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Approved Silver Bow Creek Conservation Area Repository Data Gap Quality Assurance Project Plan Request for Change to Install Additional Test Pits and Perform Material Characterization

Josh Bryson

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Atlantic Richfield Company

Josh Bryson

Liability Manager

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September 4, 2024

Emma Rott
Remedial Project Manager
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10 W. 15th Street, Suite 3200
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Office of Regional Counsel – CERCLA
1595 Wynkoop Street
Denver, CO 80202
Mail Code: 8ORC-C

Daryl Reed
DEQ Project Officer
P.O. Box 200901
Helena, Montana 59620-0901

Jonathan Morgan, Esq.
DEQ, Legal Counsel
P.O. Box 200901
Helena, Montana 59620-0901

RE: Approved Silver Bow Creek Conservation Area Repository Data Gap Quality Assurance Project Plan Request for Change to Install Additional Test Pits and Perform Material Characterization

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to distribute the approved Request for Change (RFC) to the *Silver Bow Creek Conservation Area (SBCCA) Repository Data Gap Quality Assurance Project Plan (QAPP)* (RFC-SBCCA Data Gap QAPP-2024-1). The Agencies' approval was received on August 30, 2024.

If you have any questions or comments, please call me at (406) 723-1834.

Sincerely,



Josh Bryson, PE, PMP
Liability Manager
Remediation Management Services Company
An affiliate of **Atlantic Richfield Company**

Atlantic Richfield Company

317 Anaconda Road
Butte MT 59701
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cc (email only):

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Mike Mc Anulty / Atlantic Richfield
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Mave Gasaway / DGS
Adam Cohen / DGS
Lucas Satterlee / DGS
Brianna McClafferty / Holland & Hart
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James Freeman / DOJ
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Katie Garcin-Forba / DEQ
Doug Martin / NRDP
Jim Ford / NRDP
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Katherine Hausrath / NRDP
Ted Duaine / MBMG
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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 Mavrinac / RARUS
Harrison Roughton / RARUS
Brad Gordon / RARUS
Mark Neary / BSB
Eric Hassler / BSB
Brandon Warner / BSB
Abigail Peltomaa / BSB
Aaron Rains / BSB
Sean Peterson/BSB
Josh Vincent / WET
Kevin Bethke / W&C
Scott Bradshaw / W&C
Emily Evans / W&C
Paddy Stoy / W&C
Joe McElroy / Pioneer
Troy Colvin / Pioneer
Mark Meyer / Pioneer
Pat Sampson / Pioneer
Karen Helfrich / Pioneer
Brad Hollamon / Pioneer
Randa Colling / Pioneer
Rich Keeland / Aspect
Andy White / Aspect
Ian Magruder/ CTEC
CTEC of Butte
Scott Juskiewicz / Montana Tech

File: RMO – upload
BPSOU SharePoint – upload



REGION 8
DENVER, CO 80202

August 30, 2024

Mr. Josh Bryson
Liability Manager
Atlantic Richfield Company
317 Anaconda Road
Butte, Montana 59701

Re: Conditional approval letter for the Butte Priority Soils Operable Unit (BPSOU) Silver Bow Creek Conservation Area Repository Data Gap Quality Assurance Project Plan Request for Change to Install Additional Test Pits and Perform Material Characterization (dated August 28, 2024)

Dear Mr. Bryson:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), has reviewed and is providing approval of the *Silver Bow Creek Conservation Area Repository Data Gap Quality Assurance Project Plan Request for Change (RFC) to Install Additional Test Pits and Perform Material Characterization (dated August 28, 2024)*. Please attach the signature page to the RFC and distribute as final.

If you have any questions or concerns, please call me at (406) 438-0823.

Sincerely,

Emma Rott, P.E.
Remedial Project Manager

ENCLOSURE

1. EPA and DEQ signature page

cc: (email only)

Butte File

Chris Greco / Atlantic Richfield

Mike Mcanulty / Atlantic Richfield

Loren Burmeister / Atlantic Richfield

Dave Griffis / Atlantic Richfield

Jean Martin / Atlantic Richfield

Irene Montero / Atlantic Richfield

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Sean Peterson / BSB
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CTEC of Butte
Scott Juskiewicz / Montana Tech
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Curt Coover / CDM Smith
Chapin Storrar / CDM Smith
Erin Agee / EPA

Will Lindsey / EPA
Jamie Miller / EPA
Carolina Balliew / EPA
Charlie Partridge / EPA

