Message

From: Rosalind A. Schoof [rschoof@ramboll.com]
Sent: 2/7/2019 7:18:15 PM
To: 'Williamson, Laura' [LWilliamson@mt.gov]; Partridge, Charles [Partridge.Charles@epa.gov]; Bryson, Josh [josh.bryson@bp.com]; 'Steve Ackerlund' [steve.ackerlund@bresnan.net]; Greene, Nikia [Greene.Nikia@epa.gov]; 'Bill Macgregor' [billmacgregor46@gmail.com]; 'jgriffin.redmountain@gmail.com' [jgriffin.redmountain@gmail.com]; Wardell, Christopher [Wardell.Christopher@epa.gov]; Barker, Jacqui [barker.jacqui@epa.gov]
CC: 'Sullivan, Karen' [ksullivan@bsb.mt.gov]; 'Hassler, Eric' [ehassler@bsb.mt.gov]; 'Crain, Julia' [jcrain@bsb.mt.gov]; 'Reed, Daryl' [dreed@mt.gov]; 'Palmer, Dave' [dpalmer@bsb.mt.gov]; 'Ferguson, Matthew' [Matthew.Ferguson@mt.gov]; 'Zimmerman, Heather' [HZimmerman@mt.gov]
Subject: RE: Letter to the Editor - public statement
Attachments: The Butte Superfund Health Study_wbm_SA.docx; LTE public statement draft_LW.docx

Two versions – Roz's with Laura's comments and Bill's w/ Steve's comments.

Rosalind A. Schoof
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From: Rosalind A. Schoof
Sent: Thursday, February 07, 2019 11:13 AM
To: 'Williamson, Laura' <LWilliamson@mt.gov>; 'Partridge, Charles' <Partridge.Charles@epa.gov>; 'Bryson, Josh' <josh.bryson@bp.com>; 'Steve Ackerlund' <steve.ackerlund@bresnan.net>; 'Greene, Nikia' <Greene.Nikia@epa.gov>; 'Bill Macgregor' <billmacgregor46@gmail.com>; 'jgriffin.redmountain@gmail.com' <jgriffin.redmountain@gmail.com>; Wardell, Christopher <Wardell.Christopher@epa.gov>; Barker, Jacqui <barker.jacqui@epa.gov>
Cc: 'Sullivan, Karen' <ksullivan@bsb.mt.gov>; 'Hassler, Eric' <ehassler@bsb.mt.gov>; 'Crain, Julia' <jcrain@bsb.mt.gov>; 'Reed, Daryl' <dreed@mt.gov>; 'Palmer, Dave' <dpalmer@bsb.mt.gov>; 'Ferguson, Matthew' <Matthew.Ferguson@mt.gov>; 'Zimmerman, Heather' <HZimmerman@mt.gov>
Subject: RE: Letter to the Editor regarding Davis 2018-Jan4-2019 draft

Latest version of letter.

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From: Rosalind A. Schoof
Sent: Tuesday, February 05, 2019 12:21 PM
To: Williamson, Laura <LWilliamson@mt.gov>; Partridge, Charles <Partridge.Charles@epa.gov>; Bryson, Josh <josh.bryson@bp.com>; Steve Ackerlund <steve.ackerlund@bresnan.net>; Greene, Nikia <Greene.Nikia@epa.gov>; Bill Macgregor <billmacgregor46@gmail.com>; jgriffin.redmountain@gmail.com
Cc: Sullivan, Karen <ksullivan@bsb.mt.gov>; Hassler, Eric <ehassler@bsb.mt.gov>; Crain, Julia <jcrain@bsb.mt.gov>; Reed, Daryl <dreed@mt.gov>; Palmer, Dave <dpalmer@bsb.mt.gov>; Ferguson, Matthew <Matthew.Ferguson@mt.gov>; Zimmerman, Heather <HZimmerman@mt.gov>
Subject: RE: Letter to the Editor regarding Davis 2018-Jan4-2019 draft

Laura,
Thank you so much for the additional revisions and your support throughout this process. I am very sorry you will be unable to sign the letter, but understand and respect MDPHHS' position.
Everyone (whether signing or not),
In the attached file I have mostly accepted Laura's revisions and added more text and responses to comments for you all to review.
Do we need to schedule a call to finalize this and agree it is ready to send out?

