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Residential Metals Abatement Program Construction Completion Report (Non-Residential Parcels – Indoor Soil) - Butte High School

Environmental Resource Management (ERM)

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Atlantic Richfield Company

Mike McAnulty Liability Manager

February 12, 2024

Nikia Greene Remedial Project Manager US EPA – Montana Office Baucus Federal Building 10 West 15th Street, Suite 3200 Helena, Montana 59626 Erin Agee Senior Assistant Regional Counsel US EPA Region 8 Office of Regional Counsel CERCLA Enforcement Section 1595 Wynkoop Street Denver, CO 80202 Mail Code: 80RC-C

Daryl Reed DEQ Project Officer P.O. Box 200901 Helena, Montana 59620-0901 Jonathan Morgan, Esq. DEQ, Legal Counsel P.O. Box 200901 Helena, Montana 59620-0901

RE: Residential Metals Abatement Program Construction Completion Report (Non-Residential Parcels – Indoor Soil) – Butte High School

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to submit the *Draft Residential Metals* Abatement Program Construction Completion Report (Non-Residential Parcels – Indoor Soil) – Butte High School.

The report may be downloaded at the following link:

https://theermgroupnam-

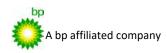
my.sharepoint.com/:f:/r/personal/thomas_beckman_erm_com/Documents/Atlantic%20Richfield% 20Co/CCRs/Butte%20High%20School?csf=1&web=1&e=U9mQBr

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

Sincerely,

Mike Mednulty

Mike McAnulty Liability Manager Remediation Management Services Company An Affiliate of **Atlantic Richfield Company**



317 Anaconda Road Butte MT 59701

Direct (406) 782-9964 Fax (406) 782-9980



Residential Metals Abatement Program Construction Completion Report (Non-Residential Parcels – Indoor Soil)

Butte High School

12 February 2024 Project No.: 0643586



The business of sustainability

Signature Page

12 February 2024

Residential Metals Abatement Program Construction Completion Report (Non-Residential Parcels – Indoor Soil)

Butte High School

12

Christopher Berg **Project Manager**

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Thomas f. Beckna

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Acronyms and Abbreviations

Name	Description
ARAR	Applicable or Relevant and Appropriate Requirements
ARCO	Atlantic Richfield Company
BPSOU	Butte Priority Soils Operable Unit
CCR	Construction Completion Report
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
EDD	electronic data deliverable
ERM	Environmental Resources Management, Inc
FSP	Field Sampling Plan
ICIAP	Institutional Control Implementation and Assurance Plan
ISR	Investigation Summary Report
mg/kg	milligrams per kilogram
QAPP	Quality Assurance Project Plan
RA	Remedial Action
RAWP	Remedial Action Work Plan
RL	reporting limit
RMAP	Residential Metals Abatement Program
USEPA	United States Environmental Protection Agency

RESIDENTIAL METALS ABATEMENT PROGRAM CONSTRUCTION COMPLETION REPORT (NON-RESIDENTIAL PARCELS – INDOOR SOIL) Butte High School

1. INTRODUCTION

This Construction Completion Report (CCR) documents soil Remedial Action (RA) construction activities completed at Butte High School as part of the 2022 Residential Metals Abatement Program (RMAP).

1.1 Background

The Butte-Silver Bow County Multi-Pathway RMAP is designed to mitigate exposure of residents of the Butte Priority Soils Operable Unit (BPSOU), the larger Butte community, and rural residential development within the Silver Bow Creek/Butte Area Superfund Site to sources of arsenic, lead, and mercury contamination.

The United States Environmental Protection Agency (USEPA) has included schools (public and private schools, daycares, and preschools) in the RMAP in the First Amendment to the Administrative Order (USEPA Docket No. Comprehensive Environmental Response, Compensation, and Liability Act [CERCLA]-08-2011-0011; USEPA 2020). Contamination of schools may originate from both mining-related (waste rock, tailings, aerial emissions) and non-mining-related sources (e.g., lead paint or broken mercury thermometers). The BPSOU residential action levels are 250 milligrams per kilogram (mg/kg) for arsenic, 1,200 mg/kg for lead, and 147 mg/kg for mercury.

Environmental Resources Management, Inc. (ERM) performed the soil investigation to determine whether remediation or abatement was required using the decision framework outlined in the *2022 Residential Metals Abatement Program Quality Assurance Project Plan (Non-Residential Parcels – Indoor Dust (ARCO 2022).* Lead was reported in the composite soil sample collected from an interior crawlspace area at a concentration exceeding the RMAP action level. It was determined that interior remedial action was required to ensure containment and mitigate potential exposures from occurring.

1.2 Site Description

Butte High School and its Annex were constructed in 1937 and 1968, respectively. The entire school was extensively remodeled between 1989 and 1990. The results of an August 2021 exterior surface soil investigation performed by Atlantic Richfield Company (ARCO) and Pioneer Technical Services, Inc. found exterior surface soils contain metals at concentrations above action levels requiring soil remediation.

ERM for ARCO conducted an interior soils investigation in April 2022 and an interior dust investigation between May and August 2022. Laboratory analytical results for the interior dust investigation did not exceed the BPSOU residential action levels for arsenic, lead, or mercury, in the dust samples collected from locations throughout the school. However, laboratory analytical results for the interior soils investigation found that soil in "Area 1" of the basement crawl space had lead concentrations exceeding the BPSOU residential action levels of 1,200 mg/kg, prompting the need for remedial action or abatement. ERM developed a Remedial Action Work Plan (RAWP) and performed remedial action containment activities presented in this CCR between January 2023 and August 2023.

