



CTEC



June 2024 Superfund Update

Current Activities

Grey Area Material

On June 25th Atlantic Richfield issued a letter saying they no longer plan to reuse onsite materials that fail any single metal concentration in the Consent Decree waste criteria. This means they no longer plan to reuse grey area material, also called grey dirt or dirty dirt. Although the Consent Decree contains language that may allow reuse of grey area material, Atlantic Richfield said that removing that material is an opportunity to simplify design and increase construction efficiency. Construction efficiency is improved because onsite materials would have been subject to extensive testing, which would have required stockpiling the material and additional handling with heavy equipment.

There are likely several motivating factors in this change of plans. There was significant public concern about reusing grey area material because the material would likely contain some metal contaminants at relatively high concentrations. The material would have been reused as backfill that is buried, but those contaminants would still be leachable. The State of Montana Department of Environmental Quality (DEQ) and Natural Resources Damage Program (NRDP) also vouched for removal of grey area material. EPA previously commented during the remedy design that the potential high levels of metals in grey area material may be too high for trees and shrubs planted at the public parks, causing vegetation mortality. At design meetings that we attended Atlantic Richfield took the vegetation mortality concerns seriously.

Another potentially motivating factor is the likely change from waste disposal at a repository to using the Berkeley Pit. Hauling grey area material offsite would have been a significant expense. Current plans are looking into using a slurry pipeline for transporting waste from the project sites to the Berkeley Pit. A slurry system is different from trucking waste, especially in cost. Trucking costs the same amount per cubic yard from the beginning to the end of waste removal. Slurrying on the other hand has a high upfront cost in constructing the slurry system, but then once constructed the costs are significantly lower. Removing the grey area material may have been viewed as significantly more feasible given those cost savings. In the end, the decision to remove grey area material should lead to better long-term safety and potentially reduced maintenance needs for the Consent Decree projects that will create a park system along Silver Bow Creek.

Publicly Observable Superfund Remedy Design Meetings

July 23 9:00-11:00 AM: BPSOU Consent Decree Remedial Design/Remedial Action Progress Meeting

August 13 9:00-10:00 AM: RMAP progress meeting

Publicly observable meetings can be accessed by signing up for EPA's Butte Superfund email newsletter by emailing Community Involvement Coordinator Katherine Jenkins at jenkins.katherine@epa.gov.

Upcoming Remedy Design Schedule

Atlantic Richfield issued a revised final Grove Gulch 100% design on July 10th. EPA is reviewing the revised design and will need to issue final agency approval prior to construction beginning.

The Blacktail Creek Hydraulic Control 30% design and Sitewide Groundwater Model updates are expected in mid-July.

The Buffalo Gulch 95% design is expected to be done in July and the Diggings East 95% design is expected to be done in September.