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Comment letter for the Butte Priority Soils Operable Unit (BPSOU) Residential Metals Abatement Program (RMAP) Yard Submittals Round 2 (dated July 25, 2024)

Brandon Warner

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THE CITY-COUNTY OF Butte-Silver Bow

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August 30, 2024

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RE: Comment letter for the Butte Priority Soils Operable Unit (BPSOU) Residential Metals Abatement Program (RMAP) Yard Submittals Round 2 (dated July 25, 2024)

Ladies and Gentlemen:

Please find our response to the comments provided on August 28th, 2024.

General Comments

1. Please state all work will be conducted in accordance with the 2024 Remedial Action Work Plan (RAWP) and Standard Operating Procedures (SOPs) and that a copy will be provided to the contractor(s) completing the work. A cross section for removal and backfill needs to be incorporated into the SOPs that will be provided to the contractor(s).
 - a. *As discussed in the 2024 RMAP Construction Kickoff Meeting held on June 12th, 2024, copies of the 2024 Remedial Action Work Plan (RAWP) and Standard Operating Procedures (SOPs) were provided to the contractors and reviewed with them in this meeting. The statement "All work will be performed in accordance with the RMAP RAWP" is already included within the Soil ISWP, Exhibit 2 of all of the work plans. Cross sections of removal and backfill are provided within Figures 1-7 in the 2024 RMAP RAWP, which has been provided to the contractors.*
2. Please note on the drawings any hard features that will be kept in place during construction (i.e., tree, sidewalks).
 - a. *Any hard features to be kept in place during construction are detailed in the narrative section of each Soil ISWP, Exhibit 2. Drawings of these features will be captured in the as-builts upon project completion.*
3. On figures, show different hatching/color shading for placement of top dressings (i.e., sod, rock, gravel) as mapped to their relative location for placement.



- a. *Per multiple discussions and meetings, only hatching/color shading will be utilized to denote exceedances and sections were 12" remedial action will occur. Placement of top dressings will be captured in the as-builts upon project completion.*
4. Please denote on the drawings any features being added (i.e. retaining wall, garden area, timbers). Note: The contractor(s) shall report to BSB any deviations from plans (i.e. not being able to excavate 14 inches, encountering bedrock).
 - a. *Features being added will be captured in the as-builts upon project completion. The contractor will report to BSB any deviations from plans. These deviations will be noted in the Construction Log forms.*
5. Please provide the laboratory data on the Helehan material being used as an attachment. It would be appropriate to include the final approved source material package as an attachment to the complete package. This is necessary to ensure that in the future there is a link to the fill material placed in the yards.
 - a. *Per previous discussions, only the type of borrow source material will be included in the Yard Submittals. Laboratory data on the borrow source materials have been submitted and approved for use by the agencies previously.*
6. Please highlight the exceedances observed in each sample summary table.
 - a. *Per previous discussions, it was agreed upon that at this time BSB's Yard Submittals would not include highlighted exceedances in each sample summary table. The process to generate the sample summary tables is automated and at this time the system is unable to highlight the exceedances. It was agreed upon with the agencies that BSB would hold off on this component until it can be automated in order to reduce the risk of human error.*

Specific Comments

7. **2705 Marcia:** The summary table does not show an exceedance for lead. Please check sample results and update table. Indicate what will be done with the weeping willow tree in the corner of the southeast yard.
 - a. *The Yard Submittal Plan for 2705 Marcia has been revised. The weeping willow tree in the corner of the southeast yard will be left in place. Excavation in this area will follow the SOPs in the 2024 RMAP RAWP.*
8. **21 E. Center St.:** Specify what will be done with the bushes/trees at this property.
 - a. *The bushes/trees on the property will be left in place. Excavation in areas with bushes and trees will follow the SOPs in the 2024 RMAP RAWP.*
9. **537 S Idaho:** Please identify on the figure the "area along the south side of the house that will be left alone". The "Lilac" bush indicated in the Anticipated Yard Activities section is a caragana bush, consider revising. Consider other options to replace the yard area around the south side of the house. Consider replacing the yard and repairing the retaining wall in lieu of no action. Please provide an explanation for why this property is being excavated to 24" if it is being capped with river rock. Is there an element of a garden?



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- a. *The area along the south side of the house that will be left in place will be captured in the as-builts upon project completion. "Lilac" has been struck from the Anticipated Yard Activities section. The remedial actions proposed for the south side of the house were developed per discussions with the property owner. The area that is being excavated to 24" will function as a rock garden that requires 24" of topsoil per the 2024 RMAP RAWP.*
10. **514 S. Jackson St.:** Please indicate what will be done with the tree(s) in the northeast yard.
 - a. *The tree(s) in the northeast yard will be left in place.*
11. **1306 N. Main St.:** Indicate if there are trees and shrubs on the property. Indicate where the deck blocks will be installed. The bullets indicate that a stump and foundation will be removed; show this on the figure. What is the foundation that will be removed?
 - a. *The tree on the property will be left in place. BSB is unaware of deck blocks being installed per this property's anticipated remedial actions. A stump and fountain are being removed, not foundation. These removals will be captured in the as-builts upon project completion.*
12. **1428 N. Main St.:** Indicate where the new garden areas are going to be on the site map that are indicated to be remediated to 24 inches.
 - a. *The new garden areas will be captured in the as-builts upon project completion.*
13. **626 Evans Ave.:** According to the sample summary table for this site, the southeast yard should also be remediated with a lead concentration of 2,321 mg/kg from 2-6". Please devise a remediation plan for this section of the yard.
 - a. *The lead concentration of 2,321 mg/kg from 2-6" was an error in the automated system. The table has been revised.*
14. **18 W Copper St.:** Anticipated Yard activities: The *north yard* is the only area being remediated. Bullet #7 states the remainder of the *south yard* will have 10 inches of clean fill over the fabric followed by 2 inches of topsoil and sod please clarify.
 - a. *Bullet #7 contained a typo and has been revised.*

Sincerely,

Brandon Warner

Brandon Warner

CC: Mike McAnulty, AR Project Manager, PDF via email.
Eric Hassler, Director, PDF via email.
UAO Listserv, PDF via email
File.