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Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Draft Final Field Sampling Plan (FSP) Package #6: UR-05, UR-27, UR-28, UR-29, UR-30, and UR-34

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July 26, 2021

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Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Draft Final Field Sampling Plan (FSP) Package #6: UR-05, UR-27, UR-28, UR-29, UR-30, and UR-34.

Dear Agency Representatives:

As described in Appendix D, Attachment C to the 2020 Consent Decree, areas listed as Unreclaimed Solid Media Sites within Butte Priority Soils Operable Unit (BPSOU) may have potentially been impacted by historic mining and therefore may pose a threat to human health, contribute metalsimpacted sediments to existing or planned wet weather control features, or contribute to the degradation of surface water quality. There are a total of 39 unclaimed sites, multiple sites will be organized in a package for approval. Field sampling plan (FSP) package #6 (FSP Package #6) includes Unreclaimed (UR) Sites UR-05, UR-27, UR-28, UR-29, UR-30, and UR-34. Site evaluations will be performed using means and methods provided in the Atlantic Richfield Company Final Unreclaimed Sites Quality Assurance Project Plan (QAPP) published October 12, 2018, which was prepared in accordance with U.S. Environmental Protection Agency (EPA) guidance documents EPA QA/R-5 and EPA QA/G-5 for QAPP development. The QAPP was updated in 2021 (referred to herein as UR Sites QAPP) as a component of the BPSOU Solid Media Management Project Plan. Results from site evaluations will be used to prepare site declarations and assist with determination of site remediation requirements. Site evaluations will begin in the third quarter of 2021 and are anticipated to be completed 2022, or as site access allows. Site declarations for sites sampled in 2021 are anticipated to be provided for Agency review and approval by the end of 2021. Declarations of sites sampled after 2021 will be provided as soon as feasible. Remedial action will be performed following Agency approval of pertinent site-specific remedial action work plans.



A preliminary list of FSP packages, provided below, will be updated to record the status and progress related to FSP package submittals.

Package	Sites	Submittal Date	Approval Date
1	UR-31, 32, and 39	May 19, 2021	June 8, 2021
2	UR-24, 26, and 40	June 30, 2021	TBD
3	UR-06, 07, 20, 22, 35, and 36	July 2, 2021	TBD
4	UR-16 and 21	July 26, 2021	TBD
5	UR-12, 13, 33, and 38	July 26, 2021	TBD
6	UR-05, 27, 28, 29, 30, and 34	July 26, 2021	TBD
7	UR-01, 02, 03, 04, 15, and 17	July 26, 2021	TBD

The crosswalk list provided below references where pertinent field sample collection and documentation elements are discussed.

	Ref	erence Location
Element	FSP	UR Sites QAPP
Title page and approval authority.		Page i
Introduction and appropriate Agency-approved UR Sites QAPP reference.	Х	
Goals and objectives of sampling.		Section 2.4, 3.2
Proposed schedule for field work.	Х	
Site figure including sampling locations, number, and depth of samples to be collected, and sample field identification.	Х	Section 3.2.1
Field activity methods and procedures, standard operating procedures.		Section 3.2, Table 4
Sample labeling and shipping.		Section 3.2.5, Appendix C
Sample analysis, specifying X-ray fluorescence (XRF) vs. laboratory analysis and laboratory name.		Section 3.3
Figure showing the site and/or area represented by a sample, sample ID, and aliquot locations for composite samples.	Х	

Soil sampling is proposed for FSP package #6 at 6 UR Sites located in the uptown area of Butte, Montana, near the west side reservoir. The results of the soil sampling will be used to support the site declaration and potential future remediation requirements for each site. This FSP is consistent with Section 3.0 Data Acquisition protocol described in the UR Sites QAPP. These 6 UR Sites are each less than 1.3 acres. Sites UR-29 and 30 are located in a residential neighborhood close to Kennedy Elementary school. Sites UR-5, 27, 28, and 34 are located in residential neighborhoods. This package includes sites that have high chance of exposure to children. Each site is discussed separately below. The attachments at the end of this document include figures for each site showing the proposed soil sampling locations.

