Butte-Silver Bow Planning Board

October 7, 2016

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RE: September 2016 Monthly Report of Activities
Butte Priority Soils Operable Unit
Unilateral Administrative Order (UAO) – EPA Docket No. CERCLA-08-2011-0011

Ladies and Gentlemen:

Pursuant to Paragraph 42 of the above referenced Order, Butte-Silver Bow submits the attached Monthly Report for activities performed at the Silver Bow Creek/Butte Area Superfund Site, as part and on behalf of the Group 1 Respondents. This monthly report covers work activities for September 2016.

Please contact me (497-6264) if you have any questions about the information in the report or need additional information about Butte-Silver Bow's work activities. Thank you.

Sincerely,

Julia Crain
Superfund Program
Butte-Silver Bow Planning Department

Attachment: Monthly Report

CC: Loren Burmeister, AR Project Manager
BSB Personnel
E-Mail version sent to List-Serve

Monthly Report – September 2016
Butte Priority Soils Operable Unit
Silver Bow Creek/Butte Area Superfund Site
Unilateral Administrative Order (EPA Docket No. CERCLA-08-2011-0011)

As directed by Paragraph No. 42 of the *Unilateral Administrative Order for Partial Remedial Design/Remedial Action Implementation and Certain Operation and Maintenance at the Butte Priority Soils Operable Unit/Butte Site (hereinafter, the Order)*, the City and County of Butte-Silver Bow provides this monthly report on work activities under the Order. The work activities described in this report are consistent with the directives contained in the Order/Remedial Action Work Plan, and cover those efforts performed by Butte-Silver Bow as part of the Group 1 Respondents, during September 2016.

I. Operations and Maintenance Activities

A. Source Areas/Butte Reclamation Evaluation System (BRES)

Routine O&M. In September of 2016, Source Area maintenance crews continued maintenance of sites throughout the Butte Hill. Crews completed routine O&M on sites including trash pickup and hauling, fence repairs, stormwater infrastructure cleanouts (sediment basins, culverts, inlets, etc.) and removing dead or decaying trees in various locations. Specifically:

- Conducted vegetative improvement to areas determined unsatisfactory during the BRES evaluation on Site 132 by scarifying existing soils, importing 65 cubic yards of Hoffman source top soil and preparing for seed application after October 15th.
- Conducted vegetative improvement to areas determined unsatisfactory during the BRES evaluation on Site CB-8 by scarifying existing soils, importing 24 cubic yards of Hoffman source top soil and preparing for seed application after October 15th.
- Removed two 55 gallons bags of trash and debris from Site CB-8.
- Conducted vegetative improvement to areas determined unsatisfactory during the BRES evaluation on Site 138 by scarifying existing soils, importing Hoffman source top soil and preparing for seed application after October 15th.
- Removed three 55 gallons bags of trash and debris from Site 136 and repaired 86 lineal feet of fence.
- Conducted vegetative improvement to areas determined unsatisfactory during the BRES evaluations on Site 155 by scarifying existing soils, importing Hoffman source top soil and preparing for seed application after October 15th.
- Removed three 55 gallons bags of trash and debris from Site CB-9.
- Screened sediment from 136 cubic yards of rock lining removed from inlet channel at Site CB-9 so that rock material can be utilized for future repairs.
- Removed twelve 55 gallon bags of trash and debris from Site 2310 and two truckloads of larger materials.
- Removed 12 yards of trash and debris (possible transient camp) from Site132.
- Prepared an area for native plant site and erosion control on Site 71N.

BRES Program. In September 2016, Butte-Silver Bow Data Administrator and Manager began reviewing the findings of the 2016 Field Evaluations and began drafting the 2016 Summary Report. Following evaluation form review staff downloaded spatial data from Arc Online. The findings of this process inform the content of the Summary Report, anticipated for submittal by end of October.

Vegetation and Weed Controls. No specific activities to report for September 2016.

Native Plants. Butte-Silver Bow has completed its obligations to the Tree Program for 2016. Butte-Silver Bow developed a list of potential planting sites during the 2016 BRES Evaluations and will plan to begin 2017 planning in October 2016.