ATLANTIC RICHFIELD COMPANY

RFC - REQUEST FOR CHANGE

<p>DATE August 28, 2024</p>	<p>RFC NO. RFC-SBCCA Data Gap QAPP-2024-01</p>	<p>CONTRACTOR WSP Environment & Infrastructure Inc. and Pioneer Technical Services, Inc.</p>	<p>RFP NO. NA</p>
<p>CONTRACT DESCRIPTION: Silver Bow Creek Conservation Area (SBCCA) Repository Siting Study</p>		<p>ATTENTION OF: Emma Rott/Daryl Reed</p>	
<p>SUBJECT: Additional Test Pit Soils Investigation and Material Characterization to Support a Soil-Water Slurry System Design <input type="radio"/> ELECTRICAL <input type="radio"/> MECHANICAL <input checked="" type="radio"/> CIVIL <input type="radio"/> STRUCTURAL/ARCHITECTURAL <input type="radio"/> INSTRUMENTATION <input type="radio"/> ENVIRONMENTAL</p>			
<p>OPERABLE UNIT: Butte Priority Soils Operable Unit MAJOR WORK TASKS: Install Additional Test Pits for Material Characterization</p>		<p>REFERENCE DWG., P.O., TAG, SPECIFICATION NO. (FOR DEVIATIONS OR DEFICIENCIES) ETC.: SBCCA Repository Data Gap Quality Assurance Project Plan (QAPP).</p>	
<p>PROBLEM DESCRIPTION:</p> <p>This request for change (RFC) outlines additional site investigation procedures that will be incorporated into the <i>Silver Bow Creek Conservation Area Repository Data Gap Quality Assurance Project Plan (QAPP)</i> (SBCCA Repository Data Gap QAPP; Atlantic Richfield Company, 2024). This RFC provides the procedures and protocols necessary for Atlantic Richfield Company (Atlantic Richfield) to install additional test pits and perform additional material characterization to further classify the physical characteristics of the materials to be excavated at the Butte Reduction Works (BRW), Buffalo Gulch (BG), Diggings East (DE), and Northside Tailings (NST) Sites. The results of the material characterization will provide additional physical properties to support the design of a soil-water slurry system to transport waste to the Berkely Pit as part of the remedial actions (RAs) necessary for the Butte Priority Soils Operable Unit Consent Decree.</p> <p>As described in SBCCA Repository Data Gap QAPP Section 1.1, additional site investigations were anticipated to support development of the Remedial Design Work Plan(s). An RFC to the SBCCA Repository Data Gap QAPP was identified as one of the anticipated methods for proposing these additional site investigations.</p> <p>Objective of the Additional Test Pits</p> <p>Additional material characterization is needed to define physical properties of materials that could be disposed of in the Berkeley Pit utilizing a soil-water slurry pumping system. Previous investigations have generally focused on the environmental characterization of the site material, and provided limited data related to soil particle size distribution, particularly regarding characterizing larger particle size materials. Characterization of larger particle size materials is necessary to support the design and evaluation of the soil-water slurry system. The additional test pits will provide necessary additional information on the particle distribution of full material bulk sample, including oversized materials.</p> <p>Slurry Design Test Pit Locations</p> <p>Atlantic Richfield plans to excavate a total of 13 test pits, with 2 to 5 test pits installed at each RA site (BRW, BG, DE, and NST). Material collected from test pits at each site will be composited into one representative bulk sample (approximately 10-cubic yards) for each RA site for material characterization testing and analysis (Table 5). The additional test pit locations are shown on revised Figures 2, 3, and 4. The locations shown on Figures 2, 3, and 4 are approximate, and the number of and pit locations may be modified as determined by the Field Team Leader in consultation with the Contractor Project Manager and Contractor Quality Assurance Officer. The test pits will be excavated to the depth of the proposed RA excavation (Table 6). The total depth of each test pit may vary depending on field conditions encountered and/or equipment limitations. Most specifically, test pits may be stopped in any scenario that may result in risk to the field team staff, equipment operators, or others associated with performance of the work.</p> <p>General Procedures</p> <p>The test pits will be excavated following the general procedures described in the SBCCA Repository Data Gap QAPP, SOP-S-06 (Appendix A), and as described below. Material collected from the test pits at each RA site will be composited into one representative bulk sample (approximately 10-cubic yards) for further material characterization testing and analysis as described in the following sections.</p>			

Test Pits and Bulk Sample Collection and Testing

- Test pit locations will be marked and surveyed.
- Test pits will be excavated using a track-mounted or rubber-tired excavator. The type of excavation equipment used for each test pit will be documented.
- Two to five test pits will be excavated at each RA site as shown on revised Figures 2, 3, and 4.
- Each test pit will be excavated to the depth identified in Table 6. All excavated material will be placed at least 3 feet from the excavated test pit's edge.
- Once the total depth is achieved, approximately 5 cubic yards of material will be scraped from the wall to characterize the entire test pit profile and stockpiled. The stockpiled material will then be homogenized and approximately 3 to 4 cubic yards of a representative sample will be loaded into a dump truck.
- Once material has been collected from all test pits and loaded into the dump truck, for an approximate bulk sample size of 10 cubic yards, a tare and gross weight will be measured on the dump truck and the sample will be unloaded at Pioneer's geotechnical laboratory for material testing.
- A representative moisture content sample will be collected from the bulk RA location sample. The moisture content sample will be used to account for water weight in the bulk sample.
- The greater than 3-inch material will be screened from the bulk RA location sample using a skid steer and skeletal bucket attachment. The greater than 3-inch material will be reloaded into a dump truck to collect a gross weight. The net weight of the greater than 3-inch material will be used to adjust the laboratory gradation to characterize the entire bulk sample.
- A representative sample will be collected from the greater than 3-inch material for abrasion and specific gravity testing.
- A representative sample will be collected from the remaining less than 3-inch material for laboratory gradation, abrasion, specific gravity, slurry consolidation, and column settling testing as described in Table 5.
- An abrasion test will be conducted on the slag material, if recovered from the BRW test pits.
- The laboratory gradation curve will be adjusted based on the weight of the greater than 3-inch material to generate a gradation curve for the total, bulk sample. The total gradation curve will be used to identify the D50 and D85 at each RA site.

