



Butte-Silver Bow Planning Board



June 5, 2015

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RE: May 2015 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 May 2015.

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,

A handwritten signature in black ink that reads "Julia M. Crain".

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 – May 2015

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 May 2015.

I. Operations and Maintenance Activities

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

Routine O&M. In April 2015, Source Area maintenance activities resumed from the winter slowdown. BSB field crews were mobilized beginning March 23 to inspect all BRES Sites with particular focus on all stormwater features and structures, e.g., ditches, sediment basins, culvert inlets and outlets, etc. Cleanouts began immediately following completion of inspections. In addition, crews began cleaning trash, debris and garbage from the length of the MSD from Texas Avenue to Montana Street.

Work continues on finalizing the new BRES data management system for BRES evaluations and O&M reporting. The new data management system has been used to create the 2014 Annual BRES Report and will be used to draft the forthcoming BRES O&M Report. The system is intended to be fully functional by June 2015 for field evaluations beginning June 22, 2015.

BRES Corrective Action Plans (CAPs). During April 2015, BSB crews began inter-seeding and fertilizing to correct BRES vegetation deficiencies (RI and VI). Remaining work from the 2014 field season will continued through April. The EPA Approved 2014 CAPs will be implemented concurrently with routine O&M tasks throughout the 2015 field season.

BRES 2015 Field Evaluations. BSB has arranged for 2015 BRES Field Evaluations to be performed by the Clark Fork Watershed Education Program (CFWEP). Preliminary schedules have the field evaluations commencing on or about Monday June 22nd, 2015. Field evaluations will again be started with an initial re-training and re-calibration of field evaluators.

Vegetation and Weed Controls. BSB Weed Department staff continues to support BSB Reclamation Department's routine weed control, seeding and mowing obligations. Plans are now being finalized for weed control during the 2015 field season, with particular emphasis placed on 2014 BRES evaluation deficiencies. The BSB Weed Department will include the sterilization of all appropriate BRES Sites, including pathways, walking trails, stormwater structures, engineered soil caps, etc.

Native Plants. Montana Tech staff and BSB personnel will continue to coordinate programs in 2015. Plantings will be concentrated at Copper Mountain, Scown Field, Missoula Field and

other areas. Preparation of soil, gravel and other materials for the seed dispersal islands can take place during the spring months and be ready for planting in the spring / early summer. Co-located BSB trees and MT Tech native plants are planned for 2015 at the Copper Mountain Park (CMP). The Seed Dispersal Island in the 11th Street Triangle at Excelsior Avenue and Walkerville Drive will be implemented in 2015. Montana Tech plantings will continue in the spring of 2015.

Excavation Review and Oversight. BSB personnel issued 12 Excavation and Dirt-Moving Permits during March 2015, due to improving weather conditions, three permits were issued for properties within 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. Additional public educational efforts are being planned for spring 2015. These education sessions will be specifically targeted towards construction workers and contractors. 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. Several BSB employees are scheduled for BMP training by MDEQ in April 2015.

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.

B-SB has proposed grading of the upper (western) bench of the Repository to its final slope of 3:1 in preparation for final reclamation. At the direction of EPA and ARCO, the final sloping of the upper (western) Repository has been placed on hold until EPA and ARCO have an opportunity to re-consider the final Repository sloping and closure plans.

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:

- Removing debris as necessary (in inlets, pipes, and other conveyances).
- Removing sediment and cleaning catch basins after storm events.
- Repairing and in some case rebuilding/replacing damaged catch basins and lateral pipes.
- Cleaning out and maintaining Hydrodynamic devices (HDDs) and other Superfund structures after storm events.
- Eliminating illicit connections (as identified in investigation work).
- Inspecting facilities to identify maintenance needs (video, dye tracers, etc.)
- Conducting Superfund Storm Water Structure O&M Activities.
- Construction projects as identified by BSB Public Works staff and/or required by the agencies.

Kaw Avenue/Front Street Storm Water Project: BSB is currently processing the CCR for the Kaw Avenue storm water project to re-route BSB infrastructure and eliminate open ditches along BNSF property. WET, BNSF, AR, and EPA conducted a final site walkthrough on October 30,

2014 and a list of final punch list tasks was developed, which were completed by Wasley Excavation November 2014.

Superfund Storm Water Structures Operations and Maintenance Plan: Per requirements from EPA, BSB and its consultant WET are working on revisions to the Superfund Storm Water O&M Plan and associated reporting. Multiple working meetings have been conducted with discussions on how to incorporate maintenance needs/requirements on BRES sites and parts of the municipal system. A preliminary discussion is planned for BSB's May construction update meeting.

Silver Bow Street Storm Water Improvements: BSB is working on a storm water improvement project on Silver Bow Street. The area has experienced chronic flooding in the past. New pipe and inlets will be installed. Design work has been completed. Construction has not been scheduled.

George – Utah Street Storm Water Improvements: BSB is working on a storm water improvement project near the intersection of Utah and George Street. The area has experienced chronic flooding in the past. New pipe and inlets will be installed. Design work and proposed construction plans have been completed. Construction has not been scheduled. This project may need to be coordinated with potential restoration work proposed by NRDP.

Skateboard Park Storm Water Improvements: BSB is working on a storm water improvement project at the BSB Skateboard Park located off Continental Drive and Second Street. The skateboard park does not have an outlet; as a result, the park must be frequently pumped out after storm events. This project will design an outlet from the park to the BSB storm water system. Design work is in progress. Construction has not yet been scheduled.