1.3 Remedial Action Objectives

ERM performed sampling and assessment to determine whether remediation or abatement was required using the following decision logic:

 Remediation/abatement was required where accessible interior soil contained arsenic, lead, or mercury at concentrations in excess of solid media action levels in areas currently accessible to children, students, or faculty.

- Remediation/abatement was required where inaccessible interior soil contained arsenic, lead, or mercury at concentrations in excess of solid media action levels in areas mainly accessible to facility staff. Inaccessible dust is defined as surface dust found in locations such as boiler or mechanical rooms, tops of ceiling tiles, janitorial closets, on ventilation system ductwork or vents, and storage rooms in areas that are not commonly accessed or occupied by children or students.
- Remediation/abatement was required for buildings constructed in 1980 and earlier, where soil/dust contains arsenic, lead, or mercury at concentrations in attics and/or crawlspaces in excess of solid media action levels and where there is an exposure pathway to an interior occupied space.

The primary objective of the RA documented in this CCR involves minimization of potential exposure pathways where interior soil was identified to have lead concentrations equal to or greater than 1,200 mg/kg. Agency-approved remedial objectives are defined in the *Butte High School Remedial Action Work Plan* (ERM 2022b). The area of concern is identified as Area 1 within the crawl space, which is located south of the boiler room and below the first-floor classrooms (Figure 2).

2. DESCRIPTION OF SOIL CONTAINMENT ACTIVITIES

2.1 Mobilization/Demobilization

ERM mobilized on 20 February 2023 and conducted remedial activities in the crawl space from 20 February 2023 to 23 February 2023. Additional one-day mobilizations were needed on 7 March 2023 and 12 August 2023 to secure the geo-textile liner to the crawlspace. The schedule is shown in Table 2.

2.2 Crawl Space Interior Soils Remediation

The Butte High School crawl space remediation area, Area 1, is shown in Figure 2. The Area 1 crawlspace consists of an approximately 3,200 square-foot rectangular area roughly 320 feet in length and 10 feet in width. This crawlspace has one walk-in door at the north end and two 3-foot by 3-foot crawlspace openings at the south end. Prior to remediation, the crawlspace contained dirt, dust, and debris (i.e., old school crafting supplies, general refuse) on the ground surface. Steel and cast-iron conduits run through the full extent of Area 1. See Appendix A for photographs of the Area 1 crawlspace.

Containment of soil and dust was necessary due to the lead concentrations detected in exceedance of the Butte Priority Soils Site-Specific Residential Action Levels for indoor soil and dust in the surface soil sample and field duplicate location in the Area 1 crawlspace. This containment measures prevents the migration of soil vapors, particulates, and dust from the crawlspace to the occupied areas of the school.

Refuse and debris in the Area 1 crawlspace were collected, and accumulated dust was wiped from horizontal surfaces and pipe chases. Refuse, debris, soil, and wipes from this remedial action work were placed in sealed waste bags before being transported out of Area 1 for proper disposal. Approximately 40 yards of refuse was removed from the Area 1 crawl space.

Gaps between utility conduits and surrounding concrete foundations were sealed to address the potential preferential pathways for soil particulate migration from the crawlspace to the occupied areas of the school from Area 1. Sealing methods included the use of spray foam insulation and/or grout placement to fill in gaps.

The floor of the crawlspace entrances were graded as needed using a piece 2x4 lumber to provide a flat level surface for installation of geotextile fabric. US 380NW nonwoven geotextile fabric was used within the first approximately 300 to 900 square feet of all three entrances (1,900 square feet in total) to the crawlspace to provide a barrier between the surface soil, receptors, and indoor air (Figure 2). US 380NW geotextile fabric will not allow soil particulates greater than 150 microns to migrate past this barrier while

remaining air and water permeable. Once the fabric was placed over surface soil, it was secured with to the crawl space walls using construction adhesive. 2"x4" lumber was adhered to the wall of each corner of the liner using construction-grade adhesive and a caulk-gun. An additional 2"x4" was attached to each corner of the crawl space liner using 1/4" screws and washers. The pieces of lumber (one on the wall, one on the corner of the liner) were screwed together to secure the liner in place.

Access to the Area 1 crawlspace was controlled by securing entrances and applying appropriate signage. The access door located at the north end of Area 1 was fixed with a Master lock. The two other crawlspace openings were sealed with plywood and secured with 3-inch screws. Aluminum signage has been secured to each of the three entrances, stating "DANGER: DO NOT ENTER HAZARDOUS AREA. AUTHORIZED PERSONS ONLY." A full list of materials used is shown in Table 3.

3. PROJECT DOCUMENTATION AND SCHEDULE

3.1 Remedial Action Records

Documentation of the 2023 RA containment project consists of a RAWP, pre- and post-remediation photos, and field notes as discussed in the following subsection.

3.1.1 Remedial Action Work Plan

The 2022 Resident Metals Abatement Program Remedial Action Work Plan – Butte High School – Indoor Soil. (ERM 2022a) contains the following information:

- School address and site description
- Soil remediation scope
- School soil remediation schedule
- Lead levels in crawl space
- A comprehensive description of planned remedial actions in the crawl space

The RAWP was used to guide containment activities and was subject to agency approval prior to implementing the RA work.

3.1.2 Photographs and Field Notes

Pre- and post-containment photographs are presented in Appendix A and field notes generated during the containment effort are presented in Appendix B.

