September 10, 2019

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Gentlemen:

Enclosed, please find the Monthly Progress Report for the Silver Bow Creek/Butte Area Superfund Site, as required by the Butte Priority Soils Operable Unit Unilateral Administrative Order.

If you have any questions or comments, please call me at (406) 723-1834.

Sincerely,

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The United States Environmental Protection Agency (EPA) issued a Unilateral Administrative Order (UAO) for the Butte Priority Soils Operable Unit (BPSOU) on July 21, 2011, with that Order taking effect September 6, 2011. Under this UAO, two groups were identified as jointly and severally liable to perform the work described therein. The Group 1 Respondents include Atlantic Richfield Company, Butte – Silver Bow County (BSB), Inland Properties (Inland), and RARUS Railroad Company. Group 2 Respondents under the BPSOU UAO include BNSF and Union Pacific Railroads.

The work required under this UAO has been ordered to fill the interim period while all affected parties continue to work with the EPA and Montana Department of Environmental Quality (DEQ) to come to agreement on an all-inclusive Consent Decree (CD) for the BPSOU. The activities described in this report are consistent with those work directives outlined in the UAO and include all technical studies, design, construction, monitoring, and maintenance efforts performed by Atlantic Richfield on behalf of RARUS and the other Group 1 Respondents, for the previous month.

Operations and Maintenance Activities for August 2019

BTL, WCP, and BPSOU Subdrain OM&M

During August, the Butte Treatment Lagoons (BTL) operated under Section 3.5 of the Partial Remedy Implementation (PRI) Work Plan of the Unilateral Administrative Order (UAO). During the 4-week operations period, approximately 53.8 million gallons of water were treated. The volume consisted of 14.3 million gallons from the Butte Priority Soils Operable Unit (BPSOU) subdrain, 9.1 million gallons from the West Camp Pump Station (WCP-1), and the remainder coming from the ground and surface water capture systems of Lower Area One (LAO).

The influent water reaching the BTL was treated by adding 29 tons of lime by continuous gravimetric lime dosing. The pH-adjusted water was then directed to Lagoon Cells A1, B1, and C1 to balance water levels between each series and to optimize the treatment flow path. The B and C Lagoons were operated in parallel during August. The effluent flow from Cell A1 was routed through Cells A2 and A3 was it was discharged at EFS-07. Cells Cells B3 and C3 were routed directly to EFS-07 as part of routine summer operations.

Routine Monday (Effluent EFS-07 and Influent INF-04) and Thursday (Effluent EFS-07) samples were collected throughout the month. An additional monthly sample suite was collected on Monday, August 12, 2019 (EFS-07, Influent INF-04, subdrain discharge
MSD-HCC, and quality assurance/quality control [QA/QC]). All preliminary, non-validated, sample results received from Pace continue to be consistent with normal operating ranges of the treatment system. The preliminary data from Pace indicate effluent water quality parameters below the Montana Department of Environmental Quality (DEQ) Circular DEQ-7 (DEQ, 2006) standards, referenced in Table 8-2 and Section 12.6.3.1 of the U. S. Environmental Protection Agency’s (EPA’s) 2006 BPSOU Record of Decision (BPSOU ROD). All pH values collected for the month of August were below 9.50 standard units (S.U.).

The BPSOU subdrain dry vault pumps were operated in parallel configuration throughout the entire month of August. The water in the BPSOU subdrain wet vault was maintained at a constant water level below the perforated drain invert throughout August.

**Site Maintenance Activities**

Operators conducted daily, weekly and monthly maintenance tasks during August as part of routine inspection and maintenance activities.

Operators began the third quarter site overview and protective system device (PSD) inspections which included valve cycling and transducer verification.

**Base Flow Monitoring**

Base flow was conducted on August 5 under slightly elevated flow conditions. The stage raised during the first part of the day, between the hours of 0800 and 1200, but afterwards remained steady. Generally, August high temperatures were slightly higher than usual (average highs of 79.6 °F and average lows of 45.8 °F compared to historic average highs of 79.0 and average lows of 44.1). Flows at SS-04 and SS-07 remained relatively steady throughout the month except in response to storm events on August 10, 11, 22, and 23. Small spikes also occurred on August 2 and 9. Due to additional Benthic Macroinvertebrate (BMI) study activities, baseflow included two additional bottles per site for analyses under US EPA Method 200.7 for total (HNO3 preserved, unfiltered) and dissolved metals (HNO3 preserved, filtered) as follows: calcium (Ca), potassium (K), magnesium (Mg), and sodium (Na). The unpreserved one-liter bottle for all sites also received an additional analysis for chlorine (Cl⁻) under SM 4500. All other analyses remained the same.

