



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

September 28, 2000

Mr. Richard Mach
Department of the Navy
Naval Facilities Engineering Command
Southwest Division
BRAC Office
1220 Pacific Highway
San Diego, CA 92132-5190

RE: EPA Review of Quality Assurance Project Plan, Parcel D Soil Delineation, Hunters Point Shipyard

Dear Mr. Mach:

EPA's contractor Tech Law in conjunction with Joe Eidelberg of the EPA Region 9 Quality Assurance Office have comments on the above referenced document. These comments are presented in an attachment to this letter.

Should you have any questions about this letter, please contact me at (415) 744-2409.

Sincerely,

A handwritten signature in black ink, appearing to read "Claire", with a long horizontal flourish extending to the right.

Claire Trombadore
Remedial Project Manager

cc: Adam Klein, Tech Law
Chein Kao, DTSC
Brad Job, RWQCB
Mike Wanta, TtEMI
Joe Eidelberg, EPA
Dale Altshul, Navy
Dave DeMars, Navy
Amy Brownell, City of SF
John Chester, City of SF

**DOCUMENT REVIEW
DRAFT QUALITY ASSURANCE PROJECT PLAN
PARCEL D SOIL SITE DELINEATION
HUNTERS POINT SHIPYARD**

Please provide EPA with copies of the following documents:

- SWDIV Environmental Work Instruction 4EN.1;
- The Navy Installation Restoration Chemical Data Quality Manual; and
- PRC Data Validation Statement of Work.

The Navy should be commended for their noticeably improved document quality compared to previous years. It is apparent that Navy is making improvements in terms of being responsive in addressing EPA QA requirements.

Overall, the subject document addresses most QA requirements, however, EPA needs clarification in order to full understand the project. It is recommended that future documents undergo a more thorough editorial review for inconsistencies and omitted material.

The subject QAPP cannot be approved until the major concerns listed below have been adequately addressed and the laboratory QAPP provided for EPA review. The laboratory comments below can be addressed by providing the laboratory QAPP.

Major Concerns

1. **Section B8, page B-12:** This section is titled nondirect measurements. However, the text describes the data management process. Section 3.3.9 of EPA QA/R-5 states “Identify any types of data needed for project implementation or decision making that are obtained from non-measurement sources such as computer databases, programs, literature files, and historical databases. Describe the intended use of the data. Define the acceptance criteria for the use of such data in the project and specify any limitations on the use of the data.” This information has not been discussed. Please revise the QAPP to discuss nondirect measurements.
2. **FSP Table A-1:** This table lists the holding times and preservatives for the project. However, there is no information provided in this table for hexavalent chromium analysis. Please revise this table to provide the method reference, sample volume and container, preservation, and holding time requirements for hexavalent chromium. Note that this information should be provided in Table 1B also.
3. **Section A9.4.1, page A-31:** This section describes data management and archiving, but does not clearly state who is responsible for field or laboratory hardcopy data. Please revise the QAPP to clearly state the individuals and their affiliation (e.g. TtEMI project manager, laboratory QA manager, SWDIV program manager) who are responsible for the storage of all field and laboratory hard copy and electronic data.

COMMENTS

1. **General:** Whenever a Navy guidance document is cited for QA information, it recommended the relevant sections be cited in each QAPP element.
2. **Section A7.1, page A-31:** This section references the project schedule in Table 2 of the FSP. The project schedule contains only four entries. The project schedule should contain a listing of the project milestones from project approval through project close out including data validation and data reporting activities. Please revise the QAPP to provide a complete project milestone chart.
3. **Section A7.6, page A-26:** This section of the QAPP states “The laboratory reporting limits listed for CLP metals in the table are the instrument detection limits (IDL), which are the minimum concentration of analytes that can be distinguished from the normal electronic noise of an analytical instrument; CLP metals are normally reported in this manner.” Historically, CLP metals were reported in this manner. However, based on the current CLP SOW for Inorganics (ILM05.0), IDLs shall no longer be used. Method detection limits (MDLs) are to be used for inorganic target analytes. This change was made to rectify a problem with inconsistency in reporting differences between CLP metals and all other inorganic reporting methods.

Please provide clarification as to whether the Navy will be using IDLs or MDLs and the rationale for the decision. Further, a technical discussion about the effect on decisions should be provided.

