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NAVAL SHIPYARD AND NAVAL STATION LONG BEACH, CALIFORNIA

INSTALLATION RESTORATION PROGRAM RESPONSE TO CALIFORNIA DEPARTMENT OF HEALTH SERVICES REVIEW COMMENTS ON THE SITE INSPECTION WORK PLAN

3 JULY 1991

SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CALIFORNIA 92132-5190

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LONG BEACH, CALIFORNIA
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PREPARED BY:
Southwest Division, Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5190

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WITH:
Jacobs Engineering Group, Inc.
3655 Nobel Drive, Suite 200
San Diego, California 92122

In association with:
International Technology Corporation
CH2M HILL
Grigsby/Graves

Bryant Wong
Project Manager

Susan Manchester for Ed Müngü
Technical Reviewer

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RESPONSE ACTIONS TO CALIFORNIA DEPARTMENT OF HEALTH SERVICES MARCH 1991 REVIEW COMMENTS ON THE FINAL DRAFT SITE INSPECTION WORK PLANS FOR LONG BEACH NAVAL SHIPYARD AND NAVAL STATION, DATED 31 OCTOBER 1990 EPA ID NO. CA6170023109

This document summarizes response actions to the California Department of Health Services (DHS) March 1991 review comments. The DHS comments are reiterated verbatim below in italics. The response to the comment immediately follows in normal type style.

GENERAL COMMENTS:

1. *These comments address the following sites specified for Phase I Resource Conservation and Recovery Act (RCRA) Facility Investigations (RFIs) in both your U.S. Environmental Protection Agency (EPA) and DHS permits:*

   - o *Mole Solid Waste Operations*
   - o *Chemical Material and Waste Storage Area*
   - o *Mole Extension Operations*
   - o *Skeet Range Solid Waste Fill Area*
   - o *Boat Disposal Location*
   - o *Lot H Operations*
   - o ** Former Quonset Hut Site (in the vicinity of Building 129)*

o * *Tank Farm 303 (including stained soil along the east fence)*

* *These two sites were not addressed in the Work Plans; please include all necessary information for these sites in the revised Work Plan.*

The former Quonset Hut site will be investigated along with Site 9 as described in the Long Beach Naval Shipyard Site Inspection (SI) Work Plan (Subsection 4.1.3 and Appendix A, Subsection 4.1.3.) Two borings are planned to investigate the trichloroethylene (TCE) spill that reportedly occurred at the rear (i.e., north) of Building 129.

The investigation of the Tank Farm 303 site will be conducted separately from the sites listed above.

Since the compliance schedule in both your EPA and DHS permits is different for Phase I RFI and RFI sites, the RFI sites in the Work Plans will be reviewed at a later date.

Please be advised that the implementation of the SI Work Plans for Long Beach Naval Station and Naval Shipyard is currently in progress. The actual field work is scheduled to begin approximately in late July.

2. *For most of the sites, the Work Plans propose very limited sampling over large areas in locations where there is very little external evidence to guide the sampling effort. This may be satisfactory if contaminants are found since the stated purpose of the sampling is confirmatory. However, we do not believe that a negative result could establish that contamination is not present in cases*

where there is strong evidence that disposal of some kind did occur. This kind of conclusion could only be supported by a much more extensive sampling effort.

The stated objective of the SI Work Plan is to "verify that the nature of hazardous substances contamination identified by the IAS [Initial Assessment Study] exists by strategically sampling suspected uncontrolled release locations" (see Subsection 1.1 of the SI Work Plans for the Naval Station and Naval Shipyard Long Beach). This correlates with EPA's intent for SIs as described in OSWER Directive 9345.1-02: "PAs [Preliminary Assessments] and SIs are limited to determining if a site ever handled hazardous substances and/or if there has been a release or potential for release of contaminants into the environment serious enough to warrant expenditure through the national Superfund. They are not intended to determine the exact magnitude or extent of contamination." Consequently, sample locations were selected based on the highest potential of encountering contamination. The Navy understands that, should no contamination be found where there is strong evidence that disposal of some kind did occur, then additional effort may be required to support the conclusion that no contamination is present.

3. *The Phase I RFI Plan must include a Project Management Plan which describes the technical approach, schedules, budget, and personnel involved in preparation and implementation of the Phase I RFI Plan and Phase I RFI Report. The Project Management Plan shall also include a description of the qualifications of personnel performing or directing the Phase I RFI Plan, including contractor personnel, and shall document the overall management approach.*

A Project Management Plan for the SI Work Plans at the Long Beach Naval Station and the Naval Shipyard depicting the technical approach, schedules, and budget has been submitted under a separate cover to DHS. Descriptions of personnel qualifications slated to implement the SI Work Plans will be submitted to supplement the Project Management Plan.

