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**Comments for the Draft Residential Metals Abatement Program –
Interior School Dust – Investigation Summary Report – Emerson
Elementary (May 22, 2023)**

Nikia Greene

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

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Ref: 8MO

June 26, 2023

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

**Re: Comments for the Draft Residential Metals Abatement Program – Interior School Dust
– Investigation Summary Report – Emerson Elementary (May 22, 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 – Interior School Dust – Investigation Summary Report – Emerson Elementary (dated May 22, 2023)*. Please incorporate these comments and submit the final version of the plan for review.

Specific Comments

1. Section 2, Field Sampling Activities: As stated in the QAPP, filter blanks, field blanks, equipment blanks and floor mat blanks need to be collected per each sampling event and at the frequency identified in the QAPP. It appears that no filter blanks were collected. These sample types should be discussed and if not collected added to the deviation section. It should also be discussed whether this affects data quality objectives.
2. Section 4, Data Quality and Usability Review, Paragraph 5: A brief summary of qualifications should be provided in this section along with a summary of the Level A/B evaluation.

Appendix D - Validation Reports

1. Global Comments: All global comments identified in an email from EPA on June 15, 2023 are applicable for this report.
2. SDG 10612235, Section 7, Matrix Spike/Matrix Spike duplicate/Post Digestion Spike Sample Results: Please provide information on which samples go with each MS/MSD sample set.
3. Section 1, Quality Assurance Review, Comments Section: The laboratory report indicates there was insufficient volume for the MSD associated with Batch 822047 for mercury analyses. This should be noted in the data validation report.
4. SDG 10621634, Section 3 Blanks: Mercury was detected in the method blank. Please double check

the samples qualified for this method blank detected result. It appears that only sample S-0001-D-S-11-20220816 (10621634013) would be qualified as estimated “J+” (eventually “J” based on other QC elements) based on the validation criteria. Please update the text and tables accordingly.

5. SDG 10622239, Section 3 Blanks: Mercury was detected in the method blank. It appears that sample S-001-D-S15-20220818 (10622239001) should be qualified as estimated “J+” based on validation criteria. Please confirm and update the text and tables accordingly.

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
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Daryl Reed / DEQ
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Katie Garcin-Forba / DEQ
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Jim Ford / NRDP
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