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:

- CFWEP has a storm water focus on their recent quarterly newsletter. They are also working to produce multiple short videos on storm water and water quality.
- BSB completed the annual MS4 report as required in Section I under Part IV. Monitoring, Recording and Reporting Requirements for the General Permit.
- BSB Staff attended MTDEQ MS4 BMP Training in Bozeman in February.
- 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.

Street/Snow Maintenance Plan – Per EPA request, BSB has revised its street and snow maintenance plan. BSB awaits EPA comments on this plan.

C. Water Quality District Activities

- On site wastewater work has continued throughout this period as well as review of subdivisions involving Sanitation in Subdivision Act.
- MBMG provided well testing results for six (6) residential drinking water wells identified in the Butte Alluvial and Bedrock Controlled Groundwater Area. All wells were below the MCL for arsenic, cadmium, copper, lead and zinc.

D. GIS Activities

Primary work in the reporting period included:

- **Maps**
 - A call was received from Kennedy and Jenks Consulting staffers regarding property ownership near the intersection of Kaw Avenue and Railroad Street.
 - A report of a possible subsidence in the 2700 block of Argyle Street was received. A site location map, with known GPS Hazards and Shafts in the vicinity was prepared.
 - Loren Burmeister requested a site specific map of Source Area Sites near Shields and Texas Avenues. The sites: 1757, 1759, 1760 and 2218, were mapped with other Butte Reclamation Evaluation System (BRES) sites and existing Rail Road Source Areas in the vicinity. An image export file was emailed.
 - Storm water inspections and Operations and Maintenance (O&M) tasks in the Missoula Gulch \ Missoula Ball Fields area has included a field review of storm water features inventoried during the winter. Maps with storm water features were plotted, and are being evaluated by GIS and Reclamation personnel.
 - A point theme of the HD's, GPS points collected by Geographic staffers in Fall 2014, received an attribute update with the official identification number noted in an illustration from a confidential Superfund Storm Water Structure document.
 - A map of Sutter Street with BRES Sites and Storm Water features was modified and plotted for Planning Department staff.
 - A subsidence map was plotted for 2500 block of Edwards Street.
 - The new construction of a new tire warehouse on Wynne Avenue was mapped as a potential site to acquire topsoil. A large scale map of the parcels being excavated was plotted for use in a grid layout evaluation.
 - The CLAPAP (Clap) database has been operating without any noticeable interruptions in the sample data entry process. A review of the necessary components queried during CLAPAP (Clap) database statistical reporting received some attention. The replication of this functionality in an updated Graphical User Interface (GUI) format would be a desirable option. GIS staff contacted Residential Metals Abatement Program (RMAP) staff currently updating the Clap with abated and sampled property data. A visit will be necessary to generate lists of properties used to create Google compliant Kml files used on RMAP Workstations.

- **BRES Program**
 - Corrective Action Plan (CAP) Reports were completed and a final review is pending and completion of 2013 and 2014 Operations and Maintenance (O&M) improvement work is ongoing. Maps of Butte Reclamation Evaluation System (BRES) Quadrants two (2) and three (3) were modified and plotted for reference use during a Reclamation Division field visit to the sites requiring work completion.
 - The BRES Database continues to be refined for use in Summer 2015. A map of the five (5) Hydrodynamic Devices (HD's) was created to add the sites to the new database. The shapefile was forwarded to Water and Environmental Technology (WET) specialists.
- **Revegetation**
 - The County Extension Agent provided species and tree and shrub numbers to be ordered for plantings planned for 2015 at Jim Scown ball field and Caledonia Triangle, Missoula Avenue Little League fields, and the 11th Street triangle. The upgrade of the American Legion Field at Copper Mountain was noted as topic of discussion and discussions regarding breaching of the vegetative cap, and procedures necessary to comply with accepted Excavation Protocols, and Best Management Practices have led to postponing plantings at Copper Mountain for this year.

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 2013 projects
- Re-insulating properties previously abated
- Paint inspections
- Residential soil/basement sampling
- Residential attic sampling
- Residential interior dust sampling
- Continuing lead education; extensive meeting with EPA and John Ray on enhancing the Community Outreach portion of the RMAP
- Provide use of HEPA vacuums
- Provide blood lead sampling through WIC clinic and establish database for blood lead results

Projects in Progress (May 2015)

56 Missoula – Soil
 340 E. Mercury – Soil
 522 W. Silver – Soil
 418 N. Jackson – Soil
 61 W. Center – Soil
 1242 E. Second – Soil
 631 Placer – Soil

1252 Aluminum – Soil
709 N. Wyoming – Attic
2601 Washoe – Attic
1145 W. Platinum – Attic
531 N. Franklin - Attic

Projects Completed: (May 2015)

709 N. Wyoming – Attic
2601 Washoe – Attic
1145 W. Platinum – Attic
531 N. Franklin - Attic
715 6th Street – Attic
330 W. Daly – Attic
1137 W. Silver – Attic
1242 E. 2nd – Attic
418 N. Jackson - Soil

Upcoming projects:

2007 Walnut – Attic
1225 W. Copper – Attic
411 W. Copper – Attic
849 Hornet – Attic
1130 Missouri – Attic
1211 Gold – Attic
965 N. Main – Soil
901 W. Copper – Soil
19/21 Gagnon - Soil

Projects Completed to date (2015) – 42
Properties Sampled to date (2015) – 130

III. Other Activities

None this month.