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Approval of the Final Butte Priority Soils Operable Unit (BPSOU), Draft Final Interim 2023 Site-Wide Groundwater Quality Assurance Project Plan (QAPP) (dated April 5, 2023)

Nikia Greene

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8, MONTANA OFFICE

FEDERAL BUILDING, 10 West 15TH Street, Suite 3200 Helena, MT 59626-0096 Phone 866-457-2690 www.epa.gov/region8

Ref: 8MO

June 15, 2023

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

Re: Approval of the Final Butte Priority Soils Operable Unit (BPSOU), Draft Final Interim 2023 Site-Wide Groundwater Quality Assurance Project Plan (QAPP) (dated April 5, 2023)

Dear Josh:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the *Draft Interim 2022 Site Wide Groundwater Quality Assurance Project Plan (QAPP)* (dated April 5, 2023) with the following comments. Once the comments have been addressed, please distribute the QAPP as final.

Comments:

- Please include the attached signature page and EPA crosswalk in the final version and distribute the QAPP.
- Please note that if this plan were to change, please submit a revised QAPP to the EPA and DEQ for review and approval.
- EPA would like to change the QAPP requirements for the data validation process for the following groundwater samples.
 - 1. Point of Compliance Wells Assuming the same laboratory is utilized throughout the year, please perform Stage 4 validation on one data package per each sampling event. It is recommended to consolidate the collected samples into one data package.
 - 2. All other validation processes/procedures are acceptable.

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

Sincerely,

Nikia Greene Remedial Project Manager

Attachment: EPA crosswalk EPA and DEQ signature page cc: (email only) Butte File Daryl Reed; DEQ Jon Morgan; DEQ counsel Carolina Balliew; DEQ Harley Harris; NRDP Katherine Hausrath; NRDP Jim Ford; NRDP Pat Cunneen; NRDP John Gallagher; BSBC Sean Peterson; BSBC Eileen Joyce; BSBC Eric Hassler; BSBC Brandon Warner; BSBC Chad Anderson; BSBC Karen Maloughney; BSBC Julia Crain; BSBC Abby Peltomaa; BSBC Jeremy Grotbo; BSBC Sean Peterson; BSBC counsel John DeJong; UP Robert Bylsma; UP counsel Leo Berry; BNSF and UP counsel Doug Brannan; Kennedy Jenks for BNSF and UP Brooke Kuhl; BNSF counsel Lauren Knickrehm; for BNSF Philip Hooper; Kennedy Jenks for BNSF and UP Bob Andreoli; Patroit/RARUS Becky Summerville; counsel for Inland Properties Inc. Robert Lowry, BNSF counsel Loren Burmeister; AR

Josh Bryson; AR Chris Greco; AR Mike Mcanulty; AR Dave Griffis; AR Jean Martin; Counsel AR Mave Gasaway; attorney for AR Adam Cohen; Counsel for AR Pat Sampson; Pioneer for AR Scott Sampson; Pioneer for AR Scott Bradshaw; TREC Karen Helfrich; Pioneer for AR Andy Dare; Pioneer for AR Scott Sampson; Pioneer for AR Brad Archibald; Pioneer for AR Andy Dare; Pioneer for AR Tina Donovan; Woodardcurran for AR Ted Duaime; MBMG Gary Icopini; MBMG David Shanight, CDM Smith Curt Coover, CDM Smith Chapin Storrar; CDM Smith Erin Agee, EPA Will Lindsey, EPA Aaron Urdiales; EPA Jamie Miller; EPA Chris Wardell; EPA Dana Barnicoat; EPA Charlie Partridge; EPA Ian Magruder; CTEC (Tech Advisor) Janice Hogan; CTEC Marissa Stockton; Rosendale State Director Kristi Carroll; Montana Tech Library