Test Pit Logging

- Test pit logs will be completed at each location.
- Test pit logging will be completed as described in the Repository Data Gap QAPP.

Test Pit Material Disposal

- Test pits will be backfilled with excavated materials not sampled and supplemented with backfill material as necessary.
- Disturbed areas will be seeded with an upland seed mix.
- Materials from the bulk RA location sample will be disposed of in the Butte Mine Waste Repository.
- There is a chance that hazardous wastes could be encountered during test pit excavation. Any hazardous wastes encountered during test pit excavation will be handled as detailed in the SBCCA Repository Data Gap QAPP.

Equipment

- Field logbook and pens.
- Field forms and references (Appendix C).
- Measuring tape.
- Unified Soil Classification System chart (American Society for Testing and Materials International [ASTM] D-2488) (Appendix C).
- Munsell color chart.
- Chain of custody forms.
- Decontamination equipment (pressure washer, tap water, dilute nitric acid, Liquinox soap, decontamination containers, paper towels, scrub brushes, and spray bottles). Refer to SOP-DE-02 in Appendix A.
- Digital camera.
- Survey-grade Global Positioning System unit.
- Appropriate safety Personal Protective Equipment.

Sampling and Analysis Procedures

Additional sampling and analysis procedures have been added in Table 5 and include the following.

- Moisture Content: ASTM D2216
- Gradation Testing: ASTM C117 and ASTM C136.
- Abrasion Testing: ASTM C131
- Specific Gravity: ASTM C127 and ASTM C128

- Column Settling Test
- Slurry Consolidation Test

Project Team

WSP, Jordan Contracting, Inc. (JCI), Pioneer’s geotechnical laboratory(s) and personnel, and WSP’s Lakewood, Colorado geotechnical laboratory will complete the described excavation and material testing.

Proposed Schedule

The test pits will be installed as soon as practical upon approval from Agencies.

Revised Figures (Attached)

- Figure 2 BG Site Map
- Figure 3 BRW Site Map
- Figure 4 DE/NST Site Map

Revised Tables (Attached)

- Table 5: Sample Collection, Preservation, and Holding Times
- Table 6: BPSOU Site Investigation Locations

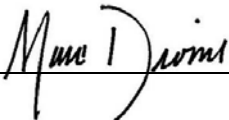
References

Atlantic Richfield Company, 2024. Silver Bow Creek Conservation Area Repository Data Gap Quality Assurance Project Plan (QAPP). Prepared by Pioneer Technical Services, Inc. May 2024.

- | | | | |
|---|---|---|---|
| <input type="radio"/> Design Deficiency Request | <input type="radio"/> Engineering Change | <input type="radio"/> Material Substitution | <input type="radio"/> Vendor Material Deficiency |
| <input type="radio"/> Agency Directive | <input type="radio"/> Construction Deficiency | <input checked="" type="radio"/> Scope | <input checked="" type="radio"/> Additional Data Collection |
| <input type="radio"/> Schedule | | <input type="radio"/> Clarification/Information | <input type="radio"/> Other |


