

Butte Priority Soils Operable Unit REMEDIATION

Bulletin #19

July 11, 2013



Cleanup activities for the Butte Priority Soils Operable Unit (BPSOU) began in 1987. These actions (Time-Critical Removal Actions and Expedited Response [Non-Time Critical Response] Actions) were taken to address immediate and significant human health and environmental risks. EPA did not want to delay this cleanup work until the Remedial Investigation/Feasibility Study and Record of Decision (ROD) was completed. After these actions were taken the ROD was approved in 2006. Major components of remediation have been completed in the BPSOU since the ROD was issued. The following discussion and tables illustrate what has been completed. what is ongoing, and an estimated time of completion for each.

Cleanup Activities Completed Prior to the ROD

Approximately 422 acres of land were addressed using the expedited Superfund removal process. The early response actions were designed and constructed in a manner consistent with the final remedy.

Time-Critical Removal Actions

- Walkerville (1988) Addressed certain waste dumps and residential soil areas with contaminated lead and/or mercury
- Timber Butte Mill (1989) Removed and consolidated contaminated soils
- Butte Priority Soils (1990 and 1991) Addressed risks from certain mine waste dumps, a concentrate spill, and seven residential vards in Butte and Walkerville
- Colorado Smelter (1992) Removed and consolidated onsite contaminated soils
- Anselmo Mine Yard and Late Acquisition/Silver Hill (1992) Addressed a mine yard and several mine dumps in Butte
- Walkerville II (1994) Addressed four additional dump areas with elevated soil lead levels
- Storm Water (started in 1995) Partially addressed storm water issues in Butte, including removal of mercury contaminated soils and diversion of contaminated storm water
- Railroad Beds (started in 1999) Addressed contaminated railroad beds and adjacent residential yards that contain elevated concentrations of metals
- Walkerville (2000/2001) Addressed additional residential dumps with elevated metals levels

Expedited Response (Non-Time Critical Response) Actions

- Lower Area One -and incorporated into the ROD Removed accessible mine tailings and contaminated soils from the Silver Bow Creek floodplain at the Colorado Tailing and Butte Reduction Works areas and installed a groundwater interception and treatment system
- BPSOU (1994-and incorporated into the ROD) Started to address certain residential areas with soil-lead concentrations above the residential action levels as part of the Residential Metals Abatement Program



- Lower Area One Manganese Removal (1992) Removed manganese ore stockpiles located within the flood plain of Silver Bow Creek
- Old Butte Landfill/Clark Tailings (1998) Completed Resource Conservation Recovery Act (RCRA) corrective action at the landfill in combination with Superfund removal actions

Status of Cleanup Activities Included in the ROD

Residential Contamination Activities

The Residential Metals Abatement Program (RMAP) aims to reduce risk from exposure to high metals. The RMAP includes comprehensive procedures for sampling, remediation, medical monitoring, community outreach, and overall property characterization and remedial status tracking.

| Activity Description | Complete | Ongoing | Estimated Completion |
|---------------------------------------|----------|---------|-------------------------|
| Final Multi-Pathway RMAP Plan | X | | |
| RMAP assessments | | Х | 2019 |
| RMAP cleanups including attic dust | | Х | 2029 |
| Community outreach and education | | Х | Ongoing |
| Health studies and medical monitoring | | Х | Ongoing |
| Long term tracking methods (database) | | Х | Ongoing |
| Anaconda Sampling Worksite 137 | X | | |
| PA012 Dump Site 113 | X | | |
| 33 West Missoula | X | | |









Non-Residential Solid Media Contamination Activities

Contaminated solid media located in non-residential areas at the BPSOU site include waste rock piles, smelter wastes, milling wastes, and contaminated soils. Concentrations of metals in solid media in non-residential areas (commercial areas, open areas, and non-active mining areas) may exceed action levels. These areas may also pose a threat to the environment as a result of storm water runoff.