Roz

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From: Williamson, Laura <LWilliamson@mt.gov>
Sent: Monday, February 04, 2019 2:41 PM
To: Partridge, Charles <Partridge.Charles@epa.gov>; Rosalind A. Schoof <rschoof@ramboll.com>
Cc: Sullivan, Karen <ksullivan@bsb.mt.gov>; Bryson, Josh <josh.bryson@bp.com>; Greene, Nikia <Greene.Nikia@epa.gov>; Steve Ackerlund <steve.ackerlund@bresnan.net>; Hassler, Eric <ehassler@bsb.mt.gov>; Crain, Julia <jcrain@bsb.mt.gov>; Bill Macgregor <billmacgregor46@gmail.com>; Reed, Daryl <dreed@mt.gov>; jgriffin.redmountain@gmail.com; Palmer, Dave <dpalmer@bsb.mt.gov>; Ferguson, Matthew <Matthew.Ferguson@mt.gov>; Zimmerman, Heather <HZimmerman@mt.gov>
Subject: RE: Letter to the Editor regarding Davis 2018-Jan4-2019 draft

Hi Roz and all,

I have added in the results of the DPHHS's 2018 cancer analysis for Silver Bow County (attached). I've also attached a table which summarizes the cancer-related findings of Davis et al and DPHHS's 2012 and 2018 analyses. I'm sending this along as a reference for those who may want or need it in the future. Please do not distribute.

I regret to inform you all that I (DPHHS) will not be signing the letter. DPHHS considers its mission to consider all research and make public health decisions based on the best available science. The agency has not, historically, commented on research that we do not agree with or that is of poor quality. Further, we feel that publicly commenting on this particular article, which the public perceives as contradicting the agency's previous reports, could erode the public's trust in DPHHS's ability to consider the state of the science to make public health decisions. Additionally, Davis et al used publicly available mortality data and DPHHS feels that it is not our role to comment further on use of that data. Now, DPHHS may consider another course of action should a research group misuse data that DPHHS owns and was made available through a research agreement.

Laura

From: Partridge, Charles <Partridge.Charles@epa.gov>
Sent: Wednesday, January 30, 2019 10:00 PM
To: Rosalind A. Schoof <rschoof@ramboll.com>
Cc: Sullivan, Karen <ksullivan@bsb.mt.gov>; Bryson, Josh <josh.bryson@bp.com>; Greene, Nikia <Greene.Nikia@epa.gov>; Steve Ackerlund <steve.ackerlund@bresnan.net>; Williamson, Laura <LWilliamson@mt.gov>; Hassler, Eric <ehassler@bsb.mt.gov>; Crain, Julia <jcrain@bsb.mt.gov>; Bill Macgregor <billmacgregor46@gmail.com>; Reed, Daryl <dreed@mt.gov>; jgriffin.redmountain@gmail.com; mferguson@mt.gov; Palmer, Dave

<dpalmer@bsb.mt.gov>
Subject: Re: Letter to the Editor regarding Davis 2018-Jan4-2019 draft

Thanks so much Karen. I appreciate your/ county position.

Cp

Sent from my iPhone

On Jan 30, 2019, at 4:36 PM, Rosalind A. Schoof <rschoof@ramboll.com> wrote:

