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Spring 6-7-2024

Re: Approval of the Butte Priority Soils Operable Unit Residential Metals Abatement Program Yard Submittals (dated April 24, 2024) and Draft RMAP Remedial Action Work Plan (dated May 7, 2024)

Molly Roby

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REGION 8

DENVER, CO 80202

June 7, 2024

Mr. Eric Hassler and Mr. Brandon Warner
Butte-Silver Bow County
600 Gilman Avenue
Butte, Montana 59701

Re: Approval of the Butte Priority Soils Operable Unit Residential Metals Abatement Program Yard Submittals (dated April 24, 2024) and Draft RMAP Remedial Action Work Plan (dated May 7, 2024)

Dear Mr. Hassler and Mr. Warner:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the Residential Metals Abatement Program (RMAP) Individual Site Work Plans (ISWPs)/Yard Submittals (dated April 24, 2024) and the Draft RMAP Remedial Action Work Plan (RAWP) for Residential Properties (dated May 7, 2024).

ISWP Approval

The table below indicates the property identification numbers and the property addresses associated with the approved ISWPs, which are included as an attachment to this approval letter:

Property Identification Number	Property Address
R-00250	4 Bennett Street
R-00301	305 Virginia Street
R-00327	331 Virginia Street, Lot
R-00328	331 Virginia Street
R-00339	401 West Granite Street
R-00845	122 West Daly Street
R-01204	107 Belle Street
R-01445	1808 A Street
R-01715	1116 California Avenue
R-01725	1118 California Avenue
R-03301	924 South Nevada Street
R-03778	824 West Diamond Street
R-04123	1120 West Mercury Street
R-04184	1018 South Colorado Street
R-04475	706 South Wyoming Street
R-04746	34 East Summit Street
R-05202	1809 South Warren Avenue
R-05207	1819 Whitman Avenue
R-05278	2217 Elm Street
R-05282	476 South Jackson Street

RAWP Approval

EPA, with concurrence from DEQ, is approving the 2024 submittal of the RAWP for residential properties as a pilot to be implemented in the 2024 construction season. Because the RAWP document is a new project document for the RMAP, the objective of the RAWP pilot will be to assess the elements of the work plan, identifying components of the work plan where improvement and efficiencies can be incorporated.

At the end of the 2024 construction season, the RMAP team (BSB, AR, Agencies) will meet to discuss the implementation of the RAWP, discuss what worked well and what improvements can be made to the RAWP implementation. It will be an opportunity for all parties to provide feedback at the culmination of the construction season. Agency comments on the RAWP will be provided at that time, which should be incorporated into the RAWP for the following construction season.

Health and Safety

As mentioned in EPA's comments on the draft version of the RAWP, health and safety should be highlighted with the construction contractor and prioritized at residential project sites. All people that support the implementation of remedial actions at residential properties should understand the health and safety requirements, be 40-Hour HAZWOPER trained, and understand the work requirements that promote health and safety (i.e., traffic control, covering loads, PPE requirements).

2024 Construction Kick Off Meeting

Thank you for scheduling the construction kick off meeting on June 12, 2024. Topics that should be covered in the agenda at the meeting include:

- Review of the RAWP elements
- Expectations of communication in the field
- Health and Safety requirements, including but not limited to:
 - 40 Hour HAZWOPER and personal protective equipment requirements
 - residential safety
 - traffic control
- Compliance with work requirements, including but not limited to: covering loads, installing separation fabric, decontamination of haul trucks, excavators, and hand tools.
- Documentation requirements - by oversight personnel and construction contractor
 - Process to submit record drawings
- Oversight of remediation contractors, including:
 - Conducting pre-construction walk-throughs
 - Excavation inspection and documented check-off: description of the required inspection and procedures for determining compliance with RAWP and ISWP.
 - Design changes require documentation and Agency approval
 - Competed backfill inspection
 - Description of the process by which the constructor submits invoices for completed work and verifies that the work is satisfactory; retention provisions; etc.
 - Development of punch-list items
 - Punch-list completion inspection and final documented check-off
 - Provisions for work acceptance and final payment; conditions to obtain acceptance during the prefinal and final inspections; and warranty of the work.

Eric Hassler and Brandon Warner
June 7, 2024
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If you have any questions or concerns, please call me at (406) 457-5021. I look forward to attending the 2024 Construction Kick Off Meeting on June 12, 2024.

Sincerely,

Molly Roby
Remedial Project Manager

ENCLOSURES

1. Signatures on the EPA and DEQ signature pages for the yard submittals

cc: (email only)

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