3.1.3 Deviations

There were no deviations from the approved activities specified in the RAWP.

3.2 **Project Documents**

Below is a summary of relevant documents relating to the RA containment activities:

- 2006 Record of Decision, Butte Priority Soils Operable Unit, Silver Bow Creek/Butte Area NPL Site (BPSOU ROD) (USEPA 2006)
- Explanation of Significant Differences to the 2006 Butte Priority Soils Operable Unit Record of Decision (USEPA 2011)

- 2020 Unilateral Administrative Order Amendment (UAO Amendment) for "Partial Remedial Design/Remedial Action Implementation and Certain Operation and Maintenance at the Butte Priority Soils Operable Unit/Butte Site (EPA Docket No. CERCLA-08-2011-0011) (USEPA 2020)
- 2022 Residential Metals Abatement Program Quality Assurance Project Plan (Non-Residential Parcels – Indoor Dust (ARCO 2022)
- 2022 Residential Metals Abatement Program (RMAP) Field Sampling Plan (FSP) Butte High School – Indoor Soil (ERM 2022a)
- 2022 Resident Metals Abatement Program (RAMP) Remedial Action Work Plan (RAWP) Butte High School – Indoor Soil (ERM 2022b)
- Draft 2022 Resident Metals Abatement Program (RAMP) Investigation Summary Report (ISR) Butte High School – Indoor Soil (ERM 2023)

3.3 **Project Schedule**

Containment activities began on 20 February 2023 and concluded 12 August 2023. The full project schedule is shown on Table 2.

4. SAFETY AND ENVIRONMENTAL CONSIDERATIONS

4.1 Safety

Health and safety documentation for the 2023 Interior Soils RA containment project was incorporated into an ERM Health and Safety Plan. Safety meetings discussing planned activities, hazards and mitigation/prevention requirements for remedial activities were completed every morning. Safety meetings addressed the daily scope of work, proper personnel protection equipment (PPE) use, and any safety observations from prior work completed.

4.1.1 Personal Protective Equipment

PPE used by ERM staff performing this work included: hard hats, safety glasses, Tyvek suits, nitrile gloves, N95 masks, long sleeve shirt, and steel toe boots.

4.1.2 Recordable Incidents

No recordable incidents occurred during the 2023 RA containment project.

4.1.3 Near Misses

No near misses occurred during the 2023 RA containment project.

4.2 Environmental Considerations

To prevent migration of soil and dust containing lead at concentrations above action levels, all debris and material removed from Area 1 was placed on plastic liners. Refuse and plastic liners were placed in industrial trash bags, and the exterior of the bags were wiped down prior to disposal. Refuse and industrial bags were placed in dumpsters outside of the school.

RESIDENTIAL METALS ABATEMENT PROGRAM CONSTRUCTION COMPLETION REPORT (NON-RESIDENTIAL PARCELS – INDOOR SOIL) Butte High School

5. INSTITUTIONAL CONTROLS

Access to the Area 1 crawlspace will be controlled by securing entrances and applying appropriate signage. The access door located at the north end of Area 1 was securely shut and locked. The two other crawlspace were covered with a lockable access door. Appropriate signage will be applied to the access door and crawlspace openings. Signage will be white, black, and red, with a warning label, "DANGER: DO NOT ENTER HAZARDOUS AREA. AUTHORIZED PERSONS ONLY". Additional signage will be added that includes contact information for the Butte School District and Butte-Silver Bow County Reclamation and Environmental Services if additional information is needed.

6. PERFORMANCE STANDARDS/ARARS COMPLIANCE

The institutional controls, as described in Section 5, will be maintained consistent with the requirements of the "Institutional Control Implementation and Assurance Plan" (ICIAP) for the BPSOU Site (BSB and ARCO, 2019). The Area 1 crawlspace will be inspected annually by Atlantic Richfield Company, and/or Butte-Silver Bow County and will be documented using a standard inspection form. The geotextile liner will be inspected for tears and deterioration. The utility conduits will be inspected for gaps and deterioration of the sealant. In general, Butte-Silver Bow County has primary responsibility for the implementation, monitoring, and enforcement of most of the institutional controls described in this ICIAP with funding and support from Atlantic Richfield and with oversight and support by the USEPA, in consultation with Montana Department of Environmental Quality. Atlantic Richfield also has certain direct responsibilities under the ICIAP.

7. REFERENCES

- ARCO (Atlantic Richfield Company). 2022. Residential Metals Abatement Program Quality Assurance Project Plan (Non-Residential Parcels – Indoor Soil). October 2022.
- BSB and ARCO (Butte-Silver Bow County and Atlantic Richfield Company). 2019. Institutional Controls Implementation and Assurance Plan. Priority Soils Operable Unit Silver Bow Creek/Butte Area, National Priorities List Site, Butte, Montana. Butte-Silver Bow County and Atlantic Richfield Company, October 2019.
- BSB and ARCO. 2020. Revised Final Multi-Pathway Residential Metals Abatement Program (RMAP) Plan. Priority Soils Operable Unit Silver Bow Creek/Butte Area, National Priorities List.
- ERM (ERM-West, Inc.). 2022a. 2022 Residential Metals Abatement Program (RMAP) Field Sampling Plan (FSP) – Butte High School – Indoor Soil. March.
- ERM. 2022b. 2022 Resident Metals Abatement Program (RAMP) Remedial Action Work Plan (RAWP) Butte High School – Indoor Soil. December.
- ERM. 2023. Draft 2022 Resident Metals Abatement Program (RAMP) Investigation Summary Report (ISR) – Butte High School – Indoor Soil. Submitted for agency review August 2023.
- USEPA (United States Environmental Protection Agency). 2006. *Record of Decision, Butte Priority Soils Operable Unit, Silver Bow Creek/Butte Area NPL Site.* U.S. Environmental Protection Agency, September 2006.
- USEPA. 2020. U.S. Environmental Protection Agency (EPA) Unilateral Administrative Order Amendment (UAO Amendment) for "Partial Remedial Design/Remedial Action Implementation and Certain Operation and Maintenance at the Butte Priority Soils Operable Unit/Butte Site" (EPA Docket No. CERCLA-08-2011-0011).