> Thanks for the suggestion Karen. I'm sorry you can't sign, but we can use your suggested language to state "members of".
>
> Roz
>
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>
> ---
>
> **From:** Sullivan, Karen <ksullivan@bsb.mt.gov>
> **Sent:** Wednesday, January 30, 2019 2:23 PM
> **To:** Rosalind A. Schoof <rschoof@ramboll.com>; Bryson, Josh <josh.bryson@bp.com>
> **Cc:** Charles Partridge (partridge.charles@epa.gov) <partridge.charles@epa.gov>; Greene, Nikia <Greene.Nikia@epa.gov>; Steve Ackerlund <steve.ackerlund@bresnan.net>; Williamson, Laura <LWilliamson@mt.gov>; Hassler, Eric <ehassler@bsb.mt.gov>; Crain, Julia <jcrain@bsb.mt.gov>; Bill Macgregor <billmacgregor46@gmail.com>; Daryl Reed (dreed@mt.gov) <dreed@mt.gov>; jgriffin.redmountain@gmail.com; mferguson@mt.gov; Palmer, Dave <dpalmer@bsb.mt.gov>
> **Subject:** RE: Letter to the Editor regarding Davis 2018-Jan4-2019 draft
>
> Roz: The Butte-Silver Bow Technical Review Committee-Environmental (Butte-Silver Bow's internal Superfund group) discussed and confirmed last week that Butte-Silver Bow will not be a signatory to the letter to the editor. I therefore think it would be appropriate for the letter to reference "members of the Butte Superfund Health Study & Biomonitoring Working Group" rather than "the Butte Superfund Healthy Study & Biomonitoring Working Group" when referencing opinions being put forth in the letter. Let me know if you have any questions or concerns – Karen Sullivan
>
> ---
>
> **From:** Rosalind A. Schoof [mailto:rschoof@ramboll.com]
> **Sent:** Monday, January 21, 2019 2:44 PM
> **To:** Bryson, Josh <josh.bryson@bp.com>
> **Cc:** Charles Partridge (partridge.charles@epa.gov) <partridge.charles@epa.gov>; Greene, Nikia <Greene.Nikia@epa.gov>; Steve Ackerlund <steve.ackerlund@bresnan.net>; Williamson, Laura <LWilliamson@mt.gov>; Hassler, Eric <ehassler@bsb.mt.gov>; Crain, Julia <jcrain@bsb.mt.gov>; Sullivan, Karen <ksullivan@bsb.mt.gov>; Bill Macgregor <billmacgregor46@gmail.com>; Daryl Reed (dreed@mt.gov) <dreed@mt.gov>; jgriffin.redmountain@gmail.com; mferguson@mt.gov
> **Subject:** RE: Letter to the Editor regarding Davis 2018-Jan4-2019 draft
>
> Thanks Josh.
>
> Laura,

Might you be able to update your section this week?
Roz

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From: Bryson, Josh <josh.bryson@bp.com>
Sent: Monday, January 21, 2019 8:27 AM
To: Rosalind A. Schoof <rschoof@ramboll.com>
Cc: Charles Partridge (partridge.charles@epa.gov) <partridge.charles@epa.gov>; Greene, Nikia <Greene.Nikia@epa.gov>; Steve Ackerlund <steve.ackerlund@bresnan.net>; Williamson, Laura <LWilliamson@mt.gov>; Hassler, Eric <ehassler@bsb.mt.gov>; Crain, Julia <jcrain@bsb.mt.gov>; Sullivan, Karen <ksullivan@bsb.mt.gov>; Bill Macgregor <billmacgregor46@gmail.com>; Daryl Reed (dreed@mt.gov) <dreed@mt.gov>; jgriffin.redmountain@gmail.com; mferguson@mt.gov
Subject: Letter to the Editor regarding Davis 2018-Jan4-2019 draft

Good Morning Roz,

Thank you for all of the work on this. I've inserted a couple of comments in addition to the below BPSOU timeline of significant events and remediation activities. This information is from our yet pending ARMontana webpage, sourced from the 2006 BPSOU ROD.

1982 Berkeley Pit mine closed; pumping of underground workings ceases.

1984 Initial site investigation work begins.

1985 to current Atlantic Richfield conducts numerous Superfund-related studies and begins various reclamation projects, working under EPA direction and supervision, including those remediation and reclamation projects described below.

1988 Atlantic Richfield removes ~300,000 cubic yards of mine waste under the Walkerville Time Critical Removal Action (TCRA)

1989 Atlantic Richfield completes the Timber Butte TCRA, addressing 40,000 cubic yards of contaminated soil.

1990 Thirty waste dumps are addressed by Atlantic Richfield under the Butte Priority Soils TCRA, resulting in removal or remediation of 100,000 cubic yards of waste.

