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Final 2024 Residential Metals Abatement Program (RMAP) Park Soil Sampling Field Sampling Plan (FSP) Submittal #14 [Silver Bow Homes Park, Butte KOA, Fairmont RV Park, and CCCS Gymnasium]

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Atlantic Richfield Company

Mike Mc Anulty Liability Manager

July 1, 2024

317 Anaconda Road Butte MT 59701 Direct (406) 782-9964 Fax (406) 782-9980

Molly Roby	Erin Agee
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Daryl Reed	Jonathan Morgan, Esq.
DEQ Project Officer	DEQ, Legal Counsel
P.O. Box 200901	P.O. Box 200901

Helena, Montana 59620-0901

RE: Final 2024 Residential Metals Abatement Program (RMAP) Park Soil Sampling Field Sampling Plan (FSP) Submittal #14 [Silver Bow Homes Park, Butte KOA, Fairmont RV Park, and CCCS Gymnasium]

Agency Representatives:

Helena, Montana 59620-0901

I am writing to you on behalf of Atlantic Richfield Company and Butte-Silver Bow to submit the *Final 2024 Residential Metals Abatement Program (RMAP) Park Soil Sampling Field Sampling Plan (FSP) Submittal* #14 [Silver Bow Homes Park, Butte KOA, Fairmont RV Park, and CCCS Gymnasium]. This submittal is in response to the Agencies' June 28, 2024, approval of the draft final submittal. The report and appendices may be downloaded at the following link:

Final 2024 RMAP Park Soil Sampling FSP Submittal #14.

If you have any questions or comments, please call me at (907) 355-3914 or Eric Hassler at (406) 497-5042.

Sincerely,

Mike Mcanulty

Mike Mc Anulty Liability Manager Remediation Management Services Company An affiliate of **Atlantic Richfield Company**

Eric Hassler, Director Department of Reclamation and Environmental Services Butte-Silver Bow





Atlantic Richfield Company

Mike Mc Anulty

Liability Manager

317 Anaconda Road Butte MT 59701 Direct (406) 782-9964 Fax (406) 782-9980

Cc: Chris Greco / Atlantic Richfield - email Josh Bryson / Atlantic Richfield – email Tim Hilmo / Atlantic Richfield – email Loren Burmeister / Atlantic Richfield – email Dave Griffis / Atlantic Richfield – email Jean Martin / Atlantic Richfield – email Irene Montero / Atlantic Richfield – email David A. Gratson / Environmental Standards - email Mave Gasaway / DGS – email Adam Cohen / DGS – email Lucas Satterlee / DGS – email Brianne McClafferty / Holland & Hart – email Carolina Balliew / EPA – email Emma Rott / EPA – email David Shanight / CDM - email Curt Coover / CDM - email James Freeman / DOJ - email Amy Steinmetz / DEQ - email Logan Dudding / DEQ – email Katie Garcin-Forba / DEQ – email Doug Martin / NRDP – email Jim Ford / NRDP - email Pat Cunneen / NRDP - email Katherine Hausrath / NRDP - email Ted Duaime / MBMG - email Gary Icopini / MBMG - email Becky Summerville / MR - email John DeJong / UP - email Robert Bylsma / UP - email John Gilmour / Kelley Drye - email Leo Berry / BNSF - email Robert Lowry / BNSF - email Brooke Kuhl / BNSF – email Lauren Knickrehm / BNSF - email Doug Brannan / Kennedy Jenks - email Matthew Mavrinac / RARUS - email Harrison Roughton / RARUS - email Brad Gordon / RARUS - email Mark Neary / BSB - email Brandon Warner / BSB – email Abigail Peltomaa / BSB - email Aaron Rains / BSB – email



Atlantic Richfield Company

Mike Mc Anulty

Liability Manager

Sean Peterson/BSB – email Josh Vincent / WET – email Kevin Bethke / W&C - email Scott Bradshaw / W&C - email Emily Evans / W&C – email Paddy Stoy / W&C – email Joe McElroy / Pioneer – email Mark Meyer / Pioneer – email Pat Sampson / Pioneer – email Troy Colvin / Pioneer – email Karen Helfrich / Pioneer – email Brad Hollamon / Pioneer - email Randa Colling / Pioneer – email Rich Keeland / Aspect – email Andy White / Aspect - email Ian Magruder/ CTEC – email CTEC of Butte - email Scott Juskiewicz / Montana Tech – email