Excavation Review and Oversight. BSB personnel continue to monitor excavation and dirt-moving activities throughout the basin, including multiple Permits already issued. Coordination with multiple Contractors requires continued coordination for access to the Mine Waste Repository. BSB personnel issued 23 Excavation and Dirt-Moving Permits during September 2016; 8 permits were issued for properties in BPSOU:

- 1026 Caledonia – move stockpiled dirt to landscape area;
- 1019 W. Woolman – utility repairs and maintenance;
- 226 W. Aluminum – utility repairs and maintenance;
- 237 E. Mercury Street – posts/poles/landscaping;
- 743 S. Wyoming – utility repairs and maintenance;
- 849 W. Copper – excavation permit for new single family residence;
- Park, west of 63 E Park (Parking Garage) – parking structure construction;
- 1223 W. Granite – Sidewalk/Driveway.

Institutional Controls (ICs). Butte-Silver Bow continues to manage its responsibilities to the Institutional Controls Program. Butte-Silver Bow is working with permit recipients to educate the permit holders on Best Management Practices, stormwater controls, sediment controls, excavation of hazardous waste, and access to the Mine Waste Repository. B-SB personnel continue to work closely with local utility companies (NWE, telephone, cable and others) to coordinate Street Opening permits, Excavation & Dirt-Moving permits and others.

Mine Waste Repository Maintenance. The Mine Waste Repository continued operation with all active dumping directed to the lower, eastern bench which continues to be monitored and maintained on a regular basis.

- Removed materials from and re-graded the lower deck of the repository using a D7 dozer.

B. Storm Water Operations and Maintenance Activities

During the reporting period, standard and routine work activities were performed. Crews were out inspecting and monitoring various facilities, and completed several cleanouts within the BPSOU site as needed. September maintenance activities include:

- Continuous monitoring of Syndicate Pit, CB8, CB9 and HDDs;
- Cleaned by-pass grate and sediment traps at CB8 on multiple dates;
- Finished constructing and rock lining a storm water ditch on the north and west boundary of Site 53 to direct storm water to the existing sediment trap and drop inlet on Montana Street. This effort included the installation of two culverts to allow access to Northwest Energies substation on Pacific Street.
- Repaired damage to areas adjacent to the culvert on the north perimeter of Site CB-9. Removed culvert and bedded the head end of the culvert in asphalt to prevent future damage from occurring. Extended the existing culvert 8 feet to prevent future erosion.
- Removed and disposed of 46 cubic yards of sediment from storm water features at Sites 155 and 155E.
- Removed sediment from 12 drop inlets and jetted connecting storm water lines on West Mercury Street from Montana Street to Wyoming Street utilizing the Vactor truck.
- Removed sediment from 9 drop inlets and jetted connecting storm water lines on West Silver Street from Montana Street to Wyoming Street utilizing the Vactor truck.
- Removed 2 cubic yards of sediment from inlet structure along walking trail Site 2330, section A.

- Removed 2 cubic yards of sediment from the sediment trap on Site 70.
- Cut curbing along Empire Street to direct storm water to existing catch basin on the corner of Boardman Street and Empire Street.

Superfund Storm Water Structures Inspections: BSB personnel continue routine inspections of storm water facilities, storm water features and storm water structures.

Superfund Storm Water Structures Operations and Maintenance Plan: This plan is currently under review with Atlantic Richfield Staff and once comments are submitted and revisions made an interim plan will be submitted to the Agencies for review.

MPDES Storm Water Permit Assistance & Monitoring – MS4: MPDES Storm Water Permit Assistance & Monitoring – MS4: Butte-Silver Bow and its consultants continue to implement requirements of its Municipal Separate Storm Sewer System (MS4) permit. The MS4 permit requires the BSB develop a Storm Water Management Program (SWMP) that addresses six control measures: public education, public involvement, illicit discharge detection and elimination (IDDE), construction site storm water control, post-construction site storm water control, and pollution prevention/good housekeeping. Activities completed under each control measure are detailed below:

