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Residential Metals Abatement Program Construction Completion Report (Non- Residential Parcels – Indoor Dust) Silver Bow Montessori

Christopher Berg

Thomas J. Beckman

Environmental Resource Management (ERM)

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Atlantic Richfield Company

Mike McAnulty Liability Manager

April 25, 2024

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RE: Residential Metals Abatement Program Construction Completion Report (Non-Residential Parcels – Indoor Dust) – Silver Bow Montessori

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 Dust) – Silver Bow Montessori.

The report may be downloaded at the following link: <u>https://theermgroupnam-</u> <u>my.sharepoint.com/:f:/g/personal/thomas beckman erm com/EoTVtKJWSUhlks J15McKfEBVsbW</u> <u>xt4OEuHQcH5VBBIb-w?e=XUuKNp</u>

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 Silver Bow Montessori

PREPARED FOR Atlantic Richfield Company

DATE April 23 2024

REFERENCE 0722184



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

Silver Bow Montessori

Thomas for Becken

Christopher Berg Project Manager

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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
ARCO	Atlantic Richfield Company
BPSOU	Butte Priority Soils Operable Unit
BSB	Butte-Silver Bow County
CCR	Construction Completion Report
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
ERM	Environmental Resources Management, Inc.
FSP	Field Sampling Plan
HEPA	high-efficiency particulate air
ISR	Investigation Summary Report
mg/kg	milligrams per kilogram
RA	Remedial Action
RMAP	Residential Metals Abatement Program
USEPA	United States Environmental Protection Agency
XRF	X-ray fluorescence spectroscopy



1. INTRODUCTION

This Construction Completion Report (CCR) documents soil Remedial Action (RA) construction activities completed at Silver Bow Montessori as part of the 2024 Residential Metals Abatement Program (RMAP). Points of contact for this project are specified in Table 1.

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 dust 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 floor surface samples collected from the basement at concentrations 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

Silver Bow Montessori School is located at 1800 Sunset Road, Butte Montana (Figure 1). It was constructed in 1947 and has not been remodeled. Exposure pathways from building attics to interior spaces are not complete. There are no crawlspaces present. The results of a July 2021 exterior surface soil investigation performed by Atlantic Richfield Company (ARCO) and Butte-Silver Bow (BSB) contractor Pioneer Technical Services, Inc. found exterior surface soils did not contain metals at concentrations above action levels requiring soil remediation.

An interior dust investigation conducted by ERM for ARCO in May and June 2022, found that floor surface dust in the basement had lead concentrations exceeding the BPSOU residential action levels of 1,200 mg/kg, prompting the need for remedial action or abatement (ERM 2024a). ERM and BSB conducted an X-ray fluorescence spectroscopy (XRF) survey on 28 December 2022. All XRF scans came back negative for lead and the source of the exceedance could not be determined (BSB 2023). On 26 July 2023, a composite soil sample taken from the exposed earthen area showed that lead concentrations in the soil were below the BPSOU residential action level of 1,200 mg/kg (ERM 2024b). Due to the lead exceedances found in the May and June 2022 interior dust



investigation, ERM developed a Remedial Action Work Plan (RAWP) and performed remedial action containment activities presented in this CCR between 27 January and 10 March 2024.

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 dust contained arsenic, lead, or mercury at concentrations in excess of solid media action levels in areas currently accessible to children, students, or faculty. Accessible dust is defined as surface dust located in areas that are commonly occupied such as classrooms, hallways, bathrooms, and other areas (e.g., cafeterias) within the school or daycare.
- Remediation/abatement was required where inaccessible interior dust 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 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 dust was identified to have lead concentrations equal to or greater than 1200 mg/kg. Agency-approved remedial objectives are defined in the *Silver Bow Montessori Remedial Action Work Plan* (ERM 2024c). The area of concern is the main day care basement area, including the two storage rooms and furnace room (Figure 2).

2. DESCRIPTION OF DUST CONTAINMENT ACTIVITIES

2.1 MOBILIZATION/DEMOBILIZATION

ERM mobilized on 27 January 2024 and completed remedial activities on 9 March 2024.

2.2 BASEMENT INTERIOR DUST REMEDIATION

The Silver Bow Montessori basement remediation area is shown in Figure 3. Access to the basement is through the main east building, down a stairwell adjacent to the southeast classroom. Access is currently restricted to Silver Bow Montessori staff. The basement is approximately 1,100 square feet, has two storage closets and a furnace/boiler room. Apart from the furnace/boiler room, the basement is primarily used for storage. Materials in the basement include books, shelves, toys, furniture, and plastic storage containers. See Appendix A for photographs of the basement. Containment of dust is necessary due to the lead concentrations detected in exceedance of the Butte Priority Soils Site-Specific Residential Action Levels for indoor dust in the floor surface sample and field duplicate location in the basement storage area. This containment is



to prevent the migration of particulates and dust from the basement storage area to the occupied areas of the school.

All porous materials were placed in industrial garbage bags. The bags were wiped down with an all-purpose detergent solution and placed in dumpsters outside of the school. Larger materials were wrapped in 6-millimeter plastic wrap, secured with tape, wiped down, and placed in dumpsters. All materials placed in the dumpsters were ultimately disposed of at the Butte Landfill. Following the removal of impacted refuse, a high-efficiency particulate vacuum (HEPA) was used to clean all surfaces including ceilings, shelves, doors, and floors, working from higher to lower surfaces. Once vacuuming was complete, all surfaces were wiped down with disposable towels and all-purpose detergent. Cleaning was suspended for an hour to allow for the surfaces to dry and any suspended dust to settle. After an hour, all surfaces were cleaned again with the HEPA vacuum. Following the cleaning procedures, the basement area was visually inspected to ensure that all visible dust and debris were removed. During refuse removal exposed insulation was identified by the field team. The insulation was covered with 6-millimeter plastic wrap, which was secured in place with 3/8-inch staples, and an additional layer of tape was applied. Smaller pathways were sealed using insulation spray foam.

