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Spring 4-24-2024

### **Butte Priority Soils Operable Unit (BPSOU) Unreclaimed (UR) Sites Final UR Field Sampling Plan (FSP) Submittal #4 – Request For Change (RFC) -UR FSP #4-001.**

Mike McAnulty

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# Atlantic Richfield Company

## Mike Mc Anulty

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April 24, 2024

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**RE: Butte Priority Soils Operable Unit (BPSOU) Unreclaimed (UR) Sites Final UR Field Sampling Plan (FSP) Submittal #4 – Request For Change (RFC) -UR FSP #4-001.**

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to submit the Butte Priority Soils Operable Unit (BPSOU) Unreclaimed (UR) Sites Final UR Field Sampling Plan (FSP) Submittal #4 – Request For Change (RFC) document RFC-UR FSP #4-001. This RFC is being submitted to describe minor changes proposed to the final FSP to accommodate alterations to the Site implemented by the property owner.

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

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John DeJong / UP – email  
Robert Bylsma / UP – email  
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Leo Berry / BNSF – email  
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Brooke Kuhl / BNSF – email  
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A bp affiliated company

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Randa Colling / Pioneer – email  
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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 24, 2024	RFC NO. RFC-UR FSP #4-001	CONTRACTOR Pioneer Technical Services, Inc.	RFP NO. NA
CONTRACT DESCRIPTION: Unreclaimed Sites Scope of Work, Appendix D, Attachment C, Section 7.0		ATTENTION OF: Molly Roby (EPA), Daryl Reed (MDEQ)	
SUBJECT: BPSOU Unreclaimed Sites Final Field Sampling Plan (FSP) Submittal #4 <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: Unreclaimed Sites FRESOW; Final Unreclaimed Sites Field Sampling Plan (FSP) Submittal #4.		REFERENCE DWG., P.O., TAG, SPECIFICATION NO. (FOR DEVIATIONS OR DEFICIENCIES) ETC: Figure 2	
<p><b>PROBLEM DESCRIPTION:</b></p> <p>The <i>Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Final Field Sampling Plan (FSP) #4: UR-16 and UR-21</i> (Atlantic Richfield Company, 2021) was approved by the Agencies on August 30, 2021. The final FSP was distributed on September 7, 2021. Since this time, third-party property owners of a portion of the UR-21 site have completed site upgrades including construction of a commercial structure, site grading, and paving. Site sampling, as proposed in the referenced FSP, is not viable at locations where upgrades have been performed.</p> <p>In addition, the Quality Assurance Project Plan (QAPP) referenced in the previously approved FSP has been updated to reflect the appropriate sampling approach.</p> <p><b>PROPOSED MODIFICATION:</b></p> <p>Figure 2 of the referenced FSP has been revised (Attachment 1) to account for site upgrades, and proposed sample locations have been redefined to complete investigation of the remaining portions of the site.</p> <p>Site soil sampling will be completed as described in the Butte Priority Soils Operable Unit (BPSOU) 2024 Draft Final Unreclaimed Sites QAPP (Atlantic Richfield Company, 2024) upon Agency approval. *** See Note on Page 2.</p> <p><b>REFERENCES:</b></p> <p>Atlantic Richfield Company, 2021. Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Final Field Sampling Plan (FSP) #4: UR-16 and UR-21. Atlantic Richfield Company. September 7, 2021.</p> <p>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. *** See Note on Page 2.</p> <p>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>.</p> <p><b>ATTACHMENTS:</b></p> <p>Attachment 1: Figure 2</p>			
<input type="checkbox"/> Design Deficiency <input checked="" type="checkbox"/> Engineering Change Request <input type="checkbox"/> Agency Directive <input type="checkbox"/> Construction Deficiency		<input type="checkbox"/> Material Substitution <input type="checkbox"/> Vendor Material Deficiency <input type="checkbox"/> Scope <input type="checkbox"/> Clarification/ Information	



Schedule

Other Final Design Document

RESPONSE/DIRECTIVE \*\*\*Note: The 2024 Final Unreclaimed QAPP was approved on June 28, 2024, and should be the updated reference for the sampling effort.

Project Manager *Sara Sam* Date 04/24/2024

Atlantic Richfield Co. Representative *Mike McNulty* Date 04/24/2024

EPA Representative *Molly Roby* Date 7/12/2024  
Digitally signed by MOLLY ROBY  
Date: 2024.07.12 11:58:23 -0600

DEQ Representative *Day Reed* Date 7/11/2024

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  - Loren Burmeister / Atlantic Richfield – email
  - Dave Griffis / Atlantic Richfield – email
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BPSOU SharePoint – upload  
RFC Logbook





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