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Re: Comment letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final Quarterly Operations and Maintenance Report Butte Treatment Lagoon System – Fourth Quarter 2022 (dated March 30, 2023)

Nikia Greene

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Ref: 8MO

July 19, 2023

Mr. Dave Griffis
Liability Manager
Atlantic Richfield Company
317 Anaconda Road
Butte, Montana 59701

Re: Comment letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final Quarterly Operations and Maintenance Report Butte Treatment Lagoon System – Fourth Quarter 2022 (dated March 30, 2023)

Dear Dave:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is providing comments on the *Draft Final Quarterly Operations and Maintenance Report Butte Treatment Lagoon System – Fourth Quarter 2022* (dated March 30, 2023). Please address the following comments and submit the final version of the report for review.

General Comments

1. The Revised text in the most recent O&M draft stated the following “Once every month, additional samples will be collected at all three sites listed in Table 3 and submitted to the laboratory to be analyzed for the parameters listed in Table 2. The analytes that will be monitored monthly include total recoverable calcium and magnesium (for hardness calculations), total alkalinity, total dissolved solids, total suspended solids, nitrate/nitrite, and **sulfate**.” The section 3 text on Page 8 of the Q4 report does not list sulfate with these other parameters. Section 3 should be revised to include sulfate as part of the once per month sampling effort, and sulfate results should be included in the main report.
2. It is noted in the data validation checklist and the Data Validation report, that the aluminum result in sample LAO-SS-1-111022 was suspect. The laboratory was contacted and upon further evaluation they reanalyzed that sample and sample LAO-SS-3-111422 due to possible laboratory contamination. The protocol in Section 3 of the Q4 report describes the protocol that if there is a total aluminum exceedance, the archived sample for dissolved aluminum would be analyzed and reported. The process followed in this case had deviated from that protocol, which involved reanalyzing the total aluminum sample as well. Please clarify through the questions below, what bottles were used and what samples were reanalyzed:
3. Please confirm that dissolved aluminum samples are collected at the same time and location as the total aluminum samples are.
 - a) Please provide the original laboratory results for these two total aluminum samples that were above criteria for documentation purposes.

- b) Please explain how the samples in question were identified as potentially contaminated?
- c) Were the reanalyzed samples taken from the original collected total/dissolved bottles for these locations? If not, where did the samples come from that were reanalyzed by the lab? We want to clear up whether an aliquot from the original sample bottle was contaminated during laboratory processing or if the sample in the bottle was compromised and it was resampled and sent back into the lab from BTL.
- d) Can the laboratory confirm the possible laboratory contamination and what part of the analytical process it was affecting?
- e) The data package states the quality department provided an “attached letter regarding this issue” (Page 3674/8316). Please provide this for documentation purposes.

Appendix D - Data Summary Report

- 1. Section 3.2.1.1, Precision, First Paragraph: There is a new CLP SOW (2020) which should be referenced instead of the 2016 version. The reference section should also be updated. The SOW should be updated in the next version of the QAPP.
- 2. Section 3.3, Data Verification and Validation, Second Paragraph: The qualifier “J-“ should be added to the list of potential qualifiers.

Appendix A of Appendix D – Data Validation Report

- 1. Section 5.2, page 89, Accuracy, 4th Paragraph: Please update the blank qualification discussion in the text to follow what is performed during validation.

If you have any questions or concerns, please call me at (406) 457-5019.

Sincerely,

Nikia Greene
Remedial Project Manager

Butte File
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Josh Bryson / Atlantic Richfield
Mike Mc Anulty / Atlantic Richfield
Loren Burmeister / Atlantic Richfield
Dave Griffis / Atlantic Richfield
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