- BSB completed the annual MS4 report as required in Section I under Part IV. Monitoring, Recording and Reporting Requirements for the General Permit.
- Butte-Silver Bow Public Works and its consultants provide engineering support and assistance in reviewing storm water design plans for proposed developments in Butte, as required by the City-County Storm Water Ordinance. Assistance regarding storm water requirements was provided to potential developers as requested.
- MDEQ has decided to administratively extend the existing MS4 permit for the years 2015-2016 while a working group conducts meetings develops new permit requirements. BSB and its consultant WET have participated in multiple permittee-stakeholder meetings on this topic and will take part in the working group meetings.
- BSB began meeting with the other MS4 Cities to develop a MS4 permit that is acceptable to the cities and DEQ.

C. Water Quality District Activities

- Attended weekly coordination meetings between the Water Quality District, Superfund, and Metro.
- Received and reviewed the domestic well sampling results from the Montana Bureau of Mines and geology
- Scheduled meeting regarding domestic well sampling program
  - Meeting will include Butte-Silver Bow, Montana DEQ, EPA, Atlantic Richfield, and Montana Bureau of Mines and Geology Staff
  - Agenda will focus on what is currently being done through the Butte Mine Flooding Operable Unit Consent Decree; and what is proposed/may be proposed for the Butte Priority Soils Operable Unit Consent Decree.
- Continued communication with TREC in the development of the domestic well sampling quality assurance project plan.

D. GIS Activities

Primary work in the reporting period included:

- Monthly review of ArcGIS Online for O&M and Stormwater Inspection data was conducted. Upon review, data was input into the BRES O&M Database;

- QA/QC and general editing of line work collected during the 2016 BRES Field Evaluation was completed;
- Staff began preparing the 2016 BRES Field Evaluation site maps. Staff developed a symbology for point, line and polygon data collected and utilized this symbology to begin the process to finalize maps for each site and the vegetation, erosion and site specific trigger items identified in the field. The maps will be incorporated into the 2016 Summary Report of BRES Field Evaluations.
- Plotted a map of Mining Claims in the vicinity described as 'Anselmo Mine east to former McQueen neighborhood' for Jim McCarthy, Archives Volunteer.
- GIS Staff exported BRES Quad 3 and Quad 4 site statistics in Excel format for analysis of BPSOU-related as-built data.
- Converted BABCGA polygon area to KMZ for Water Quality District.

II. Residential Metals Abatement Program

There are a number of standard work activities that are on-going and addressed each month:

- Identifying soil, attic and cap protection projects.
- Data base and GIS tracking system; progress and annual reports;
- Completion statements and deed attachments for projects completed;
- Re-insulating properties previously abated;
- Paint inspections;
- Residential soil/basement sampling;
- Residential attic sampling;
- Residential interior dust sampling;
- Provide use of HEPA vacuums;
- Provide blood lead sampling through WIC clinic and establish database for blood lead results;

Projects in Progress (October 2016)
310 S. Jackson – Attic
629 S. Main – Attic
3154 S. Montana – Soil
832 W. Quartz – Soil

Projects Completed: (September 2016)
630 S. Washington – Attic
2931 Amherst – Attic
1805 Florida – Attic
521 S. Washington – Attic
935 Zarelda – Attic
344 E. Mercury – Attic
3135 Quincy – Attic
706 Nevada – Attic
747 Evans – Attic
N. Main St. Lot – Soil
1107 Maryland – Soil
855 W. Granite – Soil
517 W. Silver – Soil
1006 Colorado – Soil
834/836 W. Granite – Soil

34 Missoula Apt. ½ - Soil
726 W. Quartz – Soil
728 W. Quartz – Soil

Upcoming projects:
1207 W. Platinum – Attic
911 Waukesha – Attic
1133 W. Porphyry – Attic
552 N. Franklin – Attic
45 W. Woolman – Soil
49 E. LaPlatte – Soil
622 W. Granite – Soil
217 S. Dakota – Soil
1012 W. Quartz – Basement
450 N. Idaho – Basement

Projects Completed to date (2016) – 95
Properties Sampled to date (2016) – 200
Property Requests to Access for Sampling (2016) – 650