4. *RCRA Corrective Action requirements include that surficial (i.e., within the top 2 feet) soil samples must also be taken in a measurement of potential soil contamination; please make all necessary changes to the Work Plans to incorporate additional samples at a depth of 1 to 2 feet.*

The original intent of the SI Work Plan is to comply with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) requirements for an SI and not necessarily to comply with the specific requirements of the RFI. According to the IAS, most of the sites have ceased hazardous waste operations for over 20 years, and, for all but Site 11 (Hillside East of Dry Dock 11), the contaminants have been covered with fill. The purpose of the SI is to verify the existence of these sites of past uncontrolled releases. Surficial sampling was not generally proposed (except for Site 11) because the intent of the SI is to verify the locations of sites identified by the IAS through strategic sample locations. Surficial sampling is generally conducted to conduct a preliminary risk assessment or identify areas of recent contamination probably related by current operations but not attributable to the site. Neither of these are objectives of the SI. If obvious contamination is detected (by visual observation or by field monitoring equipment) in the top 2 feet of the soil boring, a sample will be collected for analysis.

5. *A minimum of three groundwater monitoring wells should eventually be installed at both the Mole and Site 6 if contamination is discovered. Final approval of the location of these wells will depend on the location of contamination, if any. The wells would be installed in a triangular pattern to facilitate determination of groundwater flow characteristics. A continuous recording device may be required to determine groundwater fluctuations.*

See the response to General Comment No. 2. One groundwater monitoring well is proposed at this time for the SI effort. Discovery and assessment of the level of contamination during the field work may be difficult. However, visual observations and field headspace measurements (with a photoionization detector) may aid in the field assessment of contamination during the drilling and sampling efforts. If contamination levels are higher at one location than at previous locations on that site, field staff will place the designated monitoring well at this location.

6. *Groundwater monitoring wells drilled through potential areas of contamination should include a conductor casing. Describe groundwater monitoring well construction materials.*

The drilling method to be utilized will be hollow stem augers as stated in Appendix A, Subsection 4.2 of the SI Work Plans. The hollow stem auger method of drilling does not require any conductor casing to be used as the auger itself acts as a retaining barrier and prevents soils from collapsing. The auger itself also minimizes the potential for cross-contamination of the soils between different depths.

Groundwater monitoring well construction materials will include the following as a minimum:

- o 2-inch I.D. flush threaded casing
  - 10 feet of stainless steel well screen
  - 10 feet of stainless steel blank
  - remaining footage of schedule 40 PVC
- o Number 3 Monterey sand filter pack
- o Bentonite pellet seal
- o Grout seal of 5 percent bentonite and 95 percent cement

This will be added to Appendix A, Subsection 4.2.2.2, and final well design specifications will be prepared by the project hydrogeologist as stated in the Work Plans.

7. *All sampling analysis should be performed by a DHS-certified lab; please make necessary changes to the Work Plans.*

Concur. This is stated in Section 8 of the Work Plans.

8. *Indicate that all samples will be discrete, not composite samples.*

Concur. All environmental samples collected to characterize sites covered by the Work Plan will be discrete. This will be clarified in Appendix A, Subsection 4.2.1.

SPECIFIC COMMENTS:

Site 1 & 2 - Mole Solid Waste Operations and Chemical Material and Waste Storage Area

Identify the location of disposal trenches and former storage areas for containerized wastes using earlier maps and/or aerial photographs of the Mole or other methods. Include the method of identification, e.g., maps and or photographs, in the revised Work Plans.

The locations of the four borings and one monitoring well at Sites 1 and 2 were based on available information obtained from the IAS Report. The IAS Report was written as a summary and assessment of historical information including industrial processes, waste disposal records, old maps, photographs (including historical aerial photographs), and personnel interviews related to the sites. The intent of the SI Work Plan is not to reiterate existing information from other documents, but to use existing information for the purposes of strategically selecting sample locations that would verify the existence of past sites of uncontrolled releases of hazardous wastes.

According to Figure A-2, none of the proposed four sampling locations are in the area of Site 2; please make necessary corrections.

