



September 2022 Superfund Update

Activities in the last month

NRDP's Parrot Tailings Removal Project – Coordination with Atlantic Richfield on CD Projects

Montana Department of Justice Natural Resource Damage Program (NRDP's) Parrott Tailings Removal project will be winding down in 2023. They expect to complete waste removal in November and have been installing evapotranspiration caps near the railroad where Parrot waste could not be removed. They have also replaced storm sewer lines through the project area.

NRDP sent a letter to Atlantic Richfield this month asking to discuss if Atlantic Richfield is interested in taking over parts of the Parrott project, such as the groundwater capture system, haul road, or other aspects that could benefit the wider Butte Priority Soil cleanup effort. NRDP would also like to coordinate their final reclamation plans with Atlantic Richfield, including cap, roads, and parking lot construction. This will ensure that any final reclamation that could be disturbed by Atlantic Richfield's future project construction can be reclaimed after all projects are complete. Atlantic Richfield responded they plan to begin meetings this October to discuss these needs and opportunities.

Photos courtesy of NRDP: Parrot Tailings waste excavation and finished grade near the Civic Center.



Repository Siting Study

Atlantic Richfield continues working with Montana Department of Transportation (MDT) to plan haul routes from the Consent Decree project areas to a repository. The haul routes will take public streets meaning there are significant challenges to identification of the best route and traffic controls that are needed. Atlantic Richfield's contractors are working on a traffic study in the coming months to work through these details. This work will delay release of the Repository Siting Study, which will come no sooner than end of October now.

Slurry Wall Design for the Butte Reduction Works Project

Waste removal at the Butte Reduction Works project and restoration of Silver Bow Creek in that area will require pumping an enormous quantity of groundwater to allow deep excavation of waste. Construction is estimated to begin in 2024 and last three years. The EPA and Atlantic Richfield's remedy design team are currently evaluating ways to perform construction dewatering, while avoiding unwanted movement of contaminated groundwater from adjacent areas.

The concern is that non-Superfund contamination may exist under the adjacent NorthWestern Energy property, given their history of electrical transformer storage there. There is also pentachlorophenol (PCP), petroleum, and dioxin contaminated groundwater at the former Montana Pole & Treating Plant nearby. If any of these contaminants were captured by construction dewatering, they would require water treatment prior to being discharged to the creek. There are currently no plans to treat for offsite contaminants. Plans are for the dewatering water to be treated for standard mining contaminants (copper, zinc, etc.) at the existing Butte Treatment Lagoons. All parties prefer to prevent movement of offsite contaminants such as PCP.

Atlantic Richfield's design team is looking to use a slurry wall and sheet piling barrier to prevent groundwater flow from adjacent properties towards Butte Reduction Works. Further details on this will be included in the Butte Reduction Works 60% design documents which are currently slated for release in July 2023. Atlantic Richfield has completed early detection baseline PCP monitoring to help detect if the Montana Pole PCP plume is affected when aquifer testing and dewatering construction are underway. The design team will also be working on temporary variances from water quality standards for metals in construction dewatering, similar to that used during the Milltown Dam sediment removal. Temporary water quality variances are allowed by state and federal law and the Consent Decree. More information on this will be provided when details are available.

RMAP cleanup at Butte High School

Atlantic Richfield contractors completed waste removal and capping at Butte High School. This followed their 2021 RMAP school exterior soil sampling and is the last exterior area that needs to be addressed at Butte schools.

Photos courtesy of Pioneer Technical Services: Before and after pictures of RMAP cleanup of Butte High campus.



Upcoming Activity Schedule

Atlantic Richfield has not released an updated Remedial Design and Remedial Action (RDRA) schedule this month. The following upcoming activities were discussed during the most recent progress meeting.

Late September: The Grove Gulch 95% Design is planned for release. CTEC will continue to review and comment on that design.

October 21: Buffalo Gulch 60% Design. CTEC will continue to review and comment on that design.

September-October: Remedial construction is scheduled to take place at the Insufficiently Reclaimed Site, Colorado Dump – West Lot, located on East Mercury Street. Construction will include capping and installing stormwater controls. Stormwater will be directed to the existing BSB stormwater system, which drains to the Berkely Pit via the Belmont Diversion.