1992 Atlantic Richfield removes and consolidates ~40,000 cubic yards of impacted materials under the Colorado Smelter TCRA. The Lower Area One Expedited Response Action (ERA) is initiated by Atlantic Richfield, eventually addressing over 1 million cubic yards of accessible mine waste and tailings along Silver Bow Creek.

1994 Walkerville TCRA II is completed by Atlantic Richfield, addressing 12 additional waste dumps. The Butte Priority Soils ERA for Residential Soils/Source areas begins, leading to ongoing abatement efforts of contaminated yards and attics under what is now referred to as the Residential Metals Abatement Program (RMAP).

1997 The Stormwater TCRA is initiated by Atlantic Richfield to control stormwater flow, minimize erosion, and reduce transport of contaminated sediment to Silver Bow Creek. Work included reclamation of the Alice Mine dump, reclaiming ~ 2,000,000 cubic yards of contaminated soil and waste rock.

1998 Phase I of the BPSOU RIFS is completed. Atlantic Richfield enters into agreements with the EPA, State of Montana and other trustees on certain natural resource damages and remediation claims relating to Clark Fork River Basin sites.

1999 The Court approves settlements among Atlantic Richfield, the State, and the U.S. for restoration activities in the Clark Fork Basin, including remediation of most of Silver Bow Creek, and past costs incurred during litigation.

2001 Atlantic Richfield opens the Copper Mountain Sports and Recreation Complex to the public.

2002 Phase II of the BPSOU RIFS is completed.

2003 Atlantic Richfield begins construction of the Metro Storm Drain (MSD) subdrain system, which captures contaminated groundwater beneath the upper Silver Bow Creek corridor for treatment at the Butte Treatment Lagoons system.

2005 EPA proposes remedy for Butte and Walkerville areas.

2006 An allocation agreement between Butte-Silver Bow County (BSB) and Atlantic Richfield is signed, providing funding to BSB to complete certain portions of the remedy. Butte Historic Landmark District is expanded. EPA issues a Record of Decision (ROD) outlining the selected remedy for BPSOU.

2008 Upgrades of the subgrade vault pumping system and control building of the MSD subdrain system are completed by Atlantic Richfield. The State, the U.S., and Atlantic Richfield reach a final settlement for remediation of the Upper Clark Fork River site and the State and Atlantic Richfield settle restoration claims for Butte Area One, the Smelter Hill Uplands, and the Upper Clark Fork River.

2009 Atlantic Richfield begins cleanup and redevelopment construction of Mountain Con Mine Yard.

2010 Atlantic Richfield completes the Granite Mountain Memorial and begins Silver Bow Creek stream bank and floodplain removal near the confluence with Blacktail Creek. Atlantic Richfield expands groundwater capture system of Lower Area One during the Butte Reduction Works Open Area Excavation project.

2011 EPA issues a BPSOU Unilateral Administrative Order, mapping completion of additional remedy components and analyses that are needed before a consent decree can be completed. Atlantic Richfield begins the Butte Treatment Lagoons and West Camp Pump Station Upgrades, modernizing the groundwater collection and treatment system at Lower Area One.

2012 Atlantic Richfield opens Foreman's Park and recreation area at the Mountain Con Mine Yard and completes a 1-mile extension of Mine Yard and Butte Hill Trail system.

2014 Atlantic Richfield begins the Lower Area One Surface Enhancements to improve vegetative cover throughout Lower Area One.

2015 Atlantic Richfield completes demolition and reclamation of the former Wetland Demonstration Area, covering approximately eight acres in the center of Butte.

2016 Atlantic Richfield begins reclamation and preservation of the historic Lexington Hoist House and Mine Yard.

2018 EPA issues a proposed modification to BPSOU remedy. Details can be found on the Completing the work page of this website.

Josh Bryson, PE, PMP
Operations Project Manager
Remediation Management Services Company
An Affiliate of **Atlantic Richfield Company**

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