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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

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April 26, 2024

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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 The FSPs were approved with references to Quality Assurance Project Plans (QAPPs) that have been superseded by revised versions.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

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Amy Steinmetz / DEQ – email
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Gary Icopini / MBMG – email
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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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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:	
PROBLEM DESCRIPTION: 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.			
PROPOSED MODIFICATION: 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.			
REFERENCES: 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 https://www.co.silverbow.mt.us/2161/ButtePriority-Soils-Operable-Unit-Conse .			
ATTACHMENTS:			



- | | |
|--|--|
| <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 *Day Reed* Date 05/02/2024

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 Dave Griffis / Atlantic Richfield – email
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 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
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 Robert Lowry / BNSF – email
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RFC Logbook