RESPONSE/DIRECTIVE

1. Approve the excavation of test pits and collection of additional material characterization data.

Project Manager  on behalf of Alan Erickson Date 08/28/2024

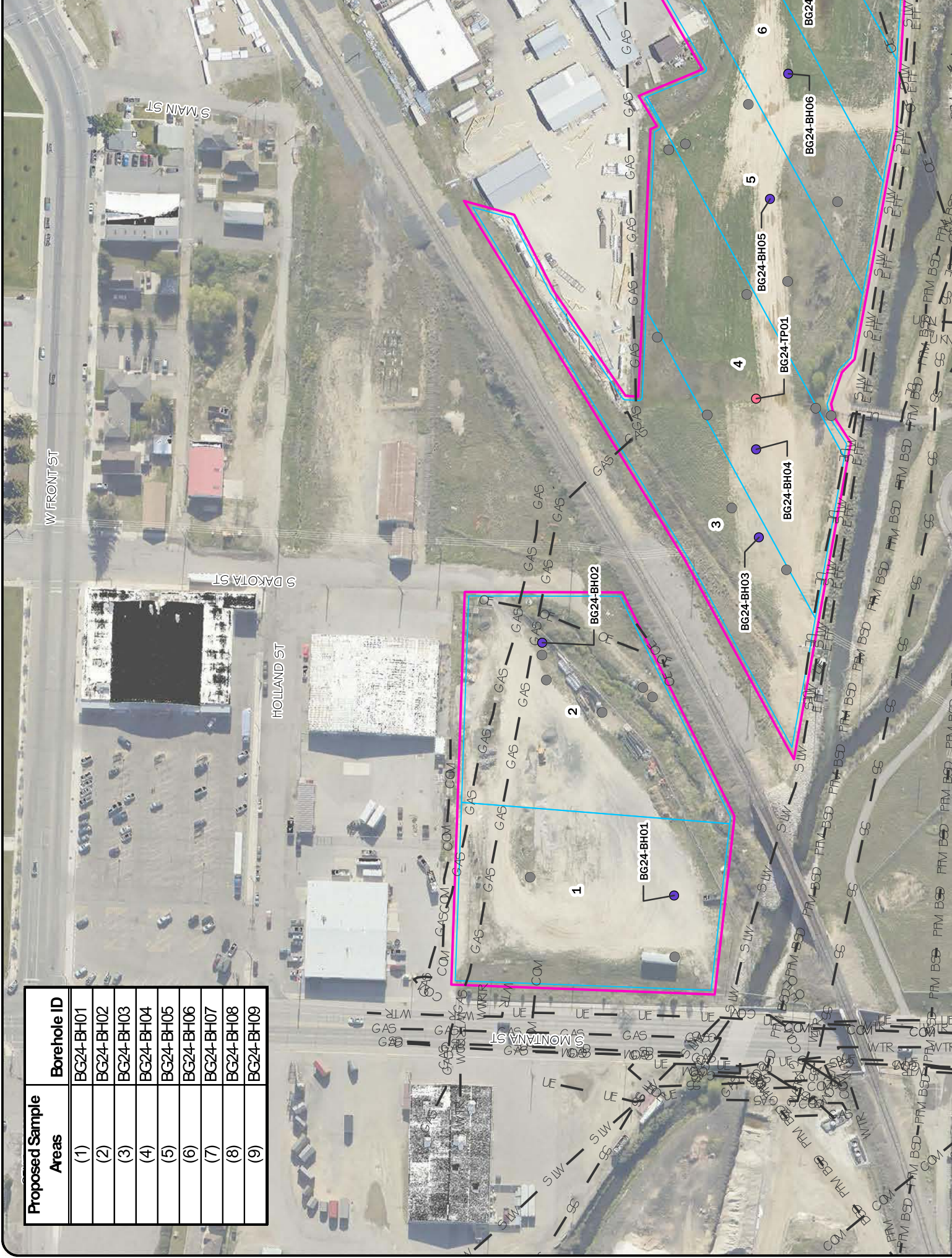
Atlantic Richfield Co. Representative  Date 08/28/2024

