Fall 10-4-2024

Butte Priority Soils Operable Unit (BPSOU) Revised Draft Final Insufficiently Reclaimed Sites Field Sampling Plan (FSP) BRES No. 181 – Mountain Con-3 Dump and Responses to Agency Comments

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October 4, 2024

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RE: Butte Priority Soils Operable Unit (BPSOU) Revised Draft Final Insufficiently Reclaimed Sites Field Sampling Plan (FSP) BRES No. 181 – Mountain Con-3 Dump and Responses to Agency Comments

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company (Atlantic Richfield) to submit the Revised Draft Final Insufficiently Reclaimed Sites BRES No. 181 – Mountain Con-3 Dump Field Sampling Plan (FSP).

The FSP listed above has been revised to incorporate Atlantic Richfield's response to Agency comments and is provided for Agency review and approval. Atlantic Richfield provides responses to site-specific Agency comments below.

Site-Specific Agency Comments:

1. ***Agency Comment:*** *Cover Letter. In the first paragraph, please revise "BRES" to be defined as the "Butte Reclamation Evaluation System" not "Butte Remediation Evaluation System" as currently written.*

Atlantic Richfield Response: The edit has been included in the FSP.

2. *Section 1.0. Background. In the last paragraph, it is noted that the site was "…reclaimed by BRES in 1998." However, BRES did not exist in 1998 and is an evaluation system, not a reclamation program. Please research the program (e.g., TCRA, NTCRA, UAO, or other mechanism) under which the Mountain Con was reclaimed and provide that information here.*

Atlantic Richfield Response: Reference to BRES was removed from the referenced sentence. The appropriate legal order under which the area was reclaimed has been included.

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3. ***Agency comment:*** *Section 2.0, Previous Findings. In the last paragraph, please add references for the 2017 and 2021 BRES evaluation summary reports. Later in the paragraph, it is stated that " barren areas are present throughout the site" although only one barren area is depicted on Figure 1. Please review the BRES site evaluations and consider if additional barren areas need to be shown on Figure 1.*

Atlantic Richfield Response: The barren area shown on Figure 1 is consistent with Geographic Information System (GIS) data provided by Butte-Silver Bow (BSB). The text was revised to reflect Figure 1.

4. ***Agency comment:*** *Figure 1. EPA anticipates that it will approve the boundary adjustment for the Mountain Con-3 Dump (BRES No. 181) to the Mountain Con Mine Dump South (BRES No. 348). Please add samples to the extended area to the east and the south shown on Figure 1 and revise that sample numbers within the FSP accordingly.*

Atlantic Richfield Response: The FSP has been revised to include additional samples as requested.

5. ***Agency comment:*** *Attachment 1. Please update the link to reference the 2024 IR QAPP.*

Atlantic Richfield Response: The link has been updated.

6. ***Agency comment:*** *Attachment 3. In the fifth observation point, it would be beneficial to observe and comment on the integrity of the stormwater features on the site. Please revise to include more detail: Are liners showing? Has the surface rock moved or broken-down? Are waste or weeds present?*

Atlantic Richfield Response: Edits have been considered.

End of Comments

If you have any questions or comments, please call me at (907) 355-3914.

Sincerely,

Mike McAnulty

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

Atlantic Richfield Company

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Harrison Roughton / RARUS
Brad Gordon / RARUS
Mark Neary / BSB
Eric Hassler / BSB
Brandon Warner / BSB
Abigail Peltomaa / BSB
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Paddy Stoy / W&C
Joe McElroy / Pioneer
Mark Meyer / Pioneer
Pat Sampson / Pioneer
Karen Helfrich / Pioneer
Randa Colling/ Pioneer
Rich Keeland / Aspect
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File: RMO – upload
BPSOU SharePoint – upload

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Re: Butte Priority Soils Operable Unit (BPSOU) Revised Draft Final Insufficiently Reclaimed Sites Field Sampling Plan (FSP) BRES No. 181 – Mountain Con-3 Dump.

