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Summer 8-15-2024

**Re: Comment letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final Annual Operations and Maintenance Report Butte Treatment Lagoon System – 2023 (dated May 28, 2024)**

Emma Rott

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## REGION 8

DENVER, CO 80202

August 15, 2024

Mr. Dave Griffis  
Treatment Operations Project Manager  
Atlantic Richfield Company  
317 Anaconda Road  
Butte, Montana 59701

**Re: Comment letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final Annual Operations and Maintenance Report Butte Treatment Lagoon System – 2023 (dated May 28, 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 Annual Operations and Maintenance Report Butte Treatment Lagoon System – 2023 (dated May 28, 2024)* with the following comments. Please address the following comments and submit the final version for review.

**Comments:**

1. Section 3.0, page 11, Monitoring, 1st paragraph: The text states that samples are analyzed for alkalinity, total dissolved solids, total suspended solids, and nitrates/nitrites. Sulfate was also part of the monthly analysis, please update the text accordingly.
2. Section 5.0 System Performance: The Cadmium Concentration graph shows 3 exceedances, the Copper Concentration graph shows 4 exceedances. Please discuss.
3. Section 5.0, System Performance, Second Paragraph: The total aluminum sample was 0.094 mg/L, which was above the 0.087 mg/L limit, which prompted the dissolved analysis that resulted in a 0.0091 mg/L non-detect value. This narrative is provided in the Q2 2023 report and needs to be added to this annual report.
  - a. The data tables in A1 only present the initial total aluminum results, but do not have the subsequent dissolved results. The dissolved result should be included in A1 for this sample.
4. Section 6.1 Dredging and Sludge Removal: May 15, 2022 was referenced for dredging. Please update to 2023.
5. With the installation of the Solar Bee into cell A2 in May 2023, please discuss what observations have been seen with this type of recirculation?
6. Appendix C – Data Summary Report; Abbreviations and Acronyms: The following abbreviations/acronyms should be added to this table: FB; RB; CCB; ICB; RL; CL; FD; SD; D%; IS; and Cal. Please confirm no other abbreviations/acronyms should be added to this table.

7. Appendix C – Data Summary Report; Section 2.1, Water Quality Sample Collection, Second Paragraph: There is reference that sample EFS-07 (LAO-SS-1) on November 10, 2022 was analyzed for dissolved metals due to a result above the standard for aluminum. However, this is from Q4 of 2022 and should be removed from this report. The sample from June 08, 2023 should be listed here in Section 2.1 instead.
8. Appendix C – Data Summary Report; Section 3.2.1.2, Accuracy, Third Paragraph: The code for serial dilution should be SD as has been used in the previous reports. Internal standard (IS) qualifications and results qualified because the working range of the instrument was exceeded (CL) should also be included in this paragraph. Please confirm all results that were qualified throughout the year are summarized with the appropriate information and that the counts are correct.
9. Appendix C – Data Summary Report; Section 3.3, Data Verification and Validation, Paragraphs 7 and 8: There is discussion of SDG 10618399 not meeting Level B Criteria. This SDG appears to be from 2022 third quarter. Please confirm and update the report accordingly.
10. Appendix C – Data Summary Report; Section 3.3.2.1, Field Blank Results, Second Paragraph: There were two results qualified based on field blank exceedances. This should be discussed in this paragraph like the rinsate blank qualifications are. Please confirm and update the report accordingly.
11. Appendix C – Data Summary Report; Section 3.3.2.2, Field Duplicate Results, First Paragraph: Please confirm the number of results qualified based on field duplicates and laboratory duplicates. The tables are showing 26 qualifications for field duplicates and 8 for laboratory duplicates.
12. Appendix C – Data Summary Report; Table A1. The dissolved aluminum results should be added to the table for the June 08 sample at LAO-SS-1-060823, as described in Question 1a from the main report comment listed above.

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  
Chris Greco / Atlantic Richfield  
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Josh Bryson / Atlantic Richfield

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