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Fall 11-23-2021

### **Atlantic Richfield Response to Approval Letter for the Final Butte Priority Soils Operable Unit (BPSOU), 2022 Draft Interim Site-Wide Groundwater Monitoring, Quality Assurance Project Plan (QAPP) (dated November 23, 2021)**

Atlantic Richfield Company

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**Atlantic Richfield Response to Approval Letter for the Final Butte Priority Soils Operable Unit (BPSOU), 2022 Draft Interim Site-Wide Groundwater Monitoring, Quality Assurance Project Plan (QAPP) (dated November 23, 2021)**

**General Comments:**

1. Agency Comment: Please include the attached EPA document review crosswalk in the final version and distribute the QAPP.

Atlantic Richfield Response: This is understood.

2. Agency Comment: If this plan were to change, please submit a revised QAPP to the EPA for review and approval.

Atlantic Richfield Response: This is understood.

**Specific Comments:**

1. Agency Comment: Cover Letter and Tables 4 and 5: It should have been noted in the cover letter that piezometers PZ-BG-01 through PZ-BG-08, PZ-GG-05 through PZ-GG-16, and wells GS-42S and GS-42D were removed from water level monitoring. Please add these wells and piezometers to the list of changes.

Atlantic Richfield Response: Piezometers PZ-BG-01 through PZ-BG-08, PZ-GG-05 through PZ-GG-16, and wells GS-42S and GS-42D have been added to the list of changes in the cover letter.

2. Agency Comment: Section 3.1.2, fourth paragraph: Please change “critical information” to “critical data.”

Atlantic Richfield Response: In Section 3.1.2, “critical information” has been changed to “critical data”.

3. Agency Comment: Table 13 in the text: In the row with the “U” qualifier, the phrase “no qualifier” should also be added as identified in the CFRSSI DM/DVP. This is correctly shown in Table 13 at the end of the document. Please make them consistent.

Atlantic Richfield Response: Within the text in Section 5.2.2, “No Qualifier” has been added to the row with the “U” qualifier.

4. Agency Comment: Section 3.5.1, Field Quality Control Samples: In the field duplicate section, the target precision criteria of less than or equal to 20% is correct, but adding the CRQL criteria is recommended (for example): “with a target precision of  $\leq 20\%$  RPD/CRQL criteria.”

Atlantic Richfield Response: The field duplicate discussion in Section 3.5.1 has been revised to include a difference  $\leq$  the reporting limit.

5. Agency Comment: Section 3.5.2, Laboratory Calibration and Quality Control Samples: In the serial dilution section the new criteria is 20%. Please update accordingly. This should also be updated in Table 7 and 12.

Atlantic Richfield Response: Table 7 and Table 12 have been revised to state the serial dilution criteria as  $\leq 20\%$  difference.

- 6 Agency Comment: Section 3.9, Data Management Procedures: Please explain in the text the process in uploading qualified EDDs into the database system after validation.

Atlantic Richfield Response: The data flow process for uploading validated EDDs has been added to the fourth paragraph of Section 3.9.

- 7 Agency Comment: Section 4.3, Quality Assurance Reports to Management: Please explain in the text that the data validation reports be added to the DSR's as an appendix.

Atlantic Richfield Response: Section 4.3 references Data Assessment Reports (DAR), which are the data validation reports. This has been clarified in Section 4.3, and it has been explained that the DAR/data validation report will be an appendix to the DSR.

In reviewing Section 4.3, it was found that the timeframe for DSR submittal differed from that specified in Section 2.6.6. Section 2.6.6 specifies May 31, while Section 4.3 stated the first day of the second quarter, or April 1. Section 4.3 has been revised to align with Section 2.6.6, stating May 31 as the due date for the DSR.

- 8 Agency Comment: TREC Data Validation SOP: For the metals calibration and laboratory QC sample requirements, should the internal standard response criteria be 60-125% instead of 70-130%? Also, for the 6020 MS/MSD row shouldn't the %R be 75-125% instead of 25-125%? The serial dilution %D should also be 20% and 25% from the new 2020 EPA guidelines.

Atlantic Richfield Response: A review was made of CLP ICP-AES and ICP-MS method criteria, criteria set forth in the November 2020 National Functional Guidelines, and Atlantic Richfield's SOW to determine the correct limits to apply in the TREC Data Validation Guidelines. The TREC data validation guidelines generally pertain to data collected for Atlantic Richfield; thus, criteria in Atlantic Richfield's SOW apply. Should TREC validate data analyzed under the CLP SOW, the National Functional Guidelines would be used. To clarify the applicability, Section 1.0 of the TREC Data Validation Guidelines has been revised to explain that the document pertains to data collected for Atlantic Richfield.

**Internal Standards:** Based on Atlantic Richfield's SOW, the 70-130 % of relative intensity (%RI) for 6020A and 6020B were retained. All other methods state %RI of 60-125%.

**Serial Dilution:** Serial dilution criteria has been revised from  $\leq 10\%$  difference to  $\leq 20\%$  difference. Table 26 has been updated to use  $\leq 20\%$  difference for serial dilutions.

**Table 26** – Metals Calibration and Laboratory QC Sample Requirements. The 6020 MS/MSD row was corrected to state 75-125%.