Dear Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company (Atlantic Richfield) to submit the Butte Priority Soils Operable Unit (BPSOU) Revised Draft Final Insufficiently Reclaimed (IR) Sites – Field Sampling and Investigation Plan (FSP) Butte Reclamation Evaluation System (BRES) No. 181 – Mountain Con-3 Dump. Revisions to this FSP address Agency comments received September 9, 2024. A link to the Agency comment letter is included in Attachment 1.

As described in Appendix D, Attachment C, Section 7.0 of 2020 BPSOU Consent Decree (BPSOU CD) (available at BPSOU CD), sites within the BPSOU reclaimed prior to the establishment of the Butte Hill Revegetation Specifications (BHRS), Appendix A of the BPSOU CD, are considered to be listed as IR Solid Media Sites. Since additional reclamation work may be required to bring the sites into compliance with the BHRS, the sites will be evaluated to assess past actions and to identify any site specific conditions that fail to meet the BHRS.

The site evaluation will include a review of available BRES field evaluations and site construction completion reports along with on-site evaluation and sampling within the existing site boundary performed according to the Atlantic Richfield *2024 Final Insufficiently Reclaimed Sites Quality Assurance Project Plan (QAPP)* (referred to herein as IR Sites QAPP). A link to the IR Sites QAPP is provided in Attachment 1.

The sampling boundary and proposed soil sampling stations and deficiencies identified during previous BRES evaluations are shown on Figure 1.

Field sampling within the existing boundary will be performed to determine whether contaminants are present, whether the existing cap and supported growth media are sufficiently protective of human health and the environment, how observed site conditions compare to the BHRS, and whether there are previously unidentified conditions contributing to site deficiencies.

The site evaluation is anticipated to be completed in 2024. A site summary and declaration will be prepared to present all available site data and describe which, if any, BHRS criteria are not met. The site will be evaluated following the recreational land use soil action levels for human health, soil screening criteria, and cover soil chemical suitability criteria provided in the IR Sites QAPP. Samples outside of the existing site boundary will be evaluated following the soil action levels for human health and soil screening criteria for waste identification in the Atlantic Richfield *2024 Unreclaimed* (UR) *Sites QAPP* (referred to herein as UR Sites QAPP). A link to the UR Sites QAPP is provided in Attachment 1.

If further remediation is recommended after the evaluation and sampling is complete, a remedial action work plan describing actions that will be implemented at the site will be provided for Agency review and approval.

The crosswalk list provided below references where pertinent field sample collection and documentation elements are discussed.

	Reference Location		
Element	**FSP**	**IR Sites QAPP**	**UR Sites QAPP**
Title Page and Approval Authority	Approval Letter	Page i	Page i
Site Introduction and Appropriate Agency-Approved QAPP Reference	Page 1, Page 2		
Data Quality Objectives		Section 2.5	Section 2.5
Site and Sampling Objectives	Figure 1	Section 3.0	Section 3.0
Proposed Schedule for Site Field Work	Page 2		
Site Figure	Figure 1		
Sampling Procedures and Standard Operating Procedures (SOPs)		Section 3.2 Appendix B	Section 3.2 Appendix B
Sample Analysis Methods		Section 3.3	Section 3.3

1.0 Background

The Mountain Con is a site consisting of approximately 28.5 acres comprised of the Mountain Con Mine Yard and several previously identified and remediated mine dumps or waste sources. The Mountain Consolidated Mine operated from 1886 to 1974 and was one of the biggest copper producers in the industry. Multiple buildings and mine related structures were previously located

within the Mountain Con site. The 1916 Sanborn Fire Insurance Maps[1,2] display the location of these structures. The steel headframe and hoist house are the only remaining structures today. The Mountain Consolidated Mine was later shortened to the Mountain Con.