EPA Representative  Date 8/30/2024

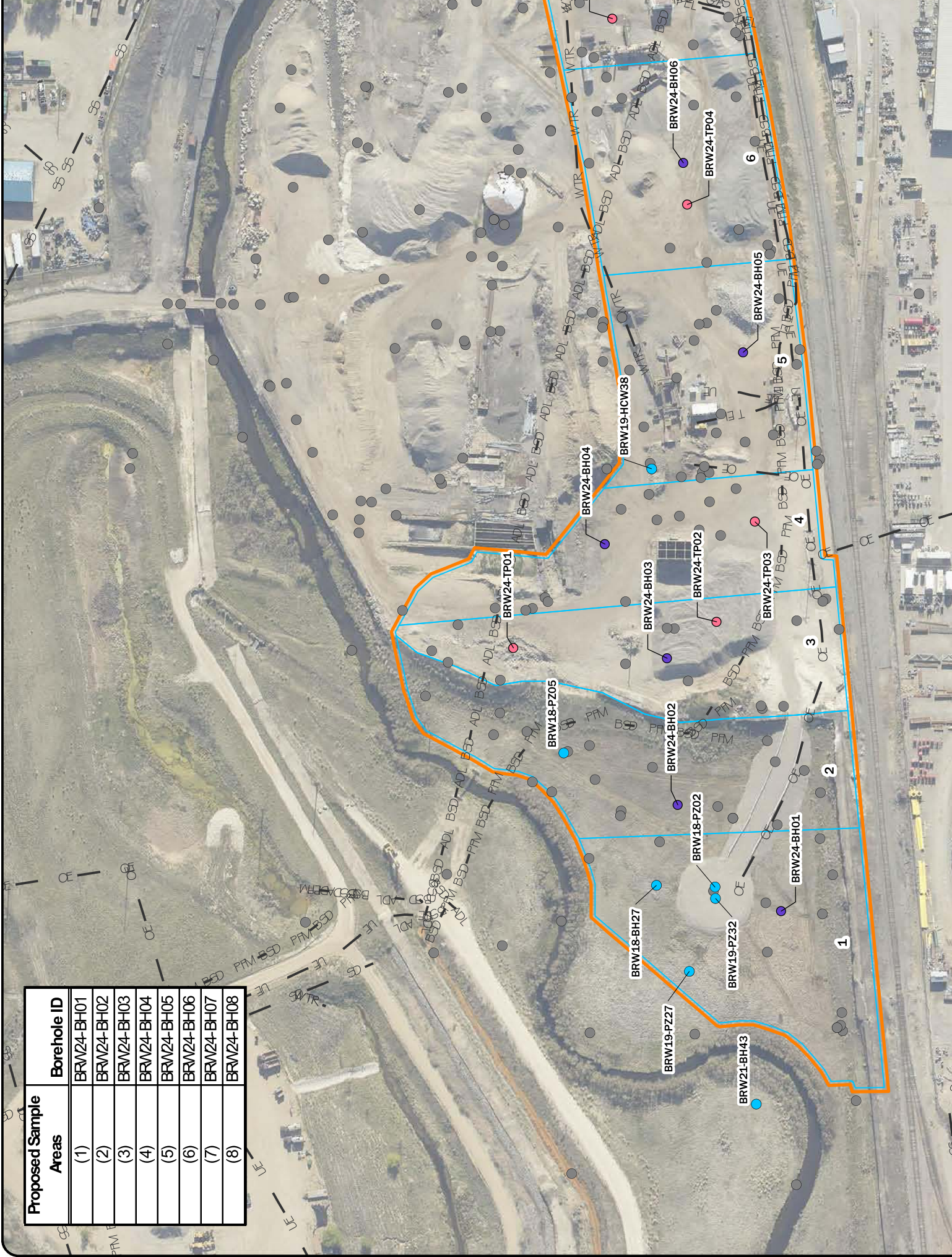
DEQ Representative  Date 8/30/2024

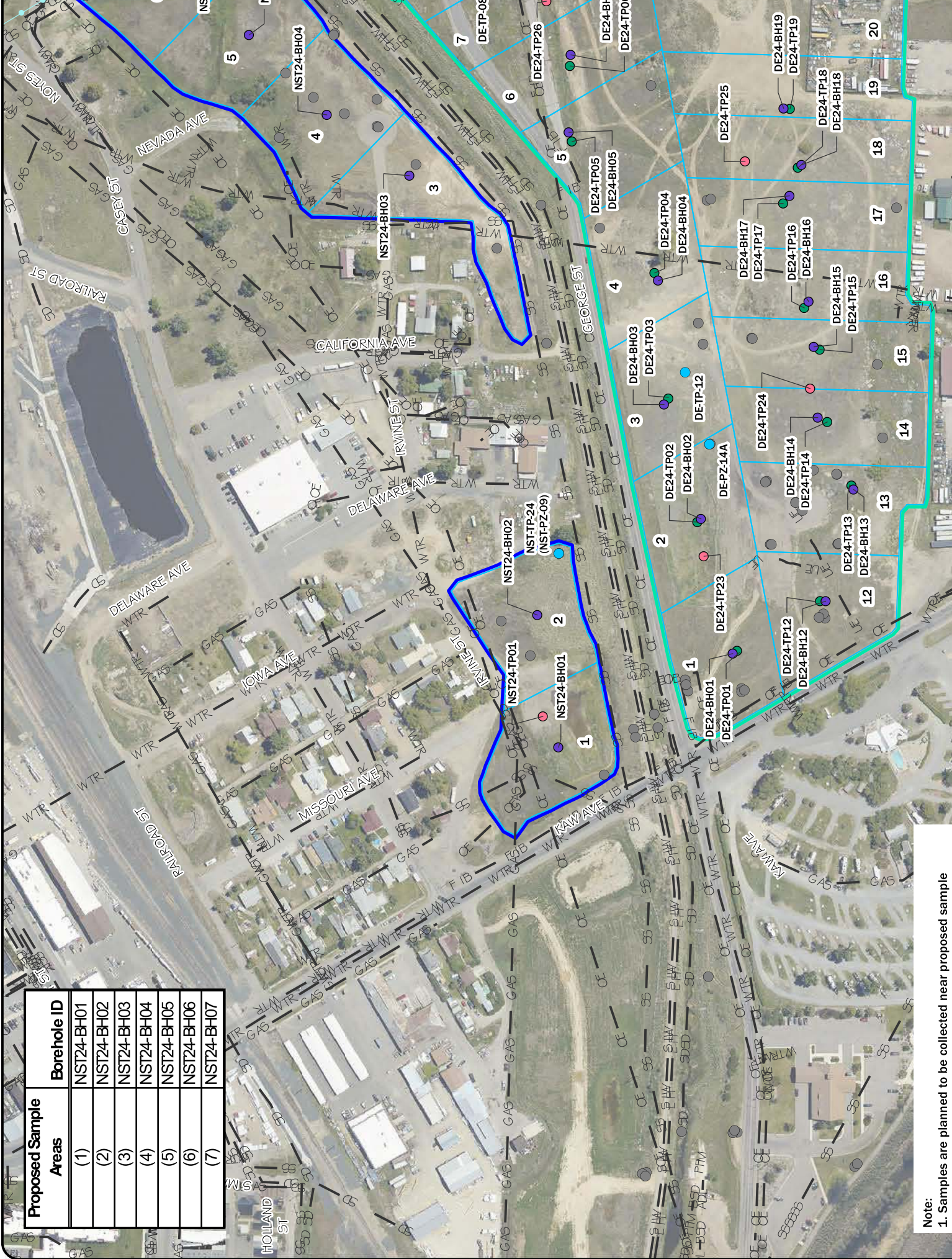
CC: See Cover Letter

Proposed Sample Areas	Borehole ID
(1)	BG24-BH01
(2)	BG24-BH02
(3)	BG24-BH03
(4)	BG24-BH04
(5)	BG24-BH05
(6)	BG24-BH06
(7)	BG24-BH07
(8)	BG24-BH08
(9)	BG24-BH09