| Activity Description | Complete | Ongoing | Estimated Completion |
|---|-------------|--------------|-------------------------|
| Source areas that were recently reclaimed due to exceedances of arsenic and/or | lead actio | n level(s) | |
| Goldsmith Dump Site 161 | X | | |
| Arctic Site 1530 | X | | |
| Wake Up Jim Site 161 – moved to Granite Mountain Area and will not be reclaimed | X | | |
| Small waste areas surrounding Clark Mill Tailings repository | X | | |
| Caledonia Street | X | | |
| Moose Dump Site 12 | X | | |
| Source areas not exceeding arsenic and/or lead action level(s) but impacting su will be reclaimed | rface water | r quality th | at were or |
| Back Fill 007 Site 65 | X | | |
| Unnamed Dump Site 148 | Х | | |
| New and Mahoney Street | Х | | |
| 413 Boardman Street | Х | | |
| Jenny Dell Site 33 | X | | |
| Kelly Mine yard entrance | X | | |
| North Wyoming Street | X | | |
| 800 North Main | | | 2013 |
| North Corner of Granite and Arizona | Х | | |
| Green Mountain Shaft | X | | |
| Streambanks, sediment, and over bank deposits from the Blacktail Creek/Metro Storm Drain confluence area to Lower Area One | X | | |
| 424 North Washington Street | X | | |
| 131 West Copper Street | X | | |
| 20 additional sites identified in 2010 | X | | |
| Other sites | | | 國的基本 |
| Sites within the Granite Mountain Memorial Area | X | | |
| Syndicate Pit | Х | | |
| Butte mine waste repository | Х | | |
| Sites not granted a "conditional and limited no further action" status in the Resp Document | oonse Actio | on Summa | ry |
| Colorado Smelter | Х | | |
| Lower railroad yard site 1 | X | | |
| Other activities | | | Sec. C |
| Maintain non-residential solid media sites to Butte Reclamation Evaluation System standards | | Х | Ongoing |





Groundwater Activities

To prevent contaminated groundwater from entering adjacent surface water sources and to prohibit domestic use of groundwater influenced by mining related wastes, a wide range of studies and remedial actions have been performed at the BPSOU.

| Activity Description | Complete | Ongoing | Estimated Completion |
|---|----------|---------|-------------------------|
| Metro Storm Drain (MSD) sub drain installation | X | | |
| Wetland demonstration area | | Х | 2014 |
| Irrigation controls and monitoring at the Parrett Tailings | | Х | Ongoing |
| Localized groundwater study | | Х | 2013 |
| Perform MSD groundwater flow monitoring | | Х | Ongoing |
| Butte Reduction Works (BRW) East End Grading and MSD/BRW Upgrades work plans | x | | |
| Culvert removals in Silver Bow Creek | X | | |
| BRW groundwater and surface water monitoring | | Х | Ongoing |
| Conduct abandoned aqueduct study | | Х | 2014 |
| Implement abandoned aqueduct study recommendations | | | 2014 |
| Prepare MSD sub drain groundwater management report | | Х | 2013 |
| Implementation of selected MSD improvement action after reviewing MSD sub drain groundwater management report | | Х | 2013 |
| Implementation of the revised groundwater monitoring program | | Х | 2013 |









Surface Water Activities

The Selected Remedy for surface water is directed at achieving the primary objectives of meeting applicable or relevant and appropriate requirements, returning Silver Bow Creek to its beneficial uses, and protecting downstream receptors from releases of contamination from BPSOU. Recent remedial design and action efforts have been focused on improving the quality of storm water that discharges from the BPSOU into receiving streams.

| Activity Description | Complete | Ongoing | Estimated Completion |
|---|-----------|---------|-------------------------|
| Upfront storm water best management practices (BMPs) | | | |
| Cleanout and maintenance of the Butte Silver Bow's storm water system | | Х | Ongoing |
| Addressing illicit sewer connections | | Х | Ongoing |
| Implementation of curb and gutter program | | Х | 2013 |
| Installation of storm water catch basin in Buffalo Gulch | | Х | To be determined |
| Capping and vegetation of waste dumps contributing to storm water contamination | | Х | Ongoing |
| Installation of hydrodynamic devices | | | 派行。但这些是我们 |
| Anaconda Road/Butte Brewery | X | | |
| Lower Buffalo Gulch | X | | 科学生的主要的 和基本的 |
| Texas Avenue | X | | |
| Warren Avenue | X | | |
| Montana Street | X | | |
| Other activities | | | |
| Sediment removal from Blacktail Creek and Silver Bow Creek channels | | Х | To be determined |
| Surface water management for base flow remediation | | Х | To be determined |
| In-stream flow of augmentation | | Х | To be determined |
| Further BMP evaluation, selection, and implementation | Sales and | Х | To be determined |









