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Butte Priority Soils Operable Unit (BPSOU) Unreclaimed (UR) Sites Final UR Field Sampling Plan (FSP) Submittal #4 – Request For Change (RFC) -UR FSP #4-001.

Mike McAnulty

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Atlantic Richfield Company

Mike Mc Anulty

Liability Manager

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April 24, 2024

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

RE: Butte Priority Soils Operable Unit (BPSOU) Unreclaimed (UR) Sites Final UR Field Sampling Plan (FSP) Submittal #4 – Request For Change (RFC) -UR FSP #4-001.

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to submit the Butte Priority Soils Operable Unit (BPSOU) Unreclaimed (UR) Sites Final UR Field Sampling Plan (FSP) Submittal #4 – Request For Change (RFC) document RFC-UR FSP #4-001. This RFC is being submitted to describe minor changes proposed to the final FSP to accommodate alterations to the Site implemented by the property owner.

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

Sincerely,



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

Atlantic Richfield Company

Mike Mc Anulty

Liability Manager

317 Anaconda Road

Butte MT 59701

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Josh Bryson / Atlantic Richfield – email
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Dave Griffis / Atlantic Richfield – email
Jean Martin / Atlantic Richfield – email
Irene Montero / Atlantic Richfield – email
David A. Gratson / Environmental Standards – email
Mave Gasaway / DGS – email
Adam Cohen / DGS – email
Lucas Satterlee / DGS – email
Brienne McClafferty / Holland & Hart – email
Carolina Balliew / EPA – email
Emma Rott / EPA – email
David Shanight / CDM – email
Curt Coover / CDM – email
James Freeman / DOJ – email
Amy Steinmetz / DEQ – email
Logan Dudding / DEQ – email
Katie Garcin-Forba / DEQ – email
Doug Martin / NRDP – email
Jim Ford / NRDP – email
Pat Cunneen / NRDP – email
Katherine Hausrath / NRDP – email
Ted Duaine / MBMG – email
Gary Icopini / MBMG – email
Becky Summerville / MR – email
John DeJong / UP – email
Robert Bylsma / UP – email
John Gilmour / Kelley Drye – email
Leo Berry / BNSF – email
Robert Lowry / BNSF – email
Brooke Kuhl / BNSF – email
Lauren Knickrehm / BNSF – email
Doug Brannan / Kennedy Jenks - email
Matthew Mavrinac / RARUS - email
Harrison Roughton / RARUS - email
Brad Gordon / RARUS - email
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Eric Hassler / BSB - email
Brandon Warner / BSB – email
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Mark Meyer / Pioneer – email
Pat Sampson / Pioneer - email
Karen Helfrich / Pioneer - email
Randa Colling / Pioneer – email
Rich Keeland / Aspect – email
Andy White / Aspect – email
Ian Magruder/ CTEC- email
CTEC of Butte – email
Scott Juskiewicz / Montana Tech – email

