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ERM Corrective Action Response

Elsie King

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**Memo**

To	Lester Dupes
From	Elsie King
Date	3 November 2022
Reference	Butte RMAP Memorandum dated October 5, 2022 "Recommended Qualification for Select Dust Cassette Data"
Subject	ERM Corrective Action Response

Dear Mr. Dupes,

This memorandum is in response to the corrective action request for ERM procedural errors in the submittal of blank cassette filters to the laboratory for the final determination of sample mass of indoor dust samples.

Indoor dust filter cassette samples were collected as part of the Silver Bow Creek/Butte Area National Priorities List (NPL) Site, Butte Priority Soils Operable Unit, Residential Metals Abatement Program (RMAP) Quality Assurance Project Plan Non- Residential Parcels – Indoor Dust (dated February 28, 2022), (QAPP; February 2022). The QAPP specifies that clean filter cassettes will be submitted to the laboratory before shipment of indoor dust samples collected with filter cassettes in order to determine the final sample mass. ERM did not provide the clean filter cassettes until after the first six sets of indoor dust filter cassette samples were reported by the laboratory.

I have investigated the indoor dust sampling process and identified four factors that contributed to this oversight:

- Misunderstanding of the use of the matched weights filters provided to the laboratory
- New field sample team members were not familiar with the QAPP procedures for indoor dust cassettes
- Information gap between alternate field teams
- Incomplete review of the first indoor dust cassette sample shipments

The filter cassettes ERM selected for this project included a matched weight set of filters that can be used to determine filter mass. However, the QAPP and laboratory procedures do not include the use of matched weight filters, but require the using the average mass of blank filters measured by the laboratory.

This situation has been discussed with the current field team members. For future sample events, the QAPP requirements for the indoor dust samples using filter cassettes will be reviewed with the current field team lead. The field team leader or Quality Manager will review the QAPP

requirements with any new team members. When field teams are alternated, the exiting field team will advise the incoming field team of the status of the samples collected and any outstanding tasks to be completed. The ERM Quality Manager will continue to monitor field team member training and communication for future indoor dust sampling events.

Elsie King, ERM