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Summer 6-22-2023

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

Nikia Greene

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

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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 – Margaret Leary Elementary (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 – Margaret Leary Elementary (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: 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 10621639, Section 7 Matrix Spike / Matrix Spike Duplicates / Post Digestion Spike Sample Results: Information should be provided on why the one sample was not qualified based on MS/MSD criteria. It should also be discussed why the lead results were not qualified based on RPD criteria. A note in the validation laboratory forms indicated %R's were evaluated instead.
3. Appendix D, Validation Reports, SDG10612230 Section 11. Field Duplicates: The comment section indicates the mercury field duplicate results were qualified based on an RPD greater than 35%. Per the validation forms the qualification was based on the absolute difference between the field duplicate results. Please confirm and update the text 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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Emily Stoick / W&C  
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