An adjusted boundary was proposed for BRES No. 181, Mountain Con-3 Dump, to accurately represent the reclaimed area and align site boundaries with completed site remediation efforts. As described in the BPSOU *Source Areas and Reclaimed Boundary Adjustments*[3], this was completed by using a high-resolution aerial image and visual comparisons to identify the areas of apparent remediation. Note that the Agencies have not approved the proposed adjusted boundary, which would divide the Mountain Con into six individual sites for future evaluation. The boundaries for these six sites are based upon as-built drawings and the unique slope, aspect, and vegetation conditions within the Mountain Con area. The sites are Mountain Con Hoist, Mountain Con Slope, Mountain Con Mine Yard, Mountain Con Dump North, Mountain Con Dump South, and Foreman's Park.

The Mountain Con-3 Dump (BRES No. 181) is approximately 3.7 acres located south of the Mountain Con headframe and adjacent to the Little Mina (BRES No. 59) site. The site is positioned in the Mountain Con Dump South area, which is south of the riprapped former rail grade, and north and east of the Mountain Con Stormwater Channel. It is comprised of the portion of the Mountain Con-2 Dump west of the Mountain Con Stormwater Channel and the Mountain Con-3 site. The Mountain Con Stormwater Channel was rehabilitated in 1998 as described in the Buffalo Gulch/Upper Kelley Mine Yard Design Report[4] under the direction of the CERCLA-VIII-95-58 Storm Water Time Critical Removal Action (TCRA). The adjacent slope was capped and revegetated at this time.

The *BPSOU 2002 Maintenance Plan for Previously Reclaimed Sites*[5] states reclamation was completed in 1998 for the triangular area northeast of the Mountain Con riprap ditch, known as BRES No. 181. Approximately one-third of this area on the east side was covered with 2 inches of lime rock. The entire area was covered with 18 inches of landfill soil. Dillon manure was incorporated at 30 dry tons per acre. Fertilizer was applied at 60 pounds nitrogen, 80 pounds phosphorus pentoxide, and 150 pounds potassium oxide per acre. Vesicular arbuscular mycorrhizae (VAM) inoculation was applied at 83 pounds per acre to approximately 85% of the slope. Mulch and perennial seeding was completed on April 27, 1999.

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[1] Library of Congress, 2024. Image 92 of Sanborn Fire Insurance Map from Butte, Silver Bow County, Montana. Accessed February 6, 2024, at Image 92 of Sanborn Fire Insurance Map from Butte, Silver Bow County, Montana. | Library of Congress (loc.gov).

[2] Library of Congress, 2024. Image 93 of Sanborn Fire Insurance Map from Butte, Silver Bow County, Montana. Accessed February 6, 2024, at Image 93 of Sanborn Fire Insurance Map from Butte, Silver Bow County, Montana. | Library of Congress (loc.gov).

[3] Atlantic Richfield Company and Butte-Silver Bow, 2022. Draft Final Source Areas and Boundary Adjustments. Prepared by Pioneer Technical Services, Inc. April 4, 2022.

[4] AERL, 1998. Final Design Report: Storm Water Time Critical Removal Action Buffalo Gulch & Upper Kelley Mine Yard. Prepared for ARCO Environmental Remediation, LLC by Thomas, Dean & Hoskins, Inc. October 14, 1998.

[5] Atlantic Richfield Company, 2002. Butte Priority Soils Operable Unit 2002 Maintenance Plan for Previously Reclaimed Sites. September 10, 2002.

The *Granite Mountain Memorial Area (GMMA) Phases I and II Remedial Action Construction Completion Report (CCR)*[6] discusses the additional remediation to the Mountain Con area. However, BRES No. 181 was not included in the reclamation or enhancements due to the site being reclaimed in 1998. This area is listed as previously reclaimed and was preserved to the extent possible during the GMMA work. The CCR details work completed on the maintenance road that is the northern border of BRES. No 181.

