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Comment/Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final Insufficiently Reclaimed Sites Field Sampling Plans (FSPs) for BRES No. 121 – Travona Dump, BRES No. 125 – Child Harold-2 Dump, BRES No. 34E – Eveline Dump East, BRES No. 45 – Garfield, BRES No. 49 – Old Glory, BRES No. 52 – Moscow, BRES No. 74 – West Gagnon Dump, and BRES No. 78 Original Mine (dated May 7, 2024)

Molly Roby

Environmental Protection Agency

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REGION 8

DENVER, CO 80202

June 28, 2024

Mr. Mike McAnulty
Liability Manager
Atlantic Richfield Company
317 Anaconda Road
Butte, Montana 59701

Re: Comment/Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final Insufficiently Reclaimed Sites Field Sampling Plans (FSPs) for BRES No. 121 – Travona Dump, BRES No. 125 – Child Harold-2 Dump, BRES No. 34E – Eveline Dump East, BRES No. 45 – Garfield, BRES No. 49 – Old Glory, BRES No. 52 – Moscow, BRES No. 74 – West Gagnon Dump, and BRES No. 78 Original Mine (dated May 7, 2024)

Dear Mr. McAnulty:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving 4 FSPs and commenting on 4 FSPs of the Butte Priority Soils Operable Unit (BPSOU) Draft Final Insufficiently Reclaimed (IR) Sites FSPs (dated May 7, 2024).

Please distribute the following FSPs for the following Butte Reclamation Evaluation System (BRES) sites as final (including the boundary adjustments):

- BRES No. 121 – Travona Dump
- BRES No. 125 – Child Harold-2 Dump
- BRES No. 49 – Old Glory
- BRES No. 74 – West Gagnon Dump

For the following IR sites, please address the comments below and resubmit the FSPs for agency review and comment:

BRES No. 34E – Eveline Dump East

1. EPA has concerns about unilaterally transferring portions of BRES sites to the RMAP and transferring responsibility for cap maintenance to private property owners. Historic sampling at the Eveline (Site No. 34) to the east and Del Monte (Site No. 35) to the south have lead results exceeding 1,200 mg/kg. If similar concentrations of lead are present in the residential portion

proposed for transfer to the RMAP, the thickness of any barriers to the waste is unknown and EPA is concerned that uncontrolled exposure could be occurring. With the BRES evaluations every four years, site conditions on the residential portion are at least being periodically checked and repairs implemented, if needed. Therefore, any boundary adjustments proposing to move a site or portion of a site from the BRES program to the RMAP program must be sampled and remediated, if necessary, before the BRES boundary adjustment can be considered. In the "Background" section of the FSP, please modify the third sentence of the last paragraph to read as follows: "Note that the Agencies have not approved the adjusted boundary and the adjustment may be made after RMAP sampling and remediation (if necessary) of the residential portion to be transferred is completed."

BRES No. 45 - Garfield

1. In the 2021 BRES evaluations, both the Del Monte (Site No. 35) and Garfield (Site No. 45) were the "Monitor" category, but required some site corrective actions; however, in the last paragraph of the "Background" Section it is noted that "...samples will only be collected within the original BRES No. 45 – Garfield boundary during the 2024 sampling event due to BRES evaluation deficiencies." Please clarify and discuss the BRES deficiency differences between the Del Monte (Site No. 35) and Garfield (Site No. 45) leading supplemental evaluation of the Garfield and not the Del Monte. Given that they are contiguous sites, both sites likely need supplemental sampling and evaluation prior to implementing the proposed boundary adjustment. Additionally, sampling the Garfield and not the Del Monte may confuse future management of the east and west sites once the boundary adjustments are made.

BRES No. 52 – Moscow

1. In the "Background" section of the FSP, please modify the second to last sentence of the last paragraph to read as follows: "Residential yards within the source area boundary may be excluded only after the RMAP sampling and remediation (if necessary) processes have been completed."

BRES No. 78 Original Mine

1. The Original Mine Yard is a complicated site incorporating both non-residential RMAP and BRES IR sampling. It is not clear or easy to discern on Figure 1 how the overall site will be managed and evaluated in the future. Additional text, another figure, or perhaps a separate document describing the management of caps at this important site is needed. For example, a large area in the west-central portion of the site seems to be excluded from both RMAP and BRES sampling and evaluation. EPA/DEQ would like to discuss the management approach at an upcoming meeting. The effective management of this site should be prioritized to the extent possible before the summer 2025 events season.

If you have any questions or concerns, please call me at (406) 457-5021.

Sincerely,



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Molly Roby
Remedial Project Manager

cc: (email only)

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|--|---------------------------------|
| Butte File | Lauren Knickrehm / BNSF |
| Chris Greco / Atlantic Richfield | Doug Brannan / Kennedy Jenks |
| Josh Bryson / Atlantic Richfield | Matthew Mavrinac / RARUS |
| Loren Burmeister / Atlantic Richfield | Harrison Roughton / RARUS |
| Dave Griffis / Atlantic Richfield | Mark Neary / BSB |
| Jean Martin / Atlantic Richfield | Eric Hassler / BSB |
| Irene Montero / Atlantic Richfield | Chad Anderson / BSB |
| David A. Gratson / Environmental Standards | Brandon Warner / BSB |
| Mave Gasaway / DGS | Abigail Peltomaa / BSB |
| Adam Cohen / DGS | Sean Peterson/BSB |
| Brianne McClafferty / Holland & Hart | Josh Vincent / WET |
| Daryl Reed / DEQ | Scott Bradshaw / W&C |
| Logan Dudding / DEQ | Emily Evans / W&C |
| Jon Morgan / DEQ | Pat Sampson / Pioneer |
| Kevin Stone / DEQ | Karen Helfrich / Pioneer |
| Amy Steinmetz / DEQ | Randa Colling / Pioneer |
| Katie Garcin-Forba / DEQ | Scott Sampson / Pioneer |
| Doug Martin / NRDP | Jesse Schwarzrock / Pioneer |
| Jim Ford / NRDP | Ian Magruder/ CTEC |
| Pat Cunneen / NRDP | CTEC of Butte |
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| Brooke Kuhl / BNSF | Katherine Jenkins / EPA |
| | Charlie Partridge / EPA |