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Re: Comment letter for the Butte Priority Soils Operable Unit (BPSOU) Silver Bow Creek Conservation Area (SBCCA) Technical Specifications 60 Percent Submittal (dated April 24, 2024)

Emma Rott

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REGION 8

DENVER, CO 80202

August 12, 2024

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

Re: Comment letter for the Butte Priority Soils Operable Unit (BPSOU) Silver Bow Creek Conservation Area (SBCCA) Technical Specifications 60 Percent Submittal (dated April 24, 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 comments on the *Butte Priority Soils Operable Unit (BPSOU) Silver Bow Creek Conservation Area (SBCCA) Technical Specifications 60 Percent Submittal (dated April 24, 2024)*. Please address the following comments and resubmit with the 95 percent submittal.

Specific Comments:

1. Section 01 33 00 Submittal Procedures; 1.01 Scope of Work: Agency reviewed pre-construction submittals only list Health and Safety Plan with Emergency Response Plan. The language in this section should be consistent with the language that was provided in the final approved Grove Gulch remedial design. That language specifies that a preliminary list of construction submittals, identifying submittals for agency review and approval, will be provided to the agencies.
2. Section 43 21 40 – Submersible Solids Handling Pumps – Part 3 Execution – 3.03 B 3a: Please clarify Process Water vs Clean Water as used in this context.
3. Division 27 – Communications; Division 26 – Electrical; and Section 33 71 02 Underground Electrical Distribution: These sections are called out as (to be developed) in the TOC. Please confirm the schedule of completion of these sections for review.

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

Irene Montero / Atlantic Richfield

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