The continuous stage recorders were checked on August 1 and 2 for correct time, stage, and file names. The bubbler system at each station was purged and any accumulated debris was removed from the bubbler and staff gauges. On August 1 and 2, stage data were downloaded from continuous recorders. The precipitation records for Kelley Mine Yard and BTL-LAO were obtained and precipitation records from Atlantic Richfield’s (AR) weather stations at the Butte Silver Bow Maintenance Shop (BSB Shop) and CB-1 were downloaded August 1. The BMMA station data is no longer included in the monthly package. A maintenance check occurred at the Kelley Mine Yard station on August 19 to confirm all systems working properly. The station was confirmed to be in place. No errors were noted at that time, and no debris obstructed the system.
Wet Weather Monitoring

In response to a significant precipitation event, wet weather sampling occurred August 10.

On August 10, Butte experienced a rain event which started out as a moderate intensity, short event that lasted from 0500 to 0545 MDT, stopped, then restarted at high intensity for a medium duration from 1705 through 2020 MDT (according to Kelley Mine Yard station), although according to BTL/LAO station the storm did not finish until 2145 MDT. BTL/LAO reported at total accumulated precipitation of 0.22 in. while Kelley Mine Yard reported 0.40 in. BSB Shop reported 0.20 in. and CB-1 reported 0.39 in. Flow at SS-07 increased to a peak of 81.9 cfs at 2315 MDT from a base of approximately 25.4 cfs at 0500 MDT. Flow at SS-04 increased to a peak of 55.4 cfs at 2215 MDT from a base of 10.6 cfs at 0445 MDT. Runoff was significant enough to trigger Blacktail Creek and Silver Bow Creek samplers. Samples were collected from 11 out of 11 surface water wet weather and 12 out of 17 Butte Hill Diagnostic locations.

Catch Basins

Levels at all three catch basins decreased throughout the month, except in response to the storm event on August 10 and 22. CB-9 did not appear to discharge throughout the month. At CB-8 discharge was observed on August 1. New discharge points were measured at 3.00 ft, 4.00 ft, and 4.75 ft with a staff gauge reading of 4.00 ft. Levels remained above 3.00 ft all month but dropped below 4.00 ft from August 1 to August 10 and again from August 24 to the end of the month. According to field observations, the discharge point at 3.00 ft allows for some seeping, but not significant flow. Discharge was also noted at CB-1 on August 1, with discharge holes at 2.00 ft and 5.50 ft. The stage read 2.10 ft on the staff gauge. Though CB-1 data files are currently being compensated, it appears that the catch basin dropped below discharge points on August 4 until the storm event on August 10 increased levels in the basin above discharge points, where it remained until sometime at the end of the month.

All three catch basins within the Missoula Gulch drainage held water during August

The Missoula Gulch Catch Basin 8 (CB-8) bypass inlet, forebay, and sediment vault and the Kaw Avenue wetlands continue to be checked frequently with maintenance performed by others as needed.

Groundwater Monitoring

Monthly field activities under the Parrot Removal Monitoring SAP included the following:
• August 6, 2019: collected water quality samples from Blacktail Creek, Silver Bow Creek, and the BPSOU subdrain and conducted a synoptic water level measuring event.
• August 6, 7, and 8, 2019: completed groundwater sampling.

Site-wide water levels were measured on August 27 and 28 and level monitoring transducers were downloaded at that time. Stage was measured at surface water sites associated with groundwater monitoring on August 28.

Substrate Study

As part of the BMFOU discharge scaling study, a surface water monitoring and a substrate monitoring field trial was conducted on August 29 and 30 at the following sites: SS-01; SS-04; SS-05; SS-06F; and a site approximately ¼ mile downstream from SS-07. A QC set consisting of 1 duplicate sample and 1 field blank sample was collected at SS-05. The purpose of the study is to see how hardness will affect the creek downstream of newly added discharge between SS-04 and SS-05. This event aimed to evaluate scale monitoring procedures and establish baseline conditions before new input introduction. Further sampling events are planned for September in conjunction with other study activities to be performed by Copper Environmental Consulting.

Copper Mountain Sampling

On August 8, nine samples (including 1 blank and 1 duplicate QC sample) were collected from the of the seep occurring to the north of the Copper Mountain Repository.

Construction Activities for August 2019

Underground Utility Locating

Multiple utility locates were requested during August in support of construction activities in and around the BPSOU subdrain corridor.

