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Comment Letter for Draft Final BPSOU Quarterly Operations and Maintenance Report Butte Treatment Lagoon System – First Quarter 2024 (dated June 26, 2024)

Emma Rott

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REGION 8

DENVER, CO 80202

October 21, 2024

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

**Re: Comment Letter for Draft Final BPSOU Quarterly Operations and Maintenance Report
Butte Treatment Lagoon System – First Quarter 2024 (dated June 26, 2024)**

Dear Mr. Griffis:

The U. S. Environmental Protection Agency (EPA) has reviewed and is providing comments on the *Draft Final BPSOU Quarterly Operations and Maintenance Report Butte Treatment Lagoon System – First Quarter 2024 (dated June 26, 2024)*. Please incorporate these minor comments and submit a revised version.

Specific Comments:

1. **3.0 Monitoring 2nd Paragraph:** Please indicate in the text where results can be found for alkalinity, total dissolved solids, total suspended solids, nitrates/nitrites as nitrogen and sulfate.
2. **4.0 Quarterly Operations and Maintenance Report:** The one excursion noted for copper on January 15, 2024, was coupled with an observation that operators had noted sediment/particles in the composite sample container prior to sampling. Protocols are needed for future events when debris is noted in sample containers before sampling to ensure that only clean bottles are used. Adequate empty bottles should be available to change out bottles if they are observed to be dirty. What steps have been taken to prevent future ISCO sampler contamination? For future O&M, consider cleaning the rim and surroundings of the ISCO when accessing the sample bottle area and keeping it clear of debris.
3. **4.0 Quarterly Operations and Maintenance Report:** What steps were taken to determine the copper excursion was related to ISCO contamination? If particles were in the sample, they would be considered an exceedance not ISCO contamination.
4. **Figure 1:** Please revise Figure 1 to include the locations mentioned in Section 2.0 *System Description Summary*.
5. **Appendix A.1 Discharge Monitoring Report Form (pg. 2):** Please correct the “to” monitoring period year from 202 to 2024 on page 2 of 2.
6. **Appendix C Events Log:** Some of the “operations” cells are cut off. Please revise to allow enough space for all operations notes so that it is legible.

7. **Appendix D, DSR 3.2.1.1 Precision:** Please add the following: The precision requirement is derived from the CFRSSI QAPP (ARCO, 1992b) and the NFG for Inorganic Superfund Methods Data Review (EPA, 2020).
8. **Appendix D, DSR Section 3.3.2.2 Field Duplicate Results** – The text states that there were eight instances where the field duplicate pair results did not meet the control limit resulting in 12 natural data points being qualified. However, there were actually 5 instances where the field duplicate pair results did not meet the control limit resulting in 8 natural data points being qualified. Please confirm and update the text accordingly.
9. **Appendix D, DSR:** Please update the Acronyms and Abbreviation
 - ARCO – Atlantic Richfield Company
 - CCR – Construction Completion Report
 - EFS – Effluent sample station
 - INF – Influent sample station
 - MSD – Metro Storm Drain
 - SDG – sample delivery group
10. **Appendix D, DSR Statement of Authenticity:** Please update USEPA Remedial Project Manager from Nikia Greene to Emma Rott.
11. **Appendix D, Attachment A DVR:** Please update the Acronyms and Abbreviations
 - ARCO – Atlantic Richfield Company
 - EFS – Effluent sample station
 - FD – field duplicate
 - HCC – hydraulic control channel
 - INF – influent sample station
 - IS – internal standards
 - mg/L – milligram per liter
 - MSD – Metro Storm Drain
 - RB – rinsate blank
 - RRL – required reporting limits
 - SS – sample site
12. **Appendix D, Attachment A – Data Validation Checklists, 10681455 Data Package and Data Validation Report:** The sample results and QC data for the dissolved metals are not present in the data package. It appears, based on the report, that this analysis was requested later and was therefore analyzed later. Please provide the data package that contains the dissolved sample results for documentation purposes.

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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