TABLES

Table 1Project PartiesButte High SchoolButte RMAP Indoor DustButte, Montana

Entity	Party	Responsibility	
	Atlantic Richfield Company		
LIAO Respondent	Liability Manager: Mike McAnulty	Responsible for conducting work elements as	
UAO Respondent	Phone: (406)7 23-1822	described in the Record of Decision	
	Email: mcanumc@bp.com		
	US Environmnetal Protection Agency		
	Project Manager: Nikia Green		
	Phone: (406) 457-5019	Government oversight of remedial design and remedial action	
Government Oversight	Email: Green.Nikia@epa.gov		
	CDM Smith (EPA Representative)		
	Oversight: David Shanight		
	Phone: (406) 459-3950		
	Environmental Resources Management		
Decign/Construction Contractor	Project Manager: Christopher Berg	Remedial design, primary remedial action	
Design/Construction Contractor	Design Team: NA	contractor	
	Oversight: Tim Wilson		

Table 2 Construction Completion Project Schedule Butte High School Butte RMAP Indoor Dust Butte, Montana

Task Name	Duration	Start	Finish
Refuse Removal	3 Days	2/20/2023	2/23/2023
Wipe down surfaces	2 Days	2/21/2023	2/22/2023
Fill in Openings/Pathways	1 Day	2/20/2023	2/23/2023
Fix Liner to Crawl Space Openings	3 Days	2/23/2023	8/12/2023 ¹
Seal Three Entrances to Crawl Space	1 Day	2/23/2023	2/23/2023

Notes

¹There were two additional one-day mobilizations to adhere the fabric to the crawl space entrances, as the originally installed adhesives failed. These occurred on 7 March 2023 and 12 August 2023.

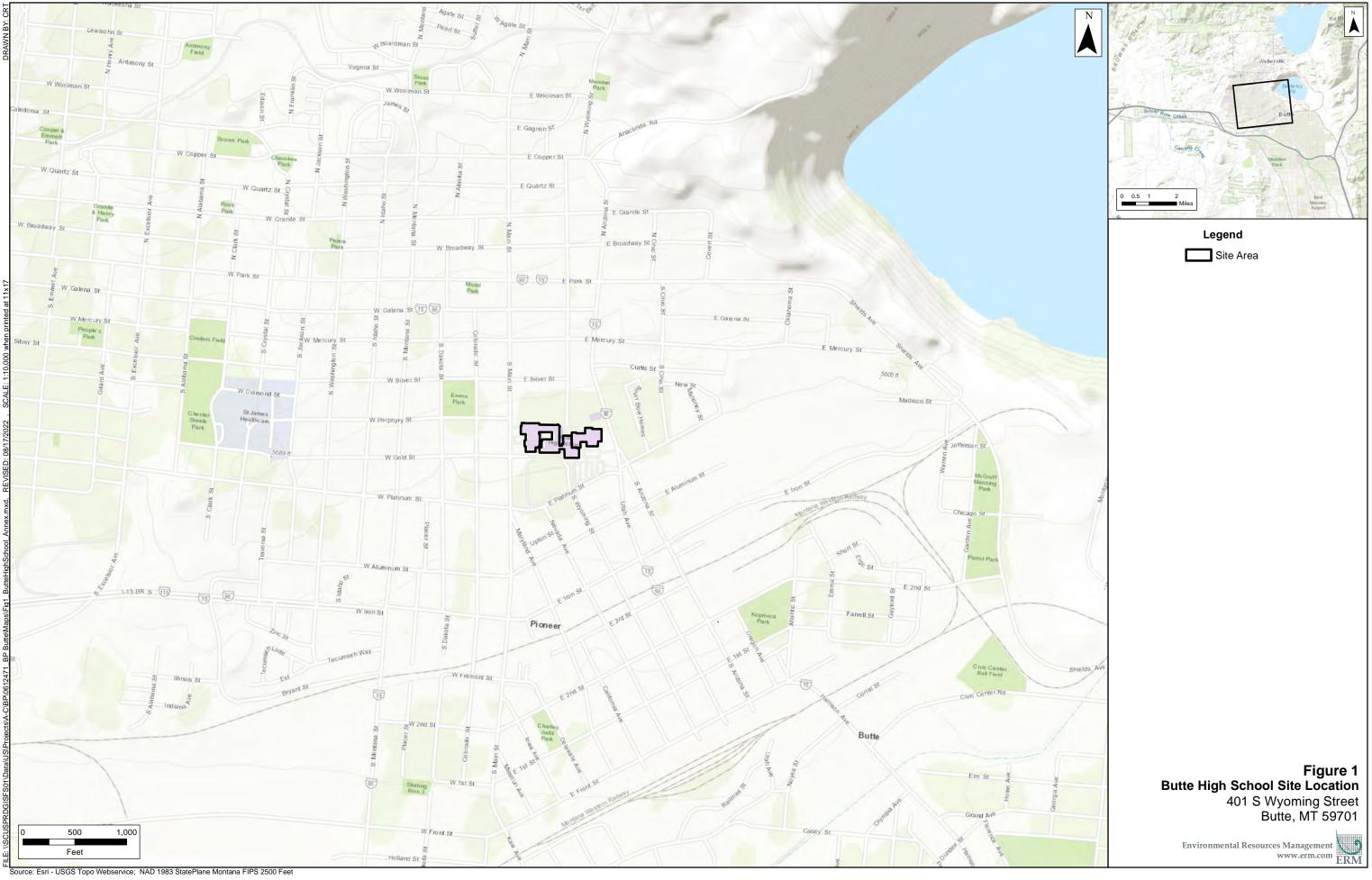
Table 3Construction Completion Equipment ListButte High SchoolButte RMAP Indoor DustButte, Montana

