

ATTACHMENTS:

Attachment 1: [DF BPSOU Type B Borrow Sub #1 \(11-13-23\).pdf](#)

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

Project Manager *Scott Samp* Date 11/21/2023

Atlantic Richfield Co. Representative *Mike McNulty* Date 11/21/2023

EPA Representative _____ Date _____

DEQ Representative _____ Date _____

- Cc:
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 - Josh Bryson / Atlantic Richfield – email
 - Loren Burmeister / Atlantic Richfield – email
 - Dave Griffis / Atlantic Richfield – email
 - Jean Martin / Atlantic Richfield – email
 - Irene Montero / Atlantic Richfield – email
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Robert Bylsma / UP – email
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Karen Helfrich / Pioneer – email
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File: MiningSharePoint@bp.com - email
BPSOU SharePoint - upload
RFC Logbook

