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MCAS EL TORO
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**RESPONSE TO COMMENTS
FINAL QUALITY ASSURANCE PROJECT PLAN
MCAS EL TORO, CALIFORNIA**

<p>Originator: Bonnie Arthur, Remedial Project Manager US EPA</p> <p>To: Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p>Date: 5 September 1995</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059/000255 File Code: 0306</p>
<p><u>MAJOR CONCERNS</u></p> <p>1. Comment #2A: Precision and accuracy objectives in terms of RPD and percent recovery were included for all analytes with the exception of hexavalent chromium.</p>	<p><u>RESPONSES TO MAJOR CONCERNS</u></p> <p>RESPONSE 1: Precision and accuracy objectives for hexavalent chromium is listed under Solid Samples in Table 3-3.</p>
<p>2. Comment #4: This item was partially addressed. Section 6.3 has been expanded to discuss a number of laboratory QC checks; however, the discussion is of a general nature, and many laboratory QC checks, such as surrogate spiking and laboratory control samples are not addressed. Additionally, the response to this comment refers to "[a] laboratory specific QA manual" for this information. As soon as the laboratories have been identified, the laboratory QA manuals should be evaluated in terms of project quality assurance objectives.</p>	<p>RESPONSE 2: As discussed in the BCT meeting, April 24, 1995, the actual laboratory assigned to perform the analytical work had not been selected prior to the generation of the CTO-0059 QAPP. These issues are addressed in the individual CLEAN II Contract Laboratory QA manuals which are reviewed and evaluated. CLEAN II is currently working with the laboratories to standardize many of these QA objectives so it can be incorporated in future QAPPs.</p>
<p><u>OTHER CONCERNS</u></p> <p>3. Comment #4: This item was not satisfactorily addressed. The response to this comment indicates that the topics cited in EPA's comment are discussed in the Work Plan, Field Sampling Plan, Data Management Plan and Quality Control Management Plan. EPA guidance requires that these topics be addressed in the QAPP. Since these topics are addressed in other documents, it is permissible to provide a brief summary of these topics in the QAPP. It is important that a rationale for the choice of analytical parameters be included in the QAPP. EPA guidance also requires that a discussion is included concerning reconciliation of results obtained from the project with DQOs.</p>	<p><u>RESPONSES TO OTHER CONCERNS</u></p> <p>RESPONSE 3: Due to the complexity of multiple sites, variety of media to be sampled, and efforts to reduce redundancy of the 7 plans prepared for the Phase II RI/FS, references were made to the sections of the various plans which provide detailed discussion of these issues. Brief summaries of these are presented in the QAPP (which is permissible). Rationale for selection of analytical parameters is discussed in detail in the WP and FSP because of the multiple site work plan. Reconciliation of results is discussed in Section 7.5 of the QAPP.</p>
<p><u>ENCLOSURE A</u></p> <p>1. Table 4-2, Sample Containers, Preservatives, and Holding Times for Inorganics; Samples collected for sulfate analysis should not be preserved with acid, especially sulfuric. Sulfate should not be</p>	<p><u>RESPONSES TO ENCLOSURE A</u></p> <p>RESPONSE 1: This has been corrected and the field team have been advised of this discrepancy. Sample analysis is correctly coordinated with the CLEAN II Contract Laboratory. A Field Change Request has been submitted to address</p>

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<p>analyzed from the same container as chemical oxygen demand (COD).</p>	<p>this error.</p>
<p>2. Appendix A: Laboratory Analytical Methods. All analyses planned for the project should be discussed in the relevant sections of the QAPjP. A number of laboratory analytical methods are discussed in Appendix A that are not addressed in the appropriate sections of the QAPjP.</p>	<p>RESPONSE 2: Appendix A was designed to highlight the various analytical methods that may be used by three different CTOs in the field. Having the methods listed in the appendix was a recommendation of the BCT to eliminate confusion when trying to determine what each CTO would actually be using.</p>
<p>3. Methods Field Screening. This section indicates that some metals may be analyzed utilizing ion-selective electrodes (ISE). ISE is not addressed in Section 3.2.1.2, Field Screening, of the QAPjP or included in Table A-1, Field Screening Instruments and Sensitivity Levels. If ISE will be utilized, these areas of the QAPjP should incorporate the appropriate information including QA objectives.</p>	<p>RESPONSE 3: At the date of issue, ISE was a consideration, however, field screening of metals has since been abandoned. All metal samples will be sent directly to the CLEAN II Contract Laboratory for analysis using CLP methodology.</p>
<p>4. Mineralogical and Grain-Size Analyses. This section states that background concentrations for metals at MCAS El Toro must be established; however, Section 6.2, Field Quality Control Checks, indicates that no background samples are envisioned in this sampling effort. This discrepancy should be clarified. This section also states that mineralogical analysis using X-ray diffraction, differential thermal analysis and petrographic techniques will be used. These analytical techniques are not addressed in other sections of the QAPjP. It is recommended that this section be expanded to discuss specific details such as the number of samples required for these analyses.</p>	<p>RESPONSE 4: For screening purposes, the Phase I RI background concentrations will be used. The BCT has requested additional discussion to consider more comprehensive background concentrations using the Phase II RI data. The use of mineralogical analyses will be discussed in this background effort.</p>
<p>5. Table B-1, Project Required Detection Limits by Method. It is unclear how the proposed detection limits for metals in soil were established. For example, Table B-1 specifies a 7 µg/L detection limit for chromium in water, and a 7 µg/kg detection limit in soil. If one gram of soil sample is digested into a final volume of 100 mL, the resultant detection limit equivalent to the response of a 7 µg/L water sample is 0.7 µg/g, or 700 µg/kg. The detection limits specifies for</p>	<p>RESPONSE 5: This was an error and it has been corrected to CLEAN II Contract Laboratory Detection Limits of 260 µg/kg for soil and 1.3 µg/L for water.</p>

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<p>metals in soil should be proportionally consistent with achievable detection limits in water.</p>	
<p>6. The 5 µg/L detection limit specified for sulfate by EPA Method 375.4 is significantly lower than the one mg/L minimum detectable limit stated in the method. If this detection limit is necessary, a rationale should be provided and the method modification necessary to achieve the detection limit discussed.</p>	<p>RESPONSE 6: The CLEAN II Contract Laboratory Detection Limits are as follows: 5 mg/kg for soil and 5 mg/L for water. The table is in error.</p>