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Approval on the Draft Butte Priority Soils Operable Unit (BPSOU) Blacktail Creek Piezometer Installation and Monitoring Well Repair Plan (dated June 10, 2022)

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 28, 2022

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

Re: Approval on the Draft Butte Priority Soils Operable Unit (BPSOU) Blacktail Creek Piezometer Installation and Monitoring Well Repair Plan (dated June 10, 2022)

Dear Josh:

The U.S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is providing an approval contingent on addressing minor comments on the *Blacktail Creek Piezometer Installation and Monitoring Well Repair Plan (dated June 10, 2022)*. Please incorporate these comments and distribute the final version of the document.

Comments:

- Section 2.3.3 The Administrative Rules of Montana (ARM) cited requires a minimum of 1.5 inches of seal on all sides of the casing for monitoring wells. It isn't clear if the piezometers installed using the Geoprobe can meet this requirement. Please clarify the diameters of the casing and equipment.
- Section 4.0 If the well has not met the development field parameter requirements after 4 hours, the well is not considered to be fully developed. Either the method of development is not appropriate for the well or there is potentially a problem with the well. If the field parameter requirements are not met after 4 hours, discontinue developing and prepare a corrective action plan that will result in the well meeting the field parameter requirements. Please revise this section to address this concern.

Sincerely,

Nikia Greene Remedial Project Manager

cc: (email only)

Butte File

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Will George; DEQ

Jon Morgan; DEQ counsel

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