

Montana Tech Library

Digital Commons @ Montana Tech

Silver Bow Creek/Butte Area Superfund Site

Montana Superfund

Summer 6-22-2023

**Comments for the Draft Residential Metals Abatement Program –
Interior School Dust – Investigation Summary Report – Whittier
Elementary (April 13, 2023)**

Nikia Greene

Follow this and additional works at: https://digitalcommons.mtech.edu/superfund_silverbowbutte



Part of the [Environmental Health and Protection Commons](#), [Environmental Indicators and Impact Assessment Commons](#), and the [Environmental Monitoring Commons](#)



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

FEDERAL BUILDING, 10 West 15TH Street, Suite 3200
Helena, MT 59626-0096
Phone 866-457-2690
www.epa.gov/region8

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 – Whittier Elementary (April 13, 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 – Whittier Elementary (dated April 13, 2023)*. Please incorporate these comments and submit the final version of the plan for review.

Specific Comments

1. Section 2, Field Sampling Activities, Statement 2: The text states: “the floorplan in the FSP did not include a boiler room, and an additional micro-vacuum surface sample and floor surface sample were taken...” This statement is unclear. Please clarify and update the text 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.
3. Appendix D, Validation Reports, SDG 10622247, Section 7 Matrix Spike / Matrix Spike Duplicates / Post Digestion Spike Sample Results: Information should be provided on why the one sample was not qualified for mercury and lead based on MS/MSD criteria.

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

Mave Gasaway / DGS

Adam Cohen / DGS

Brianne McClafferty / Holland & Hart

Daryl Reed / DEQ

Amy Steinmetz / DEQ

Dave Bowers / DEQ

Katie Garcin-Forba / DEQ

Carolina Balliew / DEQ

Jim Ford / NRDP

Pat Cunneen / NRDP

Katherine Hausrath / NRDP

Ted Duaine / MBMG

Gary Icopini / MBMG

Becky Summerville / MR

John DeJong / UP

Robert Bylsma / UP

John Gilmour / Kelley Drye

Leo Berry / BNSF

Robert Lowry / BNSF

Brooke Kuhl / BNSF

Lauren Knickrehm / BNSF

Doug Brannan / Kennedy Jenks

Matthew Mavrinnac / RARUS

Harrison Roughton / RARUS

Brad Gordon / RARUS

Mark Neary / BSB

Eric Hassler / BSB
Julia Crain / BSB
Brandon Warner / BSB
Abigail Peltomaa / BSB
Eileen Joyce / BSB
Sean Peterson/BSB
Josh Vincent / WET
Scott Bradshaw / W&C
Emily Stoick / W&C
Pat Sampson / Pioneer
Andy Dare / Pioneer
Karen Helfrich / Pioneer
Randa Colling / Pioneer
Scott Sampson / Pioneer
Ian Magruder/ CTEC
CTEC of Butte
Scott Juskiewicz / Montana Tech
David Shanight / CDM Smith
Curt Coover / CDM Smith
Chapin Storrar / CDM Smith
Erin Agee / EPA
Will Lindsey / EPA
Aaron Urdiales / EPA
Jamie Miller / EPA
Chris Wardell / EPA
Dana Barnicoat / EPA
Charlie Partridge / EPA
Kristi Carroll / Montana Tech Library