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Approval letter for the Draft Final Residential Metals Abatement Program (RMAP) 2023 Walkerville Park (Walkerville Drive and Ryan Road) Soil Remedial Action Work Plan (RAWP) (dated April 24, 2023)

Nikia Greene

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

FEDERAL BUILDING, 10 West 15<sup>TH</sup> Street, Suite 3200 Helena, MT 59626-0096 Phone 866-457-2690 www.epa.gov/region8

Ref: 8MO

May 9, 2023

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

## Re: Approval letter for the Draft Final Residential Metals Abatement Program (RMAP) 2023 Walkerville Park (Walkerville Drive and Ryan Road) Soil Remedial Action Work Plan (RAWP) (dated April 24, 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 Residential Metals Abatement Program* (*RMAP*) 2023 Walkerville Park (Walkerville Drive and Ryan Road) RAWP (dated April 24, 2023), with minor comments below. Please address these comments and distribute the document as final.

## Comments

- Please explain how final decisions will be documented and communicated to field crews regarding the two scenarios on final excavation/capping details.
- Section 4.1.2.1 Excavation, second sentence, Page 4 of 7: Remove "no" and please revise the sentence to state, "excavation work will be limited".
- The curbing, fabric, wood chip cover areas around the mature trees may need to be/should be, extended beyond what's in the design. There are large tree roots at the surface in some areas up to 20-30 feet beyond the dripline of the trees.
- This site drains predominantly to the south and east toward Ryan Road. Please include a robust silt barrier/stormwater control plan in the event of a spring storm coming through during excavation activities.

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** Daryl Reed; DEQ Will George; DEQ Jon Morgan; DEQ counsel Carolina Balliew; DEQ Harley Harris; NRDP Katherine Hausrath; NRDP Jim Ford; NRDP Pat Cunneen; NRDP John Gallagher; BSBC Sean Peterson; BSBC Eileen Joyce; BSBC Eric Hassler; BSBC Brandon Warner; BSBC Chad Anderson; BSBC Karen Maloughney; BSBC Julia Crain; BSBC Abby Peltomaa; BSBC Jeremy Grotbo; BSBC Sean Peterson; BSBC counsel John DeJong; UP Robert Bylsma; UP counsel Leo Berry; BNSF and UP counsel Doug Brannan; Kennedy Jenks for BNSF and UP Brooke Kuhl; BNSF counsel Lauren Knickrehm; for BNSF Philip Hooper; Kennedy Jenks for BNSF and UP Bob Andreoli; Patroit/RARUS Becky Summerville; counsel for Inland Properties Inc. Robert Lowry, BNSF counsel Loren Burmeister; AR Josh Bryson; AR Chris Greco; AR Mike Mcanulty; AR

Dave Griffis; AR Jean Martin; Counsel AR Mave Gasaway; attorney for AR Adam Cohen; Counsel for AR Pat Sampson; Pioneer for AR Scott Sampson; Pioneer for AR Scott Bradshaw; TREC Karen Helfrich; Pioneer for AR Andy Dare; Pioneer for AR Scott Sampson; Pioneer for AR Brad Archibald; Pioneer for AR Andy Dare; Pioneer for AR Tina Donovan; Woodardcurran for AR Ted Duaime; MBMG Gary Icopini; MBMG David Shanight, CDM Smith Curt Coover, CDM Smith Chapin Storrar; CDM Smith Erin Agee, EPA Will Lindsey, EPA Aaron Urdiales; EPA Chris Wardell; EPA Dana Barnicoat; EPA Charlie Partridge; EPA Ian Magruder; CTEC (Tech Advisor) Janice Hogan; CTEC Marissa Stockton; Rosendale State Director Kristi Carroll; Montana Tech Library