Educational materials describing the risks of bringing personal materials to basement storage and the potential of these materials to transfer metal impacted dust were distributed to the Silver Bow Montessori staff.

3. PROJECT DOCUMENTATION AND SCHEDULE

3.1 REMEDIAL ACTION RECORDS

Documentation of the 2024 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 2023 Resident Metals Abatement Program Remedial Action Work Plan – Silver Bow Montessori – Indoor Dust. (ERM 2024c) contains the following information:

- School address and site description
- Dust remediation scope
- School dust remediation schedule
- Lead levels in basement
- A comprehensive description of planned remedial actions in the basement

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) Group 1– Indoor Dust (ERM 2022)
- 2022 Resident Metals Abatement Program (RAMP) Investigation Summary Report (ISR) Silver Bow Montessori – Indoor Dust (ERM 2024a)
- 2023 Resident Metals Abatement Program (RAMP) Investigation Summary Report (ISR) Silver Bow Montessori – Interior Soil (ERM 2024b)
- 2023 Resident Metals Abatement Program (RAMP) Remedial Action Work Plan (RAWP) Silver Bow Montessori– Indoor Dust (ERM 2024c)
- Butte-Silver Bow Residential Metals Abatement Program (RMAP) Lead Based Paint Report Montessori Campus LLC (BSB 2023)

3.3 PROJECT SCHEDULE

ERM mobilized on 27 January 2024, completing debris removal and cleaning procedures on 28 January 2024. An additional mobilization was needed on 6 March and 9 March 2024 to seal exposed insulation pathways. The full schedule is shown in Table 2.

4. SAFETY AND ENVIRONMENTAL CONSIDERATIONS

4.1 SAFETY

Health and safety documentation for the 2024 Interior Dust 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

Personal protective equipment 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 2024 RA containment project.

4.1.3 NEAR MISSES

No near misses occurred during the 2024 RA containment project.

4.2 ENVIRONMENTAL CONSIDERATIONS

To prevent migration of dust containing lead at concentrations above action levels, all refuse was placed in garbage bags and/or wrapped in 6-milimeter plastic liner and wiped down with a cleaning solution. Bags were visually inspected for any dust residue and wiped down again when necessary. A liner was placed from the basement area through the first floor leading to the dumpster, to further prevent migration of dust containing lead. Following remedial activities, the liner was placed in a garbage bag, wiped down, and disposed of in dumpers outside of the school. The contents of the dumpsters were ultimately disposed of at Butte landfill.

5. PERFORMANCE STANDARDS/ARARS COMPLIANCE

The Silver-Bow Montessori basement will be inspected, and floor surface dust samples will be collected for load one year after the area is cleaned. Post-cleaning monitoring and reporting will be conducted by Atlantic Richfield Company in accordance with the QAPP. An investigation and Data Summary report will be prepared and submitted to the USEPA following completion of the post-remediation monitoring.



6. REFERENCES

- ARCO (Atlantic Richfield Company). 2022. Residential Metals Abatement Program Quality Assurance Project Plan (Non-Residential Parcels – Indoor Soil).
- 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 (Butte-Silver Bow County and Atlantic Richfield Company). 2020. *Revised Final Multi-Pathway Residential Metals Abatement Program (RMAP) Plan.* Priority Soils Operable Unit Silver Bow Creek/Butte Area, National Priorities List.
- BSB 2023 (Butte-Silver Bow County). Butte-Silver Bow Residential Metals Abatement Program (RMAP) Lead Based Paint Report Montessori Campus LLC. January 2023.
- ERM. 2022. 2022 Residential Metals Abatement Program (RMAP) Field Sampling Plan (FSP) Silver Bow Montessori Indoor Dust. March.
- ERM. 2024a. 2022 Residential Metals Abatement Program (RMAP) Investigation Summary Report (ISR) – Silver Bow Montessori – Indoor Dust.
- ERM. 2024b. 2023 Residential Metals Abatement Program (RMAP) Investigation Summary Report (ISR) – Silver Bow Montessori – Interior Soil.
- ERM. 2024c. 2023 Resident Metals Abatement Program (RAMP) Remedial Action Work Plan (RAWP) – Silver Bow Montessori – Indoor Dust.
- 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 (United States Environmental Protection Agency). 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 1 Project Parties Silver Bow Montessori - Butte RMAP Indoor Dust Butte, Montana

Entity	Party	Responsibility	
	Atlantic Richfield Company	Responsible for conducting work elements	
UAO Decreandant	Liability Manager: Mike McAnulty		
UAO Respondent	Phone: (406) 723-1822	as described in the Record of Decision	
	Email: mcanumc@bp.com]	
	US Environmental Protection Agency		
	Project Manager: Emma Rott		
	Phone: (406) 438-0823		
Government Oversight	Email: Rott.Emma@epa.gov	Government oversight of remedial design and remedial action	
	CDM Smith (USEPA Representative)		
	Oversight: David Shanight]	
	Phone: (406) 459-3950		
	Environmental Resources Management		
Design/Construction	Project Manager: Christopher Berg	Remedial Design, Primary remedial action	
Contractor	Phone: (612) 347-7169	contractor	
	Design Team: Christopher Berg, Tim Wilson		

Notes:

RMAP = Residential Metals Abatement Program

USEPA = United States Environmental Protection Agency

Table 2 Construction Completion Project Schedule Silver Bow Montessori - Butte RMAP Indoor Dust Butte, Montana

Task	Duration	Start	Finish
Basement Refuse Removal	1 Day	1/27/2024	1/28/2024
Dust Cleaning Procedures (Vac-Wash-Vac)	1 Day	1/28/2024	1/28/2024
Sealing Exposed Insulation	1 Day ¹	3/6/2024	3/9/2024

Notes:

RMAP = Residential Metals Abatement Program

¹= Sealing exposed insulation was started evening of 3/6/2024, additional mobilization was needed on 3/9/2024 to finish.

