

Montana Tech Library

Digital Commons @ Montana Tech

Silver Bow Creek/Butte Area Superfund Site

Montana Superfund

Fall 10-18-2021

Response to Comments to the Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Draft Final Field Sampling Plan (FSP) Package #7: UR-01, UR-12, UR-03, UR-04, UR-15, and UR-17

Mike McAnulty

Follow this and additional works at: https://digitalcommons.mtech.edu/superfund_silverbowbutte



Part of the [Environmental Health and Protection Commons](#), [Environmental Indicators and Impact Assessment Commons](#), and the [Environmental Monitoring Commons](#)

Atlantic Richfield Company

Mike Mc Anulty

Liability Manager

317 Anaconda Road

Butte MT 59701

Direct (406) 782-9964

Fax (406) 782-9980

October 18, 2021

Nikia Greene
Remedial Project Manager
US EPA – Montana Office
Baucus Federal Building
10 West 15th Street, Suite 3200
Helena, Montana 59626

Erin Agee
Senior Assistant Regional Counsel
US EPA Region 8 Office of Regional Counsel
CERCLA Enforcement Section
1595 Wynkoop Street
Denver, CO 80202
Mail Code: 8ORC-C

Daryl Reed
DEQ Project Officer
P.O. Box 200901
Helena, Montana 59620-0901

Jonathan Morgan, Esq.
DEQ, Legal Counsel
P.O. Box 200901
Helena, Montana 59620-0901

RE: Response to Comments to the Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Draft Final Field Sampling Plan (FSP) Package #7: UR-01, UR-12, UR-03, UR-04, UR-15, and UR-17

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to provide response to comments to the **Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Draft Final Field Sampling Plan (FSP) Package #7: UR-01, UR-12, UR-03, UR-04, UR-15, and UR-17** provided by the Agencies on September 27, 2021. The revised plan may be downloaded at the following link:

https://pioneertechnicalservices.sharepoint.com/:b:/s/submitted/EZcENghSErpJnAC6vJ1Om0ABM_L9_WfXZS4aqirOnM7sdA

Agency Comments:

Site: UR-01 Between Ryan Rd. and Alice St., UR-04 NW Corner of Center St. and Idaho St, and UR-15 S of Ryan Rd and W of 4th St:

Please remove "J" within Table 1 in the concentrations for Arsenic, Copper, Zink or define what the "J" represents.

Atlantic Richfield Response: Atlantic Richfield respectfully declines altering final data. As noted in the FSP #7 text, sample data were obtained from the BPSOU Geocortex web-based database, which contains final data from previous sampling activities. The letter "J" accompanying sample results typically indicates specific criteria may not have been met when analysis was performed, and results are considered qualified. These criteria are dependent upon laboratory protocol. Laboratory data qualifiers are defined in the data

Atlantic Richfield Company

Mike Mc Anulty

Liability Manager

317 Anaconda Road

Butte MT 59701

Direct (406) 782-9964

Fax (406) 782-9980

deliverable provided by the laboratory which performed the analysis. The U.S. Environmental Protection Agency (EPA) 2020 National Functional Guidelines for Inorganic Superfund Methods Data Review provides the following definition for J qualified data. *“The result is an estimated quantity. The associated numerical value is the approximate concentration of the analyte in the sample.”* The text has been updated accordingly.

All Figure:

Please remove the private property owner names or business names from all figures.

Atlantic Richfield Response: Private property ownership and business names have been removed from figures and text.

End of Comments

If you have any questions or comments, please call me at (907) 355-3914.

Sincerely,

Mike McAnulty

Mike Mc Anulty
Liability Manager
Remediation Management Services Company
An affiliate of **Atlantic Richfield Company**

Atlantic Richfield Company

Mike Mc Anulty

Liability Manager

317 Anaconda Road

Butte MT 59701

Direct (406) 782-9964

Fax (406) 782-9980

Cc: Patricia Gallery / Atlantic Richfield - email
Chris Greco / Atlantic Richfield – email
Josh Bryson / Atlantic Richfield - email
Mike Mc Anulty / Atlantic Richfield - email
Loren Burmeister / Atlantic Richfield – email
Dave Griffis / Atlantic Richfield - email
Jean Martin / Atlantic Richfield - email
Irene Montero / Atlantic Richfield - email
David A. Gratson / Environmental Standards / email
Mave Gasaway / DGS - email
John Davis / PRR - email
Joe Vranka / EPA - email
David Shanight / CDM - email
Curt Coover / CDM - email
James Freeman / DOJ - email
John Sither / DOJ - email
Jenny Chambers / DEQ - email
Dave Bowers / DEQ - email
Carolina Balliew / DEQ - email
Matthew Dorrington / DEQ - email
Jim Ford / NRDP - email
Ray Vinkey / NRDP - email
Harley Harris / NRDP - email
Katherine Hausrath / NRDP - email
Meranda Flugge / NRDP - email
Ted Duaime / MBMG - email
Gary Icopini / MBMG - email
Becky Summerville / MR - email
Kristen Stevens / UP - email
Robert Bylsma / UP - email
John Gilmour / Kelley Drye - email
Leo Berry / BNSF - email
Robert Lowry / BNSF - email
Brooke Kuhl / BNSF – email
Mark Engdahl / BNSF - email
Jeremie Maehr / Kennedy Jenks - email
Annika Silverman / Kennedy Jenks - email
Matthew Mavrinac / RARUS - email
Harrison Roughton / RARUS - email
Brad Gordon / RARUS - email
Mark Neary / BSB - email
Eric Hassler / BSB - email

Atlantic Richfield Company

Mike Mc Anulty

Liability Manager

317 Anaconda Road

Butte MT 59701

Direct (406) 782-9964

Fax (406) 782-9980

Julia Crain / BSB - email
Chad Anderson / BSB - email
Brandon Warner / BSB – email
Abigail Peltomaa / BSB - email
Eileen Joyce / BSB – email
Sean Peterson/BSB – email
Gordon Hart / BSB – email
Jeremy Grotbo / BSB – email
Josh Vincent / WET - email
Craig Deeney / TREC - email
Scott Bradshaw / TREC - email
Brad Archibald / Pioneer - email
Pat Sampson / Pioneer - email
Mike Borduin / Pioneer - email
Joe McElroy / Pioneer – email
Andy Dare / Pioneer – email
Karen Helfrich / Pioneer - email
Leesla Jonart / Pioneer - email
Connie Logan/ Pioneer – email
Ian Magruder/ CTEC- email
CTEC of Butte – email
Scott Juskiewicz / Montana Tech – email

File: MiningSharePoint@bp.com - email
BPSOU SharePoint - upload