File: RMO – upload BPSOU SharePoint - upload 317 Anaconda Road Butte MT 59701 Direct (406) 782-9964 Fax (406) 782-9980



SILVER BOW CREEK/BUTTE AREA NPL SITE BUTTE PRIORITY SOILS OPERABLE UNIT

Final

2024 Residential Metals Abatement Program (RMAP) Park Soil Sampling Field Sampling Plan (FSP) Submittal #14 [Silver Bow Homes Park, Butte KOA, Fairmont RV Park, and CCCS Gymnasium]

Butte-Silver Bow County

and

Atlantic Richfield Company

July 1, 2024



June 28, 2024

Mr. Mike McAnulty Liability Manager Atlantic Richfield Company 317 Anaconda Road Butte, Montana 59701

> Re: Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final 2024 Residential Metals Abatement Program Park Soil Sampling Field Sampling Plan Submittal #14 [Silver Bow Homes Park, Butte KOA, Fairmont RV Park, and CCCS Gymnasium] (dated May 10, 2024)

Dear Mr. McAnulty:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the *Draft Final 2024 Residential Metals Abatement Program Park Soil Sampling Field Sampling Plan Submittal #14 [Silver Bow Homes Park, Butte KOA, Fairmont RV Park, and CCCS Gymnasium]* (dated May 10, 2024). Please distribute this field sampling plan submittal as final.

If you have any questions or concerns, please call me at (406) 457-5021.

Sincerely,

Digitally signed by MOLLY ROBY Date: 2024.06.28 15:39:30 -06'00'

Molly Roby Remedial Project Manager

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 Mike McAnulty June 28, 2024 Page 2 of 2

> 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

SILVER BOW CREEK/BUTTE AREA NPL SITE BUTTE PRIORITY SOILS OPERABLE UNIT

Final

2024 Residential Metals Abatement Program (RMAP) Park Soil Sampling Field Sampling Plan (FSP) Submittal #14 [Silver Bow Homes Park, Butte KOA, Fairmont RV Park, and CCCS Gymnasium]

Prepared for:

Butte-Silver Bow County Superfund Division 155 W. Granite Butte, Montana 59701

and

Atlantic Richfield Company 317 Anaconda Road Butte, Montana 59701

Prepared by:

Pioneer Technical Services, Inc. 1101 S. Montana Street Butte, Montana 59701

July 1, 2024

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LIST OF ATTACHMENTS

Attachment A 2024 RMAP QAPP (Non-Residential Parcels)

Modification	Author	Version	Description	Date		
0	Jesse Schwarzrock	Draft Final	Issued for Agency Review	May 10, 2024		
1	Jesse Schwarzrock	Final	Issued for Agency Records	July 1, 2024		

DOCUMENT MODIFICATION SUMMARY

1.0 INTRODUCTION

This Field Sampling Plan (FSP) was developed to outline a portion of the 2024 Residential Metals Abatement Program (RMAP) park/play area soil sampling plan for parks in the Butte, Montana, area. Soil sampling procedures, data quality objectives, standard operating procedures, sampling analytical methods, sampling equipment, quality control (QC) samples, and data validation and assessment will be conducted according to the 2024 Residential Metals Abatement Program (RMAP) Quality Assurance Project Plan (QAPP) (Non-Residential Parcels)¹ (referred to herein as QAPP), provided in Attachment A.

2.0 PARK SOIL SAMPLING SCOPE

The scope of work covered by this FSP includes the following parks:

- Silver Bow Homes Park.
- Butte KOA.
- Fairmont RV Park.
- CCCS Gymnasium.

The attached figure set depicts the areas to be sampled and shows the individual sampling polygons and associated areas. Table 1 lists the park properties (along with resident identifications, geocodes, and ownership information), and Table 2 shows the anticipated sampling quantities for the parks covered by this FSP.

3.0 PARK SOIL SAMPLING SCHEDULE

Sampling schedules will be finalized through ongoing conversations with appropriate representatives. Sampling efforts will begin in the summer of 2024. The appropriate utility locating service (i.e., One Call Utility Locate Services) will be contacted and informed of sampling activities 48 hours prior to commencement.

4.0 FIELD SAMPLING PLAN

4.1 Soil Sampling Procedures

Soil sampling procedures will be completed as stated in Section 3.1 (for composite sampling) of the QAPP (Attachment A).