Site: UR-05 NW Corner of N. Montana St. and Ruby St.

Background

Site UR-05 is approximately 0.3 acres. It is located just west of the intersection of North Montana and Ruby Streets and on the east side of the Tullamore subdivision (Figure 1). Most of the site is owned by Butte-Silver Bow. Potential owners of small portions of the site include Eastern Sunrise LLP and Tracy and Chris Christensen. The site is bordered on the north by a walking trail, on the west and south by private residences, and on the east by North Montana Street. Site UR-05 is vacant and has a moderate amount of established grass with weeds around the boundary. The north boundary of the site contains sandy and dry soils. The south boundary of the site has bare areas with low manganese and iron staining. There is an abandoned vehicle on the site. The area east of the vehicle contains light, yellow-colored soil with developing rills that drain south. Note that Figure 1 shows a boat in the northwest corner, however the boat is no longer there.

The site is along the east edge of the Missoula Gulch drainage basin.

Previous Sampling Efforts

Data obtained from the Geocortex web-based database at https://eis2.woodardcurran.com/Html5Viewer/index.html?viewer=BPButte.BPSOU contains the records for four previous soil samples collected near Site UR-05. The approximate sample locations are included on Figure 1 with results provided in Table 1 below. Some of the sample results exceed BPSOU action levels for arsenic, copper, lead, and zinc. The BPSOU action levels are listed in Tables 1 and 2 of the UR Sites QAPP.

Table 1: Previous Sampling Results from BPSOU Soil Sampling (units are milligrams per kilograms)

		Sample Sta	ation ID	
coc	CON003-00	CON003-02	PSERA9307	BF-006
Arsenic	92	105 J	190	283 J
Cadmium	4	5	5	18
Copper	579 J	643	825	1,200
Lead	294	1,360	555	1,330
Zinc	1,370 J	1,100	1,490	3,500
Sample Date	5/15/91	5/15/91	4/1/93	6/23/87

COC: contaminant of concern.

Site: UR-27 317 W. Copper St.

Background

Site UR-27 is approximately 0.05 acres. It is located at 317 West Copper Street at the back (or north) half of the lot. This is northeast of the intersection of West Copper and North Washington Streets in uptown Butte (Figure 2). Site UR-27 is bounded on the west by a vacant lot, on the north by W. Gagnon Street, on the east by the residence at 315 W. Copper St., and on the south by the south half of the lot at 317 W. Copper Street. Site UR-27 is owned by the Arbogast Family Trust.

Site UR-27 is a portion of a vacant lot in a fairly dense residential area. The site is mostly bare ground and may be used for parking by area residents. There are weeds on the south end of the site. Site UR-27 is in the Missoula Gulch drainage basin.

The site has relative homologous areas and is very small. Per the UR Sites QAPP, a site less than 1 acre requires 5 samples. Two samples were recommended for this site to achieve the 10-foot diagonal spacing and represent the material observed on the site.

Previous Sampling Efforts

No previous sample data available.

Site: UR-28 Waukesha St. (800 Block), approximately 835 Waukesha

Background

Site UR-28 is approximately 0.12 acres and is located on the north side of the 800 block of Waukesha Street (Figure 3), a residential area. Site UR-28 is a single lot owned by Joan Kerns, who also owns the lot and home to the east of UR-28. Site UR-28 is vacant land and is completely bare with sporadic weeds. Rills have formed down the middle of the site with vehicle travel appearing to make them greater in the width. Two cars and a truck bed trailer are currently parked on the lot. The site is in the Missoula Gulch drainage basin and drains to catch basins (CB) CB-8 and CB-9.

Previous Sampling Efforts

No previous sample data available.