Table 3 Construction Completion Equipment List Silver Bow Montessori - Butte RMAP Indoor Dust Butte, Montana

Equipment	# of Units by Contractor	Description
All-Purpose Detergent (120 ounce box)	1	Used for cleaning contaminated surfaces, refuse bags
Shop Vacuum with HEPA filter	1	Used to vacuum all surfaces
Industrial Garbage Bags (40 bags/box)	2	All small refuse was disposed of in garbage bags
6-milimeter Plastic Wrap (10x25 feet)	2	All larger materials were wrapped in plastic wrap, also used to seal exposed insullation
Industrial Strength Duct Tape	3	Used to secure larger refuse, seal exposed insulation
Foam Insulation Spray	2	Used to seal smaller insullation pathway between concrete and wooden frame
Staple Gun	1	Used to secure 6-milimeter plastic to exposed insullation areas
3/8" Staple Gun Staples (box of 1000)	1	Used to secure 6-milimeter plastic to exposed insullation areas

Notes:

HEPA = high-efficiency particulate air

RMAP = Residential Metals Abatement Program

Table 4 Construction Completion Material Quantities Silver Bow Montessori - Butte RMAP Indoor Dust Butte, Montana

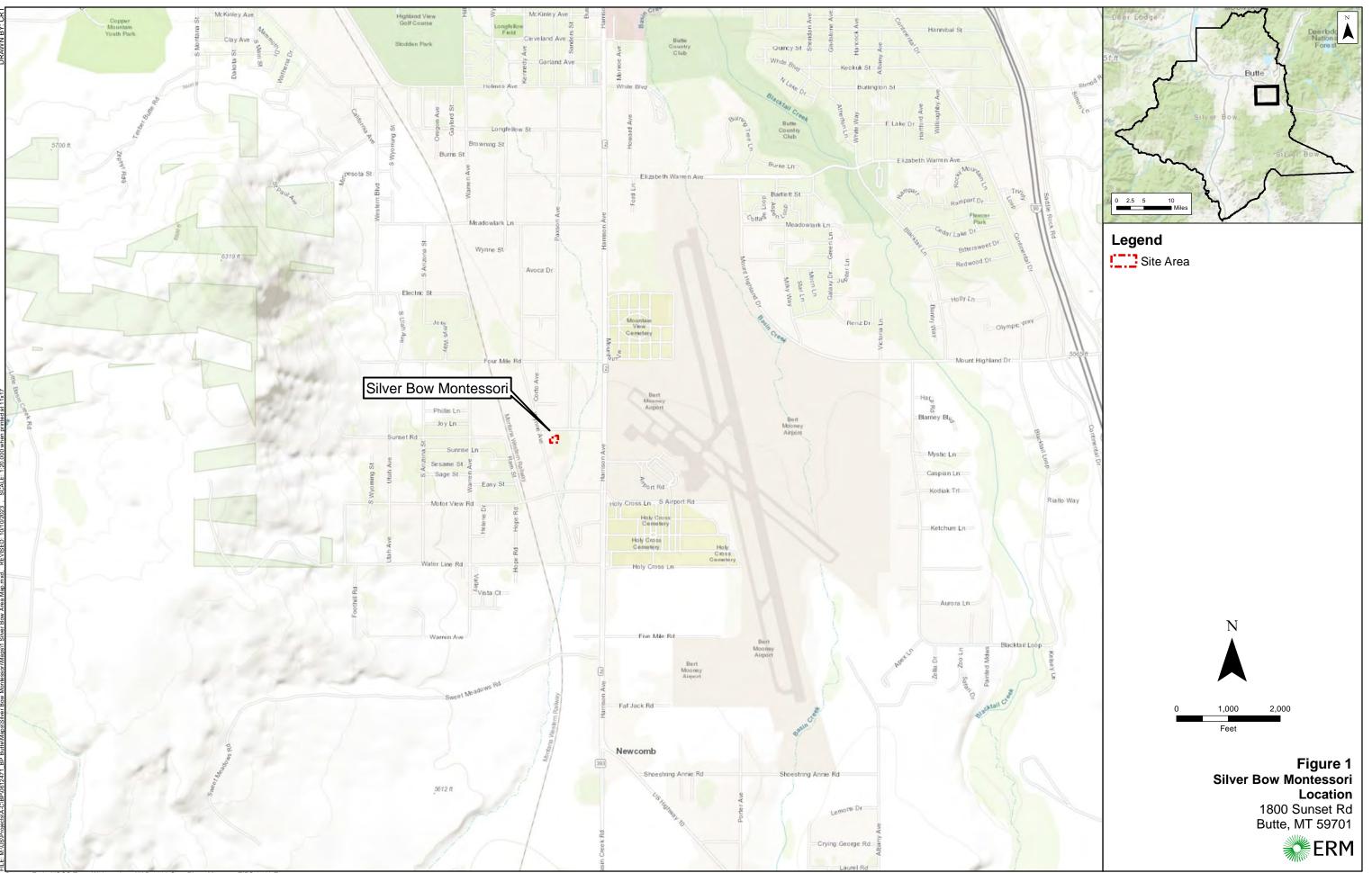
Materials	Quantities	Notes
Refuse Removed from Basement		All removed refuse was placed in industrial garbage bags or wrapped in 6-milimeter plastic wrap, wiped down, and placed in dumpsters provided by the school. Materials in the dumpsters were ultimately disposed of at the Butte Landfill.

