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Summer 8-27-2024

Re: Conditional approval letter for the Butte Priority Soils Operable Unit (BPSOU) Butte Reduction Works (BRW) Phase III Quality Assurance Project Plan (QAPP) Request of Change BRW-2024-01 (dated August 9, 2024).

Emma Rott

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REGION 8

DENVER, CO 80202

August 27, 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) Butte Reduction Works (BRW) Phase III Quality Assurance Project Plan (QAPP) Request of Change BRW-2024-01 (dated August 9, 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 conditional approval of the *Butte Priority Soils Operable Unit (BPSOU) Butte Reduction Works (BRW) Phase III Quality Assurance Project Plan (QAPP) Request of Change BRW-2024-01 (dated August 9, 2024)*. Please address and consider the following comments and resubmit for approval by EPA and DEQ.

Comments:

1. During the review of this RFC, it was noted that the BRW Phase III QAPP was last approved in 2022. After approval of this RFC, the work associated with this RFC can proceed, however please provide the annual update to the Phase III QAPP thirty calendar days after the receipt of this letter for review and approval by EPA.
2. Please define all markings on Figure 1 in the legend (i.e., dark grey, light grey, black, light blue, and dark blue areas. In the text of the RFC, please provide a brief explanation of the proposed features (e.g., playground feature, pump track, bridge, etc.) for which the geotechnical work is being conducted.
3. Please confirm if sufficient data from previous studies have been provided for the parking lot feature, staircase, etc.
4. Consider adding language about the target depths for geotechnical boreholes (defined in Table 1) as it relates to the BRW excavation plan and proposed excavation depth(s).

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

Sincerely,

Emma Rott, P.E.
Remedial Project Manager

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

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