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

Nikia Greene

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

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Ref: 8MO

July 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 – West Elementary School (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 – West Elementary School (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.
3. Section 4, Data quality and Usability Review, Paragraph 5: Please confirm how the percentage of usable data is calculated. It appears that only 3% of the results are not usable (rejected).

Appendix B – Field Notes and Sample Data Sheets

1. On page 63 of 784, please confirm the sample name for “sampled S-33.” It appears the full sample name should be -33 and not -30.

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 10610168, Section 7, Matrix Spike / Matrix Spike Duplicate/Post Digestion Spike Sample Results: The data validation report stated the equipment blank was used for the MS/MSD analyses. The validator used this MS/MSD as an LCS/LCSD. Information on the results of this review and the situation with this MS/MSD should be presented in the LCS/LCSD section as well. Please update the text accordingly. Also, the sampling team should identify which sample is used for MS/MSD. Please ensure this process is followed. From the laboratory communication it seems a normal sample was chosen for MS/MSD but not enough volume was there. Please confirm this was the situation.
3. SDG 10614872, Table 1: The Laboratory Sample Number contains an extra number “one” for each of the sample numbers. Please confirm and update the table 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
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