Notes:

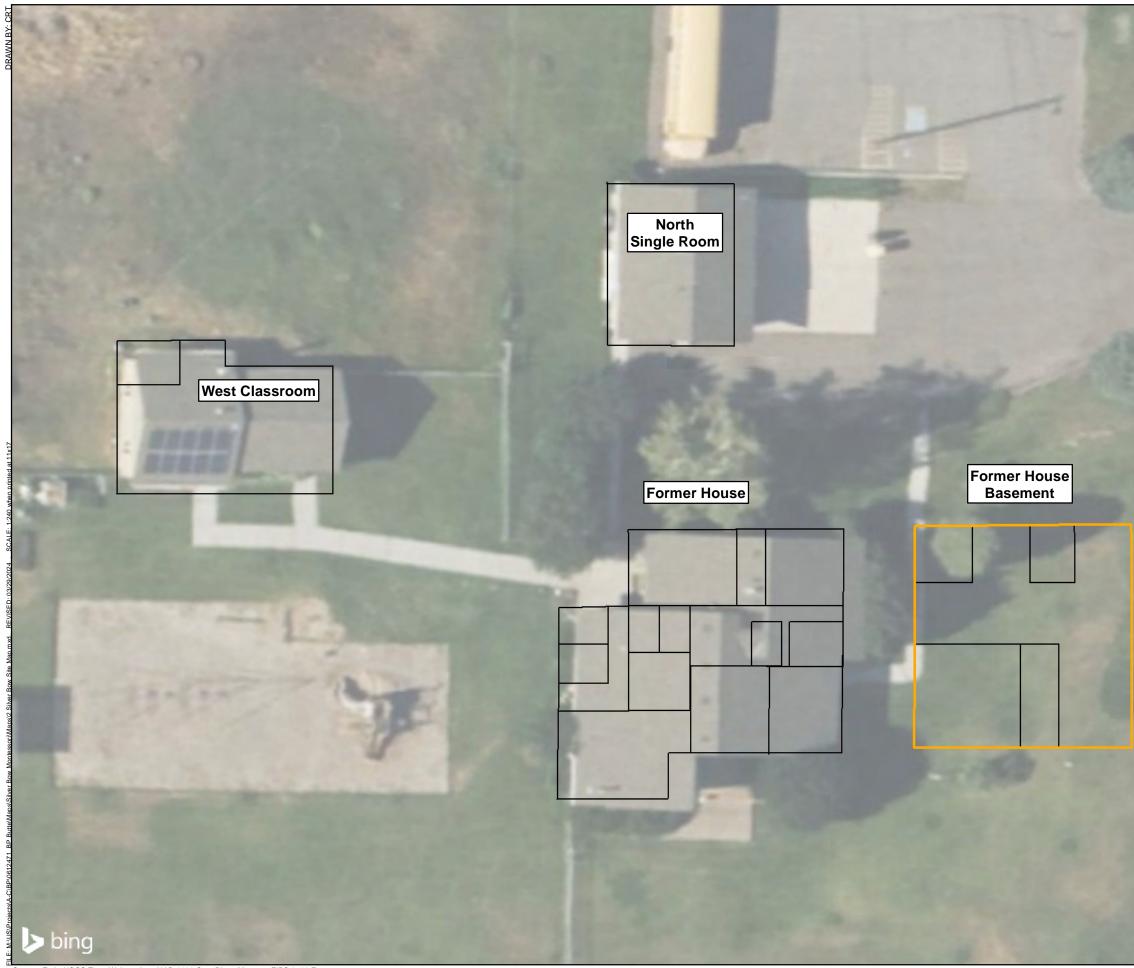
RMAP = Residential Metals Abatement Program