Lower Area One (LAO) Groundwater Treatment Facility

The Selected Remedy for the groundwater treatment facility includes retention, upgrades, and continued operations of the lagoon system for treating captured and routed groundwater prior to discharge to Silver Bow Creek. Recent design and remedial action work included multiple upgrades to the existing Butte Treatment Lagoons (BTL).

| Activity Description | Complete | Ongoing | Estimated Completion |
|---|----------|---------|-------------------------|
| Phase I | | | |
| Upgrade West Camp pump station | X | | |
| Upgrade of treatment lagoons outlet structures | | Х | 2013 |
| Replace existing automatic sampling building and effluent station | | Х | 2013 |
| Construct new influent pump station | | Х | 2013 |
| Phase II | | | |
| Improvements at BTL | | Х | 2013 |
| Upgrade existing chemical addition system | | Х | 2013 |
| Improve BTL access roads | | Х | 2013 |
| Construct new operations building | | Х | 2013 |
| Revegetation of BTL construction areas | | Х | 2014 |
| Long-term plans | | | |
| Water management plan | | Х | 2013 |
| Sludge management plan | X | | |
| Instrumentation, controls, and monitoring plan | X | | |
| Construction reports for MSD vault upgrades | X | | |





Monitoring and Compliance Requirements

The Selected Remedy for groundwater, surface water, and storm water requires an aggressive monitoring program for the entire groundwater alluvial aquifer and for the surface water sources. All monitoring data collected under the monitoring programs are periodically reviewed to determine whether the Selected Remedy remains effective.

| Activity Description | Complete | Ongoing | Estimated Completion |
|---|----------|---------|-------------------------|
| Surface Water | | | |
| Implement a revised interim surface water monitoring plan | | Х | Ongoing |
| Perform wet weather sampling – automatic and opportunistic sampling | | Х | Ongoing |
| Review surface water data summary reports and final surface water monitoring plan | | Х | Ongoing |
| Groundwater | | | |
| Implement the revised interim groundwater monitoring plan | | Х | Ongoing |
| Provide operations and maintenance of groundwater wells | | Х | Ongoing |
| Review groundwater data summary reports | | Х | Ongoing |

Institutional Controls Requirements

The institutional controls (IC) in the Selected Remedy are non-engineering tools that serve to protect the response actions (past and future) from degradations. The four basic IC categories used are: governmental, proprietary, informational, and enforcement/permitting. The specific Selected Remedy IC tools and the status of each are provided below.

Activity Description

Establish controlled groundwater area and other controls the technically impracticability zone to prevent domestic Implementation of BSB's zoning, ordinance, and permit r water controls, protection of capped mine materials, and contaminated soils

Implement deed notices under Montana state law for cap areas

Install fences and signage to prevent remedy disruption



Operations and Maintenance (O&M) Activities

The Selected Remedy requires the development of long-term and integrated comprehensive monitoring and O&M plans for all aspects of the Selected Remedy within the BPSOU.

| Activity Description | Complete | Ongoing | Estimated Completion |
|---|----------|---------|----------------------|
| Implementation of the Active and Inactive Railroad O&M plans | | X | Ongoing |
| Implementation of the BTL O&M plans | | X | Ongoing |
| Implementation of the West Camp O&M plan | | X | Ongoing |
| Implementation of the MSD groundwater capture system O&M plan | | X | Ongoing |
| Implementation of the Repository O&M Plan | - 2 | Х | Ongoing |
| Implementation of the storm water catch basins, hydrodynamic devices, and other O&M plans | | Х | Ongoing |



| | Complete | Ongoing | Estimated Completion |
|--|----------|---------|-------------------------|
| for the alluvial aquifer in use | Х | | |
| requirements for storm removal and disposal of | | Х | Ongoing |
| oped and waste left in place | | Х | Ongoing |
| | | Х | Ongoing |







US EPA Federal Building #339 400 N Main Street Butte, Montana 59701

Do You Need More Information?

U.S. Environmental Protection Agency:

Sara Sparks, Remedial Project Manager, 406-782-7415 Jean Cannada, Senior Environmental Employee, 406-782-3264 Nikia Greene, Remedial Project Manager, 406-457-5019 **Butte Silver Bow Health Department:** Eric Hassler, Residential Metals Abatement Program Manager, 406-497-5042 Michele Bay, Community Outreach Coordinator, 406-497-5045 **Montana Department of Environmental Quality:** Joe Griffin, Project Officer, 406-560-6060