BMFOU Horseshoe Bend Effluent Line (HBEL) Outlet Modification

Dewatering from the Horseshoe Bend Effluent Line (HBEL) outlet construction activities began on Monday, August 19, 2019 and continued through the end of the month. Water was pumped to the Kaw Avenue pond and metered to the BPSOU wet vault for treatment at the BTL.

Non-Construction Efforts for August 2019

BTL and BPSOU Sub-Drain Quality Assurance Project Plan (QAPP)

A BTL and BPSOU Subdrain Quality Assurance Project Plan (QAPP) was developed to present the sampling procedures, laboratory analytical methods, and QA/QC procedures
applicable to sampling activities at the BTL Groundwater Treatment System; specifically, the surface water discharge monitoring activities, and BPSOU subdrain monitoring activities. The Draft Final QAPP was submitted for Agency review on May 7, 2018. Agency comments were received July 23, 2018. The revised QAPP was submitted for Agency review and approval on October 31, 2018. Agency comments were received December 11, 2018. The QAPP will be revised to address Agency comments and resubmitted for review and approval once, review and Agency approval is received for the revised Draft Final BTL Groundwater Treatment System Routine Operations, Maintenance, and Monitoring (OM&M) Plan.

Unreclaimed Sites QAPP

The Unreclaimed Sites QAPP has been approved and the final version has been submitted to the Agencies. Site soil SAPs are being developed and will be submitted for approval to the Agencies as they are individually completed throughout the first half of 2019.

Anderson Shaft Remedial Action Design

The Anderson Shaft draft design has been conditionally approved on May 9, 2019. Internal procurement procedures are underway with construction to follow.

Butte Reduction Works Field Investigation, Monitoring and Reporting

On August 28, 2019, all transducers were downloaded and inspected, and manual water level measurements were also performed and documented at the locations identified in the BRW Phase I QAPP.

A Request for Change (RFC) to the BRW Phase I QAPP (BRW Phase I QAPP RFC-BRW-2019-01) was submitted to the Agencies for review on July 3, 2019. The RFC summarizes the changes and/or deviations made from the BRW Phase I QAPP procedures during the Phase I field investigation activities. Additionally, the RFC provides the procedures and protocols necessary to conduct additional groundwater sampling at the BRW Smelter Area Site. No comments were received in August.

A Draft Butte Reduction Works Remedial Design Work Plan and Draft Pre-Design Investigation Work Plan were submitted to Agencies for review on August 1, 2019. No comments were received in August.

An RFC to the BRW Phase I QAPP (BRW Phase I QAPP RFC-BRW-2019-02) was submitted for internal review on August 26, 2019. The RFC provides the procedures and protocols necessary to conduct a Phase II Site Investigation, including additional hydrocarbon investigation and a pumping test at the BRW Smelter Area Site. Comments were received and are currently being addressed.
Agency comments on the RFC to the *Butte Mine Waste Repository O&M Manual* (BPSOU-MWR OMM-RFC-01) were received on July 8, 2019. Comments were addressed and the revised RFC was submitted for internal review on August 28, 2019. The RFC details Atlantic Richfield’s proposal to treat and dispose of soils containing hydrocarbons from the BRW Site at the Butte Mine Waste Repository.

**Diggings East Storm Water Basin and Northside Tailings/East Buffalo Gulch Area Site Investigation**

Atlantic Richfield is anticipating receiving an access agreement from Union Pacific to sample the remaining 12 locations at the North Side Tailings (NST) site. All other fieldwork for the Diggins East (DE)/NST sites has been completed. Ongoing design and Consent Decree (CD)-related efforts will continue. Agency comments were received for the *Draft Final Northside Tailings/East Buffalo Gulch Area and Diggings East Stormwater Basin Area Fill Characterization and Geotechnical Investigation Sampling and Analysis Plan Request for Change 02: Conduct Two Pumping Tests.*

**BPSOU Repository Development**

A Calculation brief was completed to detail the methods and assumptions used to estimate the costs of hauling materials to different potential repository locations. Work was initiated on a Remedial Design Work Plan (RDWP) and supporting documents in accordance with EPA guidance to complete a pre-design investigation of the preferred potential repository location.

**BPSOU Solid Media Management Program Plan**

The BPSOU Solid Media Management Program Plan (Plan) was developed to encompass the various programs in place, to appropriately address land reclamation, and provide the means to sustain reclamation efforts in the BPSOU. Programs described in this Plan include reclaimed upland areas, unreclaimed sites, residential programs, and riparian areas. The Plan provides program level over-arching guidance for all solid media reclamation plans within the BPSOU. The Draft Final Plan was submitted for Agency review, comment, and approval on November 9, 2018. Agency comments have been received.

