

Montana Tech Library

Digital Commons @ Montana Tech

Silver Bow Creek/Butte Area Superfund Site

Montana Superfund

Winter 1-14-2022

Approval Letter for the Revised Draft Final Butte Priority Soils Operable Unit (BPSOU) Revised Butte Reclamation Evaluation System (BRES) Field Manual (dated July 2021)

Nikia Greene

Follow this and additional works at: https://digitalcommons.mtech.edu/superfund_silverbowbutte



Part of the [Environmental Health and Protection Commons](#), [Environmental Indicators and Impact Assessment Commons](#), and the [Environmental Monitoring Commons](#)



**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

January 14, 2022

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

Mr. Eric Hassler
Superfund Program Manager
Butte-Silver Bow
155 W. Granite St., Room 108
Butte, Montana 59701

Re: Approval Letter for the Revised Draft Final Butte Priority Soils Operable Unit (BPSOU) Revised Butte Reclamation Evaluation System (BRES) Field Manual (dated July 2021)

Dear Mike and Eric:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the Revised Butte Priority Soils Operable Unit (BPSOU) *Butte Reclamation Evaluation System (BRES) Field Manual* (dated July 2021) with the comment below. Please re-date the cover page of the manual and distribute as final. The version of this document may be used for the 2022 field season with the next annual review of the manual to be conducted in October 2022.

- As mentioned in EPA's January 2, 2022 comment letter on for the Revised Draft Final Reclaimed Areas Maintenance and Monitoring Plan (dated October 8, 2021), greater detail is needed to include all aspects of polygon delineation with respect to Section 4 of Appendix E of the BPSOU ROD 2006. While the BRES manual does discuss in greater detail, at a minimum a reference to the BRES manual, reference to an SOP for polygon delineation, and details of the importance of polygon delineation into more internally homogeneous units is requested within this plan. EPA continues to be concerned that the polygon approach is not being used as intended, thus reducing the consistency and reproducibility of the field evaluations. However, it is EPA's understanding that the forthcoming Reclaimed Areas Boundary Adjustment Report may in fact provide sites (polygons) with a more homogeneous delineation. If that is the case, then we do not have concerns about the use of delineating sites (polygons).

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

Sincerely,

Nikia Greene
Remedial Project Manager

cc: (email only)

Butte File

Jenny Chambers; DEQ

Matt Dorrington, DEQ

Daryl Reed; DEQ

Will George; DEQ

Jon Morgan; DEQ counsel

Carolina Balliew; DEQ

Harley Harris; NRDP

Katherine Hausrath; NRDP

Jim Ford; NRDP

Ray Vinkey; 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

Anne Walsh; UP

Robert Bylsma; UP counsel

Leo Berry; BNSF and UP counsel

Mark Engdahl; BNSF

Brooke Kuhl; BNSF counsel

Jeremie Maehr; Kennedy Jenks for BNSF and UP

Annika Silverman; 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

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
Mike Borduin; Pioneer for AR
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
Don Booth; AR consultant
Ted Duaiame; MBMG
Gary Icopini; MBMG
David Shanight, CDM Smith
Curt Coover, CDM Smith
Chapin Storrar; CDM Smith
Erin Agee, EPA
Joe Vranka; EPA
Chris Wardell; EPA
Dana Barnicoat; EPA
Charlie Partridge; EPA
Jean Belille; EPA
Ian Magruder; CTEC (Tech Advisor)
Janice Hogan; CTEC
Kristi Carroll; Montana Tech Library