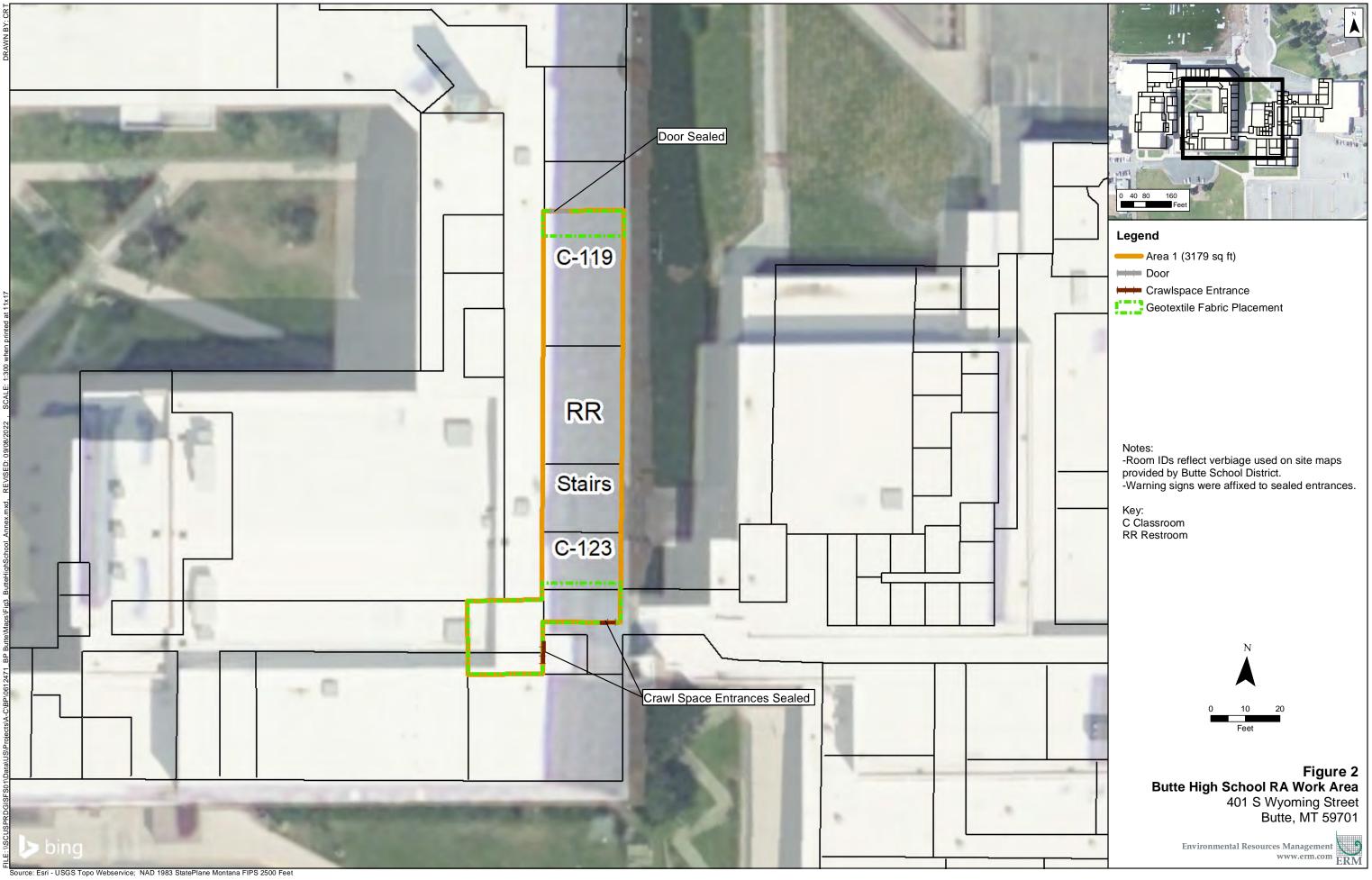
Equipment	# of Units by Contractor	Description
Power Drill	1	Drill used to seal entrances to crawl space
Insulation Foam	7	Seal pathways from pipes and other openings
Plastic Liner	3	Used to wrap large refuse materials
DAP Concrete Sealer	3	Seal pathways in outerwalls bordering crawl space
Industrial Garbage Bags	100	Used for disposal for refuse
Geotextile Liner	1 - 3,600 square foot liner	Fixed to crawl space ground at 3 entrances
Warning Signs	3	Signs were fixed to 3 crawl space entrances
Tri-Phosphate Solution	1	Wipe down interior surfaces and refuse
Shop Paper Towel Rolls	5	Wipe down interior surfaces, refuse, clean work area
Can of White Paint	1	Paint plywood that was fixed to two crawl space entrances