Sites 1 and 2 overlap and are located at the same general vicinity. Waste disposal activities and potential contamination occurred at different time periods with different type waste operations at generally the same area (Sites 1 and 2) according to the IAS. Therefore, the four sampling locations identified in Figure A-3 serve to investigate both Sites 1 and 2.

The limited number of proposed sampling locations may potentially miss contaminated areas.

See the response to General Comment No. 2.

Groundwater may not be a good indicator of potential contamination due to the proximity of sampling locations to the seawall and tidal influence.

Sampling locations were selected primarily from existing information from the IAS concerning past drum storage locations. In addition, it is decided that the highest potential for encountering groundwater contamination would most likely be on the ocean side of the mole since there would be a slight hydraulic gradient from the center of the mole outward toward the surrounding ocean waters. As the contaminant plume migrates toward the ocean, it will also disperse so that the width of the plume would increase as it travels away from the contaminant source. Thus, locating the monitoring well towards the outer edge of the mole should increase the potential for intercepting a contaminant plume in comparison to a more inland location.

According to the IAS, there may have been at one time four trenches about 8 to 9 feet deep, 6 to 10 feet wide, and 50 feet long. In the absence of confirmatory information concerning the location of trenches, a surface geophysical technique such as ground penetrating radar (GPR) can be used for locating waste trenches.

Concur. However, for the purposes of the SI, the sampling effort is considered adequate (see the response to General Comment No. 2). If, in the event that no evidence of reported trenches is uncovered during the SI, GPR or a more appropriate geophysical technique will be considered in the next phase of investigation.

Include additional soil samples at a depth of 1 to 2 feet as requested in General Comment No. 4.

See the response to General Comment No. 4.

After identifying trench locations, in addition to the proposed four sampling locations, include at least one random sampling location per trench.

If during the course of the SI trench location(s) can be verified, the objective of a future phase of investigation would be to identify the locations of these trenches and to attempt to collect samples from these trenches.

Moreover, soil samples should be collected at a depth of 5 feet, as proposed, as well as at the base of the trenches.

Concur. As stated in Appendix A, Subsection 4.1 of the SI Work Plans, if evidence (e.g., from visual observation or detection from field monitoring equipment) of additional potentially contaminated soil layers are encountered during drilling, samples from those contaminated layers will be collected and analyzed.

Groundwater should be analyzed for metals (EPA Methods 6010/7000) due to the close proximity of the water table.

Concur. See Table 7-1 and Appendix A, Table A-5 and Subsection 4.1.1 of the Naval Station's SI Work Plan.

Soil and groundwater should be analyzed for organometallics, such as tributyltin, since spent sandblast material may have been disposed of at this site.

Waste disposal activities of solid wastes are associated with Site 1. The period of operation for this site was approximately 20 years, from the mid-1940s to the mid-1960s. The only reported incident of sandblasting of a vessel coated with marine paint containing tributyltin was between 1971 and 1975, during which special precautions were taken for the removal and disposal of the tributyltin-tainted sandblast grit. This incident is addressed in the discussion of Site 12 only. According to a telephone conversation with the Naval Ocean Systems Center, tributyltin was rarely used in the Navy marine ship paints. Thus, analysis of tributyltin for this site is not recommended during the SI. If high concentrations of metals are detected from the analytical testing of samples collected from this site, then tributyltin analyses will be recommended for future phases of investigation at this site.

Site 4 - Mole Extension Operations

The two sampling locations should be located in areas of Mole extension operations as evidenced in aerial photographs of June 1972 or by other methods. Include the method of locating sampling locations, e.g., maps and/or photographs, in the revised Work Plans.

Sample Location No. 9 of Site 4 is placed at a potentially contaminated location according to the proposed Servmart SI reports conducted by SCS Engineers of Long Beach, California in 1990. The reports stated that high concentrations of total petroleum hydrocarbons and metals were encountered. Sample Location No. 10 is placed in the

area of the mole extension activities. This location was selected based on the evidence of the June 1972 aerial photograph in the IAS Report dated August 1983.

Sample locations identified in the SI Work Plans were selected based on the review of the IAS and other available information. The IAS Report is a summary and assessment of available historical information including industrial processes, waste disposal records, old maps, photographs (including historical aerial photographs), and personnel interviews related to the sites. Unfortunately, historical maps and photographs are not available for each site. However, the objective of the SI Work Plan is not to reiterate existing information from other documents, but to use available information to strategically select sampling locations that would verify the presence of contaminated sites.

Include additional soil samples at a depth of 1 to 2 feet as requested in General Comment No. 4.

See the response to General Comment No. 4.