Site: UR-29 Greens Apts. – Surrounding areas

Background

Site UR-29 is approximately 1.3 acres. It is located at the west end of Lexington Street on the south side of the street (Figure 4). On the north side of Lexington is the Montana Technological University (Montana Tech) student housing known as the Greens. Site UR-29 occupies a south-facing slope. The east portion of the site extends as far south as Zarelda Street.

Site UR-29 is owned by the Board of Regents of Higher Education (Montana Tech), Ferry Lane Ltd., and Butte-Silver Bow. There may be a very small portion owned by Terry Dunmire (or Jewel Zander). Site UR-29 is vacant land in a residential area. The NW portion of the site has moderate grass cover with 2 small areas of what appears to be impacted soil. In the middle of the northern boundary, a drain from the Greens housing complex enters the site and rills have formed through what looks to be impacted soils. There is a rock outcropping that contains dark, goldish-colored soil with manganese staining. Drainage appears to run towards the residence more than the drainage ditch on the eastern boundary of the site. Two cars are parked on the southwest end of the site. The site drainage discharges into Missoula Gulch and to CB-8 and CB-9.

Previous Sampling Efforts

There is no record of previous soil sampling at Site UR-29 nor in its vicinity.

Site: UR-30 N. Henry Ave. and W. Zarelda St. - SW Corner

Background

Site UR-30 is approximately 0.44 acres. It is located at the southwest corner of Zarelda Street and North Henry Avenue. The site is bordered on the south by Hornet Street and on the west by private residences (Figure 5). The majority of Site UR-30 is owned by Butte-Silver Bow. A small portion of the site along the west edge is owned by Timothy Baxter. Site UR-30 is vacant land in a residential area in uptown Butte. Grass is established across the site and the north boundary contains a small fine-gravel area with no vegetative growth. There are 3 small areas with light, yellow-colored soil on the site.

The site drains into Missoula Gulch and to CB-8 and CB-9.

Previous Sampling Efforts

There is no record of previous soil sampling at Site UR-30 nor in its vicinity.

Site: UR-34 Desperation Air Shaft – East of Site

Background

Site UR-34 is approximately 0.14 acres. It is located along the north side of the Butte-Anaconda and Pacific (B.A.&P) railroad walking trail between North Emmet and North Western Avenues (Figure 6). The site is bordered on the north by private residences and on the west by the remnants of the former Desperation Air Shaft. Ownership of Site UR-34 includes Atlantic Richfield Company, Butte-Silver Bow, Chuck and Ruth Walters, and Helen Walbon.

Site UR-34 is vacant land on a fairly steep south-facing slope in a residential area. The site is moderately well vegetated with a few distinct bare areas. The eastern section of the site is currently being used by private landowners as a grass mulch dump. The site is in the Missoula Gulch drainage basin and drains to CB-8 and CB-9.

Previous Sampling Efforts

Data obtained from the Geocortex web-based database at https://eis2.woodardcurran.com/Html5Viewer/index.html?viewer=BPButte.BPSOU contains the records for two previous soil samples collected near Site UR-34. The approximate sample locations are included on Figure 6 with results provided in Table 2 below. Some of the sample results exceed BPSOU action levels for arsenic, copper, lead, and zinc. The BPSOU action levels are listed in Tables 1 and 2 of the UR Sites QAPP.

Table 2: Previous Sampling Results from BPSOU
Soil Sampling
(units are milligrams per kilograms)

	Sample Station ID	
COC	BHP002-00	FSUA-61
Arsenic	625 J	523
Cadmium	9	NA
Copper	2,520	850
Lead	766	1,360
Zinc	1,620	1,240
Sample Date	5/14/91	12/14/95

COC: contaminant of concern. NA: not analyzed.