**Butte Reclamation Evaluation System (BRES) Manual**

The BRES Manual was recently updated to reflect improvements with the process used to complete field evaluations of reclaimed areas within the BPSOU. The revised BRES Manual was submitted for Agency review, comment and approval on November 8, 2018. Agency comments were received on April 5, 2019.
BPSOU Reclaimed Areas Maintenance and Monitoring Plan

The *Draft Final BPSOU Reclaimed Areas Maintenance and Monitoring Plan* (M&M Plan) developed to aid in maintaining reclaimed areas was issued for Agency review, comment and approval on November 8, 2018 in parallel with the revised BRES Manual. The M&M Plan provides field personnel with standard corrective measures to ensure the remedy remains effective and protective.

BTL Groundwater Treatment System Routine Operations, Maintenance and Monitoring (OM&M) Plan

The *Draft Final BTL Groundwater Treatment System Routine Operations, Maintenance, and Monitoring (OM&M) Plan* and the *BTL Water Management Contingency Operations Plan* were revised to address Agency comments and submitted to the Agencies for review and approval on August 30, 2018. Follow-up comments to these documents were received from the Agencies on December 11, 2018. Atlantic Richfield has been in consultation with the Agencies regarding comments and is currently working to address these comments and submit revisions during the third quarter.

Comprehensive Remedial Action Monitoring, Sampling and Analysis Plan

Agency comments for the *Draft Final Parrot Removal Monitoring, Sampling and Analysis Plan (SAP)* were received May 10, 2018 and comments from Natural Resource Damage Program (NRDP) were received June 11, 2018. In addition, an RFC was submitted to the Agencies on September 10, 2018 to install new wells upgradient of the Parrot removal to compensate for abandoned monitoring wells. Comments will be addressed for both documents and incorporated into the expanded *Comprehensive Remedial Action Monitoring SAP* and submitted to the Agencies for review. Sampling is currently being completed under the *Parrot Removal Monitoring SAP*.

Copper Mountain Seep SAP

A Sampling and Analysis Plan for surface water and groundwater monitoring of the seep occurring to the north of the Copper Mountain Repository was developed. Submittal to the agencies is anticipated in September.

Copper Mountain Seep Pre-Design Investigation Work Plan

Work on a Pre-Design Investigation Work Plan for the seep occurring to the north of the Copper Mountain Repository was begun. Submittal to the agencies is anticipated in September.

Work progressed on the design basis report and Predesign Investigation Evaluation Report for the Buffalo Gulch and Grove Gulch remedial action projects. Soil data at the Buffalo Gulch and Grove Gulch sites collected in June was entered into the database, data validation began, and DSR tables started. Submittal to the agencies is anticipated in November along with the 30% design resubmittal.

Reporting

Agency comments for the Draft Final 2017 Annual Butte Treatment Lagoons (BTL) Operations and Maintenance Report (O&M) Report were received on June 4, 2018. Comments have been addressed and a revised report submitted to the Agencies on August 20, 2018 for review and final approval.


The Draft Final Quarterly Operations and Maintenance Report Butte Treatment Lagoon System - Second Quarter 2019 was submitted to the Agencies on September 4, 2019.

Upcoming Activities for September 2019

Sitewide Base Flow Monitoring

Base flow monitoring of Silver Bow Creek and Blacktail Creek, including flow measurements and sample collection, with an attempt to monitor under stable conditions, will occur in September. At the end of the month, site wide groundwater levels and associated surface water levels will be measured. Copper Mountain monitoring is planned to continue through September on a weekly basis. Substrate samples will continue to be taken throughout the month as needed. Semi-annual groundwater sampling is also planned to commence in September.

Scrap H Road

Following Agency review of the draft final document and receipt of any comments, a Final CCR detailing remedial construction activities will be submitted to the Agencies for their records.
**Unreclaimed Sites**

Additional individual site SAPs are currently under development and will be submitted for Agency review and comment.

**BTL Operations**

Operation of the BTL is expected to remain consistent with routine operating conditions. Adjustments to treatment systems to accommodate weather and inflow conditions are expected throughout the month. Coordination with upcoming construction activities will be addressed by site operators as needed.

Sludge will be hauled from the north and south drying beds to the mine waste repository as soon as the primary haul route is open to traffic. The main haul route north on Excelsior Avenue has been closed for construction and is anticipated to be open the first week of September.

