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Summer 8-16-2023

**Approval for the Butte Priority Soils Operable Unit (BPSOU) 2023  
Residential Metals Abatement Program Stodden Park 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**

FEDERAL BUILDING, 10 West 15<sup>TH</sup> Street, Suite 3200  
Helena, MT 59626-0096  
Phone 866-457-2690  
www.epa.gov/region8

Ref: 8MO

August 16, 2023

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

**Re: Approval for the Butte Priority Soils Operable Unit (BPSOU) 2023 Residential  
Metals Abatement Program Stodden Park 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 Stodden Park Soil Remedial Action Work Plan (RAWP) (dated August 8, 2023)* with the following comments. Please address the following comments and distribute as final.

1. Section 4.1: Please confirm that there will be 18 inches of woodchip cover underneath the footprint of the existing mining truck replica.
2. Section 4.1: Please consider scheduling the layout of the excavation to accommodate potential delays caused by local storm events.
3. Section 4.2: Backfill is detailed for the woodchip area, please specify soft surface backfill materials and depths that this material will be placed.
4. Section 5.3: Since this borrow source material was sampled in 2020, please confirm that the results included in Attachment D are representative (i.e., 1 sample per 5,000 cubic yards) of the material that will be used for backfilling purposes at this site. Understanding that this material was sampled under the Anaconda Smelter site's programs, please submit a borrow source form for review and approval for use within the BPSOU. This form will need to be signed/approved by the BPSOU remedial project manager.
5. Figure 1: Please update features on the figure in the legend (i.e., UE).
6. Figure 1 and Figure 2: Please label and identify removal depths for the soft surface walkway. This should also be in Attachment A as well. In addition to the walkway areas, please include PA6 and any other polygon areas that may be removed during this remedial action.
7. From information gathered from site walk through on August 14, 2023, please include any design drawings of the drainage system below the playground remediation area.

8. This area is a multi-use facility, please include a site-specific traffic control, public safety and emergency services access plan.
9. Please include a list of all contractors and sub-contractors that will be working on this project.

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  
Mave Gasaway / DGS  
Adam Cohen / DGS  
Brienne McClafferty / Holland & Hart  
Daryl Reed / DEQ  
Amy Steinmetz / DEQ  
Dave Bowers / DEQ  
Katie Garcin-Forba / DEQ  
Carolina Balliew / DEQ  
Jim Ford / NRDP  
Pat Cunneen / NRDP  
Katherine Hausrath / NRDP  
Ted Duaine / MBMG  
Gary Icopini / MBMG  
Becky Summerville / MR  
John DeJong / UP  
Robert Bylsma / UP  
John Gilmour / Kelley Drye  
Leo Berry / BNSF  
Robert Lowry / BNSF

Brooke Kuhl / BNSF  
Lauren Knickrehm / BNSF  
Doug Brannan / Kennedy Jenks  
Matthew Mavrinac / RARUS  
Harrison Roughton / RARUS  
Brad Gordon / RARUS  
Mark Neary / BSB  
Eric Hassler / BSB  
Julia Crain / BSB  
Brandon Warner / BSB  
Abigail Peltomaa / BSB  
Eileen Joyce / BSB  
Sean Peterson/BSB  
Josh Vincent / WET  
Scott Bradshaw / W&C  
Emily Stoick / W&C  
Pat Sampson / Pioneer  
Andy Dare / Pioneer  
Karen Helfrich / Pioneer  
Randa Colling / Pioneer  
Scott Sampson / Pioneer  
Ian Magruder/ CTEC  
CTEC of Butte  
Scott Juskiewicz / Montana Tech  
David Shanight / CDM Smith  
Curt Coover / CDM Smith  
Chapin Storrar / CDM Smith  
Erin Agee / EPA  
Will Lindsey / EPA  
Aaron Urdiales / EPA  
Christina Progress / EPA  
Jamie Miller / EPA  
Chris Wardell / EPA  
Dana Barnicoat / EPA  
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