Soil and groundwater should be analyzed for organometallics, such as tributyltin, since spent sandblast material may have been disposed of at this site.

The period of operation of the solid waste disposal activities at Site 4 was between the 1950s and 1972. The only reported incident of sandblasting of a vessel coated with marine paint containing tributyltin was between 1971 and 1975, during which special precautions were taken for the removal and disposal of the tributyltin-tainted sandblast grit. This incident is addressed in the discussion of Site 12 only. According to telephone conversation with the Naval Ocean Systems Center, tributyltin was rarely used

in the Navy marine ship paints. Thus, analysis of tributyltin for this site is not recommended during the SI. If high concentrations of metals are detected from the analytical testing of samples collected from this site (indicating possible contamination from the presence of paint chips), then tributyltin analyses will be recommended for future phases of investigation at this site.

Site 5 - Skeet Range Solid Waste Fill Area

Provide the depth of the landfill. Provide more than one sampling location. If trenches were used for disposal, identify their location using earlier maps and/or aerial photographs or other methods (such as GPR). If trenches were used for disposal, identify their location using earlier maps and/or aerial photographs or other methods (such as ground penetrating radar).

Based on the findings of the IAS, Site 5 was not operated as a landfill per se. Inert solid materials, such as construction debris, bed frames, desks, and fire bricks, were reportedly deposited here to serve as riprap along the sea wall. No reports or indications of actual landfilling, burial, or disposal of material into trenches were found during the IAS. Because of the relatively low potential for encountering contamination at this site, one sample location has been indicated as being sufficient for the SI.

Additional soil samples at a depth of 1 to 2 feet as requested in General Comment No. 4.

See the response to General Comment No. 4.

Soil samples can be collected at a depth of 5 feet, as proposed, however, soil samples should also be collected at the base of the landfill or trenches.

Concur. As stated in Appendix A, Subsection 4.1 of the SI Work Plans, if evidence (e.g., from visual observation or detection from field monitoring equipment) of additional potentially contaminated soil layers are encountered during drilling, samples from those contaminated layers will be collected and analyzed.

Site 6 - Boat Disposal Location

The criss-cross sampling strategy places too many sampling locations near the perimeter of the site; please make necessary changes or provide sampling locations based on the location of trenches using earlier maps and/or aerial photographs. Include the method of locating sampling locations, e.g., maps/or photographs, in the revised Work Plans.

The criss-cross pattern for locating the sample locations (primarily the trenches) gives a random sampling strategy and is intended to cover the entire Site 6. These locations will not be on the outside edge of the site, but within anticipated areas of the waste disposal operations, based on personal communications. No earlier maps or photographs are available to specifically locate trenches.

Include additional soil samples at a depth of 1 to 2 feet as requested in General Comment No. 4.

See the response to General Comment No. 4.

Soil and groundwater should be analyzed for organometallics, such as tributyltin, since spent sandblast material may have been disposed of at this site.

The period of operation of the solid waste disposal activities at Site 6 was between 1942 and 1965. The only reported incident of sandblasting of a vessel coated with marine paint containing tributyltin was between 1971 and 1975, during which special precautions were taken for the removal and disposal of the tributyltin-tainted sandblast grit. This incident is addressed in the discussion of Site 12 only. Therefore, it is unlikely that sandblast grit contaminated by tributyltin was disposed of at this site. According to telephone conversation with the Naval Ocean Systems Center, tributyltin was rarely used in the Navy marine ship paints. Thus, analysis of tributyltin for this site is not recommended during the SI. If high concentrations of metals are detected from the analytical testing of samples collected from this site (indicating contamination from the presence of paint chips), then tributyltin analyses will be recommended for future phases of investigation at this site.

Site 10 - Lot H Operations

Provide sampling locations away from the corners of this site since generally, site corners are areas of reduced activity. The proposed four sampling locations may be moved more towards the center of the site or based on maps and/or aerial photographs (or other methods) revealing past waste disposal practices. Include the methods of locating sampling locations, e.g., maps and/or photographs, in the revised Work Plan.

Based on the operations that took place at Site 10 (i.e., scrap yard operations), the actual storage of materials was near the perimeter areas, based on personal communications with former Naval Shipyard personnel. The placement of scrap

material and salvageable equipment along the perimeter of the site afforded the operators the practical advantage of having more room to maneuver within the scrap yard. Thus, a higher potential for locating contamination exists at the sampling locations indicated in the Work Plan. These sampling locations are within the reported area of the scrap yard operations. No earlier maps or photographs have been made available to specifically locate spill locations.

