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Re: Comment letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final 2023 BPSOU Subdrain Data Summary Report (dated May 1, 2024)

Emma Rott
Environmental Protection Agency

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REGION 8

DENVER, CO 80202

August 12, 2024

Mr. Dave Griffis
Liability Manager
Atlantic Richfield Company
317 Anaconda Road
Butte, Montana 59701

Re: Comment letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final 2023 BPSOU Subdrain Data Summary Report (dated May 1, 2024)

Dear Mr. Griffis:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is providing comments on the *Draft Final 2023 BPSOU Subdrain Data Summary Report (dated May 1, 2024)* with the following comments. Please address the following comments and submit the final version for review.

Comments:

1. Section 2.1.1 Measurement Accuracy and Data Screening for Flow Meter Data, page 15: Bullet 2 - Evaluation of atypical data: It is stated that flow data was compared and plotted to determine causes of inconsistencies, fluctuations, etc. If this comparison was not triggered, include that as a statement in the Section 4.0 Conclusion. When it is triggered, include that as a statement in the Section 4.0 Conclusion with reference to where those figures/data are located in the Appendix.
2. Section 2.1.1.1 Area Velocity Flow Meters; page 16: Specify the meter velocity range when stating accuracy of plus or minus 0.01 ft/second.
3. Section 2.1.1.2 Electromagnetic Flow Meter; page 16: Specify the manufacturers velocity range for the Marsh-McBirney Flo-Tote Electromagnetic Sensor when presenting the velocity resolution of the sensor.
4. Section 3.1 Review DQOs and Sampling Design: The QAPP is not attached to this report. Remove the reference of the QAPP being in Appendix A.
5. Section 4.0, Conclusions on the Quality of the Data, Second Paragraph, First Sentence: The sentence states the following: "Proper chain of custody and sample handling activities were observed during sample collection, delivery to the laboratory and analysis except." Please confirm if anything should be added at the end of this sentence or if the word "except" should be deleted.

6. Table 2 Average of Manual Velocity Measurements; page 27: 6/22/23 dashes are in the table, add description below table of reason for missed samples if not related to being under water. If it was because it was underwater, then replace dash with “underwater.
7. Table 4 Air Quality; page 29: Values above standards should be identified on the table.
8. Table 6 Site Visit Summary; page 31: 5/22/23 Removed/Replaced equipment has a note stating MH-MSD106 could not be installed on 4/26/23 because the manhole was covered by water. The dates are contradictory please verify and update accordingly.
9. Appendix B, Referenced Materials: Lab notes for 1/16/23 are unavailable, please confirm and revise accordingly.
10. Appendix B, Referenced Materials: Please re-check all logbook data and verify that Table 2 has correct values listed. For example, 2/20/23, manual flow in logbook listed differs from Table 2 please verify and update.
11. Meters; page 16: Specify the meter velocity range when stating accuracy of plus or minus 0.01 ft/second.

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

Sincerely,

Emma Rott, PE
Remedial Project Manager

cc: (email only)

Butte File
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