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### Re: Comments on the 2024 Draft Final Butte Priority Soils Operable Unit (BPSOU) Interim Site- Wide Groundwater Monitoring Quality Assurance Project Plan (QAPP) (dated November 29, 2023)

Emma Rott

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## REGION 8

DENVER, CO 80202

June 13, 2024

Mr. Josh Bryson  
Liability Manager  
Atlantic Richfield Company  
317 Anaconda Road  
Butte, Montana 59701

**Re: Comments on the 2024 Draft Final Butte Priority Soils Operable Unit (BPSOU) Interim Site-Wide Groundwater Monitoring Quality Assurance Project Plan (QAPP) (dated November 29, 2023)**

Dear Mr. Bryson:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is providing comments on the 2024 Draft Final Butte Priority Soils Operable Unit (BPSOU) Interim Site-Wide Groundwater Monitoring Quality Assurance Project Plan (QAPP) (dated November 29, 2023). Please incorporate these comments along with those in the accompanied QAPP crosswalk and submit the final version of the plan for review.

**General Comments:**

1. Currently, the EPA and DEQ are uncomfortable with elimination of collecting samples from the 35 groundwater wells from the site-wide monitoring network, and reduction of monitoring at 14 groundwater wells that are described in the cover letter and with this draft final quality assurance project plan. Please set up a meeting with the agencies to discuss these proposed changes to be considered in future monitoring plans.

**Specific Comments:**

2. Section 2.1: Project Organization and Responsibilities, Pages 1 - 3: The person performing the data validation should be listed in this section.
3. Section 2.4.1: Data Quality Objectives, Page 6, Step 1, 1st bullet, 5th sentence: Upper end post-ROD concentrations for arsenic, copper and lead stated in this sentence have decreased from what was stated in the 2023 QAPP. How can the maximum values in the post-ROD monitoring period decrease? Maximum arsenic was observed at BPS11-10A at 1.69 mg/L; the maximum cadmium is 1.8 (not 1.82) at GS-11R; maximum copper is 233 at GS-11R. Highest lead is 1.9 at GS-11R. Highest zinc is 313 at GS-11R. Please revise this sentence with the correct and appropriate maximum post-ROD concentrations.
4. Section 2.4.2: Measurement Performance Criteria for Data, Completeness, Page 15, last

sentence: the text states “The QAPP completeness goal is 95 percent for each matrix.” This QAPP is specific to groundwater. Please revise the sentence to read: “The QAPP completeness goal is 95 percent for groundwater samples.”

5. Section 3.4.4: Sample Disposal, Page 28, 1st paragraph: There should be a sentence added that states the laboratory needs to contact Atlantic Richfield before samples are disposed of.
6. Section 3.5.1: Field Quality control Samples, Field Duplicate, Page 28, 4th paragraph: The full language discussing the criteria for sample results that are less than 5x the RL should be added to this section for consistency with other sections of the QAPP.
7. Section 5.1.3: Laboratory Data Reporting Requirements, Page 36: The Stage 4 data validation language should be put back into this section of the report as it was written in the 2023 version of the QAPP.
8. Section 5.2.2: Laboratory Chemistry Data, Page 37: The Stage 4 validation language needs to be put back into this section of the report as it was written in the 2023 version of the QAPP.
9. Section 5.2.2, Laboratory Chemistry Data, Page 38: The qualifiers “J+” and “J-” should be added to the list of potential qualifiers.
10. Section 5.2.2. Laboratory Chemistry Data, Page 39: It should be noted that results that are qualified as estimated “J” based on MDL/MRL criteria, and have no other required qualifications, are considered enforcement quality data.
11. Table 9: For the frequency of ICV in the first row, the table states, “At beginning of analytical run, immediately after ICV.” This does not make sense to run ICV after ICV. Please revise.
12. Figures 2 through 4: Harrison Avenue is labeled MT HIGHWAY 2 in these figures. Please change this label to Harrison Avenue as it is referred as in the cover letter and the QAPP.
13. Appendix D, Laboratory Data Package Components: The Stage 4 data package deliverables items should be added to this appendix.
14. Appendix E: The Stage 4 validation information needs to be added back into this appendix as was stated for 2023.

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

Sincerely,

Emma Rott, PE  
Remedial Project Manager

ENCLOSURES

1. EPA Crosswalk

cc: (email only)

Butte File

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