Fall dredging is scheduled to begin in September in Lagoon Cell A1.

The BTL operations personnel are continuing to coordinate with Butte Mine Flooding Operable Unit (BMFOU) activities in order to minimize interruptions in operating the BPSOU subdrain and the BTL systems. This effort includes scheduling activities and managing water from the BMFOU efforts and routing them through the BPSOU subdrain and BTL systems prior to discharge into nearby surface water systems. These efforts are expected to continue throughout the first half of 2019 and may require coordination with routine BPSOU subdrain and BTL maintenance activities, as well as many of forthcoming BPSOU field activities.

**Parrot Removal Monitoring**

Routine Parrot removal monitoring activities are scheduled to take place on September 5, 2019. The monitoring for September will include a synoptic water level and transducer download. Monitoring is expected to extend for at least 2 years beyond completion of the RA, remedial design (RD), and restoration construction activities.

**Butte Reduction Works Field Investigation and Monitoring**

Phase I field data management activities will continue in September, including reviewing analytical results, completing soil boring logs, and validating data. All transducers will be downloaded and inspected, and manual water levels measurements will be performed and documented towards the end of September.

The RFC to the *BRW Phase I QAPP* (BRW Phase I QAPP RFC-BRW-2019-02) and the RFC to the *Butte Mine Waste Repository O&M Manual* (BPSOU-MWR OMM-RFC-01) will be submitted to Agencies for review in September.
An RFC to the *BRW Phase I QAPP* (BRW Phase I QAPP RFC-BRW-2019-03) is currently being developed and will be submitted for internal review in September. The RFC provides the procedures and protocols necessary to conduct a Slag Removal Pilot Study as part of the overall remedial design effort for the BRW Site.

**Diggings East Storm Water Basin and Northside Tailings/East Buffalo Gulch Area**

Atlantic Richfield is anticipating receiving an access agreement from Union Pacific to sample the remaining 12 locations at the NST site. All other fieldwork for the DE/NST sites has been completed. Ongoing design and CD-related efforts will continue. Agency comments were received for the *Draft Final Northside Tailings/East Buffalo Gulch Area and Diggings East Stormwater Basin Area Fill Characterization and Geotechnical Investigation Sampling and Analysis Plan Request for Change 02: Conduct Two Pumping Tests.*

**BPSOU Repository Development**

Work will continue to draft the RDWP and supporting documents to complete a field investigation at the preferred repository location. Once complete, the documents will be submitted for Agency review and approval, prior to commencing the proposed field investigation. No field activities are anticipated in September.
Attachment A: Problems Encountered

Area-velocity data loss occurred at MSD-CLV-CASEY-L due to equipment malfunction from June 1 through July 27. Data loss due to battery failure occurred at this site from July 27 to August 8 when the meter was replaced, and the new meter was confirmed to be working properly.

At LC-CLV-1 data loss occurred due to equipment malfunction from May 1 to August 7, when the meter was replaced. On August 8, the new meter was confirmed to be working properly.

A defective pH probe at SS-07 was replaced. On July 29 the new probe was installed but was not calibrated until August 6. Data from time of failure to August 6 will be suspect. On August 20, the pH at SS-07 was checked against a YSI Professional Plus multiparameter instrument. The pH was re-calibrated as it varied from the YSI readings. After calibration, both instruments read similar values.

At SS-01, pH was initially calibrated on August 6. On August 20, readings were checked against the YSI instrument. Due to slight variance, the meter was cleaned August 21. To clean the probe, the meter was placed in a 1:1 DI water to bleach solution for approximately 3 minutes to kill any growing organisms on the probe that might be causing faulty readings. It was rinsed with DI and then soaked in pH 4 buffer to “recharge” the glass bulb. The probe was again cleaned with DI and finally was re-calibrated normally. Readings were confirmed to have stabilized correctly on August 22.

Also, at SS-01, the USGS staff gauge mount was observed loose or damaged. A report was sent to USGS informing them of maintenance needed. The loose mount may affect staff gauge readings until USGS corrects the problem.

SS-06G also contains a pH meter which was initially calibrated August 8 and found to be in working order during the YSI comparisons on August 20. The pH probe should be cleaned with DI/bleach solution and pH 4 buffer upon the next field calibration.

A time change from MST to MDT was noticed in the CB-1 data files and the data file for August was not compensating correctly. Troubleshooting is underway and revised reports will be submitted in September.

No other site maintenance except periodic battery changes had the potential to affect data.

Finalization of documents, as well as property access agreements, also require continuing adjustments to many of the investigation and RA activities discussed above.