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Fall 9-9-2024

**Comment letter for the Butte Priority Soils Operable Unit (BPSOU)
Draft Final Insufficiently Reclaimed Sites Field Sampling Plan
(FSP) for BRES No. 181 – Mountain Con-3 Dump**

Molly Roby

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REGION 8

DENVER, CO 80202

September 9, 2024

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

Re: Comment letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final Insufficiently Reclaimed Sites Field Sampling Plan (FSP) for BRES No. 181 – Mountain Con-3 Dump

Dear Mr. McAnulty:

The U.S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is commenting on the Butte Priority Soils Operable Unit (BPSOU) Draft Final Insufficiently Reclaimed (IR) Sites FSP for BRES No. 181 – Mountain Con-3 Dump (dated June 19, 2024). For this IR site, please address the comments below and resubmit the FSPs for agency review:

1. Cover Letter. In the first paragraph, please revise “BRES” to be defined as the “Butte Reclamation Evaluation System” not “Butte Remediation Evaluation System” as currently written.
2. Section 1.0. Background. In the last paragraph, it is noted that the site was “...reclaimed by BRES in 1998.” However, BRES did not exist in 1998 and is an evaluation system, not a reclamation program. Please research the program (e.g., TCRA, NTCRA, UAO, or other mechanism) under which the Mountain Con was reclaimed and provide that information here.
3. Section 2.0, Previous Findings. In the last paragraph, please add references for the 2017 and 2021 BRES evaluation summary reports. Later in the paragraph, it is stated that “barren areas are present throughout the site” although only one barren area is depicted on Figure 1. Please review the BRES site evaluations and consider if additional barren areas need to be shown on Figure 1.
4. Figure 1. EPA anticipates that it will approve the boundary adjustment for the Mountain Con-3 Dump (BRES No. 181) to the Mountain Con Mine Dump South (BRES No. 348). Please add samples to the extended area to the east and the south shown on Figure 1 and revise that sample numbers within the FSP accordingly.
4. Attachment 1. Please update the link to reference the 2024 IR QAPP.
5. Attachment 3. In the fifth observation point, it would be beneficial to observe and comment on the integrity of the stormwater features on the site. Please revise to include more detail: Are liners showing? Has the surface rock moved or broken-down? Are waste or weeds present?

Mike McAnulty
September 9, 2024
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If you have any questions or concerns, please call me at (406) 457-5021.

Sincerely,

Molly Roby
Remedial Project Manager

cc: (email only)

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