Unreclaimed Sites Quality Assurance Project Plan

All field work and soil analysis will be completed in accordance with the UR Sites QAPP. The QAPP will be reviewed annually and updated as needed on Agency review and approval. Soil sampling will be conducted at the 6 UR Sites at depth intervals of 6 to 12 inches, 2 to 6 inches, and 0 to 2 inches. Sampling will take place in that order from the deepest interval (6 to 12 inches) to the shallowest interval (0 to 2 inches). Proposed sample locations for each site are shown on Figures 1 through 6.

Sampling Procedure

All sampling procedures are to be followed according to the UR Sites QAPP, which describes the activities necessary to conduct soil sampling and characterization activities on UR Sites within BPSOU. It also describes the quality assurance/quality control policies and procedures to be used during collection and analysis. Implementation of this fieldwork will likely commence in the spring of 2021, assuming that access has been obtained for all subject parcels.

If you have questions or comments, please do not hesitate to call me at (907) 355-3914.

Sincerely,

Mike Michaelty

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

Attachments:

Figure 1 Unreclaimed Site UR-05 Proposed Sample Locations Figure 2 Unreclaimed Site UR-27 Proposed Sample Locations Figure 3 Unreclaimed Site UR-28 Proposed Sample Locations Figure 4 Unreclaimed Site UR-29 Proposed Sample Locations Figure 5 Unreclaimed Site UR-30 Proposed Sample Locations Figure 6 Unreclaimed Site UR-34 Proposed Sample Locations

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
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John Davis / PRR - email

Joe Vranka / EPA - email

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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

Julia Crain / BSB - email

Chad Anderson / BSB - email

Brandon Warner / BSB - email

Abigail Peltomaa / BSB - email

Molly Maffei / BSB - email

Gordon Hart / BSB – email

Jeremy Grotbo / BSB – email

Josh Vincent / WET - email

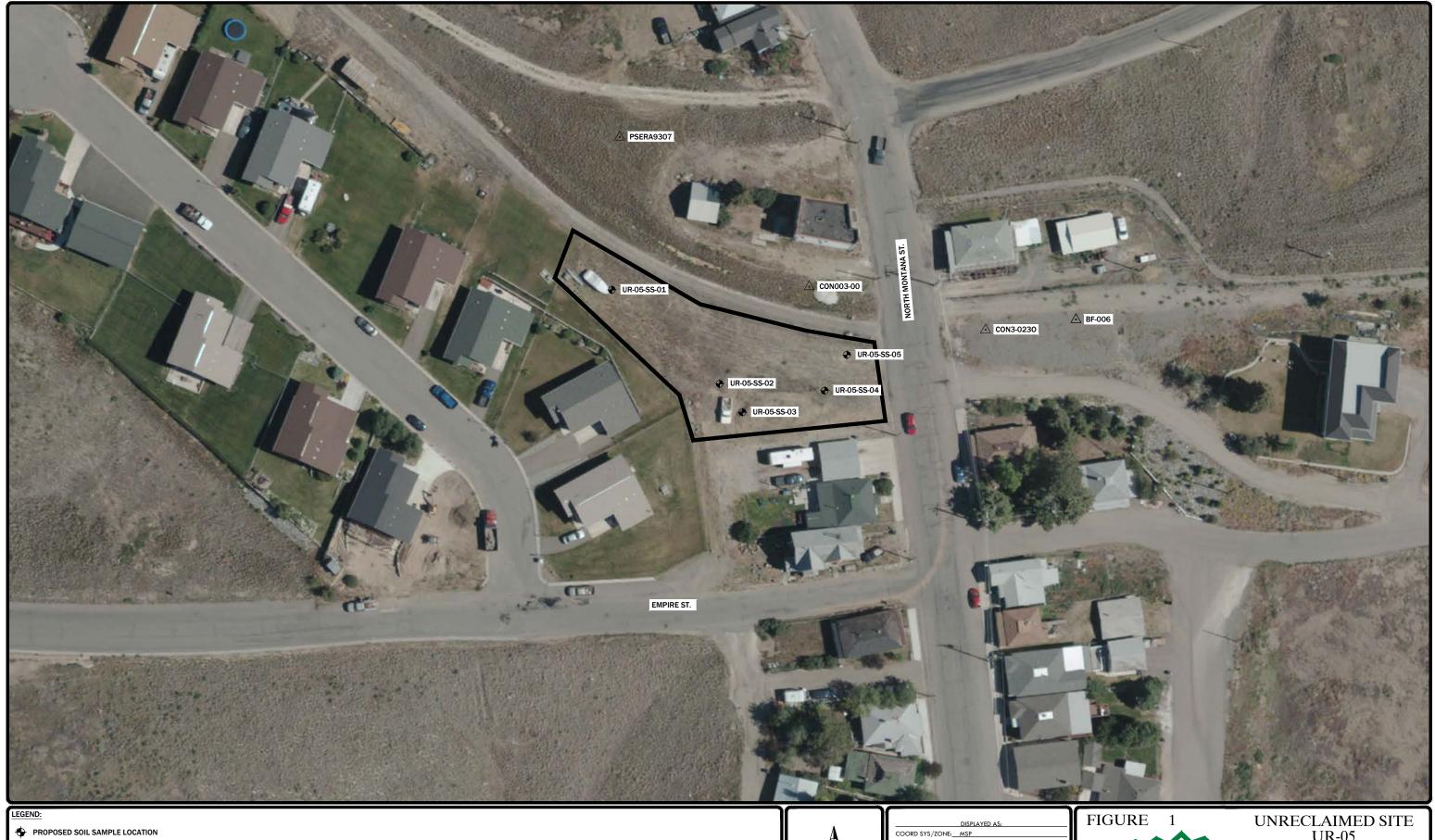
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Scott Bradshaw / TREC - email

