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Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final 2023 Residential Metals Abatement Program (RMAP) Racetrack Borrow Submittal (dated May 26, 2023)

Nikia Greene

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

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Ref: 8MO

June 12, 2023

Mr. Mike McAnulty
Liability Manager
Atlantic Richfield Company
317 Anaconda Road
Butte, Montana 59701

**Re: Approval letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final 2023
Residential Metals Abatement Program (RMAP) Racetrack Borrow Submittal
(dated May 26, 2023)**

Dear Mike:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is approving the *Draft Final 2023 Residential Metals Abatement Program (RMAP) Racetrack Borrow Submittal (dated May 26, 2023)* with the following comment. Please address this comment and distribute this plan as final.

- The data validation reports need to provide more information. The backup laboratory forms that are attached are useful and identify issues with the data, but the validation report needs to provide an explanation of why something was qualified or not. For example, in SDG 10648736, the initial calibration blank on 4/18/2023 had a detect cadmium value of 0.036 ug/L. The validation report states ICBs and CCBS were not within the control window which is correct. No information is provided in this section though that discussed what was detected, the concentration and why qualifiers were not required. The narrative data validation reports need to provide enough information for a non-validator to be able to understand the validation that was performed.

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

Sincerely,

Nikia Greene
Remedial Project Manager

Attachments: EPA and DEQ signed Butte Hill Cover Soils Approval Submittal Forms (electronic version only)

cc: (email only)

Butte File

Daryl Reed; DEQ

Jon Morgan; DEQ counsel

Carolina Balliew; DEQ

Harley Harris; NRDP

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