FIGURES

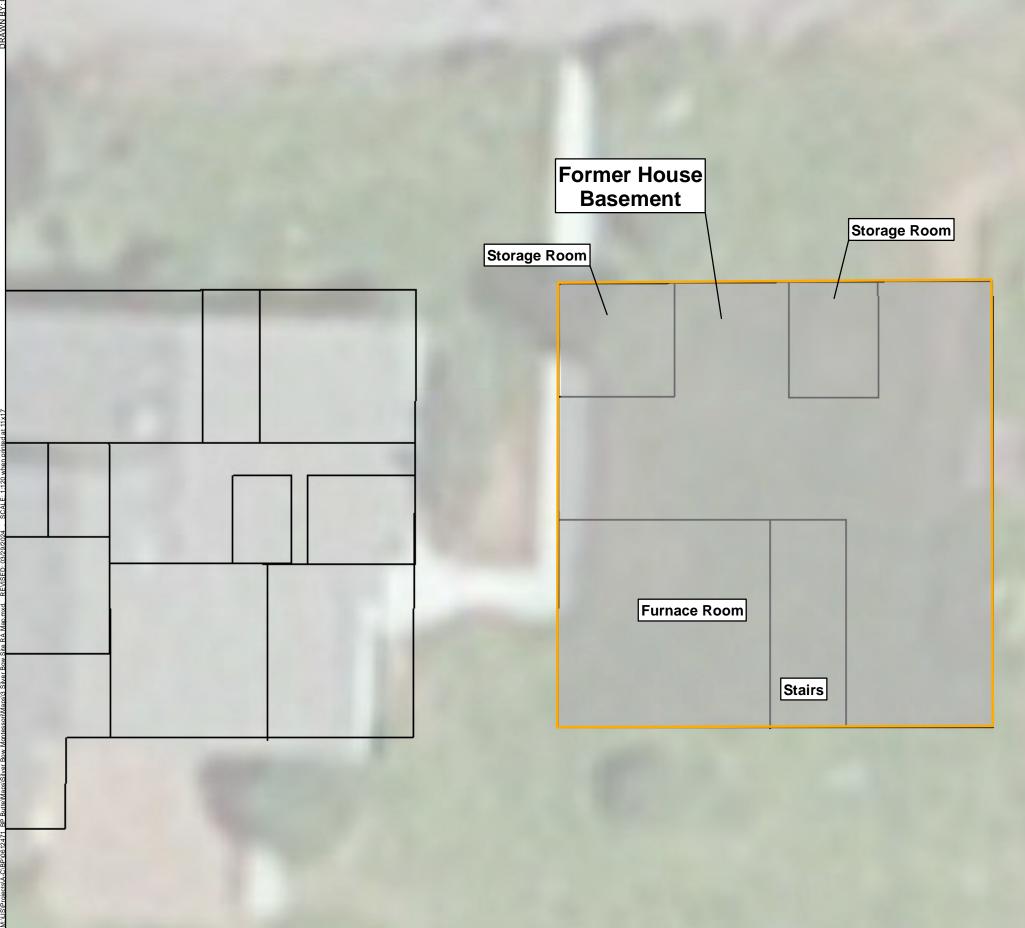


Source: Esri - USGS Topo Webservice; NAD 1983 StatePlane Montana FIPS 2500 Feet

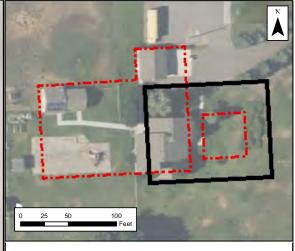


Source: Esri - USGS Topo Webservice; NAD 1983 StatePlane Montana FIPS 2500 Feet





Source: Esri - USGS Topo Webservice; NAD 1983 StatePlane Montana FIPS 2500 Feet



Legend

RA Work Area

Notes:

-Room IDs reflect verbiage used on site maps provided by Silver Bow Montessori. - The Former House basement is located below Former House.

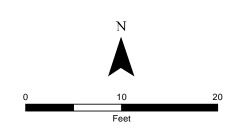


Figure 3 Silver Bow Montessori Basement Remedial Action Work Area 1800 Sunset Rd Butte, MT 59701





APPENDIX A SITE PHOTOGRAPHS



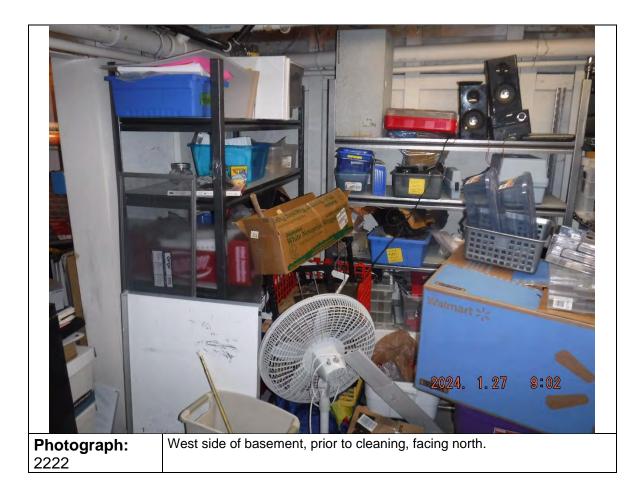
Photograph: 2220



Photograph: 2221

North storage closet, prior to cleaning, facing north.









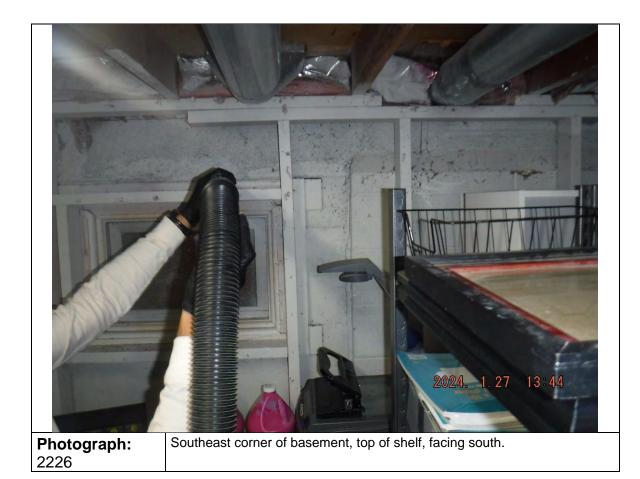




2225

solution.







Photograph:Southeast corner of baseme2227

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MIRS.	ERM Project Number 0722184