4.1.1 Soil Sampling Density, Location, and Compositing

Soil sampling density, location, and compositing decisions will be made according to the information provided in Section 3.1.1 (for composite sampling) of the QAPP (Attachment A).

¹ The development of this document is currently ongoing with an anticipated submittal in spring 2024. The QAPP will be included as Attachment A of this document upon Agency approval.

4.1.2 Soil Sampling Depths

Sampling depths will be selected as stated in Section 3.1.2 (for composite sampling) of the QAPP (Attachment A).

4.1.3 Equipment Decontamination

Reusable sampling equipment will be decontaminated as described in Section 3.1.4 (for composite sampling) of the QAPP (Attachment A).

4.2 Sampling Polygon Delineation

The reasoning behind the delineation of sampling polygons is documented below. This information was collected from Butte-Silver Bow representatives and site visits. Field sampling crews will have the flexibility to make minor modifications to these polygons in the field as needed (e.g., if crews discover a garden area that was not previously delineated, they will have the ability to add it to the plan and sample accordingly), in consultation with the Agencies' field representative.

4.2.1 Silver Bow Homes Park

This site (0.27 acres) is a communal gathering area that serves the Silver Bow Homes complex in uptown Butte just east of Butte High School. The park area is located at the intersection of Ohio and New streets, just east of the Silver Bow Homes complex. Most of the park was previously sampled during the 2023 event (see Figure 1). During a meeting with the property manager in 2024 to discuss the 2023 remedial action work plan, the property manager indicated there is an additional area east of the areas sampled in 2023 that is used by Silver Bow Homes tenants and requested the area be sampled. This FSP details the sampling of this additional area.

- Land Use Category #1 (playgrounds) This land use category is not applicable at this site.
- Land Use Category #2 (high access areas/barren sports areas) This land use category is not applicable at this site.
- Land Use Category #3 (grass areas/turf covered sports fields) This land use category is not applicable at this site.
- Land Use Category #4 (low access areas/low maintenance areas) Silver Bow Homes has an unmaintained area adjacent to the maintained area that was sampled in 2023. Due to the infrequent use and unmaintained nature, this area has been designated as a low access sampling area that will be sampled per the composite methodology detailed in Section 3.1 of the QAPP (Attachment A).
- Land Use Category #5 (garden areas) This land use category is not applicable at this site.
- Opportunistic Samples This land use category is not currently applicable at this site. The field team will have the ability to add opportunistic samples accordingly, in consultation with the Agencies' field representative.

4.2.2 Butte KOA

This site (0.06 acres) is a communal playground area that serves the temporary campers within the KOA campground. The park area is located in the center of the KOA at the intersection of Kaw Avenue and Geroge Street (Figure 2 and Figure 3).

- Land Use Category #1 (playgrounds) There is one area that falls under this category. This area is designated as a playground area that will be sampled per the composite sampling method logic detailed in Section 3.1 of the QAPP (Attachment A).
- Land Use Category #2 (high access areas/barren sports areas) This land use category is not applicable at this site.
- Land Use Category #3 (grass areas/turf covered sports fields) This land use category is not applicable at this site.
- Land Use Category #4 (low access areas/low maintenance areas) This land use category is not applicable at this site.
- Land Use Category #5 (garden areas) This land use category is not applicable at this site.
- Opportunistic Samples This land use category is not currently applicable at this site. The field team will have the ability to add opportunistic samples accordingly, in consultation with the Agencies' field representative.

4.2.3 Fairmont RV Park

This site (0.36 acres) is a communal playground area that serves the temporary campers within the Fairmont RV Park campground. The park area is located in the center of the RV Park at the intersection of Fairmont Road and German Gulch Road (Figure 4 and Figure 5).

- Land Use Category #1 (playgrounds) There are two areas that fall under this category. These areas are designated as playground areas that will be sampled per the composite sampling method logic detailed in Section 3.1 of the QAPP (Attachment A).
- Land Use Category #2 (high access areas/barren sports areas) This land use category is not applicable at this site.
- Land Use Category #3 (grass areas/turf covered sports fields) There is one distinct established/maintained lawn area adjacent to the playground areas within the Fairmont RV Park site. Due to the total area involved, it has been split into two polygons. The areas are designated as accessible areas that will be sampled per the composite sampling method logic detailed in Section 3.1 of the QAPP (Attachment A).
- Land Use Category #4 (low access areas/low maintenance areas) This land use category is not applicable at this site.
- Land Use Category #5 (garden areas) This land use category is not applicable at this site.

