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**Butte Priority Soils Operable Unit (BPSOU) Final 2022
Insufficiently Reclaimed Sites Quality Assurance Project Plan
(QAPP) Corrective Action Report**

Nikia Greene

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February 22, 2023

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RE: Butte Priority Soils Operable Unit (BPSOU) Final 2022 Insufficiently Reclaimed Sites Quality Assurance Project Plan (QAPP) Corrective Action Report

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to submit the Corrective Action Report addressing field duplicate XRF sampling frequency requirements at Insufficiently Reclaimed Sites sampled in the Butte Priority Soils Operable Unit (BPSOU).

If you have any questions or comments, please call me at (907) 355-3914.

Sincerely,

Mike McAnulty

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Corrective Action Report/ Corrective Action Plan

Project ID	Project Name	Document ID
Insufficiently Reclaimed Sites	2022 Insufficiently Reclaimed Sites	CAR-IR-2022-01
Preparer's Signature/Submit Date		Submitted to:
Jackie Janosko / February 22, 2023		EPA - Nikia Greene, in consultation with DEQ - Daryl Reed
Description of the requirement or specification	Final Insufficiently Reclaimed (IR) Sites Quality Assurance Project Plan (QAPP) (7/12/2022); Section 3.4.1.2 (Field Duplicate [FD]): "Field duplicate samples will be collected at a frequency of 1 per 20 samples or once per sampling event, whichever is more frequent."	
Reason for the Corrective Action	The FD frequency requirement for XRF samples (5%, evaluated on a per site basis, with separate counts for sampling conducted under UR versus IR QAPPs) was not met, and the overall FD frequency for XRF samples was not met for samples evaluated per IR QAPP (3.6%).	
Location, affected sample, affected equipment, etc. requiring corrective action	For the four IR sites which didn't meet XRF field duplicate requirements (IR-08, IR-30, IR-38, and IR-50), three required sampling under the UR QAPP. If UR and IR field duplicate samples are evaluated together, the overall field duplicate frequency was met (5.5%).	
Suggested Corrective Action	(Continue on Back) 2022 UR and IR samples meet overall field duplicate sample frequency requirements when combined, the following steps (outlined on the next page) are proposed as corrective action.	
Corrective Action Plan	(Continue on Back)	
	<input type="checkbox"/> Approval signature/date: _____	
	Approval of corrective actions required by EPA? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> EPA approval name/date: _____ <input type="checkbox"/> Corrective actions completed name/date: _____	
Preventative Action Plan	(Continue on Back) Preventative action is described on the next page to ensure field duplicate samples are collected at a frequency of 1 per 20, on a per site basis, for 2023 sampling and beyond. <input checked="" type="checkbox"/> Preventative actions completed name/date: Jackie Janosko / January 25, 2023	

Corrective Action Report/ Corrective Action Plan

<p>Suggested Corrective Action (Continued)</p>	<p>Since 2022 UR and IR samples meet overall field duplicate sample frequency requirements for XRF analyses when combined (5.5%), supplementary XRF field duplicate samples were collected under the UR QAPP (6.8%), and supplementary field duplicate samples were submitted for laboratory ICP analysis under the IR QAPP, which enable evaluation of field sample collection techniques for 2022 IR sampling. The steps described below are proposed as corrective action in evaluating 2022 samples:</p>
<p>Corrective Action Plan (Continued)</p>	<p>Given that field XRF sample collection techniques may be evaluated using supplementary data, the field duplicate frequency (on a per site, per QAPP basis) will not be used in the designation of data quality as enforcement, screening, or rejected. (If the data are otherwise enforcement quality, they will remain enforcement quality.)</p> <p>Forthcoming data summary reports for the four affected sites (IR-08, IR-38, IR-50, and IR-30) will list this deficiency as a deviation to the 2022 IR QAPP and explain corrective action (described herein), as approved by Agency oversight personnel.</p>
<p>Preventative Action Plan (Continued)</p>	<p>The following preventative actions will be implemented for future field sampling efforts to ensure field duplicate samples are collected at a frequency of 1 per 20, on a per site basis, for the 2023 sampling and beyond.</p> <p>A Field Team Leader (FTL) checklist has been developed and will be reviewed by the FTL after sampling has been completed at an individual site. All tasks have a "completed by" and "checked by" field, ensuring that completion of each task, per requirements of the QAPP, are verified during the sampling program. Implementation of this checklist will ensure that deficiencies are caught early and corrected prior to data review.</p> <p>Once the 2023 IR QAPP and 2023 UR QAPP are approved, the Contractor Project Manager (CPM), Quality Assurance Officer (QAO), FTL, and field team members will conduct a meeting with field team members prior to kickoff of any field sampling. The review will highlight past deficiencies, any changes, and review requirements of sampling.</p> <p>Additionally, text will be added to the 2023 IR QAPP, provisioning the use of quality control samples collected under the UR QAPP. This is applicable to sites evaluated using both IR and UR sampling programs: 1 per 20 per site.</p>