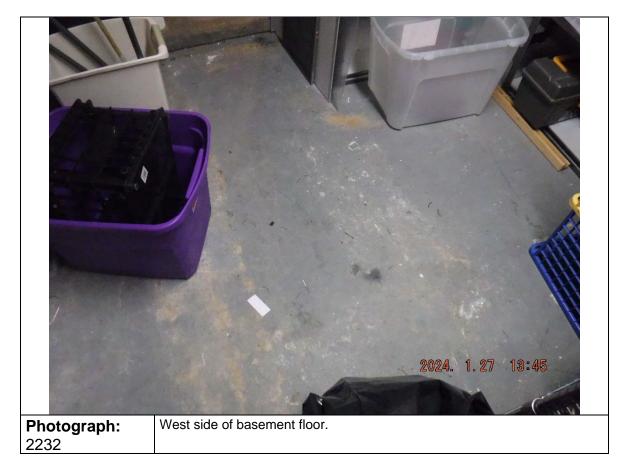


	Butte RMAP
ERM	Silver Bow Montessori CCR
	ERM Project Number 0722184



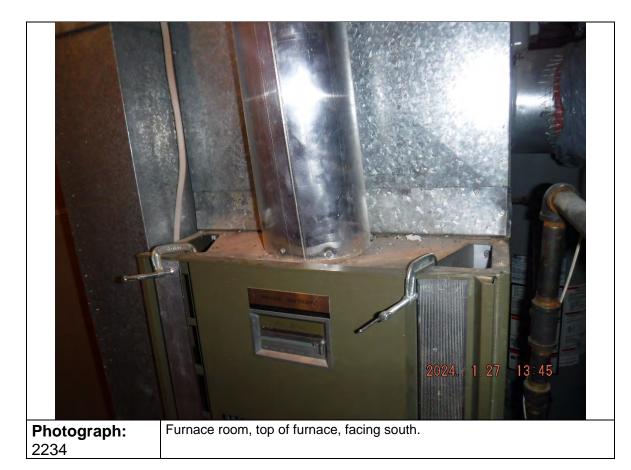






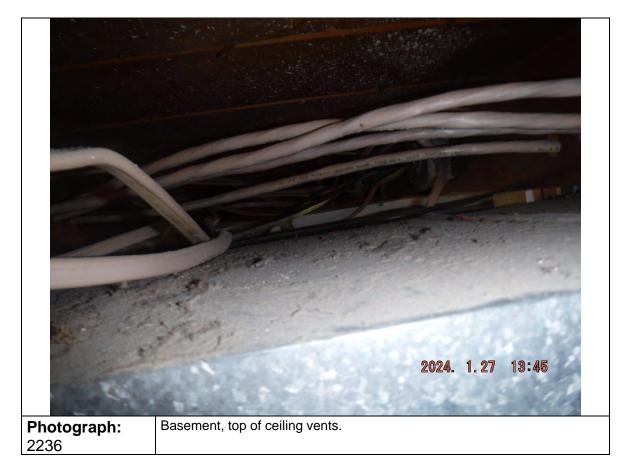






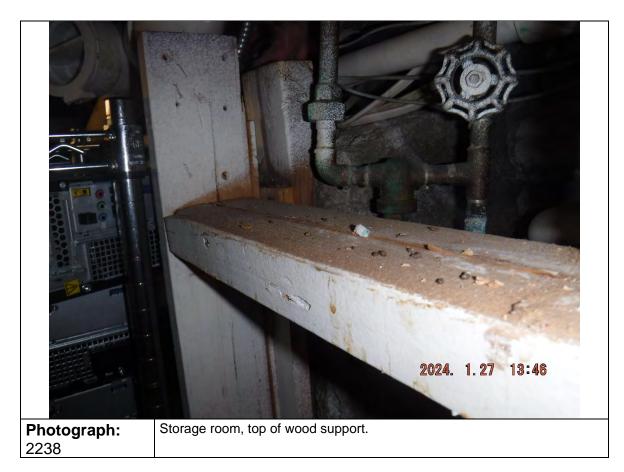






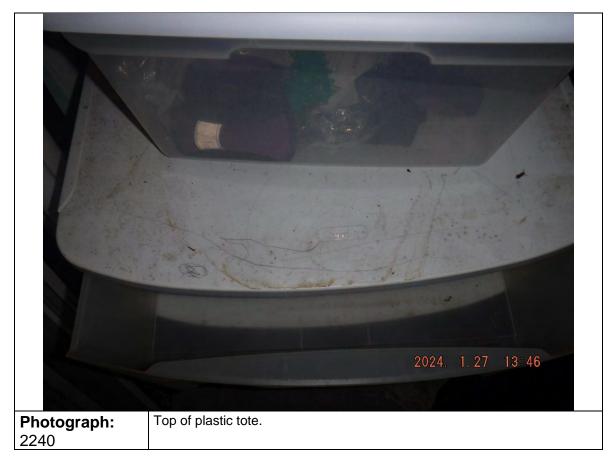






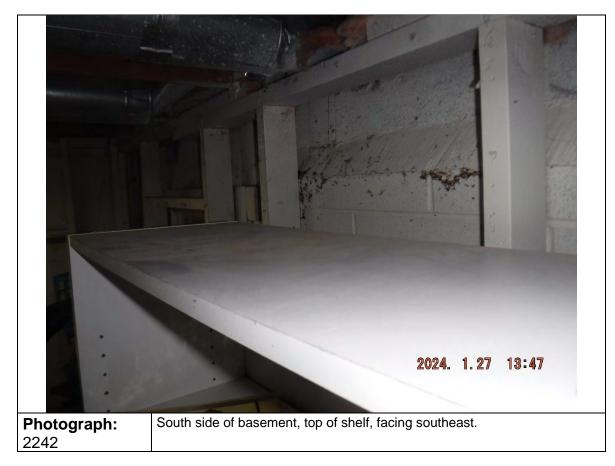








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ERM	Silver Bow Montessori CCR
	ERM Project Number 0722184





	Butte RMAP
ERM	Silver Bow Montessori CCR
	ERM Project Number 0722184





Photograph: 2247

West storage closet, following removal of impacted materials, facing south.







2249

cleaning, facing north.





Photograph: 2251	Furnace room floor, following initial cleaning, facing south.

	Butte RMAP
ERM	Silver Bow Montessori CCR
	ERM Project Number 0722184





Photograph:
2253Southeast side of basement, following initial cleaning, facing south.