Table 4Construction Completion Material QuantitiesButte High SchoolButte RMAP Indoor DustButte, Montana

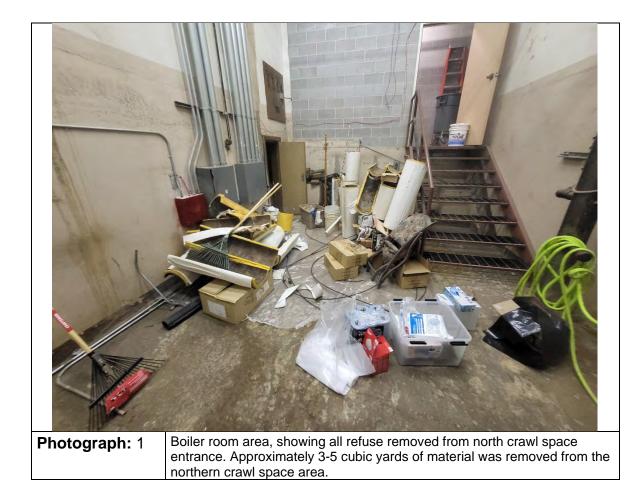
Materials	Quantities	Notes
Removed debris/refuse	Approximately 40 yards	Debris/refuse that were in crawl space. They were placed in heavy duty trash bags, larger materials were wrapped in plastic and placed in dumpsters

FIGURES





APPENDIX A SITE PHOTOGRAPHS





Photograph: 2 More refuse located deeper at north entrance of crawl space.

	9
5	ERM

Butte RMAP Butte High School Crawl Space Remediation ERM Project Number 0643586



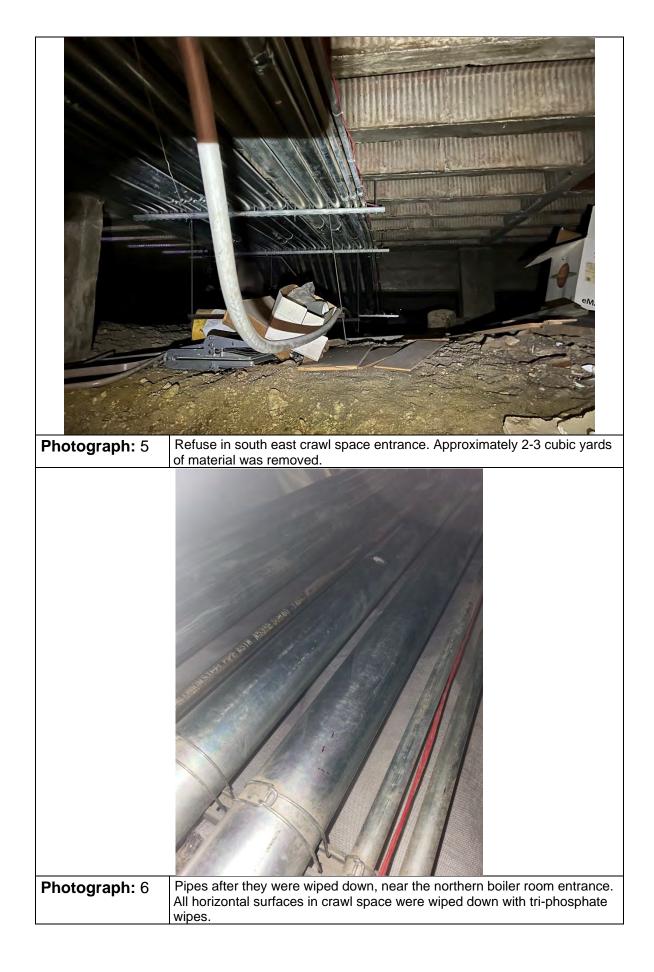


Photograph: 4

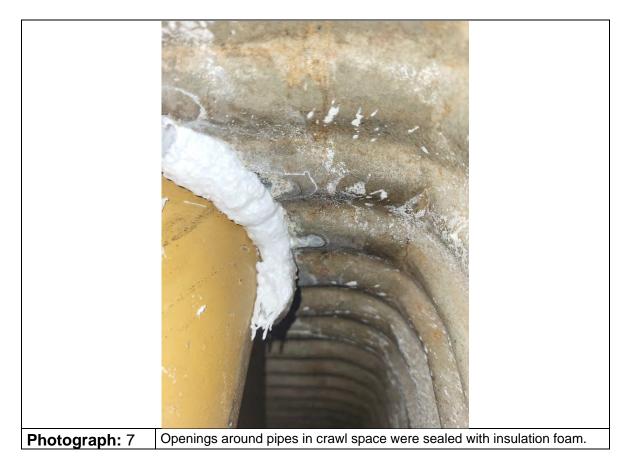
After all refuse was removed from southwestern crawl space corner.



