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**Comments for the Draft Residential Metals Abatement Program –
Interior School Dust – Investigation Summary Report – Former
Hawthorne School (April 12, 2023)**

Nikia Greene

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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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 – Former Hawthorne School (April 12, 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 – Former Hawthorne School (dated April 12, 2023)*. Please incorporate these comments and submit the final version of the plan for review.

Specific Comments

1. Section 2, Field Sampling Activities, fourth bullet: The text indicates samples were collected in two janitor's closets and one storage room. Table 1 indicates the samples were collected in two storage rooms and one janitor's closet. Please confirm the locations and update the text and /or Table 1 accordingly.
2. 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.

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
Jean Martin / Atlantic Richfield
Irene Montero / Atlantic Richfield
David A. Gratson / Environmental Standards
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