

Montana Tech Library

Digital Commons @ Montana Tech

Silver Bow Creek/Butte Area Superfund Site

Montana Superfund

Spring 5-6-2024

**Approval letter for the Butte Priority Soils Operable Unit (BPSOU)
2024 Draft Final Insufficiently Reclaimed Areas Quality Assurance
Project Plan (QAPP) (dated March 8, 2024)**

Molly Roby

Follow this and additional works at: https://digitalcommons.mtech.edu/superfund_silverbowbutte



Part of the [Environmental Health and Protection Commons](#), [Environmental Indicators and Impact Assessment Commons](#), and the [Environmental Monitoring Commons](#)



REGION 8

DENVER, CO 80202

May 6, 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) 2024 Draft Final Insufficiently Reclaimed Areas Quality Assurance Project Plan (QAPP) (dated March 8, 2024)

Dear Mr. McAnulty:

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) 2024 Draft Final Insufficiently Reclaimed Areas Quality Assurance Project Plan (QAPP) (dated March 8, 2024) with the condition that mercury is still included as an analyte.

There is one general comment, however, that needs to be addressed. Justification for the removal of mercury from the BPSOU Soil Screening Criteria for Waste Identification (Table 2) has not been documented. While EPA and DEQ are open to a proposal justifying the removal of mercury from the analyte list for Insufficiently Reclaimed (IR) investigations, it should be included as an analyte per Appendix D of the Consent Decree (Appendix 1, Table 1: Waste Identification Criteria). A clearly justified basis for removing mercury from IR investigations should be documented for agency review.

Once addressing the comment above, please distribute this QAPP as final, including the review crosswalk and signature page. If you have any questions or concerns, please call me at (406) 457-5021.

Sincerely,

A handwritten signature in blue ink, which appears to read "Molly Roby".

Molly Roby
Remedial Project Manager

Enclosures: QAPP EPA Crosswalk and QAPP Signature Page (including DEQ and EPA sign-off)

cc: (email only)

Butte File	Sean Peterson/BSB
Chris Greco / Atlantic Richfield	Josh Vincent / WET
Josh Bryson / Atlantic Richfield	Scott Bradshaw / W&C
Loren Burmeister / Atlantic Richfield	Emily Evans / W&C
Dave Griffis / Atlantic Richfield	Pat Sampson / Pioneer
Jean Martin / Atlantic Richfield	Andy Dare / Pioneer
Irene Montero / Atlantic Richfield	Karen Helfrich / Pioneer
David A. Gratson / Environmental Standards	Randa Colling / Pioneer
Mave Gasaway / DGS	Scott Sampson / Pioneer
Adam Cohen / DGS	Jesse Schwarzrock / Pioneer
Brianne McClafferty / Holland & Hart	Ian Magruder/ CTEC
Daryl Reed / DEQ	CTEC of Butte
Logan Dudding / DEQ	Scott Juskiewicz / Montana Tech
Jon Morgan / DEQ	David Shanight / CDM Smith
Kevin Stone / DEQ	Curt Coover / CDM Smith
Amy Steinmetz / DEQ	Chapin Storrar / CDM Smith
Dave Bowers / DEQ	Erin Agee / EPA
Katie Garcin-Forba / DEQ	Will Lindsey / EPA
Doug Martin / NRDP	Andrew Schmidt / EPA
Jim Ford / NRDP	Carolina Balliew / EPA
Pat Cunneen / NRDP	Emma Rott / EPA
Katherine Hausrath / NRDP	Chris Wardell / EPA
Ted Duaine / MBMG	Charles Van-Otten / EPA
Gary Icopini / MBMG	Charlie Partridge / EPA
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 Mavrinc / RARUS	
Harrison Roughton / RARUS	
Mark Neary / BSB	
Eric Hassler / BSB	
Chad Anderson / BSB	
Brandon Warner / BSB	
Abigail Peltomaa / BSB	
Eileen Joyce / BSB	