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

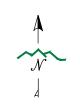
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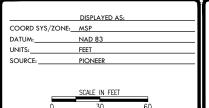




▲ PREVIOUS SOIL SAMPLE LOCATION

UR-05 IS 0.32 ACRES







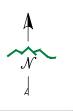
UNRECLAIMED SITE UR-05 PROPOSED SAMPLE LOCATIONS



LEGEND:

PROPOSED SOIL SAMPLE LOCATION

UR-27 IS 0.03 ACRES



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DATUM:	NAD 83
UNITS:	FEET
SOURCE:	PIONEER
	SCALE IN FEET

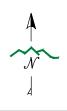


UNRECLAIMED SITE UR-27 PROPOSED SAMPLE LOCATIONS



PROPOSED SOIL SAMPLE LOCATION

UR-28 IS 0.12 ACRES



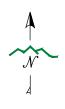




UNRECLAIMED SITE UR-28 PROPOSED SAMPLE LOCATIONS



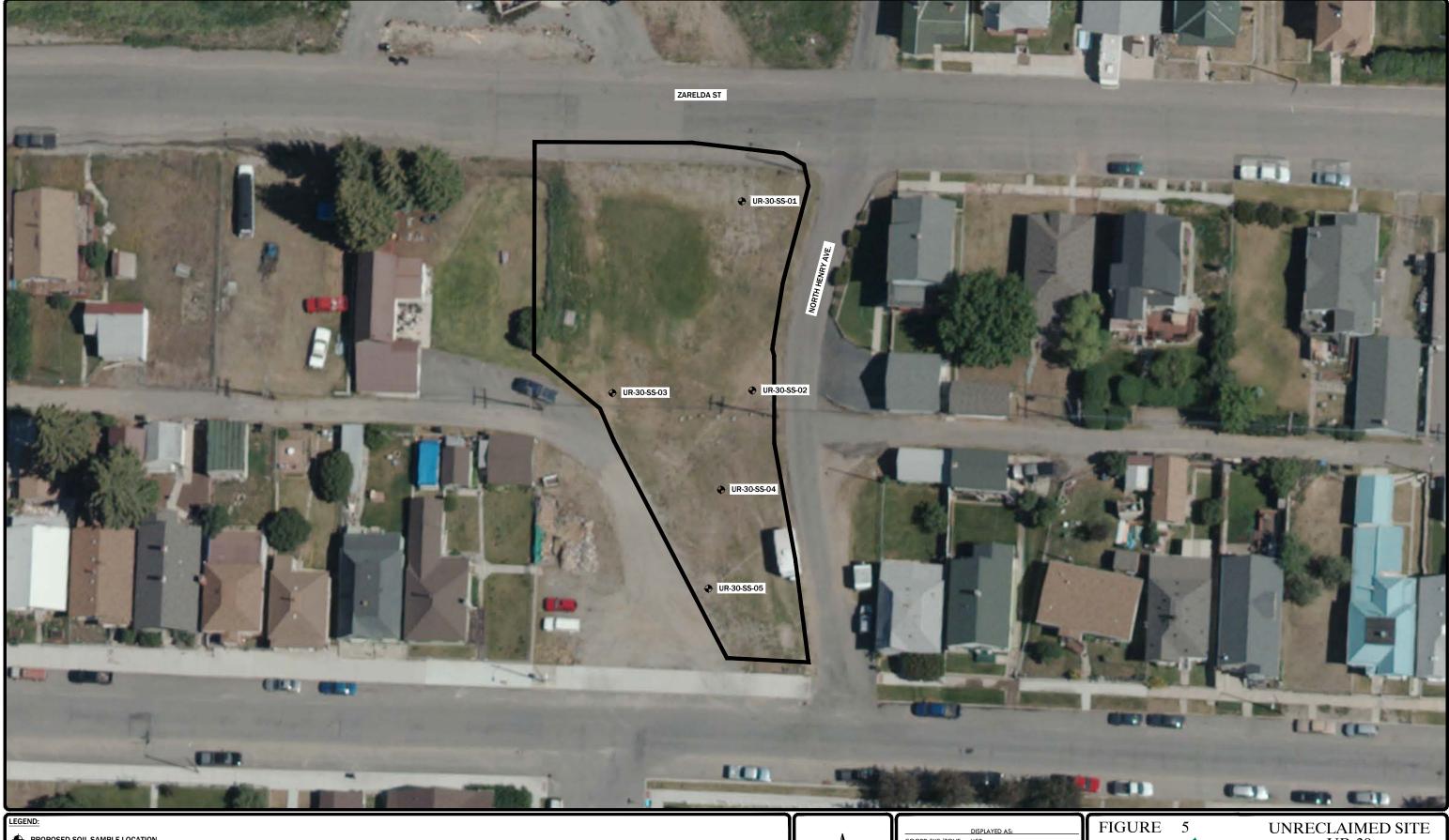
UR-29 IS 1.31 ACRES



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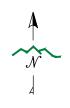


UNRECLAIMED SITE UR-29 PROPOSED SAMPLE LOCATIONS



PROPOSED SOIL SAMPLE LOCATION

UR-30 IS 0.44 ACRES



-	DISPLAYED AS:
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DATUM:	NAD 83
UNITS:	FEET
SOURCE:	PIONEER
	SCALE IN FEET

DIONEER
TECHNICAL SERVICES, INC.
1101 SOUTH MONTANA
BUTTE, MONTANA 59701
(406) 782-5177

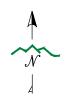
UNRECLAIMED SITE UR-30 PROPOSED SAMPLE LOCATIONS

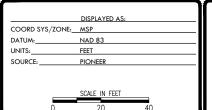


PROPOSED SOIL SAMPLE LOCATION

PREVIOUS SOIL SAMPLE LOCATION

UR-34 IS 0.14 ACRES







UNRECLAIMED SITE UR-34 PROPOSED SAMPLE LOCATIONS