• Opportunistic Samples – This land use category is not currently applicable at this site. The field team will have the ability to add opportunistic samples accordingly, in consultation with the Agencies' field representative.

4.2.4 CCCS Gymnasium

This site (0.7 acres) is a privately owned gymnasium that is utilized by both owners and the public for special events. The sampling area is located along West Broadway Street and the alley way joining North Henry Avenue and North Excelsior Street. (Figure 6).

- Land Use Category #1 (playgrounds) This land use category is not applicable at this site.
- Land Use Category #2 (high access areas/barren sports areas) There is one area that falls under this category. The area is designated as a high access area that will be sampled per the composite sampling method logic detailed in Section 3.1 of the QAPP (Attachment A).
- Land Use Category #3 (grass areas/turf covered sports fields) There is one distinct established/maintained boulevard area along West Broadway Street. The area is designated as an accessible area that will be sampled per the composite sampling method logic detailed in Section 3.1 of the QAPP (Attachment A).
- Land Use Category #4 (low access areas/low maintenance areas) This land use category is not applicable at this site.
- Land Use Category #5 (garden areas) This land use category is not applicable at this site.
- Opportunistic Samples This land use category is not currently applicable at this site. The field team will have the ability to add opportunistic samples accordingly, in consultation with the Agencies' field representative.

4.3 Deviations

This section addresses any deviations to the Agencies-approved QAPP (Attachment A) pertaining to the 2024 Butte Priority Soils Operable Unit RMAP park soil sampling in or near Butte. Deviations include the following:

- There are no currently known deviations.
- Any future deviations will be discussed with the Agencies' field representative, documented in the field, and addressed in future Data Summary Reports.

5.0 LABORATORY METHODS

5.1 Soil Metals Analyses Methods

Soil metals analyses will be conducted as stated in Section 3.6 of the QAPP (Attachment A).

6.0 QUALITY CONTROL

6.1 Field Quality Control Samples

Field QC will be conducted as stated in Sections 3.7 and 3.7.1 of the QAPP (Attachment A).

FIGURES

- Figure 1. Silver Bow Homes Park Field Sampling Plan #2
- Figure 2. Butte KOA Park Field Sampling Plan (1/2)
- Figure 3. Butte KOA Park Field Sampling Plan (2/2)
- Figure 4. Fairmont RV Park Field Sampling Plan (1/2)
- Figure 5. Fairmont RV Park Field Sampling Plan (1/2)
- Figure 6. CCCS Gymnasium Field Sampling Plan



- LEGEND LAND USE #1 COMPOSITE SAMPLING (PLAYGROUND AREAS) LAND USE #2 COMPOSITE SAMPLING (HIGHLY ACCESSIBLE AREAS/BARREN SPORTS FIELDS) LAND USE #3 COMPOSITE SAMPLING (MAINTAINED GRASS AREAS)
- LAND USE #3 ISM SAMPLING (MAINTAINED GRASS AREAS) LAND USE #4 COMPOSITE SAMPLING (LOW ACCESS AREAS) LAND USE #4 ISM SAMPLING (LOW ACCESS AREAS) LAND USE #5 COMPOSITE SAMPLING (GARDEN AREAS) OPPORTUNISTIC COMPOSITE SAMPLING NON-SAMPLING AREAS
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- SAMPLING PERIMETER BOUNDARY
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SILVER BOW HOMES PARK FIELD SAMPLING PLAN Date: 3/14/2024 #2

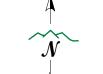


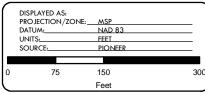
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SAMPLING PERIMETER BOUNDARY





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BUTTE KOA FIELD SAMPLING PLAN

DATE: 3/18/2024



- LEGEND LAND USE #1 COMPOSITE SAMPLING (PLAYGROUND AREAS) LAND USE #2 COMPOSITE SAMPLING (HIGHLY ACCESSIBLE AREAS/BARREN SPORTS FIELDS) LAND USE #3 COMPOSITE SAMPLING (MAINTAINED GRASS AREAS)
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BUTTE KOA FIELD SAMPLING PLAN



