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Fall 9-26-2022

### **Approval letter for: Butte Priority Soils Operable Unit (BPSOU) Revised Draft Final Quarterly Operations and Maintenance Report Butte Treatment Lagoons System – Third Quarter 2021 (dated July 20, 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

Mr. Dave Griffis  
Treatment Operations Project Manager  
Atlantic Richfield Company  
317 Anaconda Road  
Butte, MT 59701

**Re: Approval letter for: Butte Priority Soils Operable Unit (BPSOU) Revised Draft Final  
Quarterly Operations and Maintenance Report Butte Treatment Lagoons System –  
Third Quarter 2021 (dated July 20, 2022)**

Dear Dave:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the *Revised Draft Final Quarterly Operations and Maintenance Report Butte Treatment Lagoons System – Third Quarter 2021 (dated July 20, 2022)* with the following comments that can be addressed during the Operations and Maintenance (O&M) plan update and reported in the quarterly reports and annual reports.

**Comments**

Atlantic Richfield Company Response to General Comment 1 to Main Report: EPA agrees that operating trends and performance records need to be reviewed and compared to operating changes and other factors that have occurred in recent years as the response to comment indicated. However, the response did not identify how that process would be initiated or presented. While the specifics of the analysis do not need to be presented here in a response, detail such as when to expect such an analysis as well as how it will be presented. Please provide detail as to when the analysis will be presented and in what form. For example, the evaluation format and procedures can be described in the O&M plan or in a similar plan to the Butte Mine Flooding Operable Unit's operations assurance plan. These evaluation responses should be submitted to EPA as necessary, and also documented in the quarterly report(s), along with summarizing in the annual report.

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  
Matt Dorrington; DEQ  
Daryl Reed; DEQ  
Will George; DEQ  
Jon Morgan; DEQ counsel  
Carolina Balliew; DEQ  
Harley Harris; NRDP  
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