4. **Section B6.2, page B-10:** This section discusses the calibration of field analytical equipment. However, there is no discussion regarding PID calibration. Please revise the QAPP to provide PID calibration information.
5. **Section D2.2.4, page D-2:** This section discusses full data validation of data summary packages for groundwater samples. However, groundwater sampling is not being performed for this project. Please revise the QAPP to correct this discrepancy by discussing the full data validation of data summary packages for soil samples.
6. **Appendix 2, page A-II-2:** The last sentence refers to Table A-1-1. However, there is no table A-1-1 in this QAPP. Please clarify this inconsistency.
7. **Appendix 4:** This appendix contains a three-page letter which references the data validation for this project. The letter specifies data validation qualifiers such as J3 and R2. It is unclear if the National Functional Guidelines (NFG) documents are being used for this project or if a modified NFG method will be used which is based on the PRC document Data Validation Statement of Work (DVSOW). Please revise the QAPP to more clearly state the utilization of the DVSOW and submit this document for review with the QAPP if these are the actual data validation procedures to be used in the project.
8. **FSP Appendix C, Table C-1:** Please correct the following inconsistencies and unclear

references:

- The soil VOC analytical method specifies “CLP VOC/5035”. However, the FSP text specifies SW-846 method 5035/8260;
 - If the analytical protocol is CLP VOC/5035, then the QAPP should be modified to specify the CLP method that allows Method 5035 to be used; and,
 - The 14 day holding time for VOCs by Method 5035 is only valid if the laboratory preserves the soil sample within 48 hours of sample collection. This should be clarified in this table.
9. **Table B-1:** This table contains an abbreviated list of analytes as compared to the actual analytical methods. However, this table contains more analytes than the other tables of the QAPP and FSP. There is no rationale provided for this constituent list. Please revise the QAPP to provide a consistent analyte list. If additional analytes are to be analyzed, a discussion should be added to the QAPP to state the intended data usages and project objectives for these analytes.

Laboratory Comments

1. The Draft Quality Assurance Project Plan for Parcel D Soil Site Delineation, Hunters Point Shipyard, San Francisco, California (the QAPP) does not name the laboratory that will conduct the analytical work for this project. Therefore, the QAPP lacks all laboratory-specific information, including standard operating procedures (SOPs) for all analytical methods to be conducted, detection limits, preventative maintenance information, QC calibration frequency and acceptance criteria, and laboratory chain-of-custody procedures. Severn Trent Laboratories, Vermont is referenced in footnotes to several tables in the QAPP, and this laboratory is currently being used by the Navy for the Parcel B soil removal action. Please revise the QAPP to name the selected laboratory and provide all the laboratory-specific information needed to meet the requirements of the document *EPA Requirements for Quality Assurance Project Plans* (EPA QA/R-5).
4. **Section B3.1.2, page B-3:** This section describes in generic terms the laboratory sample handling and custody procedures. Please revise the QAPP to describe this laboratory-specific information, or alternatively, Please ensure the laboratory QA Plan includes information on the laboratory-specific sample handling procedures.
5. **Section B6.4, page B-11:** This section describes calibration of laboratory equipment and states “For methods not defined, CLP-referenced method requirements will be followed.” CLP methods are prescribed analytical methods for certain organic compounds and inorganic analytes. The use of these method calibrations is limited strictly to the constituent lists specified in the method. Laboratories use other specific methods outside of these CLP methods which have specific calibrations. Therefore, the specific calibrations for non-CLP methods must be specified. Please revise the QAPP to delete

this sentence and provide the specific method requirements for all non-CLP methods.

5. **Section B6.4.1, page B-11:** Please revise the QAPP to ensure that all laboratory-specific information is provided including initial and continuing calibration, all internal QC checks, preventive maintenance, laboratory performance and system audits, data reduction, data validation, data reporting, and current laboratory-specific analytical method detection limits.
6. **Section B7, page B-12:** This section generically describes inspection and acceptance for consumables. Section 3.3.8 of EPA QA/R-5 states “Describe how and by whom supplies and consumables shall be inspected and accepted for the project.” However, since the analytical laboratory has not been named and there is no QA plan available for review, this information is not laboratory-specific. Please revise the QAPP to include all laboratory-specific information that describes how and by whom supplies and consumables shall be inspected and accepted for the project.
7. **Table B-1:** Footnote “b” states that “The values in parentheses are the laboratory reporting limits for the methanol extraction Encore method.” This footnote corresponds to only 2 of the 6 VOC reporting limits. It is unclear if only these two VOCs will be sampled and analyzed by the Encore method or if both Encore and non-Encore reporting limits are being addressed in this table. Please revise the QAPP to clarify this footnote. Please note that only one set of reporting limits should be specified and the FSP states that the Encore method will be used.