Proposed Sample Areas	Borehole ID
(1)	BRW24-BH01
(2)	BRW24-BH02
(3)	BRW24-BH03
(4)	BRW24-BH04
(5)	BRW24-BH05
(6)	BRW24-BH06
(7)	BRW24-BH07
(8)	BRW24-BH08





Proposed Sample Areas	Borehole ID
(1)	NST24-BH01
(2)	NST24-BH02
(3)	NST24-BH03
(4)	NST24-BH04
(5)	NST24-BH05
(6)	NST24-BH06
(7)	NST24-BH07

Note:
 1. Samples are planned to be collected near proposed sample

Table 5. Sample Collection, Preservation, and Holding Times

Analytical Group	Analytical Lab/Company ¹	Analyte	Analytical Method	Lab Reporting Limit (CROL for Data Validation Purposes)	Lab Method Detection Limit ²	Holding Time			
All Sites Soil Laboratory Samples									
(1) Required Data	Pace Analytical	Calcium Carbonate % (as CaCO3)	USDA 60-23	0.10%	0.10%	14 days after extraction	500		
		Loss on Ignition - Organic Matter (LOI)	SSSA Part 3	0.10%	0.10%	14 days after extraction			
		Total Carbon (Mining Method)	ASA 929-2.2	0.10%	0.10%	NA			
		Total Organic Carbon - LECO Furnace	Calculation	-	-	NA			
(2) Additional Data - ABA and Nutrients	Pace Analytical	Acid Base Accounting	EPA 600/2-78-054	0.1 tons/1000 tons	0.1 tons/1000 tons	14 days after extraction	250		
		Total Nitrogen	353.2	0.1 ppm	0.1 ppm	28 days after extraction			
		Total Phosphorous	EPA 6010	10 mg/kg	4.3 mg/kg	6 months			
		TKN, Nitrogen	EPA 351.2	1 mg/L	0.07 mg/L	28 days after extraction			
		Ortho-phosphate	SM4500-N-C	0.1 mg/L	0.05 mg/L	48 hours after extraction			
(3) Additional Data - Particle Size	Pioneer's Material Testing Laboratory	Particle Size Distribution	ASTM D6913	NA	NA	None			
(4) Split Sample	Split sample for Life Cycle Geo, LLC	NA	NA	NA	NA	NA			
(5) Additional Data - Mineralogy	Mineralogy, Inc. (Tulsa, OK)	Mineralogy (X-ray Diffraction)	NA	NA	NA	NA			
(6) Additional Data - Total Elemental Analysis	Pace Analytical	Total Elemental Analysis (Whole Rock Analysis) Total digestion using hydrofluoric acid.	EPA 6010	--	--	6 months			
		Aluminum (Al)		10 ppm	0.5 ppm				
		Antimony (Sb)		20 ppm	4 ppm				
		Arsenic (As)		3 ppm	0.5 ppm				
		Cadmium (Cd)		0.5 ppm	0.06 ppm				
		Calcium (Ca)		50 ppm	2 ppm				
		Copper (Cu)		1 ppm	0.2 ppm				
		Iron (Fe)		10 ppm	0.4 ppm				
		Lead (Pb)		15 ppm	0.2 ppm				
		Magnesium (Mg)		50 ppm	6 ppm				
		Manganese (Mn)		1ppm	0.02 ppm				
		Molybdenum (Mo)		5 ppm	0.3 ppm				
		Potassium (K)		50 ppm	10 ppm				
		Silicon (Si)		15 ppm	7.45 ppm				
Sodium (Na)	50 ppm	3 ppm							
Sulfur (S)	500 ppm	275.5 ppm							
Zinc (Zn)	2 ppm	0.9 ppm							
(7) Additional Data - DE Fill	Pace Analytical	Toxicity Characteristics Leaching Procedure (TCLP)	6010D TCLP	--	--	180 Days			
		Arsenic		200 µg/L	9.08 µg/L				
		Barium		100 µg/L	6.73 µg/L				
		Cadmium		30 µg/L	1.90 µg/L				
		Chromium		100 µg/L	4.27 µg/L				
		Copper		100 µg/L	14.3 µg/L				
		Lead		100 µg/L	9.99 µg/L				
		Nickel		200 µg/L	9.20 µg/L				
		Selenium		200 µg/L	6.86 µg/L				
		Silver		100 µg/L	4.13 µg/L				
		Zinc		200 µg/L	11.3 µg/L				
		Mercury		7470A TCLP	0.6 µg/L			0.286 µg/L	28 Days
		Chlordane		8081B TCLP	5 µg/L			2.11 µg/L	14 Days
		Endrin			1 µg/L			0.207 µg/L	
		Heptachlor (and its epoxide)			0.5 µg/L	0.0946 µg/L			
		Lindane			0.5 µg/L	0.0665 µg/L			
		Methoxychlor		8260D TCLP	5 µg/L	1.72 µg/L		14 Days	
		Toxaphene			15 µg/L	3.90 µg/L			
		Benzene			25 µg/L	2.58 µg/L			
		Carbon tetrachloride			25 µg/L	3.34 µg/L			
		Chlorobenzene			25 µg/L	3.33 µg/L			
		Chloroform			25 µg/L	5.8 µg/L			
		1,4-Dichlorobenzene			25 µg/L	3.66 µg/L			
		1,2-Dichloroethane			25 µg/L	4.24 µg/L			
		1,1-Dichloroethylene			25 µg/L	3.31 µg/L			
		Methyl ethyl ketone			250 µg/L	27.4 µg/L			
		Tetrachloroethylene		25 µg/L	2.62 µg/L				
		Trichloroethylene		25 µg/L	3.05 µg/L				
		Vinyl chloride		25 µg/L	1.15 µg/L				
		o-Cresol		8270E TCLP	100 µg/L	8.88 µg/L		14 Days	
		m-Cresol			100 µg/L	9.74 µg/L			
		p-Cresol			100 µg/L	9.74 µg/L			
		2,4-Dinitrotoluene			100 µg/L	9.15 µg/L			
		Hexachlorobenzene			100 µg/L	12.8 µg/L			
Hexachloro-1,3-butadiene	100 µg/L	8.51 µg/L							
Hexachloroethane	100 µg/L	7.19 µg/L							
Nitrobenzene	100 µg/L	6.15 µg/L							
Pentachlorophenol	200 µg/L	20.0 µg/L							
Pyridine	500 µg/L	9.23 µg/L							
2,4,5-Trichlorophenol	100 µg/L	11.3 µg/L							
2,4,6-Trichlorophenol	100 µg/L	6.86 µg/L							
2,4-D	8151A TCLP	5 µg/L	5 µg/L		14 Days				
2,4,5-TP (Silvex)		5 µg/L	5 µg/L						
		Moisture Content	ASTM D2216	NA	NA	NA			

