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Winter 1-2022

## **Atlantic Richfield Response to Comments BPSOU Draft Final Data Management Plan**

Atlantic Richfield Company

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***Atlantic Richfield Response to Comments  
BPSOU Draft Final Data Management Plan***

Re: Comments on the Butte Area NPL Site Butte Priority Soils Operable Unit (BPSOU) Draft Final Draft Data Management Plan (DMP) (dated July 2021)

**General Comments:**

Comment: Comment 1: Not all acronyms are spelled out and accounted for on the acronym list, please check and correct.

***Atlantic Richfield Response to Comment:*** *Acronym list has been updated.*

Comment: Comment 2: Not all of the documented references are on the reference list, please include missing references to Section 6.

***Atlantic Richfield Response to Comment:*** *Reference list has been updated.*

Comment: Comment 3: Not all of the references in Section 6 are within the document, please revise to include only relevant references used within the text.

***Atlantic Richfield Response to Comment:*** *Reference list has been updated.*

Comment: Comment 4: Please include a statement about how personal protected information (PPI) will be managed.

***Atlantic Richfield Response to Comment:*** *The following has been added to Section 3.2 “Personal protected information (PPI) such as blood lead data is stored in a stand-alone database managed by the Butte Silver Bow County Health Department. Requests for this data must go through the Health Department and any data that is shared has the personal identifying information removed. Since PPI data is governed by additional rules and managed as a separate database, this data and database is not discussed in this document.”*

Comment: Comment 5: Please change the name of the report to 2021 DMP.

***Atlantic Richfield Response to Comment:*** *Document has been updated to 2022.*

**Specific Comments:**

Comment: Section 3.0 Data Acquisition, Types and Sources, 2<sup>nd</sup> bullet, page 5 – Analytical Laboratory Data – include chain of custody copies, validation documentation – please be more specific than generally stating “chemistry data”

***Atlantic Richfield Response to Comment:*** *Section 3.0 has been updated to include specifics about chemistry data.*

Comment: Section 3.2.1 Data Categories, 2<sup>nd</sup> bullet, page 6 – why is survey data included with laboratory analytical data? Please explain why survey data was added to this bullet.

***Atlantic Richfield Response to Comment:*** *This was an inadvertent addition and survey data was removed from the bullet, while survey data was left in the first bullet for field data.*

Comment: Section 3.2.1 Data Categories 3<sup>rd</sup> bullet, page 6 – end of first sentence after maps, please add “and as built engineering drawings”.

***Atlantic Richfield Response to Comment:*** Requested text has been added.

Comment: Section 3.2.1 Data Categories, 3<sup>rd</sup> bullet, page 6 – last sentence -.wpdx should be changed to .docx. Please Correct.

***Atlantic Richfield Response to Comment:*** Requested text has been added.

Comment: Section 3.2.2 Data Types, page 6 – Please specify the units (meters or feet) for the Montana State Plane coordinate system.

***Atlantic Richfield Response to Comment:*** The Montana State Plane coordinate system is in feet. The requested text has been added.

Comment: Section 3.3.5 Residential Metals Abatement Program (RMAP) Database, page 9 – In paragraph two, please change the second to last sentence to read “samples are collected according to the appropriate RMAP quality assurance project plan (QAPP)” instead of “to EPA, in consultation with DEQ, protocol.”

***Atlantic Richfield Response to Comment:*** Requested text has been added.

Comment: Section 3.3.5 Residential Metals Abatement Program (RMAP) Database, page 9 – please clarify that the RMAP program requires AR/BSB to provide services to all of the properties in the BPSOU where the property owner approves access and any property owner in the greater Butte area that wish to participate in the program. This should clarify why it’s important for the RMAP program to track property access and status information.

***Atlantic Richfield Response to Comment:*** Requested clarification has been added.

Comment: Section 3.3.5 Residential Metals Abatement Program (RMAP) Database, page 9-10 – EPA notes that the information included under the “long-term database” presents the basic information necessary to produce property and access status reports as well as the DSR, HHRA, homeowner letters, and construction completion reports. Please note that this list of data fields may be refined as AR/BSB and EPA work through discussions on the database and web application.

***Atlantic Richfield Response to Comment:*** Given the ongoing discussions this section has been revised to indicate what is required at a minimum and as the database evolves future states of the database will be captured in the annual review process. In addition, since the final database version may, or may not, include the required fields exactly as stated, the required fields portion of each bullet point has been removed.

Comment: Section 4.2 Computer Software, number 2, page 12 – Please add Microsoft word and Adobe .pdf.

***Atlantic Richfield Response to Comment:*** Requested text has been added.

Comment: Section 4.4.1 Water/Continuous Data, 2<sup>nd</sup> paragraph, page 13 – Please include water temperature as data that is captured?

***Atlantic Richfield Response to Comment:*** Requested text has been added.

Comment: Section 4.4.1: 3<sup>rd</sup> paragraph – If dissolved oxygen and ORP are data that is captured for BTL operations please include within text.

***Atlantic Richfield Response to Comment: Requested text has been added.***

Comment: Section 4.4.5 Existing Data, page 14 – Please add a reference in this section to the Existing Data QAPP.

***Atlantic Richfield Response to Comment: Requested reference has been added.***