Butte-Silver Bow Planning Board

March 10, 2016

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RE: February 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 February 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
Special Projects Planner
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 – February 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 February 2016.

I. Operations and Maintenance Activities
A. Source Areas/Butte Reclamation Evaluation System (BRES)

Routine O&M. In February 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:

- Repaired/replaced fencing at BRES Sites 150 and 05;
- Removed garbage and debris at BRES Sites 59, 58, 41, 40, 42 and 43;
- Installed Best Management Practices (BMPs) at the approved snow storage areas, Walkerville's Snow storage area on Walkerville Drive and the alternative snow storage area at the Missoula Ball Field parking lot. The BMPs consisted of dirt berms, swales and gravel waddles.

BRES Program. A summary report of trigger items identified during the 2015 BRES Field Evaluations has been created and delivered to Operations Manager for field review. The outcome of field reviews will inform the development of site-specific corrective actions to be implemented in spring and summer 2016.

Vegetation and Weed Controls. None to report at this time.

Native Plants. Butte-Silver Bow has completed its 2016 Tree Program work plan in partnership with the Montana Tech native plant program. 10 locations have been selected for planting in summer 2016. A preliminary report of target areas will be provided to EPA in March 2016.

Excavation Review and Oversight. BSB personnel issued 7 Excavation and Dirt-Moving Permits during February 2016; no permits were issued for utility repairs, maintenance or upgrades in the BPSOU.

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 BMPs, 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. Typical maintenance activities include:

- Continuous monitoring of CB8 and CB9;
- Cleaned by-pass grate and inspected sediment traps at CB8 9 times;
- Constructed dirt berm adjacent to BRES Site 20A to direct storm water to existing ditch;
- Removed ice and debris from 2 catch basins on BRES Site 97S2 and removed ice and debris from existing ditch to allow storm water to flow to the northwest catch basin on Anaconda Road;
- Inspected storm water ditch and sediment traps located south of the interstate and adjacent to the Unnamed Dump;
- Inspected storm water structures on BRES Site135;
- Constructed berm north of BRES Site 79;
- Constructed berm adjacent to storm water ditch located on Lisac's property to divert storm water;
- Inspected and removed ice and debris to ensure proper storm water flow from 103 drop inlets locate in the western portion of BPSOU.
- Inspected all 5 Hydrodynamic Devices in February.

Superfund Storm Water Structures Operations and Maintenance Plan: Per requirements from EPA, BSB and its consultant WET will submit a Draft Interim Plan to EPA and DEQ prior to end-of-year.

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
- Attended Stormwater BMP Evaluation Meetings
    - Meeting Dates: 1/25/16, 2/2/16, 2/17/16, and 2/24/16

- Attended TRC Meetings
- Attended Bi-Weekly Internal Superfund Update Meetings
- Had meeting with Health Department Staff regarding previous water sampling done in Fairmont area.

D. GIS Activities

Primary work in the reporting period included:

- Superfund Division is assessing the quality and comprehensiveness of onsite document management. A new structure and catalogue is currently being developed and organized.
- The Butte Reclamation Evaluation System (BRES) database is updated with all 2015 Operations and Maintenance (O&M) Daily Work Report information. 2016 data is incorporated on a monthly basis, and the information will be queried moving forward for development of monthly work reports to AR.
- A BRES Quad One (1) map was plotted and delivered to ARCO representatives. There have been discussions of modifying the current BRES Site boundaries to include areas being noted for O&M work during field evaluations. The BRES program has completed a four (4) year cycle of analysis from Walkerville and vicinity, (Quad 1) south to the Timber Butte \ Clark Mill region (Quad 4).
- Copies of a map and legal description prepared for the closure of unimproved Avoca Drive were provided to ARCO Property Specialists to assist with property ownership verification.
- A Superfund Structures GIS theme was requested and received from Water and Environmental Technology (WET) staff. This file is a collaboration of data we received from ARCO contractors (Storm Water Channels) in 2009 and provided to WET for the Master Plan effort. Hydrodynamic Device (Point) locations, SW Channels, (Lines) and Catch Basins (Polygons) are all included in the database. This data was saved to an appropriate directory on the GIS File Server. An effort will be made to organize this information into an ARC GIS online project for use by staff conducting Storm Water investigations in the field.
- The CLAPAP (Clap) database has been updated with parcel information, and sample results from residences visited the end of December 2015, and January 2016.
- Draft maps of locations considered for 2016 planting projects have been plotted and are being evaluated.
- The architectural design site map of the Butte - Silver Bow Maintenance Center was scanned, and the image export file emailed to requesting Water and Environmental Technology (WET) staff.
- GIS themes of Mining Claim boundaries, and Claim Names were copied to an ARCO Environmental auxiliary hard drive, and delivered to ARCO staff at the Kelley Mine Yard.
- A citizen request for a map of ARCO Environmental property ownership west of their home at 941 W Copper Street was completed.
- A Google Earth friendly Kmz of our Shaft locations was requested, and emailed to a CDM – Smith staff Dave Swanson, who is doing work on Railroad ownership in the vicinity of the Belmont Mine Yard for the Environmental Protection Agency (EPA).
- An effort to calculate the square miles of a modified Silver Bow Creek Watershed was completed. The analysis area would include the area upstream of the confluence of Blacktail and Silver Bow Creeks. A draft map, and statistics calculated for acreage, and square miles were forwarded to Reclamation Division personnel. Land Record requests for maps on N Main Street were completed. These maps included Butte Reclamation Evaluation System (BRES) Sites in the vicinity of selected property ownership, as well as municipal and Superfund storm water features.

II. Residential Metals Abatement Program

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

- 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 (March 2016)
1017 W. Park – Attic
10 S. Crystal – Attic
450 N. Idaho – Basement
1012 W. Quartz – Basement

Projects Completed: (February 2016)
327 N. Wyoming – Attic
1021 S. Wyoming – Attic
1009 Hornet – Attic
926 W. Silver – Attic
2715 St. Ann – Attic

Upcoming projects:
15 Bennett – Attic
102 E. Center – Attic
925 W. Copper – Attic
3302 Sherman – Attic
929 S. Arizona – Attic

(Ready to start spring 2016)
620 S. Montana – Soil
118 Minah – Soil
122 Minah – Soil

Projects Completed to date (2016) – 12
Properties Sampled to date (2016) – 10

III. Other Activities

None this month.