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Spring 4-26-2024

**Butte Priority Soils Operable Unit (BPSOU) Final Insufficiently Reclaimed Sites Field Sampling Plans (FSPs) and Final Unreclaimed Sites FSPs Request for Change UR/IR 2024-001**

Mike McAnulty

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# Atlantic Richfield Company

## Mike Mc Anulty

Liability Manager

317 Anaconda Road

Butte MT 59701

Direct (406) 782-9964

Fax (406) 782-9980

April 26, 2024

Molly Roby  
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: 8ORC-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: Butte Priority Soils Operable Unit (BPSOU) Final Insufficiently Reclaimed Sites Field Sampling Plans (FSPs) and Final Unreclaimed Sites FSPs Request for Change UR/IR 2024-001**

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to submit a Request for Change (RFC) related to previously approved Field Sampling Plans (FSPs) describing soil sampling to be conducted under Unreclaimed and Insufficiently Reclaimed Sites scopes of work. The FSPs were approved with references to Quality Assurance Project Plans (QAPPs) that have been superseded by revised versions.

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

Direct (406) 782-9964

Fax (406) 782-9980

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  
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  
Mark Neary / BSB – email  
Eric Hassler / BSB – email  
Brandon Warner / BSB – email  
Abigail Peltomaa / BSB – email

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Butte MT 59701

Direct (406) 782-9964

Fax (406) 782-9980

Aaron Rains / BSB – email  
Sean Peterson/BSB – email  
Josh Vincent / WET – email  
Kevin Bethke / W&C – email  
Scott Bradshaw / W&C – email  
Emily Evans / W&C – email  
Paddy Stoy / W&C – email  
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

# ATLANTIC RICHFIELD COMPANY

## RFC - REQUEST FOR CHANGE

DATE April 26, 2024	RFC NO. RFC-UR/IR FSP-001	CONTRACTOR Pioneer Technical Services, Inc.	RFP NO. NA
CONTRACT DESCRIPTION: 2020 CD Further Remedial Elements Scope of Work, Appendix D, Attachment C, Sections 7.0 and 8.0.		ATTENTION OF: Molly Roby (EPA), Daryl Reed (MDEQ)	
SUBJECT: BPSOU UR and IR Final Field Sampling Plan (FSP) QAPP references <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: Insufficiently Reclaimed FRESOW; Final Field Sampling Plan (FSPs) Unreclaimed FRESOW; Final Field Sampling Plan (FSPs)		REFERENCE DWG., P.O., TAG, SPECIFICATION NO. (FOR DEVIATIONS OR DEFICIENCIES) ETC:	
<b>PROBLEM DESCRIPTION:</b>  Various field sampling plans (FSPs) describing soil sampling to be conducted under Unreclaimed and Insufficiently Reclaimed Sites Scopes of Work were approved with references to specific Quality Assurance Project Plans (QAPPs). Sampling was not readily achievable at select sites during the sampling season when the FSP was approved, and QAPPs have been updated annually.			
<b>PROPOSED MODIFICATION:</b>  Site soil sampling will be completed, analyzed, and data validated as described in the latest approved version of the appropriate sampling protocol of the corresponding sampling year, superseding the QAPP referenced in the FSP.  For example, all sampling completed at Insufficiently Reclaimed Sites during the 2024 sampling season will be performed as described in the BPSOU 2024 Final Insufficiently Reclaimed Sites QAPP (Atlantic Richfield Company 2024), upon Agency approval of the referenced QAPP. Similarly, all sampling completed at Unreclaimed Sites during the 2024 sampling season will be performed as described in the BPSOU 2024 Final Unreclaimed Sites QAPP (Atlantic Richfield Company, 2024) upon Agency approval of the referenced QAPP.			
<b>REFERENCES:</b>  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.  Atlantic Richfield Company, 2024. Butte Priority Soils Operable Unit (BPSOU) 2024 Draft Final Insufficiently Reclaimed Sites Quality Assurance Project Plan. Atlantic Richfield Company. March 8, 2024.  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 <a href="https://www.co.silverbow.mt.us/2161/ButtePriority-Soils-Operable-Unit-Conse">https://www.co.silverbow.mt.us/2161/ButtePriority-Soils-Operable-Unit-Conse</a> .			
<b>ATTACHMENTS:</b>			



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

RESPONSE/DIRECTIVE

Project Manager *Scott Long* Date 04/26/2024

Atlantic Richfield Co. Representative *Mike McNulty* Date 04/26/2024

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  
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 Brianne 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 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  
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Andy White / Aspect – email  
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CTEC of Butte – email  
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RFC Logbook