ERM	Butte RMAP Silver Bow Montessori CCR
	ERM Project Number 0722184





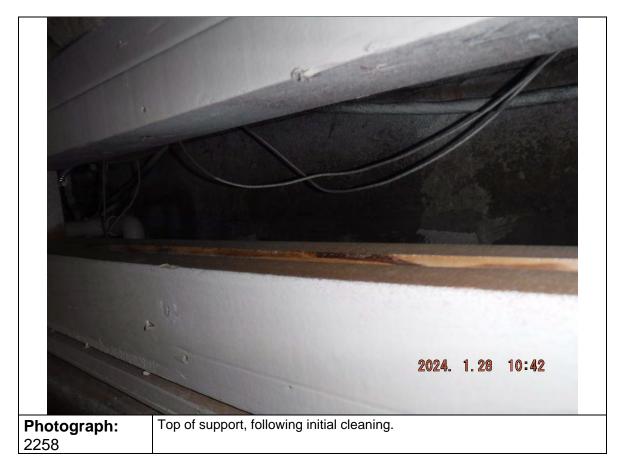
Photograph:
2255North storage closet, following initial cleaning, facing north.

ERM	Butte RMAP Silver Bow Montessori CCR ERM Project Number 0722184
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	Butte RMAP
ERM	Silver Bow Montessori CCR
	ERM Project Number 0722184























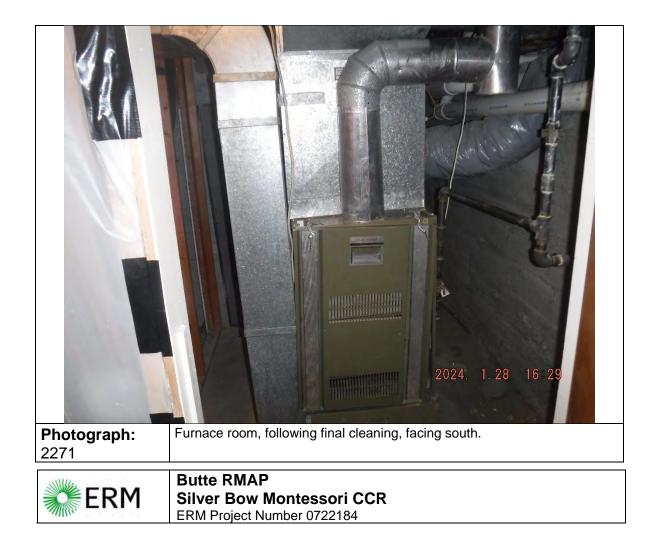
Photograph: 2269

North storage closet, following final cleaning, facing north.