Include additional soil samples at a depth of 1 to 2 feet as requested in General Comment No. 4.

See the response to General Comment No. 4.

Provide additional, deeper soil samples since solvents may have been disposed of at this site.

The ground elevation at this site is approximately -10 feet mean sea level (msl) according to the IAS. The groundwater is approximately 10 feet below the mean high tide at the furthest location at the Naval Shipyard. Thus, soil samples at depths of 5 and 10 feet should be adequate prior to reaching the groundwater. However, as stated in Appendix A, Subsection 4.1 of the SI Work Plans, if evidence (e.g., from visual observation or detection from field monitoring equipment) of additional potentially contaminated soil layers are encountered during drilling, samples from those contaminated layers will be collected and analyzed.

Soil and groundwater should be analyzed for PCBs [polychlorinated biphenyl] (EPA Method 8080) and organometallics, such as tributyltin, since waste oils and spent

sandblast material may have been disposed of at this site. Analysis parameters should include pH for both soil and groundwater.

Analysis for PCBs will be included for soil and groundwater samples and is added to Tables 7-1 and A-5 and Appendix A, Subsection 4.1.4 of the Long Beach Naval Shipyard SI Work Plan as agreed at our 21 June 1992 meeting.

The period of operation of the solid waste and scrap yard activities at Site 10 were between the 1952 and 1957. The only reported incident of sandblasting of a vessel coated with marine paint containing tributyltin was between 1971 and 1975, during which special precautions were taken for the removal and disposal of the tributyltin-tainted sandblast grit. This incident is addressed in the discussion of Site 12 only. According to telephone conversation with the Naval Ocean Systems Center, tributyltin was rarely used in the Navy marine ship paints. According to a marine paint manufacturer, tributyltin was not introduced to marine paints until the 1960s. It is unlikely that sandblast grit contaminated by tributyltin was disposed of at this site. Thus, analysis of tributyltin for this site is not recommended during the SI.

Field analysis of pH and electrical conductance will be taken on all groundwater samples as stated in the Work Plan.

APPENDIX A: FIELD QUALITY ASSURANCE/QUALITY CONTROL PROGRAM

6.0 Field Procedures

Use Teflon-lined caps for glass containers where organics are the analytes of interest. Use polyethylene containers with polypropylene or polyethylene caps when metals are the analytes of interest.

Concur. Added in Appendix A, Subsection 4.2.2.

Soil sample containers should be stainless steel under low pH soil conditions, such as potential conditions at the Lot H Past Operations site.

Concur. All soil sample containers will be in stainless steel as stated in Appendix A, Subsection 4.2.2 of the Work Plan.

The maximum holding time for metal samples, when analysis of mercury is required, should not be greater than 28 days. Please make the necessary changes since at least one site (Lot H Past Operation) is suspected of having mercury contamination.

Concur. Added in Table A-7.

Measurement of monitoring well static water level elevations are important to determine whether the predicted horizontal and vertical flow gradients have changed since the last measurements. Measurements should include the depth to standing water and the depth to the bottom of the well casing intake screen. This information is required both to calculate the volume of stagnant water in the well and to provide a check on the integrity

of the well (e.g., to identify problems with silting). Measurements should be made on all wells the first day at the site prior to pumping any well, and again immediately before collecting samples. Instruments used to make the measurements should be capable of obtaining reliable measurements to within ± 0.01 foot. While a steel tape may suffice, water tends to bead up on the tape, making accurate water level determination difficult. An electronic depth-sounding device is preferred for measuring the depth to water. Measurements should be referenced to a marked point whose elevation has been surveyed by a licensed surveyor; this point is usually the top of the well by a licensed surveyor; [sic] this point is usually the top of the well casing. The depth measuring device must be thoroughly cleaned between wells to prevent cross contamination.

Concur. Standard Operating Procedures (SOP) No. 38 and No. 39 on groundwater measurements are included in the Work Plans.

If present in high concentrations, relatively insoluble organic liquids may form either a floating phase on the top of the well water or a dense layer at the bottom of the aquifer depending on the density of the liquid. Samples collected from within the well may contain a mixture of both of these layers and consequently be representative of neither the contaminant layer nor the bulk of the well water. Determination of the presence of these layers is important in interpretation of well water data as well as in evaluation of subsurface transport and mitigation measures. Organic liquid-water interface probes are available commercially which can determine the existence and thickness of these layers by lowering the probe into the well before evacuation. It must be carefully lowered into the surface of the liquid and down to the bottom of the water column. A transparent bottom-opening bailer can also be used to detect and collect floating layers. If an immiscible layer is detected, its thickness should be recorded and sample collected.

