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**Approval letter for the Butte Priority Soils Operable Unit (BPSOU)
2022 Subdrain Data Summary Report Plan (DSR) (July 7, 2023)**

Nikia Greene

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE**

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Ref: 8MO

October 2, 2023

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

Re: Approval letter for the Butte Priority Soils Operable Unit (BPSOU) 2022 Subdrain Data Summary Report Plan (DSR) (July 7, 2023)

Dear Dave:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the *Butte Priority Soils Operable Unit (BPSOU) 2022 Subdrain Data Summary Report (DSR) (dated July 7, 2023)* with the following comments. Please address the following comments and distribute this DSR submittal as final.

1. Executive Summary: Include turbidity as a sampling parameter.
2. Section 2.0 Summary of Data Collection, Equipment Maintenance, Sampling, and Laboratory Analyses:
 - 2.1.1 Measurement Accuracy and Data Screening for Flow Meter Data; Subsection #2: Evaluation of atypical data: It is stated that flow data was compared and plotted to determine causes of inconsistencies, fluctuations, etc. Is there atypical data that triggered this comparison? If so, include this data in the Appendix.
 - 2.1.1.1: Specify the meter velocity range when stating accuracy of plus or minus 0.01 ft/second.
 - 2.1.1.2 Electromagnetic Flow Meter: Specify the manufacturers velocity range for the Marsh-McBirney Flo-Tote Electromagnetic Sensor when stating the percent accuracy of the sensor.
 - 2.2 Water Quality Sample Collection: List turbidity as a field parameter. It is listed in Table 1a and 1b.
3. Section 3.1 Review DQOs and Sampling Design: It is stated the QAPP is in Appendix A, but Appendix A contains the Data Validation Report. The DQOs should be included in this report.
4. Section 4.0, Conclusions on the Quality of the Data: The text states “Sulfate and Nitrogen, Nitrite plus Nitrate, results were qualified due to receiving temperature reported outside the preservation

criteria and are considered usable as screening quality data (Appendix A).” Fluoride was also qualified as screening quality due to receiving temperature, please update text accordingly.

5. Section 4.1 Deviation: There should be discussion on implications from the data quality objectives not meeting the 95% completeness. Is there a contingency to address sites that are unable to be sampled?
6. Table 1a. July 2022 Field Parameters: Sampling Sites HCC-OUT and MSD-OUT should be included the table.
7. Table 1b. November 2022 Field Parameters: Include Sampling Sites HCC-OUT and MSD-OUT in table and note sampling did not take place at MSD-OUT due to weather conditions. In the future, could data be obtained by breaking the ice?
8. Table 2: Average of Manual Velocity Measurements: Listed for MH-MSD113 on 8/23/22 is 0.84 ft/sec, according to the field notes the three velocity readings were 0.82 ft/sec, 0.82 ft/sec, and 0.82 ft/sec making the average 0.82 ft/sec. Update table accordingly.

Appendix A, Data Validation, Assessment Checklists, and Tables

9. Section 1.0, Data Validation Report Summary, Seventh Paragraph, Second Sentence: The text states “In addition to the manhole locations, surface water samples were collected at MSD-OUT, which were collected by TREC, Inc. (TREC).” The surface water sample at MSD-OUT appears to have only been collected for the July 20 sampling event. Please clarify this in the text.
10. Section 5.5, Completeness, Fourth Paragraph, First Sentence: The text states 429 natural data points were generated for the sampling events. With the addition of the dissolved barium and silica results for a couple of the samples, the total is 435. Please confirm if this total should be 435 as listed in the main Data Summary Report and if the number of planned results should be 468 with the added analytes.
11. Section 5.5, Completeness: Information should be provided on the affects to data quality objectives regards to the completeness goal not being met.

If you have any questions or concerns, please call me at (406) 457-5019.

Sincerely,

Nikia Greene
Remedial Project Manager

Butte File
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