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Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final Insufficiently Reclaimed Sites - Field Sampling Plan (FSP) BRES No. 38 – Sister Dump (dated June 16, 2022)

Nikia Greene

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

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Ref: 8MO

September 26, 2022

Mike Mc Anulty
Liability Manager
Remediation Management Services Company
An affiliate of Atlantic Richfield Company
317 Anaconda Rd
Butte, MT 59701

**Re: Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final
Insufficiently Reclaimed Sites - Field Sampling Plan (FSP) BRES No. 38 – Sister Dump
(dated June 16, 2022)**

Dear Mike:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the *BPSOU Butte Priority Soils Operable Unit (BPSOU) Draft Final Insufficiently Reclaimed Sites - Field Sampling Plan (FSP) BRES No. 38 – Sister Dump (dated June 16, 2022)*. Please address comments below and attach the Final Insufficiently Reclaimed Sites Quality Assurance Project Plan (QAPP) and Unreclaimed Sites QAPP to this FSP upon final distribution.

Comments:

- Please update the FSP tracking table included in this FSP.
- On Figure 1, there is a portion of the property that indicates that exposed waste was identified during the BRES inspection. Will or has this portion of the site been sampled under the RMAP and is this exposed waste area located on private property? If this area has not been sampled, it may be proactive to sample this potential area of exposed waste area under this FSP or appropriate program.
- Please provide as-built information for the area that was recently reclaimed by BSB during the 2021 field season. While the photo does provide evidence that site work was completed at portion of the site, the EPA does not have work plans or corrective action plans for these work areas. The as-builts and remedial action narrative will be helpful in determining if additional sampling should be completed in this area.
- It may be prudent to perform an engineering evaluation to determine which best management

practices that could be deployed to prevent uncontrolled sediment runoff from site, specifically where storm water and runoff flows onto ONeill Street. In addition, an engineering evaluation and sampling in the channel where the banks and nearby areas are actively eroding may be an appropriate step. Again, UR-38 should be visited by the Source Area Work Group.

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

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