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Spring 3-13-2024

**Re: Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final 2024 Type B Borrow Material Submittal #2 (dated February 14, 2024)**

Molly Roby

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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

March 13, 2024

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 2024  
Type B Borrow Material Submittal #2 (dated February 14, 2024)**

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) Draft Final 2024 Type B Borrow Submittal #2 (dated February 14, 2024)*. Please attach the EPA and DEQ signature pages and distribute as final. If you have any questions or concerns, please call me at (406) 457-5021.

Sincerely,

A handwritten signature in blue ink that reads "Molly Roby".

Molly Roby  
Remedial Project Manager

Attachments: Butte Hill Cover Soil Approval Submittal (electronic version only)

cc: Butte File

Chris Greco / Atlantic Richfield  
Josh Bryson / 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

cc: continued...

Brianne McClafferty / Holland & Hart  
Daryl Reed / DEQ  
Logan Dudding / DEQ  
Kevin Stone / DEQ  
Amy Steinmetz / DEQ  
Dave Bowers / DEQ  
Katie Garcin-Forba / DEQ  
Doug Martin / NRDP  
Jim Ford / NRDP  
Pat Cunneen / NRDP  
Katherine Hausrath / NRDP  
Ted Duaiame / 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  
Mark Neary / BSB  
Eric Hassler / BSB  
Chad Anderson / BSB

Brandon Warner / BSB  
Abigail Peltomaa / BSB  
Eileen Joyce / BSB  
Sean Peterson/BSB  
Josh Vincent / WET  
Scott Bradshaw / W&C  
Emily Evans / W&C  
Pat Sampson / Pioneer  
Andy Dare / Pioneer  
Karen Helfrich / Pioneer  
Randa Colling / Pioneer  
Scott Sampson / Pioneer  
Jesse Schwarzrock / Pioneer  
Ian Magruder/ CTEC  
CTEC of ButteScott Juskiewicz / Montana  
Tech  
David Shanight / CDM Smith  
Curt Coover / CDM Smith  
Chapin Storrar / CDM Smith  
Erin Agee / EPA  
Will Lindsey / EPA  
Andrew Schmidt / EPA  
Carolina Balliew / EPA  
Emma Rott / EPA  
Chris Wardell / EPA  
Charles Van-Otten / EPA  
Charlie Partridge / EPA

# BUTTE HILL COVER SOIL APPROVAL SUBMITTAL

2/13/2024

Source: ARWW&S RDU 8 South Borrow Area  
 Sample #: 24-RMAP-TypeB-6

Description	Specification	Sample	Specification Met		Other Information Requested
			Yes	No	
<b>Chemical (mg/kg)</b>					<b>Organic Matter (%)</b>
As	< 97	13.1	X		N/A
Cd	< 4	0.5	X		
Cu	< 250	22.0	X		<b>Soil Nutrients</b>
Hg	< 5	0.02	X		N (mg/kg) <u>N/A</u>
Pb	< 100	10.0	X		P (mg/kg) <u>N/A</u>
Zn	< 250	178.0	X		K (mg/kg) <u>N/A</u>
<b>pH (s.u.)</b>					
	> 5.5	N/A			
	< 8.5	N/A			
<b>SAR</b>					
	< 12	N/A			
<b>Saturation (%)</b>					
	< 85	N/A			
	> 25	N/A			
<b>EC (mmhos/cm)</b>					
	< 4	N/A			
<b>Textural Classification (USDA) &lt;2.0 mm</b>					<b>Particle Size</b>
		N/A			Sand (%) <u>N/A</u>
	Loam				Silt (%) <u>N/A</u>
	Sandy loam				Clay (%) <u>N/A</u>
	Sandy clay loam				
	Sandy clay				
	Clay loam				
	Silty clay				
	Silty clay loam				
	Silt loam				
	Silt				
	*Per EPA Approval (Loamy sand)				
<b>Rock Content (%) (by volume)</b>					
	< 45	N/A			

Legend:

# Value	- Criteria met
# Value	- Does not meet Criteria
N/A	- Not Applicable

Atlantic Richfield Representative: Mike McNulty ate: 02/14/24

EPA Representative: Wally Jankovic Raley Date: 3/13/2024

MT DEQ Representative: Clay Reed Date: 3/7/2024

# BUTTE HILL COVER SOIL APPROVAL SUBMITTAL

2/13/2024

Source: ARWW&S RDU 8 South Borrow Area  
 Sample #: 24-RMAP-TypeB-7

Description	Specification		Specification Met		Other Information Requested
			Yes	No	
<b>Chemical (mg/kg)</b>					<b>Organic Matter (%)</b>
As	<	97	12.9	X	N/A
Cd	<	4	0.3	X	
Cu	<	250	21.9	X	
Hg	<	5	0.01	X	
Pb	<	100	9.9	X	
Zn	<	250	173.0	X	
<b>pH (s.u.)</b>					<b>Soil Nutrients</b>
	>	5.5	N/A		N (mg/kg) <u>N/A</u>
	<	8.5			P (mg/kg) <u>N/A</u>
					K (mg/kg) <u>N/A</u>
<b>SAR</b>					
	<	12	N/A		
<b>Saturation (%)</b>					
	<	85	N/A		
	>	25			
<b>EC (mmhos/cm)</b>					
	<	4	N/A		
<b>Textural Classification (USDA) &lt;2.0 mm</b>			N/A		<b>Particle Size</b>
		Loam			Sand (%) <u>N/A</u>
		Sandy loam			Silt (%) <u>N/A</u>
		Sandy clay loam			Clay (%) <u>N/A</u>
		Sandy clay			
		Clay loam			
		Silty clay			
		Silty clay loam			
		Silt loam			
		Silt			
		*Per EPA Approval (Loamy sand)			
<b>Rock Content (%) (by volume)</b>					
	<	45	N/A		

**Legend:**

# Value	- Criteria met
# Value	- Does not meet Criteria
N/A	- Not Applicable

**Atlantic Richfield Representative:** Mike McNulty Date: 02/14/24

**EPA Representative:** Wally Jankovic Raley Date: 3/13/2024

**MT DEQ Representative:** Clay Reed Date: 3/7/2024