Table 6. BPSOU Site Investigation Locations

Location	Northing (Approximate)	Easting (Approximate)	Proposed Excavation Depth (ft)	Total Depth (ft)	Installation Method	Archived Core Sampling (AC) from Table 5	
						Discrete Sample	Co
Buffalo Gulch Boreholes							
BG24-BH01	651539.78	1196809.92	6.7	15	Geoprobe	-	-
BG24-BH02	651702.68	1197132.50	10.5	15	Geoprobe	-	-
BG24-BH03	651444.39	1197256.65	7.4	15	Geoprobe	-	-
BG24-BH04	651453.39	1197364.52	7.7	15	Geoprobe	-	-
BG24-BH05	651428.28	1197683.70	9.4	15	Geoprobe	-	-
BG24-BH06	651404.46	1197844.92	11.2	20	Geoprobe	-	-
BG24-BH07	651411.19	1197995.42	12.2	20	Geoprobe	-	-
BG24-BH08	651377.94	1198182.89	10.3	15	Geoprobe	-	-
BG24-BH09	651397.98	1198377.62	10.8	15	Geoprobe	-	-
BG24-TP01	651436.27	1197440.00	9.1	10	Excavator	-	-
BG24-TP02	651373.54	1198236.00	12.0	12	Excavator	-	-
Butte Reduction Works Boreholes and Piezometers							
BRW18-BH27	651313.45	1195016.77	9.9	15	Geoprobe	-	-
BRW18-PZ02	651239.59	1195014.45	9.8	40	Geoprobe	1, 4	1, 4
BRW18-PZ05	651430.31	1195183.84	10.3	28	Geoprobe	1, 4	1, 4
BRW19-HCW38	651319.59	1195542.24	20	24.5	Sonic	1, 4	1, 4
BRW19-PZ27	651271.93	1194908.24	9.3	29	Geoprobe	1, 4	1, 4
BRW19-PZ32R	651238.96	1194999.89	12.5	25	Geoprobe	1, 4	1, 4
BRW21-BH43	651434.42	1196505.17	NA - Outside Excavation Boundary	30	Geoprobe	-	-
BRW24-BH01	651166.14	1194947.88	11.1	20	Geoprobe	-	-
BRW24-BH02	651301.03	1195120.82	12.3	20	Geoprobe	-	-
BRW24-BH03	651310.15	1195297.79	21.7	25	Sonic	-	-
BRW24-BH04	651389.63	1195441.91	16.0	25	Sonic	-	-
BRW24-BH05	651212.23	1195686.04	10.0	15	Sonic	-	-
BRW24-BH06	651288.07	1195923.41	13.2	20	Sonic	-	-
BRW24-BH07	651367.23	1196235.05	11.8	20	Sonic	-	-
BRW24-BH08	651425.21	1196453.18	13.3	20	Sonic	-	-
BRW24-TP01	651493.80	1195316.00	28.6	29	Excavator	-	-
BRW24-TP02	651237.60	1195349.00	21.8	22	Excavator	-	-
BRW24-TP03	651189.10	1195475.00	16.2	17	Excavator	-	-
BRW24-TP04	651274.60	1195876.00	15.3	16	Excavator	-	-
BRW24-TP05	651368.90	1196110.00	14.0	14	Excavator	-	-
Diggings East Test Pits, Piezometers, and Boreholes							
DE-PZ-14A	651150.44	1199347.17	17.9	30	Geoprobe	1, 4	1, 4
DE-TP-08	651601.91	1200297.47	8.5	15	Geoprobe	-	-
DE-TP-12	651201.91	1199497.47	17.1	15	Geoprobe	-	-
DE24-BH01	651118.02	1198906.29	7.6	15	Geoprobe	-	-

