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Re: Comment Letter for Draft BPSOU 2023 Groundwater Data Summary Report (dated May 31, 2024)

Emma Rott

Environmental Protection Agency

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Recommended Citation

Rott, Emma, "Re: Comment Letter for Draft BPSOU 2023 Groundwater Data Summary Report (dated May 31, 2024)" (2024). *Silver Bow Creek/Butte Area Superfund Site*. 852.
https://digitalcommons.mtech.edu/superfund_silverbowbutte/852

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REGION 8

DENVER, CO 80202

September 23, 2024

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

Re: Comment Letter for Draft BPSOU 2023 Groundwater Data Summary Report (dated May 31, 2024)

Dear Mr. Bryson:

The U. S. Environmental Protection Agency (EPA) in consultation with the Montana Department of Environmental Quality (DEQ) has reviewed and is providing comments on the *Draft BPSOU 2023 Groundwater Data Summary Report (dated May 31, 2024)*. This data was collected under the *Silver Bow Creek Butte Area NPL Site 2023 Final Butte Priority Soils Operable Unit Interim Site-Wide Groundwater Monitoring Quality Assurance Project Plan (July 2023)*. Please incorporate these comments and submit a revised version.

Comments:

1. List of Tables: Table 6b is the general chemistry results table and Table 6c is the field data results. However, table 6c is not included on the list or in the DSR report but it is in the folder files provided to EPA to review. Please confirm and update the text accordingly.
2. Section 1.0, Introduction: Replace Metro Storm Drain (MSD) with BPSOU Subdrain in this sentence and throughout the document.
3. Section 1.0, Introduction: In the third paragraph, it is stated that the fall sampling proceeded through October 9, 2023. There was one sample collected on October 11. Please confirm and update the text accordingly.
4. Section 3.1, Water Quality Monitoring Methods: In the second paragraph, dissolved calcium, iron, magnesium, manganese, potassium, and sodium are stated to be analyses completed. These are not seen in any of the data tables (DSR or DQA) nor in the data packages. Confirm if these 5-year sample results are included in any of the sample counts for this report.
5. Section 3.4, Water Quality Results: In the bullet points, there are the dissolved calcium, iron, magnesium, manganese, potassium, and sodium analytes listed. Again, these are not seen in any data tables throughout the report. The QAPP states that Aluminum, calcium, iron, and magnesium results must be reported even if they are not target analytes.

6. Section 3.4, Water Quality Results: In paragraph 4, it is stated that field measured data is provided in table 6b. Table 6b is general chemistry results and table 6c is field data but is not included in the DSR document but is in the files delivered to us. Please confirm and update the text and add the table into the report.
7. Section 3.4.1, Water Quality Data Assessment: All the sample counts are incorrect in paragraph 2. There are 2121 total analytical data points, 1873 natural samples, 1805 enforcement quality, and 67 screening quality. Anticipated analyses would be an additional 11 added to the total data points.
8. Section 3.6, Operation and Maintenance Activities: Add a reference to Table 8.
9. Figure 2, Water Monitoring Network: Potentiometric contours seem to be misplaced in the vicinity of the following wells: AMW-22, AMC-05, AMW-20, BPS11-04, BPS11-12A, and BPS11-15. Please revise.
10. Figure 6 – Water Quality 5Yr Spring 2023 Mercury Concentrations: The notes in the legend represented with a green symbol should read “NOT Exceeding Mercury Criteria”.
11. Appendix B, Data Quality Assessment, List of Tables: Table B2b is not included in the list of tables but is in the report.
12. Appendix B, Data Quality Assessment, Section 3.0, DQA: At the end of the section, table B2b is not labeled correctly in the text. It is listed as Table 2b which it should be Table B2b.
13. Appendix B, Data Quality Assessment, Throughout the document: The sample counts appear to be incorrect. We are seeing 2121 total analytical data points, 1873 natural samples, 1805 enforcement quality, and 67 screening quality results. Please confirm and update the text and recalculate the percentages if required.
14. Appendix B, Data Quality Assessment, Section 3.3.2.1, Field Blanks: There are 27 results with FB flags shown in the tables. Please confirm and update as appropriate.
15. Appendix B, Data Quality Assessment, Section 3.3.2.2, Laboratory Blanks: There are 7 results with MB flags in the tables. Please confirm and update as appropriate.
16. Appendix B, Data Quality Assessment, Section 3.3.2.2, Laboratory Blanks: The affected results are stated to include dissolved manganese. There appear to be no dissolved manganese results, please confirm and revise as appropriate.
17. Appendix B, Data Quality Assessment, Section 3.3.6, Matrix Interference Samples: There are not dissolved iron results so it should not be included in the affected analysis list. Please confirm and update the text as appropriate.
18. Appendix B, Data Quality Assessment, Section 3.3.6, Matrix Interference Samples: There are 41 samples in the tables flagged for matrix interference. Three of the results were QC samples. Please confirm and revise text as appropriate.
19. Appendix B, Data Quality Assessment, Section 3.5, Completeness: Per a previous comment, please update the sample count numbers if required. The text discusses the number of analytical data points that would have been achieved if all the wells had been sampled. Is this information used for the last sentence in the paragraph discussing the overall completeness for 2023 BPSOU groundwater sampling? Is that how the 98.6% value is determined? Please update the text for clarity.

20. Appendix B, Data Quality Assessment, Section 4.0, Data Assessment Summary: The third paragraph states that 47 data points received U qualifiers for FB, MB, or CCB detections. There are only 32 U quals for all the analyses and adding up FB, MB, and CCB qualifications equals 37. This does not take into consideration if one result received multiple blank quals or if one sample was qualified something else due to an additional QC criterion. Please confirm and revise the text as appropriate.
21. Appendix B, Data Quality Assessment, Section 4.0, Data Assessment Summary: The third paragraph states that 43 data points received screening quality for matrix interference. This should be 36 since there were 41 total results and then 3 quality control data points and two other results that were flagged for FB and matrix interference which would be subtracted from the 41. Please confirm and revise the text as appropriate.
22. Appendix C, Continuous Water Levels: Major changes occurred in a number of wells in May and November. It seems likely that these are associated with jetting operations in the BPSOU subdrain. The 2nd Quarter BTL O&M Report indicated jetting of the subdrain on April 18 and 19 which doesn't quite align with the major changes seen on the hydrographs. The 4th quarter BTL: O&M report indicated jetting on October 31 which seems to align with the November changes seen in the hydrographs. Some of these changes are labeled as such but most are not. Please add more precise jetting dates (not the entire year) to Table 8 and label hydrographs affected by the jetting more completely.

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

Sincerely,

Emma Rott, P.E.
Remedial Project Manager

cc: (email only)

Butte File

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