

Montana Tech Library

Digital Commons @ Montana Tech

Silver Bow Creek/Butte Area Superfund Site

Montana Superfund

Summer 9-13-2024

**Re: Comment Letter for Draft BPSOU 2023 Site-wide Surface
Water Data Summary Report (dated May 31, 2024)**

Emma Rott

Follow this and additional works at: https://digitalcommons.mtech.edu/superfund_silverbowbutte



Part of the [Environmental Health and Protection Commons](#), [Environmental Indicators and Impact Assessment Commons](#), and the [Environmental Monitoring Commons](#)



REGION 8

DENVER, CO 80202

September 13, 2024

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

Re: Comment Letter for Draft BPSOU 2023 Site-wide Surface Water 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 Site-wide Surface Water Data Summary Report (dated May 31, 2024)*. Please incorporate these comments and submit a revised version.

General Comments:

1. Appendices J and L are missing from the data summary report file. Please add.

Specific Comments:

2. Section 3.1.1: The completeness is stated to be 100%. There were two rejected results. Please update the text to reflect these rejected results in the completeness calculation.
3. Section 3.3: The section states that 104 natural sample analyses were anticipated. As identified in the associated DQA, please confirm if total solids are being included in the 104 natural sample data point count. If so, this data should be presented in the appropriate tables or the number of natural sample data points should be adjusted to not include this as a data point.
4. Section 3.4 and associated tables: Metrics listed in Tables 16a, 16b, and 16c do not match metrics listed in Table 14 (or Table 7 of the 2023 QAPP). Please explain the nomenclature changes and define the extra metrics. Also, change the reference to Table 10 to Table 14.
5. Section 3.4: Please compile a summary of habitat data and present in this section. This should include a short narrative and summary tables.
6. Table 1: Change "Criteria" to "Standards." Footnotes 1 and 2 should refer to the RODA, not DEQ-7. The RODA acute performance standard for dissolved zinc is 36 µg/L. Please revise.
7. Figure C2: There is one outlier value with approximately 0.5 ft stage. Please verify this value.
8. Appendix A – DQA, Section 2.5.1, Laboratory and Field Duplicates: The text states (3) three WW

field duplicate results did not meet criteria. In the associated tables there are 8 field duplicate results that were outside of criteria. Confirm and update the text accordingly.

9. Appendix A – DQA, Section 2.6.2.1, Field Blanks: Total and dissolved Hg and total Pb should be included in the affected analyses list for FB qualifications.
10. Appendix A – DQA, Section 2.6.2.1, Field Blanks: Please confirm the number of qualified results based on field blank criteria. There appears to be 96 results versus the 72 reported in the text.
11. Appendix A – DQA, Section 2.6.2.2, Method Blanks: The reference for the WW tables should be presented in the first sentence. Please confirm the cadmium results that were qualified. It appears there were no dissolved cadmium results qualified based on method blank criteria.
12. Appendix A – DQA, Section 2.6.2.2, Method Blanks: The text states, “One dissolved lead result in the field blank was qualified based on MB detection.” This qualification is not seen in the tables but there is a qualification for TDS. Please confirm the information in the text versus the tables.
13. Appendix A – DQA, Section 2.6.2.2, Method Blanks: The text states, “Results were qualified as “U,” assigned an “MB” data validation description code and given an enforcement quality.” It is unclear as to which data this is discussing. Please confirm what this sentence is referring to.
14. Appendix A – DQA, Section 2.6.3, Matrix Spike and Matrix Spike Duplicate: The reference for the WW tables in the first sentence should be presented in the text.
15. Appendix A – DQA, Section 2.6.3, Matrix Spike and Matrix Spike Duplicate: Nitrate and Nitrite should be included in the list of analyses affected by MS recovery criteria for NF samples.
16. Appendix A – DQA, Section 2.6.3, Matrix Spike and Matrix Spike Duplicate: Please confirm the number of NF natural samples qualified based on MS criteria. The tables are presenting 34 versus the twenty-nine in the text.
17. Appendix A – DQA, Section 2.6.6, Recalculations: The information provided in this section is very thorough and helpful. Going forward, if the same laboratory is to be used for DOC analyses, is there a plan in place to get the laboratory to provide the information for the DOC calculations that they did not provide for this set of data?
18. Appendix A – DQA, Section 2.8, Completeness: The text states that the completeness for NF samples was 100%. There were two rejected results. Please update the completeness percentage for usable data.
19. Appendix A – Level AB Checklist, WW, 10654961: The screening result for level A is not marked. Please update the form.
20. Appendix E – DQA, Section 3.0, Data Quality Assessment: The third paragraph states that general chemistry and field parameters are in the data tables. Besides total and dissolved metals, there is only TSS and SO₄ data. Please confirm if field parameter data should be presented in these tables and/or update the text.
21. Appendix I – DQA, throughout report: Please confirm if total solids are being included in the 104 natural sample data point count. If so, this data should be presented in the appropriate tables or the number of natural sample data points should be adjusted to not include this as a data point.
22. Appendix I – DQA, Section 3.2.1, Laboratory and Field Duplicates: Please confirm if the soil characteristic results should be discussed in this section as there were some qualifications based on field duplicate and laboratory duplicate precision criteria. They did not include the soil