2.0 Previous Evaluation Findings

As specified in the BPSOU CD, information collected during previous site investigations has been reviewed and incorporated into the proposed sampling design. Given the date of remediation and BRES evaluations indicating the site is degrading, the site should be investigated to ensure the cap is adequate for operation and maintenance.

The site was evaluated in 2017 and 2021 during the recurring 4-year cycle of field evaluations of previously reclaimed sites within the BPSOU. The results from the BRES field evaluation summary and technical recommendation reports indicate the site is located on a steep south facing slope where erosion issues are problematic; a barren area and multiple vegetative improvement areas are present throughout the site. Most of the site is experiencing erosion due to burrowing rodents, weeds, and plant litter. Plant litter has increased significantly, contributing to pedestalling, flow pattens, and soil movement. Cheatgrass and mustard occur frequently on the site, and spotted knapweed, dalmatian toadflax, baby's breath, salsify, dandelion, and prickly lettuce occur infrequently.

3.0 Previous Sampling Efforts

The BPSOU OneMap database contains the records for previous soil samples collected within the BPSOU. No previous sample stations are located on BRES No. 181 – Mountain Con-3 Dump. The BPSOU soil action levels and screening criteria are listed in Table 1 and Table 2, respectively, in Section 2.5 of the IR Sites QAPP.

4.0 Preliminary Field Visit

A preliminary field visit occurred during the development of this sampling plan to qualify current site conditions and identify focus areas for further investigation. Sampling locations were determined by a preliminary field visit to determine barren (non-vegetative) areas, satellite imagery, and BRES evaluations from Butte-Silver Bow (BSB). A stormwater feature is on the west side of the site capturing runoff. A site evaluation will be conducted immediately prior to field activities to confirm the site sample locations. Photograph 1 through Photograph 3, taken during the field visit, show the site overview. Site boundaries are shown on Figure 1.

[6] Atlantic Richfield Company, 2012. Granite Mountain Memorial Area (GMMA) Phases I and II Remedial Action (RA) Construction Completion Report (CCR). Prepared by Pioneer Technical Services, Inc. for Atlantic Richfield Company. September 10, 2012.

Photograph 1. Overview of BRES No. 181 facing north.

Photograph 2. Overview of channel through the site.

Photograph 3. Overview of maintenance road on the north portion of the site.

The area will be further investigated during site sampling for potential opportunistic sample location(s). Figure 1 illustrates the proposed sample stations for BRES No. 181.

5.0 Site Characterization Plan

Per the IR Sites QAPP, the site will be sampled at two depth intervals [(1) 0 to 6 inches and (2) 6 to 18 inches] to determine the extent of waste present, previous reclamation, and transient material. Opportunistic samples may be obtained in the field at the discretion of field sampling personnel or Agency oversight representative(s). The field team leader will be responsible for determining the appropriate number and depth of samples as dictated by field conditions.

Field and laboratory analytical results will be used to prepare the site declaration and prescribe site remedial improvements.

Existing site grading and drainages will be visually evaluated per the data sheet provided in Attachment 3 to determine stormwater flow patterns and identify if additional stormwater controls will help prevent sediment migration. Contributing sources of stormwater upgradient and adjacent to the site will also be investigated.

At minimum, items identified below, but not specifically detailed in the QAPP, may be visually evaluated to determine adequacy and to identify if additional remedial measures are necessary. Additional items also may be identified during the remedial design process.

- Evaluate relative percent vegetative cover (as needed).
  - Coordinate and confirm plant species with biology/plant ecologist or related subject matter expert (as needed).
- Evaluate the performance of existing stormwater controls to mitigate run-on/runoff.
- Evaluate location and condition of existing stormwater controls.
- Identify potential remedial improvements to mitigate site erosion and vegetative areas to meet the BHRS.
- Identify necessary maintenance for successful long-term operation.
- Evaluate steep slopes for erosion of possible mining waste and potential for regrading.

The final remedial cap configuration (i.e., vegetative or engineered) will be coordinated with the landowner's end usage.