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FAIRMONT RV PARK FIELD SAMPLING PLAN

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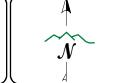


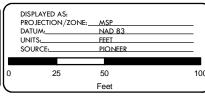
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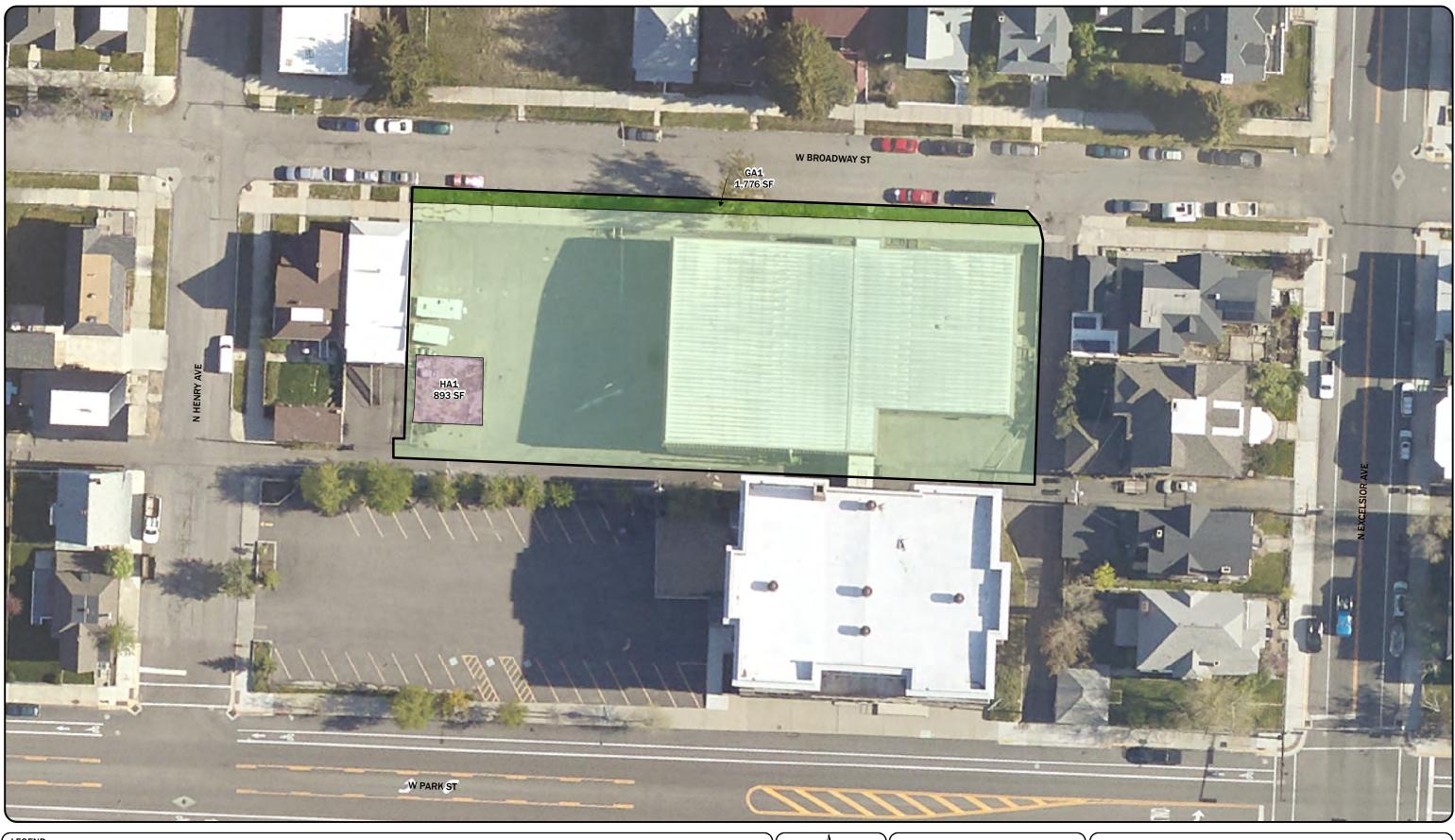




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FAIRMONT RV PARK FIELD SAMPLING PLAN



