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Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Clark Tailings Consolidated Waste Management Area (CTCWMA) Quality Assurance Project Plan (QAPP) (dated July 31, 2023)

Nikia Greene

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE**

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Ref: 8MO

August 17, 2023

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

Re: Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Clark Tailings Consolidated Waste Management Area (CTCWMA) Quality Assurance Project Plan (QAPP) (dated July 31, 2023)

Dear Josh:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the *Clark Tailings Consolidated Waste Management Area Quality Assurance Project Plan (QAPP) (dated July 31, 2023)* with the following comments.

1. Section 2.2.1 Site Construction, Pg. 5-6, sentence starting on pg. 5 and continuing to pg. 6 – The main concern with the organic silt derived from LAO is the secondary metals present. The organic silt beneath the LAO tailings has been shown to be highly impacted by metals, which are very leachable. Please revise the sentence.
2. Section 2.3.1 Table 1, Pg. 12 – The statement “3 different infiltration locations will be selected for infiltration testing. At each location, multiple layers may be tested. The layers analyzed will likely include the capillary break layer and the infiltration barrier layer.” This is too broad. Please identify which layers and general areas are targeted and if necessary, adjustments may be made in the field.
3. Please attach the EPA and DEQ approval page and EPA crosswalk to the QAPP and distribute as final.
4. Please review the standard operating procedures (SOP) and make sure that all approved and signed off by the appropriate team parties.

If you have any questions or concerns, please call me at (406) 457-5019.

Sincerely,

Nikia Greene
Remedial Project Manager

Attachments: EPA crosswalk and EPA and DEQ signature page

Butte File
Chris Greco / Atlantic Richfield
Josh Bryson / Atlantic Richfield
Mike Mc Anulty / 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
Brienne McClafferty / Holland & Hart
Daryl Reed / DEQ
Amy Steinmetz / DEQ
Dave Bowers / DEQ
Katie Garcin-Forba / DEQ
Carolina Balliew / DEQ
Jim Ford / NRDP
Pat Cunneen / NRDP
Katherine Hausrath / NRDP
Ted Duaine / MBMG
Gary Icopini / MBMG
Becky Summerville / MR
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John Gilmour / Kelley Drye
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