Table 6. BPSOU Site Investigation Locations

Location	Northing (Approximate)	Easting (Approximate)	Proposed Excavation Depth (ft)	Total Depth (ft)	Installation Method	Archived Core Sampling (A) from Table 5	
						Discrete Sample	Co
DE24-BH12	650909.46	1199008.93	7.3	15	Geoprobe	-	-
DE24-BH13	650854.80	1199241.17	8.7	15	Geoprobe	-	-
DE24-BH14	650908.51	1199371.65	7.4	15	Geoprobe	-	-
DE24-BH15	650944.07	1199534.08	7.1	15	Geoprobe	-	-
DE24-BH16	650954.25	1199660.42	5.1	10	Geoprobe	-	-
DE24-BH17	651001.96	1199865.83	4.9	10	Geoprobe	-	-
DE24-BH18	650980.43	1199952.66	5.5	10	Geoprobe	-	-
DE24-BH19	651006.25	1200049.48	8.1	15	Geoprobe	-	-
DE24-BH20	651013.56	1200219.33	6.7	15	Geoprobe	-	-
DE24-BH21	651024.88	1200345.39	6.5	15	Geoprobe	-	-
DE24-BH22	651072.87	1200507.62	7.7	15	Geoprobe	-	-
DE24-TP01	651118.02	1198906.29			Excavator	-	-
DE24-TP02	651178.29	1199188.49			Excavator	-	-
DE24-TP03	651249.08	1199432.43			Excavator	-	-
DE24-TP04	651283.26	1199696.25			Excavator	-	-
DE24-TP05	651450.33	1199985.47			Excavator	-	-
DE24-TP06	651434.66	1200161.38			Excavator	-	-
DE24-TP07	651442.31	1200339.31			Excavator	-	-
DE24-TP08	651598.07	1200341.00			Excavator	-	-
DE24-TP09	651640.34	1200500.02			Excavator	-	-
DE24-TP10	651663.14	1200615.43			Excavator	-	-
DE24-TP11	651898.62	1200633.00			Excavator	-	-
DE24-TP12	650909.46	1199008.93			Excavator	-	-
DE24-TP13	650854.80	1199241.17			Excavator	-	-
DE24-TP14	650908.51	1199371.65			Excavator	-	-
DE24-TP15	650944.07	1199534.08			Excavator	-	-
DE24-TP16	650954.25	1199660.42			Excavator	-	-
DE24-TP17	651001.96	1199865.83			Excavator	-	-
DE24-TP18	650980.43	1199952.66			Excavator	-	-
DE24-TP19	651006.25	1200049.48			Excavator	-	-
DE24-TP20	651013.56	1200219.33			Excavator	-	-
DE24-TP21	651024.88	1200345.39			Excavator	-	-
DE24-TP22	651072.87	1200507.62			Excavator	-	-
DE24-TP23	651492.18	1200276.00	6.5	7	Excavator	-	-
DE24-TP24	651162.40	1199112.00	6.6	7	Excavator	-	-
DE24-TP25	650938.62	1199463.00	5.9	6	Excavator	-	-
DE24-TP26	651076.03	1199940.00	12.4	13	Excavator	-	-

The excavation depth will be determined depending on field conditions encountered and fill material available.

Table 6. BPSOU Site Investigation Locations

Location	Northing (Approximate)	Easting (Approximate)	Proposed Excavation Depth (ft)	Total Depth (ft)	Installation Method	Archived Core Sampling (A) from Table 5	
						Discrete Sample	Co
Northside Tailings Pumping Wells, Test Pits, and Boreholes							
NST-TP-24 (NST-PZ-09)	651466.48	1199117.88	7.4	15	Geoprobe	-	-
NST24-BH01	651480.50	1198701.88	14.6	20	Geoprobe	-	-
NST24-BH02	651521.29	1198973.62	6.0	10	Geoprobe	-	-
NST24-BH03	651779.31	1199905.75	3.9	10	Geoprobe	-	-
NST24-BH04	651961.12	1200029.67	13.4	20	Geoprobe	-	-
NST24-BH05	652128.62	1200192.87	2.9	10	Geoprobe	-	-
NST24-BH06	652274.57	1200330.18	5.9	10	Geoprobe	-	-
NST24-BH07	652386.72	1200481.88	3.6	10	Geoprobe	-	-
NST24-TP01	651500.03	1198776.00	4.2	5	Excavator	-	-
NST24-TP02	652263.61	1200441.82	4.0	4	Excavator	-	-
Quality Assurance Samples							
Field Duplicate	Verify sampling procedures, 1 per 20 samples. No field duplicate needed for Particle Size Distribution and XRD analysis.		-		-		