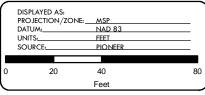
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CCCS GYMNASIUM FIELD SAMPLING PLAN

DATE: 4/10/2024

TABLES

Table 1. 2024 RMAP Park Soil Sampling Property List (FSP Submittal #14)Table 2. 2024 RMAP Park Soil Sampling Quantity Summary (FSP Submittal #14)

TABLE 1: 2024 RMAP PARK SOIL SAMPLING PROPERTY LIST (FSP Submittal #14)

Count	Res-ID	Geocode	Name	Owner
1	P-0054	01119713470010000	Silver Bow Homes Park	Butte Affordable Housing INC
2	P-0062	01119724415250000	Butte KOA	Maric Properties LLC
3	P-0063	01119402101130000	Fairmont RV Park	Bashaw LLC
4	6 0020	01119714112230000		Community Counceling Correctional
4	S-0029	01119714112230000	CCCS Gymnasium	Service Inc

TABLE 2: 2024 RMAP PARK SOIL SAMPLING QUANTITY SUMMARY (FSP Submittal #14)

									Land Use #1	Land Use #2	Land Use #3	Land Use #4	Land Use #5	Opportunistic	# of Subsample								
				Total Area		Type Sampling		Non Sampling	Playgrounds	High Access	Grass Areas	Low Access	Gardens	Sample Areas	Locations/	# of				2-12"			
Figure #	Res-ID	School/Park	Owner	(SF)	Polygon ID	(Composite or ISM)	Polygon Areas (SF)	Areas (SF)	(SF)	(SF)	(SF)	(SF)	(SF)	(SF)	Increments	Samples	0-2"	2-6"	6-12"	(ISM Only)	12-18"	18-24"	Notes
1	P-0054	Silver Bow Homes Park	BSB	54,785	LA1	Composite	11,642					11,642			6	3	As/Pb/Hg	As/Pb/Hg	As/Pb/Hg	-	-	-	-
T	F-0054	Silver bow nomes Park	858	54,785	Non Sampling Areas	-	43,143	43,143							-	-	-	-	-	-	-	-	-
2	P-0062	Butte KOA	Maric Properties LLC	457,491	PA1	Composite	2,547		2,547						5	3	As/Pb/Hg	As/Pb/Hg	As/Pb/Hg	-	-	-	-
2	F-0002	Butte KOA	Marie Properties Lee	437,431	Non Sampling Areas	-	454,944	454,944							-	-	-	-	-	-	-	-	-
					PA1	Composite	1,321		1,321						3	3	As/Pb/Hg	As/Pb/Hg	As/Pb/Hg	-	-	-	-
					PA2	Composite	2,853		2,853						5	3	As/Pb/Hg	As/Pb/Hg	As/Pb/Hg	-	-	-	-
3	P-0063	Fairmont RV Park	Bashaw LLC	683,250	GA1	Composite	5,804				5,804				3	3	As/Pb/Hg	As/Pb/Hg	As/Pb/Hg	-	-	-	-
					GA2	Composite	5,821				5,821				3	3	As/Pb/Hg	As/Pb/Hg	As/Pb/Hg	-	-	-	-
					Non Sampling Areas	-	667,451	667,451							-	-	-	-	-	-	-	-	-
					GA1	Composite	1,776				1,776				3	3	As/Pb/Hg	As/Pb/Hg	As/Pb/Hg	-	-	-	-
4	S-0029	CCCS Gymnasium	Community Counceling Correctional Service Inc	33,444	HA1	Composite	893			893					3	3	As/Pb/Hg	As/Pb/Hg	As/Pb/Hg	-	-	-	-
					Non Sampling Areas	-	30,775	30,775							-	-	-	-	-	-	-	-	-
		•	Totals (SF):	1,228,970	-	-	1,228,970	1,196,313	6,721	893	13,401	11,642	0	0	31	24			•	•	-	-	•
			Totals (AC):	28.21	-	-	28.21	27.46	0.15	0.02	0.31	0.27	0.00	0.00			•						

Attachment A 2024 RMAP QAPP (Non-Residential Parcels)

2024 BPSOU RMAP Park Soil Sampling Field Sampling Plan Submittal #14 The 2024 Non-Residential Parcels QAPP is currently being developed. The final approved version of the QAPP will be inserted into this FSP once both documents have obtained Agency approval.