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### **Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final 2023 Residential Metals Abatement Program Borrow Amendment Work Plan (dated January 12, 2023)**

Nikia Greene

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

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Helena, MT 59626-0096

Phone 866-457-2690

[www.epa.gov/region8](http://www.epa.gov/region8)

Ref: 8MO

March 1, 2023

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

**Re: Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final 2023  
Residential Metals Abatement Program Borrow Amendment Work Plan  
(dated January 12, 2023)**

Dear Mike:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the *Draft Final 2023 Residential Metals Abatement Program Borrow Amendment Work Plan (dated January 12, 2023)* with the following comments. Please address these comments and distribute this plan as final.

- Section 4.2:
  - a. Please clarify the amendment ratio is by weight or volume.
  - b. The extent/method (e.g., area, shape) with which material will be placed “on the floor of the borrow development area” is not clear. It is recommended that the amendment be implemented as suggested by laying borrow soils in a windrow and not a large pad area. If a large pad area approach is assumed, blending the compost may be better suited using standard agricultural tillage or ripping implements. Please clarify the approach.
- Exhibit E Organic Amendment Calculator: The basis for depth of amendment at 6 inches over 12.4 acres is not clear. Recommend providing further explanation for this assumption in the text, and in general, further explanation of the calculation process. Currently, the work plan references Exhibit E, but provides no explanation of the calculation process.
- As you may be aware, the EPA is in the process of evaluating and determining the risks associated with of perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS) found in biosolids materials. The EPA anticipates completing this risk assessment at the end of 2024. Because the PFOA and PFOS risk assessment will be completed at the end of the 2024 calendar year, the EPA and DEQ requires that an alternative organic material (i.e., non-biosolid material) be specified for this project. Additional information on EPA’s PFAS and PFOA risk assessment work

can be found using the following weblink: <https://www.epa.gov/biosolids/risk-assessment-pollutants-biosolids>.

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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