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Comments for the Draft Residential Metals Abatement Program – Interior School Dust – Investigation Summary Report – Ramsay Elementary_Rev1 (April 26, 2023)

Nikia Greene

Environmental Protection Agency

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Ref: 8MO

June 22, 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 – Ramsay Elementary_Rev1 (April 26, 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 – Ramsay Elementary_Rev1 (dated April 26, 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. Appendix D, Validation Reports, SDG 10612232, Level A/B: The completed field form row is marked no but then the details are marked yes, please confirm and update the form accordingly.
3. Section 5, Conclusions and Remedial Recommendations: Please revise text to state, “all data quality objectives were met except for one nondetect mercury result.”

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

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Loren Burmeister / Atlantic Richfield

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