Concur. Stated in SOP No. 39 and added in Appendix A, Subsection 4.2.2 of the Work Plans.

Field measurements of pH and specific conductance should be made in quadruplicate for statistical analysis.

Conductivity, pH, and temperature will be recorded at each sampling event as stated in Appendix A, Subsection 4.2.2. Calibration, operation, and maintenance of the instrumentation to be used are provided in SOP Nos. 12, 13, and 14. Readings will be taken until stabilized results are obtained and then work will proceed. Once acceptable results have been obtained, repetitive readings will not be necessary and will be limited to minimize drilling subcontractor and engineering field standby costs.

Laboratory decontamination of sampling equipment is preferable to field decontamination but is not always possible. In general, when a piece of equipment must be cleaned in the field and reused, it should only be used to collect samples expected to be more highly contaminated. It must never be used if it appears discolored or otherwise obviously contaminated.

Concur. Sampling equipment and decontamination procedures will be followed in accordance with SOP Nos. 25 and 26 and Appendix D, as stated in the Work Plans, to insure that high quality is obtained during sampling events and site construction activities.

Pumps should be cleaned in the field by pumping a solution of nonphosphate detergent through the pump and associated tubing. This solution should be followed by tap water, then followed by purified water. The purified water rinse should be repeated three times.

Concur. Pumps are not anticipated at this time for the actual field construction and sampling activities. Sampling equipment and decontamination procedures will be followed in accordance with SOP Nos. 25 and 26 and Appendix D, as stated in the Work Plans to insure that high quality is obtained during sampling events and site construction activities.

Bailers should be disassembled and cleaned by washing in nonphosphate detergent, followed by rinses with tap water, purified, spectroscopic grade solvent, and deionized water. They should then be air dried, reassembled using powderless surgical gloves, and wrapped in aluminum foil. Solvents which have been successfully used to decontaminate sampling equipment include hexane, acetone, and isopropyl alcohol. EPA recommends the use of hexane because of its ability to dissolve many hydrophobic compound. Because it is not water soluble, it is often difficult to use in the field (e.g., surfaces must be thoroughly dry before applying the hexane). Isopropyl alcohol and acetone has the advantage of drying wet surfaces quickly, dissolving many organic compounds, and being less toxic and less flammable than other suggested solvents.

Concur. Sampling equipment and decontamination procedures will be followed in accordance with SOP Nos. 25 and 26 and Appendix D, as stated in the Work Plans to insure that high quality is obtained during sampling events and site construction activities. Isopropyl alcohol will be utilized during the decontamination procedure.

7.0 SAMPLE CUSTODY

Sample labels should include the following minimum information:

- *Site location*

- *Field ID number*
- *Collection date and time*
- *Name of collector*
- *Preservation*

Custody seals should be used for all samples to demonstrate that no tampering has occurred.

Concur. These items are included in Appendix A, Subsection 5.3, Sample Labels, and SOP Nos. 30 and 31 of the Work Plans.

Samples should be delivered to the laboratory as soon as possible; this is usually within 1 or 2 days. Packages for shipping hazardous materials must comply with the Code of Federal Regulations, Title 49, Parts 171 through 179.

Concur. Environmental samples collected each day will be delivered to the appropriate laboratory on the next available working day by express mailing service. This is included in Appendix A, Subsection 5.1.3. Packages for shipping will comply with all federal regulations and will be in accordance with SOP No. 31 of the Work Plan.

Provide rationale for proposed organic water and organic/inorganic soil sample analysis procedures as described in Section 7.3.2. Sample containers should be completely filled to avoid headspace loss.

Concur. Sample containers will be completely filled to avoid headspace loss in all environmental samples collected. Field procedures are provided in Appendix A, Subsection 4.2.2.

8.0 LABORATORY PROCEDURES

Describe analytical procedures for asbestos and organometallics, such as tributyltin.

No standard analytical methods for asbestos and tributyltin exist. Therefore, we are requesting the laboratory to submit its analytical methods for asbestos and tributyltin for our review and approval. A copy will be forwarded to DHS.

Include analytical method detection limits.

Analytical method detection limits are incorporated in Appendix A, Tables A-3 and A-4.

Include laboratory turnaround time.

Estimated laboratory turnaround times are to be determined.