6.0 Sampling Procedure

All soil sampling and characterization activities and procedures will follow the IR Sites QAPP. Samples will be obtained from the sample stations listed below. The IR Sites and UR Sites QAPPs describe the quality assurance/quality control policies and procedures that will be used during sample collection and analyses.

Stations within the existing boundary are listed below and will be sampled under the IR Sites QAPP.

Sample Station	Two Depth Intervals (inches)
IR-181-SS01	(1) 0-6, (2) 6-18
IR-181-SS02	(1) 0-6, (2) 6-18
IR-181-SS03	(1) 0-6, (2) 6-18
IR-181-SS04	(1) 0-6, (2) 6-18
IR-181-SS05	(1) 0-6, (2) 6-18
IR-181-SS06	(1) 0-6, (2) 6-18
IR-181-SS07	(1) 0-6, (2) 6-18
IR-181-SS08	(1) 0-6, (2) 6-18
IR-181-SS09	(1) 0-6, (2) 6-18
IR-181-SS11	(1) 0-6, (2) 6-18
IR-181-SS12	(1) 0-6, (2) 6-18
IR-181-SS13	(1) 0-6, (2) 6-18
IR-181-SS14	(1) 0-6, (2) 6-18
IR-181-SS15	(1) 0-6, (2) 6-18
IR-181-SS16	(1) 0-6, (2) 6-18
IR-181-SS17	(1) 0-6, (2) 6-18
IR-181-SS18	(1) 0-6, (2) 6-18
IR-181-SS19	(1) 0-6, (2) 6-18

Stations outside the existing boundary are listed below and will be sampled under the UR Sites QAPP.

Sample Station	Three Depth Intervals (inches)
IR-181-SS10	(3) 0-2, (4) 2-6, (5) 6-12
IR-181-SS20	(3) 0-2, (4) 2-6, (5) 6-12
IR-181-SS21	(3) 0-2, (4) 2-6, (5) 6-12

7.0 Site Summary Report and Declaration

After the site evaluation and data collection activities are complete, a site evaluation summary report will be prepared and submitted to the Agencies for review and approval. The report will include a summary of all available site sampling data and a site declaration specifying any deficient criteria as specified in the BPSOU CD.

If you have questions or comments, please do not hesitate to call me at (907) 355-3914.

Sincerely,

Mike McAnulty

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

Attachments:

Figures
Attachment 1 – Document Links
Attachment 2 – FSP Submittal List
Attachment 3 – Field Data Sheet

Cc (email only):