File: RMO – upload
BPSOU SharePoint - upload

ATLANTIC RICHFIELD COMPANY

RFC - REQUEST FOR CHANGE

DATE April 24, 2024	RFC NO. RFC-UR FSP #4-001	CONTRACTOR Pioneer Technical Services, Inc.	RFP NO. NA
CONTRACT DESCRIPTION: Unreclaimed Sites Scope of Work, Appendix D, Attachment C, Section 7.0		ATTENTION OF: Molly Roby (EPA), Daryl Reed (MDEQ)	
SUBJECT: BPSOU Unreclaimed Sites Final Field Sampling Plan (FSP) Submittal #4 <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: Unreclaimed Sites FRESOW; Final Unreclaimed Sites Field Sampling Plan (FSP) Submittal #4.		REFERENCE DWG., P.O., TAG, SPECIFICATION NO. (FOR DEVIATIONS OR DEFICIENCIES) ETC: Figure 2	
<p>PROBLEM DESCRIPTION:</p> <p>The <i>Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Final Field Sampling Plan (FSP) #4: UR-16 and UR-21</i> (Atlantic Richfield Company, 2021) was approved by the Agencies on August 30, 2021. The final FSP was distributed on September 7, 2021. Since this time, third-party property owners of a portion of the UR-21 site have completed site upgrades including construction of a commercial structure, site grading, and paving. Site sampling, as proposed in the referenced FSP, is not viable at locations where upgrades have been performed.</p> <p>In addition, the Quality Assurance Project Plan (QAPP) referenced in the previously approved FSP has been updated to reflect the appropriate sampling approach.</p> <p>PROPOSED MODIFICATION:</p> <p>Figure 2 of the referenced FSP has been revised (Attachment 1) to account for site upgrades, and proposed sample locations have been redefined to complete investigation of the remaining portions of the site.</p> <p>Site soil sampling will be completed as described in the Butte Priority Soils Operable Unit (BPSOU) 2024 Draft Final Unreclaimed Sites QAPP (Atlantic Richfield Company, 2024) upon Agency approval.</p> <p>REFERENCES:</p> <p>Atlantic Richfield Company, 2021. Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Final Field Sampling Plan (FSP) #4: UR-16 and UR-21. Atlantic Richfield Company. September 7, 2021.</p> <p>Atlantic Richfield Company, 2024. Butte Priority Soils Operable Unit (BPSOU) 2024 Draft Final Unreclaimed Sites Quality Assurance Project Plan. Atlantic Richfield Company. February 26, 2024.</p> <p>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.</p> <p>ATTACHMENTS:</p> <p>Attachment 1: Figure 2</p>			
<input type="checkbox"/> Design Deficiency <input checked="" type="checkbox"/> Engineering Change Request <input type="checkbox"/> Agency Directive <input type="checkbox"/> Construction Deficiency		<input type="checkbox"/> Material Substitution <input type="checkbox"/> Vendor Material Deficiency <input type="checkbox"/> Scope <input type="checkbox"/> Clarification/ Information	



Schedule

Other Final Design Document

RESPONSE/DIRECTIVE

Project Manager  Date 04/24/2024

Atlantic Richfield Co. Representative  Date 04/24/2024

EPA Representative _____ Date _____

DEQ Representative _____ Date _____

- Cc: Chris Greco / Atlantic Richfield – email
Josh Bryson / Atlantic Richfield – email
Tim Hilmo / Atlantic Richfield – email
Loren Burmeister / Atlantic Richfield – email
Dave Griffis / Atlantic Richfield – email
Jean Martin / Atlantic Richfield – email
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Brianna McClafferty / Holland & Hart – email
Carolina Balliew / EPA – email
Emma Rott / EPA – email
David Shanight / CDM – email
Curt Coover / CDM – email
James Freeman / DOJ – email
Amy Steinmetz / DEQ – email
Logan Dudding / DEQ – email
Katie Garcin-Forba / DEQ – email
Doug Martin / DEQ – email
Jim Ford / NRDP – email
Pat Cunneen / NRDP – email
Katherine Hausrath / NRDP – email
Ted Duaime / MBMG – email
Gary Icopini / MBMG – email
Becky Summerville / MR – email
John DeJong / UP – email
Robert Bylsma / UP – email
John Gilmour / Kelley Drye – email
Leo Berry / BNSF – email
Robert Lowry / BNSF – email
Brooke Kuhl / BNSF – email
Lauren Knickrehm / BNSF – email
Doug Brannan / Kennedy Jenks – email
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Joe McElroy / Pioneer – email
Mark Meyer / Pioneer – email
Pat Sampson / Pioneer – email
Karen Helfrich / Pioneer – email
Randa Colling / Pioneer – email
Rich Keeland / Aspect – email
Andy White / Aspect – email
Ian Magruder/ CTEC – email
CTEC of Butte – email
Scott Juskiewicz / Montana Tech – email

File: RMO – upload
BPSOU SharePoint – upload
RFC Logbook

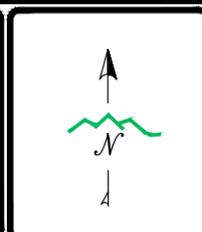




LEGEND:

● PROPOSED SOIL SAMPLE LOCATION

UR-21 IS 2.20 ACRES



DISPLAYED AS: _____

COORD SYS/ZONE: MSP

DATUM: NAD 83

UNITS: FEET

SOURCE: PIONEER/GOOGLE

SCALE IN FEET

0 30 60

FIGURE 2 UNRECLAIMED SITE
UR-21
PROPOSED
SAMPLE LOCATIONS

PIONEER
TECHNICAL SERVICES, INC.
1101 SOUTH MONTANA
BUTTE, MONTANA 59701
(406) 782-5177

DATE: 4/2024