characteristic data in the counts for FD and RPD codes.

23. Appendix I – Level 2b Checklist, Sediment, TOC, Section 5: Yes is marked for data flagged due to LDS problems but there were no data flagged for this. No should be marked.

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

Chris Greco / Atlantic Richfield

Mike Mcanulty / Atlantic Richfield

Loren Burmeister / Atlantic Richfield

Dave Griffis / Atlantic Richfield

Tim Hilmo / Atlantic Richfield

Jean Martin / Atlantic Richfield

Irene Montero / Atlantic Richfield

David A. Gratson / Environmental Standards

Mave Gasaway / DGS

Adam Cohen / DGS

Brianne McClafferty / Holland & Hart

Daryl Reed / DEQ

Logan Dudding / DEQ

Jon Morgan / DEQ

Kevin Stone / DEQ

Amy Steinmetz / DEQ

Katie Garcin-Forba / DEQ

Doug Martin / NRDP

Jim Ford / NRDP

Pat Cunneen / NRDP

Katherine Hausrath / NRDP

Ted Duaine / MBMG

Gary Icopini / MBMG

Becky Summerville / MR

John DeJong / UP

Robert Bylsma / UP

John Gilmour / Kelley Drye

Leo Berry / BNSF

Robert Lowry / BNSF

Brooke Kuhl / BNSF

Lauren Knickrehm / BNSF

Doug Brannan / Kennedy Jenks

Matthew Mavrinac / RARUS
Harrison Roughton / RARUS
Eric Hassler / BSB
Chad Anderson / BSB
Brandon Warner / BSB
Abigail Peltomaa / BSB
Sean Peterson/BSB
Josh Vincent / WET
Scott Bradshaw / W&C
Emily Evans / W&C
Pat Sampson / Pioneer
Karen Helfrich / Pioneer
Randa Colling / Pioneer
Scott Sampson / Pioneer
Jesse Schwarzrock / Pioneer
Mark Meyer / Pioneer
Ramzi Khuri / Jacobs
Cord Harris / Jacobs
Rich Keeland / Aspect Engineering
Andy White / Aspect Engineering
Ian Magruder/ CTEC
CTEC of Butte
Scott Juskiewicz / Montana Tech
David Shanight / CDM Smith
Curt Coover / CDM Smith
Chapin Storrar / CDM Smith
Erin Agee / EPA
Will Lindsey / EPA
Ben Mathieu / EPA
Jamie Miller / EPA
Carolina Balliew / EPA
Molly Roby / EPA
Katherine Jenkins / EPA
Charlie Partridge / EPA