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

Nikia Greene

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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 – Monroe Head Start (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 – Monroe Head Start (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 10611628, Section 7 Matrix Spike / Matrix Spike Duplicates / Post Digestion Spike Sample Results: Mercury Matrix Spike / Matrix Spike Duplicate %Rs and %RPDs were outside acceptable criteria, it appears just the source sample was qualified based on the exceedance. Please clarify the process utilized when applying (nor not applying) qualifiers to particular samples. Please confirm the qualifiers and update the text and sample results accordingly if required.

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
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