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Summer 8-16-2023

**Approval for the Butte Priority Soils Operable Unit (BPSOU) 2023
Residential Metals Abatement Program Stodden Park Soil
Remedial Action Work Plan (RAWP) (dated August 8, 2023)**

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

August 16, 2023

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

**Re: Approval for the Butte Priority Soils Operable Unit (BPSOU) 2023 Residential
Metals Abatement Program Stodden Park Soil Remedial Action Work Plan (RAWP)
(dated August 8, 2023)**

Dear Mike:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the *Butte Priority Soils Operable Unit (BPSOU) 2023 Residential Metals Abatement Program Stodden Park Soil Remedial Action Work Plan (RAWP) (dated August 8, 2023)* with the following comments. Please address the following comments and distribute as final.

1. Section 4.1: Please confirm that there will be 18 inches of woodchip cover underneath the footprint of the existing mining truck replica.
2. Section 4.1: Please consider scheduling the layout of the excavation to accommodate potential delays caused by local storm events.
3. Section 4.2: Backfill is detailed for the woodchip area, please specify soft surface backfill materials and depths that this material will be placed.
4. Section 5.3: Since this borrow source material was sampled in 2020, please confirm that the results included in Attachment D are representative (i.e., 1 sample per 5,000 cubic yards) of the material that will be used for backfilling purposes at this site. Understanding that this material was sampled under the Anaconda Smelter site's programs, please submit a borrow source form for review and approval for use within the BPSOU. This form will need to be signed/approved by the BPSOU remedial project manager.
5. Figure 1: Please update features on the figure in the legend (i.e., UE).
6. Figure 1 and Figure 2: Please label and identify removal depths for the soft surface walkway. This should also be in Attachment A as well. In addition to the walkway areas, please include PA6 and any other polygon areas that may be removed during this remedial action.
7. From information gathered from site walk through on August 14, 2023, please include any design drawings of the drainage system below the playground remediation area.

8. This area is a multi-use facility, please include a site-specific traffic control, public safety and emergency services access plan.
9. Please include a list of all contractors and sub-contractors that will be working on this project.

If you have any questions or concerns, please call me at (406) 457-5019.

Sincerely,

Nikia Greene
Remedial Project Manager

Butte File
Chris Greco / Atlantic Richfield
Josh Bryson / Atlantic Richfield
Mike Mc Anulty / Atlantic Richfield
Loren Burmeister / Atlantic Richfield
Dave Griffis / Atlantic Richfield
Jean Martin / Atlantic Richfield
Irene Montero / Atlantic Richfield
David A. Gratson / Environmental Standards
Mave Gasaway / DGS
Adam Cohen / DGS
Brienne McClafferty / Holland & Hart
Daryl Reed / DEQ
Amy Steinmetz / DEQ
Dave Bowers / DEQ
Katie Garcin-Forba / DEQ
Carolina Balliew / DEQ
Jim Ford / NRDP
Pat Cunneen / NRDP
Katherine Hausrath / NRDP
Ted Duaine / MBMG
Gary Icopini / MBMG
Becky Summerville / MR
John DeJong / UP
Robert Bylsma / UP
John Gilmour / Kelley Drye
Leo Berry / BNSF
Robert Lowry / BNSF

Brooke Kuhl / BNSF
Lauren Knickrehm / BNSF
Doug Brannan / Kennedy Jenks
Matthew Mavrinac / RARUS
Harrison Roughton / RARUS
Brad Gordon / RARUS
Mark Neary / BSB
Eric Hassler / BSB
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Brandon Warner / BSB
Abigail Peltomaa / BSB
Eileen Joyce / BSB
Sean Peterson/BSB
Josh Vincent / WET
Scott Bradshaw / W&C
Emily Stoick / W&C
Pat Sampson / Pioneer
Andy Dare / Pioneer
Karen Helfrich / Pioneer
Randa Colling / Pioneer
Scott Sampson / Pioneer
Ian Magruder/ CTEC
CTEC of Butte
Scott Juskiewicz / Montana Tech
David Shanight / CDM Smith
Curt Coover / CDM Smith
Chapin Storrar / CDM Smith
Erin Agee / EPA
Will Lindsey / EPA
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