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Winter 2-27-2024

### Comments for the Draft Residential Metals Abatement Program – Interior School Dust – Investigation Summary Report – United Congregational (Crayon Factory Preschool) (dated November 16, 2023)

Emma Rott

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
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Ref: 8MO

February 27, 2024

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 – United Congregational (Crayon Factory Preschool)  
(dated November 16, 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 – United Congregational (Crayon Factory Preschool (dated November 16, 2024)*. Please incorporate these comments and submit the final version of the plan for review.

**Investigation Summary Report Comments**

1. TOC's: Please remove extra "TABLES" and "FIGURES"
2. Section 1.2: Please add Meeting Room to Decision Unit 1.
3. Table 1: The sample name for the mercury results that were reanalyzed needs to be appropriately identified with the designation of RE1 (or as designated) as the mercury results were analyzed three times for the parent sample and field duplicate sample.
4. Please label Photographs 1741 and 1742 with Sample ID.

**Appendix C – Laboratory Reports**

5. In the emails provided in the laboratory data package on pages 100 to 109 of the report PDF, there is discussion of a new type of sample cassette being used for the Gold Hill samples. Please discuss the differences in the cassettes and whether the new cassettes may or may not have had any effect on the dust results in the Gold Hill report. Also be sure the appropriate quality control samples were analyzed with the new filters (i.e., filter blank, lot blank). There were also questions from the laboratory to ERM regarding other filter samples as well. Please clarify that all the issues/questions were addressed and there is no impact to the sample data results.

## Appendix D – Validation Reports

6. SDG 10663489: In section 8 for MS/MSD, sample S-0023-D-S-03-20230727 is listed as having the mercury result qualified. There is not a mercury result for this sample in Table 1. Confirm and update the text accordingly.

If you have any questions or concerns, please call me at (406) 438-0823

Sincerely,



Emma Rott  
Remedial Project Manager

cc: (email only)

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

Kevin Stone / DEQ

Logan Dudding / DEQ

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Doug Martin / NRDP

Jim Ford / NRDP

Pat Cunneen / NRDP

Katherine Hausrath / NRDP

Ted Duaime / MBMG

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John DeJong / UP

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David Shanight / CDM Smith  
Curt Coover / CDM Smith  
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Erin Agee / EPA  
Will Lindsey / EPA  
Jamie Miller / EPA  
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