

RD/RA Meeting – BPSOU – March 26, 2024
Draft Meeting Summary

- I. Safety Moment - Please be careful in these spring snows – it’s slick out there as we go from freeze to thaw to freeze

- II. Acronyms
 - QAPP=Quality Assurance Project Plan
 - PDI=Preliminary Design and Investigation
 - PDI/ER=Preliminary Design and Investigation/Engineering Review
 - FRESOW=Further Remedial Element Scope of Work
 - ARARS=Applicable or Relevant and Appropriate Requirements

- III. SBCCA Document Tracker
 - Three-month outlook
 - 2024 – Groundwater Quality Assurance Project Plan (QAPP)
 - o Agency comments due
 - o EPA: comments prepared; will follow up on comment transmittal
 - Groundwater management plan – consultant work in progress
 - Construction management QAPP – April 22 deadline
 - Grove Gulch – waiting for agency confirmation of the 100% submittal – meeting next Monday (April 1) with agencies
 - Repository and Haul Routes – 30% submittal expected in July (7/15/24) – in anticipation of a May goal to start moving materials
 - Buffalo Gulch – July – next level of design
 - Subdrain – December 2024
 - Butte Reduction Works – June 2024
 - Diggings East – 60% submittal in April – mid-next month will be delivered to the agencies – Design team is dedicating significant attention here
 - There is alignment on the timing of the Diggings East and the Sitewide submittals
 - Groundwater Remedy Optimization – 5-15-2024 – Stress Test QAPP – this is the last season to do the stress test before construction
 - BTC Hydraulic control - 30% design – May submittal – parallel to comments on Preliminary Design and Investigation (PDI)
 - Northside Tailings – targeting the end of the year
 - Discussion
 - o Goal is good design and good specs in the first submittal so subsequent submittals move effectively
 - o Grove Gulch’s work should serve as a template for other sites; we hope the work there will help us advance other sites more seamlessly
 - o Highlighting significant changes from one submittal to the next is very helpful – calling attention to what’s changed and what’s new from the prior submittal

- IV. SBCCA Program Schedule
 - Grove Gulch 100% submittal is in
 - Repository – schedule indicates the mid-April deadline for the screening report
 - Buffalo Gulch – July – treatability study is the central piece – coordination with Butte Reduction Works for waste management and treatment
 - Subdrain – submittal toward the end of the year
 - Butte Reduction Works – Preliminary Design – 60% design – delivered in October to the agencies

- Diggings East – updates – 60% coming in April
- BPSOU Groundwater Remedy – Submitting 30% early July
- Blackwater Creek – May 60%
- Blacktail – PDI/ER Evaluation report is expected any time – no phase 2 geotechnical report needed

V. Butte Reduction Works Interim Demolition Activities

- Began prior to Christmas
- Phase I activities complete
- Slag wall gone
- There was some construction outside the boundary – corrective action discussion underway

VI. Casey Street Water Line

- Late April/Early May to begin the work
- Contacting residents re: temporary water shut offs and road closures
- Alternate service to residents

VII. Grove Gulch

- Thanks to all for getting the work done
- Completing the work this year is the goal
- Material procurement underway in hopes of getting into the field ASAP
- EPA – Coordinating the review with CDM
- October - NRD sent comments – met on Dec 21 – don't feel that our comments were fully addressed – requesting EPA clarify; EPS did advance comments, incorporating those that they support; AR – latest iteration should clarify how comments were addressed; cover letter and FRESOW check list should clarify how comments were integrated as well

VIII. Repository

- Want to maintain options, not screen out possibilities
- A fundamental concern: risk of overwhelming Butte Mine Waste Repository
- Focus on subareas C and E; avoid A and D; to maintain options, D would be characterized as available in a worst case
- After screening report come detailed evaluations – geotechnical evaluations, assessment of intermixing waste streams, etc., comparative analysis
- EPA is evaluating the level of modification to the ROD for all locations included in the screening; EPA will have to memorialize the change; cost/performance/scope will determine how these are evaluated
- Scope = questions of access, of compliance with ARARS
- Siting committee is looking at which locations are acceptable; scope/cost/performance is outside the committee's charge
- Final report with recommendation – scope/performance/cost – will be done after the committee's work is done
- EPA – will need sufficient information to direct changes to the ROD
- It is important that everyone understand the 2020 decisions the same way in order to make progress together
- March 28th Committee Meeting

IX. Waste Transport

- There is risk to doing this analysis prior to location decisions but is a necessary to keep moving forward
- Focus on slurry rather than haul routes when possible

- Closure of Excelsior Street – needs to be clarified -- Antimony to Walkerville Road
- Grove Gulch haul Routes were approved in 2006
- Butte Reduction Works – each project requires approval of the selected haul route
- Haul routes are specified in the final design packages

X. Buffalo Gulch

- No comments received on 60% design with respect to items 1-9:
 1. Geotechnical Reports (Pioneer and DOWL)
 2. Hydrology Report
 3. Retention and Detention Drain Time Report
 4. Control Theory Document
 5. Only 1 Comment on Construction Plans
 6. Specifications
 7. Construction Quality Assurance Plan
 8. Remedial Design Work Plan Update
 9. Pre-Design Investigation Work Plan Update
- These nine items will be part of the 95% design
- Review periods for each percentage are: 90 days for 30%, 60 days for 60% and 30 days for 95%
- 60% is essential – need to be sure the big design effort from 60-95 is on solid ground

XI. Diggings East

- Working on access agreement
- Managing water is a primary focus
- Address groundwater now
- Interim work plans go directly to the utility (though EPA did review them)

XII. Remedy-Restoration Integration

- Focus on stacking our groundwater monitoring
- Looking at groundwater capture
- Developing a model for groundwater activities
- Always looking for restorations funds as project resources wind down
- NRD will be in contact with AR

XIII. Community Engagement

- Communicate with the press to get coverage
- Social media augments
- Next Door could be useful to alert the public to road closures, construction notices
- Drive activity to bpsou.com
- QR Code that opens bpsou.com could be helpful on print and electronic communication
- Open bpsou.com at public meetings to show people what's available
- Newsletter – important and can drive bpsou.com traffic

XIV. Round Table

- o EPA is holding office hours for community members in Butte – starting next week – useful to have the project management document from today's meeting to help people see what's happening and when
- o Please include the review time when sending a document for review; again the review times are: 90 days for 30%; 60 days for 60% --- the concept locks in here; 60-to-95 is details; 30 for 95%
- o Appreciate the transition in project managers
- o There are outstanding/unresolved comments from past submittals that we need to attend to
- o Early agreements on big, fundamental questions will help us make progress

- Remember – our goal is working under the consent decree --- we have some hard decisions coming
- Surface water management plan – there is ongoing work once the remedy is implemented; we need to give the remedy the opportunity to work and use ongoing monitoring to direct additional action, if necessary
- 60% is the place for to work out any conceptual differences
- Next meeting – distribute the tracking document in advance – and spend the time on each location’s specific
- 4th Tuesday of each month to continue the RD/RA meetings – next is April 26 – 9:00 a.m.