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Josh Bryson / Atlantic Richfield
Tim Hilmo / Atlantic Richfield
Loren Burmeister / Atlantic Richfield
Dave Griffis / Atlantic Richfield
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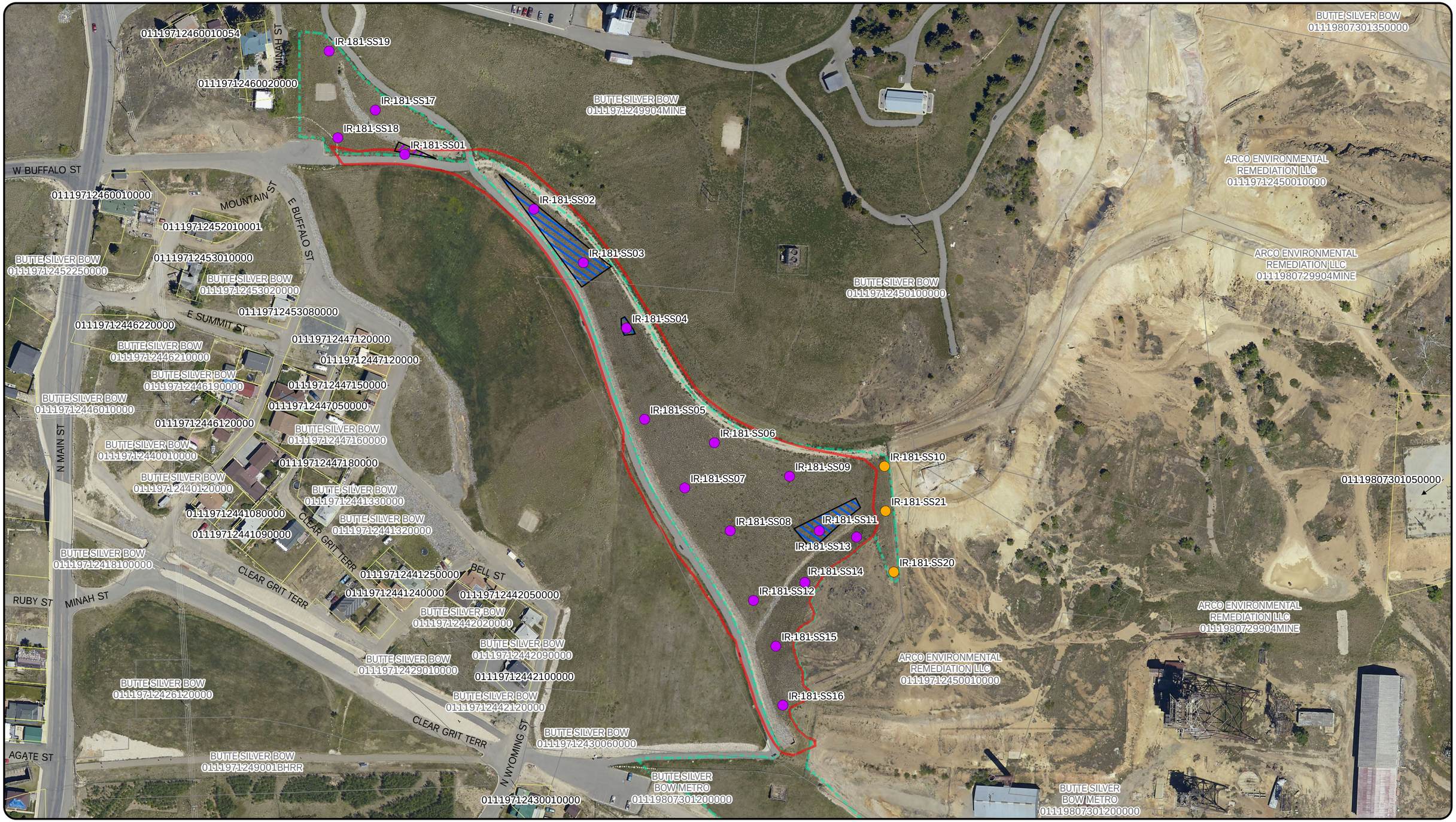
Brad Hollamon / Pioneer
Randa Colling / Pioneer
Rich Keeland / Aspect
Andy White / Aspect
Ian Magruder/ CTEC
CTEC of Butte
Scott Juskiewicz / Montana Tech

File: RMO – upload
BPSOU SharePoint – upload

Figures

Figure 1 -Insufficiently Reclaimed Sites BRES No. 181 – Mountain Con-3 Dump Proposed Sample Stations



LEGEND

- SAMPLE UNDER IR QAPP
- SAMPLE UNDER UR QAPP
- PROPERTY OWNERSHIP
- ACCESS PROPERTY OWNERSHIP
- BRES EVALUATION VEGETATIVE IMPROVEMENT
- BRES EVALUATION BARREN AREA
- BRES BOUNDARY (ORIGINAL)
- BRES BOUNDARY (PROPOSED ADJUSTMENT)

THE PARCEL BOUNDARIES SHOWN ARE FOR REFERENCE USE ONLY AND DO NOT REPRESENT A LEGAL SURVEY

N

DISPLAYED AS:
PROJECTION/ZONE: MSP
DATUM: NAD 83
UNITS: INT'L FT
SOURCE: PIONEER/BSB/AR/QSI 2020

0 75 150 300
Feet

FIGURE 1

PIONEER TECHNICAL SERVICES, INC.