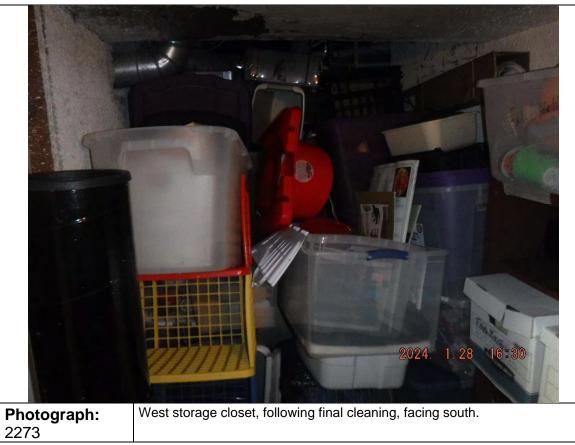


Butte RMAP Silver Bow Montessori CCR ERM Project Number 0722184

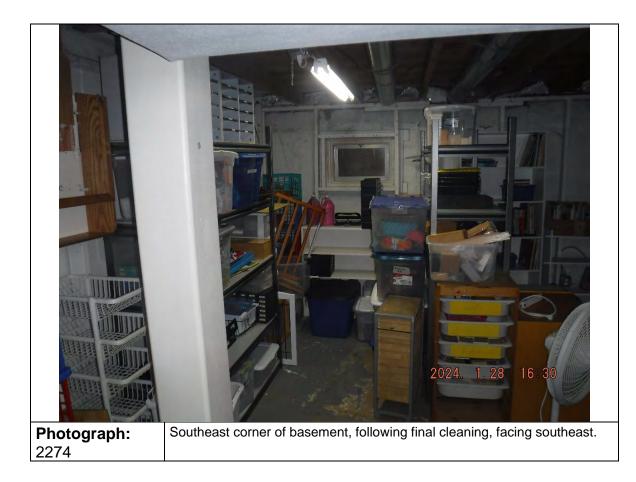








ERM	Butte RMAP Silver Bow Montessori CCR
	ERM Project Number 0722184



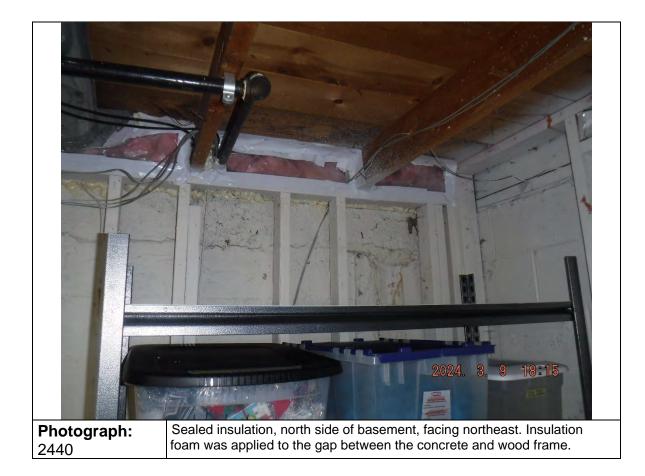






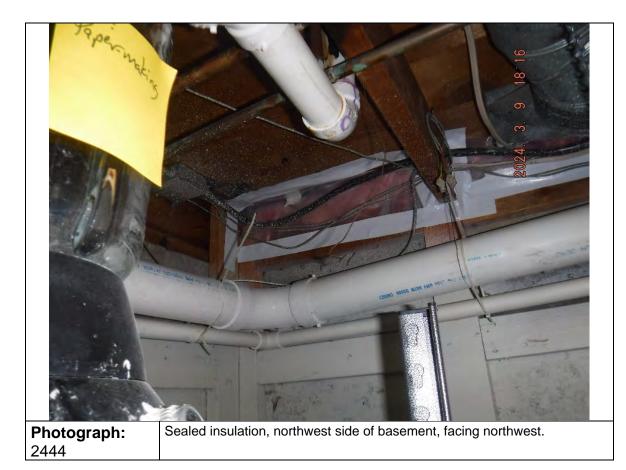
Sealed insulation, south side of basement, facing southeast. Insulation foam was applied to the gap between the concrete and wood frame. 2439

1111/1664	Butte RMAP
ERM	Silver Bow Montessori CCR
	ERM Project Number 0722184



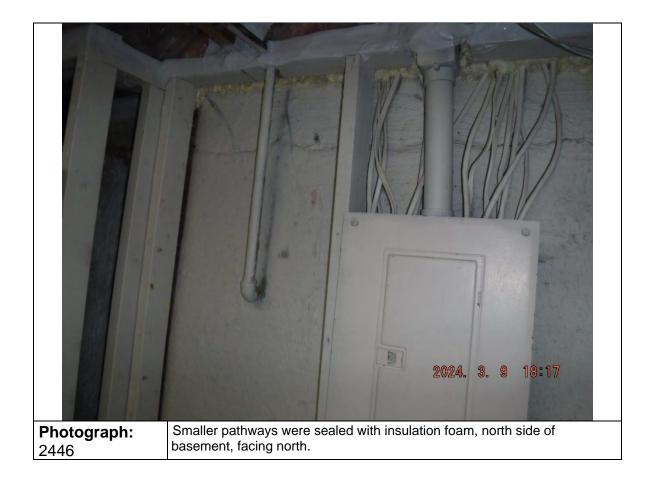


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Butte RMAP Silver Bow Montessori CCR ERM Project Number 0722184









APPENDIX B FIELD NOTES

1/27/09 TimW. si vit B Color Kyle S Silver Bow Kyus 36 128/24 32 Montesson Kanes Sew, Kenes 0700 0320 Cole, Kyle, and Kare Kyle, Kary, Cole met. muet at silver Bow to for Morning Niebing, health discuss plan of action, and sefety. health day safety. 0800 Field team arrived on 0700 Dumps to arrived 5. 12. = Field team left for luch (two) for remediation 1245 dispessel. and supplies-run from Photos: 2220 -2224 ACE. 4 show initial photos. 1400 Field team returned Cole, Kyle, Kare began Work. to site, 1500 Cole W. left site 200 Tim Wilson arrived -145:31 for dump runo on site to ossist. Cole W. Laid down 1815 1515 10-0-0 50 Don (landlord and tion Not at After the Bell. Board Nember) arrived - ¥5 /25 Photo: 2063 on site to answer 10 10 Cole c) arrived at questions that Tim 1530 1530 had. East Middle to take Kyle, Kane Cole break for which. 1210 photos of placerds. Photos: 2264, 2265 1310 Returned from lunch. Cole returned to 1630 Don left site, Silver Bow Montesosi. 1500 Tim Wilson left Field team Finished site. Photo: 2266-2274 Sibe. Kyle, Cole, Kare left site. 730 1780 Ended day Ma M Retein car Rein unale Isquare Scale I sipilare e

3/6/24	(45) TW	Butte RMAP		(46)
1400	Arrive at Kennely			lior
	checkin with admin		1515	off-sife
1415	Meet with Chil and I	Rab I	1603	Arrive at Silver Bow Montesoni
	from BSB			check-in
1415	Begin XRE seen (18))		1615	unlosd equipment, walk through
	- top of shelf = D.D			Begin cut 6-mil plustic, sealing
	- vent = 2.0			exposed insulation. Applied
	- door = 0.0 +++ 3/+/24			insulation fain to smaller
	- shelf - 9.0 Dib			pithway = stapled plastic is frome.
	Both Window =0.0		2200	pff-site
420	North classion			
	- shelf = 0.0			
	- cest wall = 0.5			
	- 2.012 = 0.12			
	- WINIGH = D.D			/
1430	Haliway doors D.n		- /)
	- wall (hillway) = 203	-		
1440	Counting Room			
	-1-5cm = 2:01	M =+	-	
	- 073- = 0.08			
AU	KRE JEANS LINE DALS	٤ 🔳		
×	negotive		-	
(5))	Discussed next step with	*	-	
	BSB, consider simpling in			1 h 1/2 3/0/24
	North of school - expos	red	-	/
Scale Ingo		6	Scale, 1 sq	and the first th

BNA 47 RMAP 3/9/24 TW. Arrive at Silver-Bow 1200 1215 Re-apply another layer F or involating form, and another layer of tope. 1500 FILK UP Additional Materials et Ace Hardware, Finish sceling insulation: 1000 Inspect plastic For terro; ensure seal in sufficients 1330 off-site Photos: 2437-2441, 2444-2446, 2243 H H 3/1/24 H H E L H 5 Scale 1 square =



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