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Re: Comments for the Draft Residential Metals Abatement Program – Indoor Soil – Investigation Summary Report – Butte High School (received July 5, 2023)

Nikia Greene

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE**

FEDERAL BUILDING, 10 West 15TH Street, Suite 3200
Helena, MT 59626-0096
Phone 866-457-2690
www.epa.gov/region8

Ref: 8MO

August 2, 2023

Mr. Mike McAnulty
Liability Manager
Atlantic Richfield Company
317 Anaconda Road
Butte, Montana 59701

**Re: Comments for the Draft Residential Metals Abatement Program – Indoor Soil –
Investigation Summary Report – Butte High School (received July 5, 2023)**

Dear Mike:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is providing comments on the *Draft Residential Metals Abatement Program – Indoor Soil – Investigation Summary Report – Butte High school (received July 5, 2023)*. Please incorporate these comments and submit the final version of the plan for review.

Investigation Summary Report Comments

1. List of Figures
 - Figure 2 – Please change “Interior” to “Indoor” for consistency with document title and with the title of Figure 2.
 - Figure 3 – Please add “Soil” in front of “Sampling” for consistency with the title of Figure 3.
2. 1.2, Site Description:
 - 1st Bullet Point: Area 1 – Point states Area 1 runs along under rooms C-118 and C-123. Figure 2 depicts Area 1 running along under rooms C-119, RR, Stairs, C-123, and C-125. Please revise for accuracy and consistency.
 - 2nd Bullet Point: Area 2 – Figure 2 also depicts Area 2 running along underneath room M-102. Please revise for accuracy and consistency.
3. Section 2, Field Sampling Activities: This section does not mention the duplicate sample that was taken at Area 1. Please revise.
4. Section 3.1, Indoor Soil Sampling Results: Text states that the sample with lead levels above the action level was: S-0009-C-S-01-20220412, however the attached documents from Pace Analytical state the sample number is S-0009-S-C-01-20220412. Please revise.

5. Section 3.1, Indoor Soil Sampling Results: The field duplicate sample should also be mentioned in this section since it also has a lead detection greater than the residential action level for soil. Please revise.
6. Section 4, Data Quality and Usability Review: A brief summary of qualifications and/or a sentence stating “no data required qualification” should be provided in this section along with a summary of the Level A/B evaluation.
7. Table 1 – Summary of Analytical Sampling Results: Please add “Non-Residential Samples” before “Indoor Soil” in the title for consistency.
8. Figure 1: Please add “Site” before “Location” in figure title to match the Contents section.
9. Figure 2 & 3: Section 1.2 states “Butte High School” as well as its “Annex”. It may be useful to identify these on Figures 2 and 3 because they are described separately with different construction dates in Section 1.2.

Appendix D – Validation Reports

1. All global comments identified in an email from EPA on June 15, 2023, are applicable for this report.

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

Sincerely,

Nikia Greene
Remedial Project Manager

Butte File
Chris Greco / Atlantic Richfield
Josh Bryson / Atlantic Richfield
Mike Mc Anulty / Atlantic Richfield
Loren Burmeister / Atlantic Richfield
Dave Griffis / Atlantic Richfield
Jean Martin / Atlantic Richfield
Irene Montero / Atlantic Richfield
David A. Gratson / Environmental Standards
Mave Gasaway / DGS
Adam Cohen / DGS
Brianne McClafferty / Holland & Hart
Daryl Reed / DEQ

Amy Steinmetz / DEQ
Dave Bowers / DEQ
Katie Garcin-Forba / DEQ
Carolina Balliew / DEQ
Jim Ford / NRDP
Pat Cunneen / NRDP
Katherine Hausrath / NRDP
Ted Duaine / MBMG
Gary Icopini / MBMG
Becky Summerville / MR
John DeJong / UP
Robert Bylsma / UP
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Leo Berry / BNSF
Robert Lowry / BNSF
Brooke Kuhl / BNSF
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Doug Brannan / Kennedy Jenks
Matthew Mavrinc / RARUS
Harrison Roughton / RARUS
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Josh Vincent / WET
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Ian Magruder/ CTEC
CTEC of Butte
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Chapin Storrar / CDM Smith
Erin Agee / EPA
Will Lindsey / EPA
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