INSUFFICIENTLY RECLAIMED
SITE BRES No. 181
MOUNTAIN CON - 3

DATE: 10/3/2024

Path: Z:\Shared\Active Projects\ARCO\BPSOU\LandSupport\BRES_Pro_Project\BRES_aprx.aprx

Attachment 1
Document Links

Document Links

Insufficiently Reclaimed Sites QAPP:

Final 2024 IR Sites QAPP[7]

Unreclaimed Sites QAPP

Final 2024 UR Sites QAPP[8]

Agency Comment Letter

Agency Comment Letter

[7] Please note the link provided is valid for 1 year from the date of this submittal.
[8] Please note the link provided is valid for 1 year from the date of this submittal.

Attachment 2
FSPs Submittal List

Site	Submittal Date	Approval Date
BRES No. 104 – Colorado Dump Shaft	9/29/2021	11/5/2021
BRES No. 104 – Colorado Dump Shaft, Final Revised	12/2/2021	12/6/2021
BRES No. 154 – Clark Mill Tailings NE	12/1/2021	12/6/2021
BRES No. 30 – Atlantic-1	1/12/2022	2/22/2022
BRES No. 16 – Curry	1/12/2022	2/22/2022
BRES No. 8 – Belle of Butte	3/11/2022	9/26/2022
BRES No. 38 – Sister Dump	6/16/2022	9/26/2022
BRES No. 32 – Corra 2 Dump	6/20/2022	6/30/2022
BRES No. 158 – Waste Rock Dump	6/20/2022	7/11/2022
BRES No. 50 Zelia	6/22/2022	6/30/2022
BRES No. 93 – Soudan Dump	6/23/2022	6/30/2022
BRES No. 96 Washoe Dump	6/23/2022	7/11/2022
BRES No. 133 – Dexter Mill	7/14/2022	7/26/2022
BRES No. 37 – Josephine Shaft	7/20/2022	7/26/2022
BRES No. 34 – Eveline Dump	7/22/2022	8/2/2022
BRES No. 17 – Paymaster	7/25/2023	8/10/2023
BRES No. 31 – Waste Dump #5	7/25/2023	8/10/2023
BRES No. 48 – Old Glory West	7/25/2023	8/10/2023
BRES No. 66 – West Ruby Dump	7/25/2023	8/10/2023
BRES No. 68 – Little Mina-2	7/25/2023	8/10/2023
BRES No. 174 – Buffalo South and Buffalo Ditch	7/25/2023	8/10/2023
BRES No. 84 – Mandan Park	7/25/2023	8/2/2023
BRES No. 125 – Child Harold-2 Dump	8/8/2024	6/28/2024
BRES No. 121 – Travona Dump	8/8/2024	6/28/2024
BRES No. 34E – Eveline Dump East	9/20/2024	9/16/2024
BRES No. 45 – Garfield	8/8/2024	
BRES No. 49 – Old Glory	8/8/2024	6/28/2024
BRES No. 52 – Moscow	9/20/2024	9/16/2024
BRES No. 74 – West Gagnon Dump	8/8/2024	6/28/2024
BRES No. 78 – Original Mine	9/20/2024	9/16/2024
BRES No. 181 – Mountain Con-3 Dump	10/4/2024	

Attachment 3
Field Data Sheet

Site: Date: Personnel:

Are rills present? If yes, describe.

Areas of flow present? Is sediment being deposited? Describe.

Describe any flow patterns from above/on to site.

Describe any flow patters below/off-site.

Identify stormwater infrastructure on/adjacent to the Site.
Describe the condition (ie. new construction, heavily sedimented, etc.)

Are liners exposed?

Is the evidence of aggregate movement or disturbance?

Are weeds present?

General Site Observations (Presence/type/condition of cap, Vegetation, Soil staining, Structures on Site, etc.)