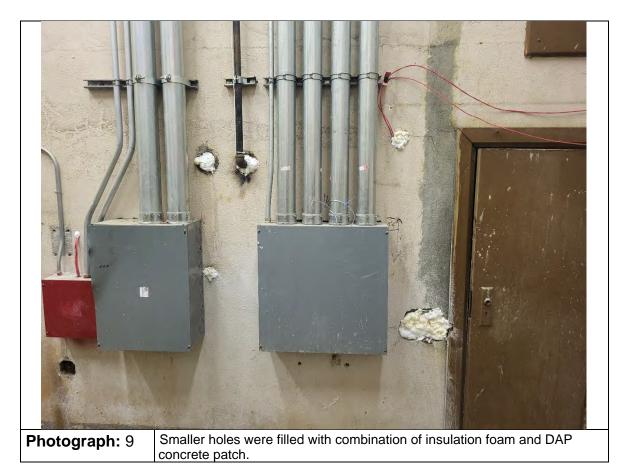
Butte RMAP Butte High School Crawl Space Remediation ERM Project Number 0643586



	Butte RMAP
	Butte High School Crawl Space Remediation
ERM	ERM Project Number 0643586

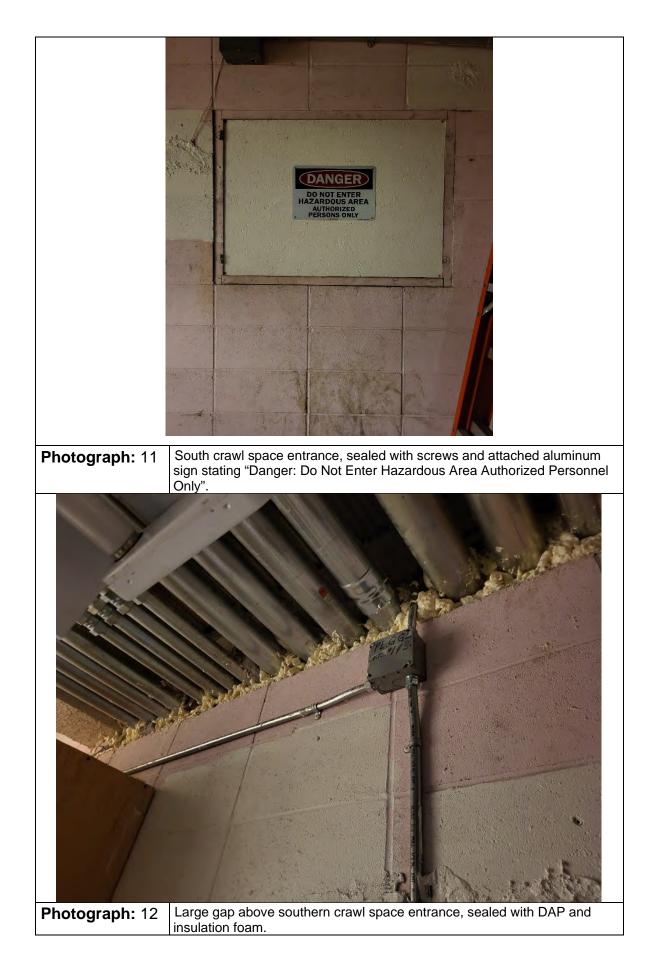


Photograph: 8	Door in boiler room with aluminum sign stating: "Danger: Do Not Enter Hazardous Area Authorized Personnel Only". Door would not close, so door hinges were removed to allow for door to be closed properly. A double hinge hasp was installed, and combination lock was used to lock the door. The combination was given to administrative staff.
ERM	Butte RMAP Butte High School Crawl Space Remediation ERM Project Number 0643586

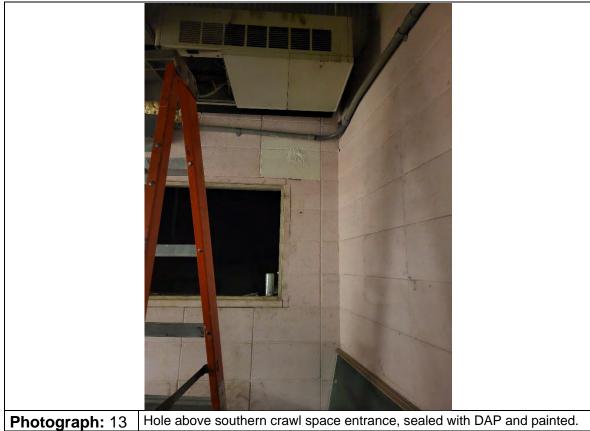


	TERME AND A A A A A A A A A A A A A A A A A A
Photograph: 10	Southwest crawl space entrance, sealed with screws and attached aluminum sign stating "Danger: Do Not Enter Hazardous Area Authorized Personnel Only".

	Butte RMAP
	Butte High School Crawl Space Remediation
ERM	ERM Project Number 0643586



9	Butte RMAP Butte High School Crawl Space Remediation
ERM	ERM Project Number 0643586



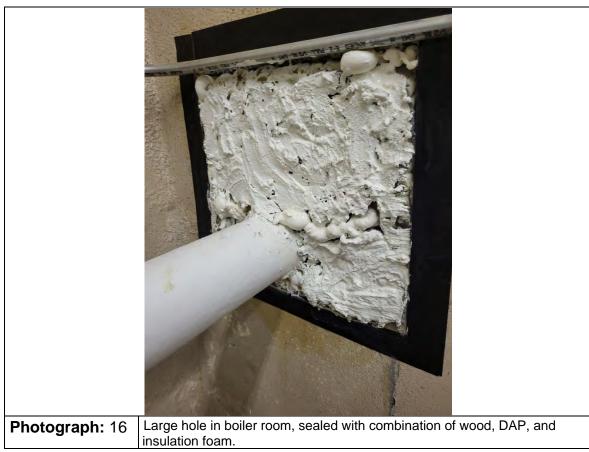


 Butte RMAP

 Butte High School Crawl Space Remediation

 ERM
 Project Number 0643586



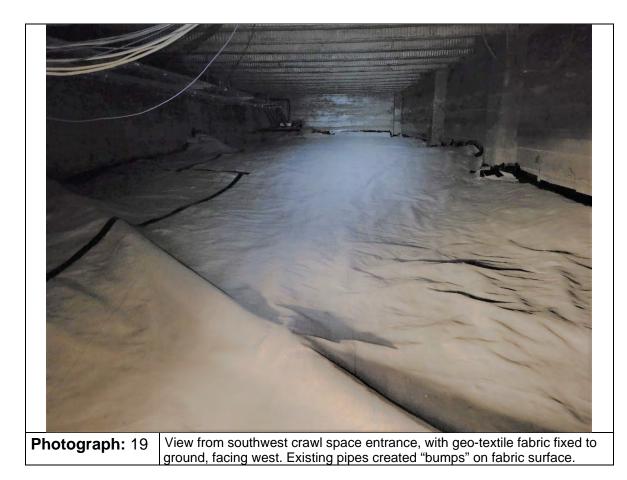


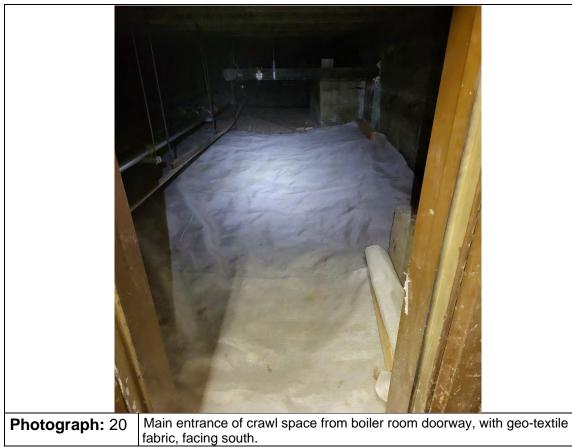
	Butte RMAP
	Butte High School Crawl Space Remediation
ERM	ERM Project Number 0643586





ERM	Butte RMAP Butte High School Crawl Space Remediation ERM Project Number 0643586
EKIVI	ERM Project Number 0643586





	Butte RMAP
	Butte High School Crawl Space Remediation
ERM	ERM Project Number 0643586



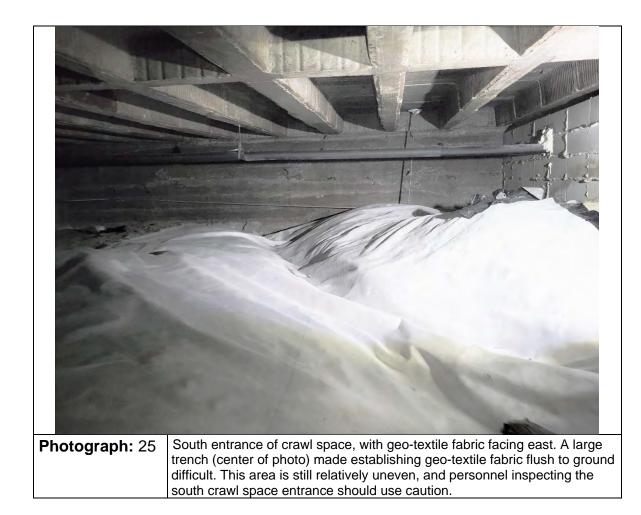
 Photograph: 22
 View of east side of crawl space entrance by boiler room, with-geotextile fabric, facing east.

	Butte RMAP
	Butte High School Crawl Space Remediation
ERM	ERM Project Number 0643586











APPENDIX B FIELD NOTES

Butte R-MAP Remediction 2120/23 To invitation La Daniels, B. Armintan 0000 Pick-up rential Pick-up Charlie Daniels 0940 Grab supplies From Lowis/ 10 00 Home Depot 1350 Picking Brookely NN Armstrong From airporit, Leave for : Butte 1530 sin-site at Butte High same 1548 Check the with front to PFice site contact, wilk through 1600 Begin removing garbage From North Entrance by boiler in the second se room 1800 Dumpster not on site, recive permission to voc other dumpisters, Fill ari much ar possible 1977 off-site The An--2/20/23 Rite in the Rain. Scale: 1 square =

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Scale: 1 square = ____

Field Log	erm
Site Address: Butte HS	Personnel: TW NC
Date: 3/7/23 Scope of Work: Fix 600r to N	Pages: 10F1 Crawl space entrance, adhere liner to well
Scope of work. Fix 600r to N	CTAW . Space
0830 Leive Bozeman	But the state of the second se
1000 on-site check in,	rately meeting
1030 Fix N CTAWL SP	pace door, recure with lock
1300 Enter CRAWL SPALE,	apply tape athesive to increments
1500 inspect your, adne	sive, clean up
HERO OFF-JIFC	
TW	The state of the s
याहार	
	- ip-
	12 hours to the second se
	11
	11 Mr

Field Log	ERM
Site Address: Buth US	Personnel: TW CW
Date: 8/12/23	Pages: 10fl
Scope of Work: Fix liner to crawl	Space
0740 Leve Mozemin Fo	- Butte High school
0900 Arrive on site,	checkin
1000 SAFety meeting	
1030 Enter crawl space	install lumber on wall corners
1230 Allow adhesives to	dry
1301 Dall lumber cornes	r to wall corners
1510 Reapply adhesive t	« corners in Northern entrance
1500 Re-check corners	
1020 OFF-site	
	1 11.
	15 10hi

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