



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
215 Fremont Street  
San Francisco, Ca. 94105

AUG 25 1987

MEMORANDUM

SUBJECT: Revised Moffett Field Naval Air Station  
Quality Assurance Project Plan

FROM: Kent M. <sup>Kent</sup>Kitchingman, Chief  
Quality Assurance Management Section  
Environmental Services Branch, OPM (P-3-2)

TO: Amy Zimpfer, Chief  
Federal Response Section  
Superfund Programs Branch, TWMD (T-4-3)

The subject document has been reviewed by Rose Fong. Many of the previous comments were addressed. Several areas merit further attention. Comments which are of lesser importance are marked by an asterisk (\*).

1. Target analyte detection limits were not specifically identified for the project. It is assumed, since the topic was considered in various discussions by the Navy, the Regional Board, and EPA, that the Regional Board regards the method detection limits tabulated in Section 9, Analytical Procedures, to be adequate to meet the applicable and appropriate regulatory requirements.
2. In Table 6-2, Water Sample Containers, Preservatives and Holding Times, samples for analysis of volatile aromatics (especially benzene, ethylbenzene, and toluene) should be collected separately from the volatile halocarbons and preserved with HCl (1+1) to pH 2, in accordance with EPA Methods 602 and 621. In addition, the maximum sample holding times for the major ions, alkalinity, and nitrate measurements should be corrected to conform with the EPA references cited.
3. In Section 9, Analytical Procedures, the specific methods which will be used to analyze for the individual major ions, TDS, and TOC need to be identified. The reference cited contains more than one method for several of these analytes; not all are approved, and therefore are not interchangeable.

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4. Section 10, Data Reduction, Validation, and Reporting. The data generated by the backup laboratory, which will provide split-sample as well as overflow sample analyses, is no less important than the data generated by the KJC Laboratory. For this reason, the means to verify data validity and correctness of data transcription for this laboratory is an additional responsibility of the project QA Officer, and should be addressed in this section. In addition, the laboratory's data reporting requirements should be outlined.

5. Section 14, Specific Routine Procedures Used to Assess Data Precision, Accuracy, and Completeness, needs to be clarified, as follows:

a. On page 11-2, it is stated that problem resolution will be required when laboratory blank contamination is discovered. Instrument adjustment (masking the contamination), according to page 14-1, is not an acceptable form of resolution. The attainable detection or quantitation limit could as a result of adjustment be elevated above the level of interest to the data users. Inability to achieve target detection limits (Table 9-1) is not justified by shortfalls in laboratory control. Instead, sample data which are associated with contaminated blanks should be identified as such if reported.

b. On page 14-2, it is stated that laboratory control limits will be used to identify a need for corrective action. Action is also necessary whenever the accuracy criteria specified by the individual methods are exceeded.

8270 6. In Section 16, the QA report should include the results of the start-up validation of the capillary column modification of Method ~~625~~ (see page 9-1), which is required prior to any sample analysis using the method.

\* 7. The following are editorial comments:

a. In the last bullet on page 3-9, the meaning of "horizontal and vertical control" should be clarified.

b. On page 14-1, the description of the denominator of the industrial statistic ("sum") should be consistent with the calculation (" $X_1 - X_2$ ").

If further assistance regarding the preceding comments is needed, please contact Rose Fong, at 4-8379. The document will be returned to Lewis Mitani, the project officer.

cc: G. Baker (T-3-1)  
L. Mitani (T-4-3)

Review of  
Quality Assurance Project Plan  
Naval Air Station Moffett Field

Specific Comments

1. Section 5, Table 5-1. The Sample Plan states that there will not be soil duplicates; however, values are included in the table for relative percent difference of soil duplicate samples. EPA does require soil duplicate samples. The sampling points for obtaining the duplicates should be noted. Duplicates should be selected from areas of suspected highest concentrations.
2. Section 6, page 1 of 3, paragraph 3. What type of trowel (material of construction) will use? The sampling method is inconsistent with VOC analyses as much of any VOC's present would be lost. How will sample containers be prepared?
3. Section 6, page 1 of 3, paragraph 4. How will the laboratory be instructed to obtain the fraction to be analyzed from the sample.
4. Section 6, page 1 of 3, paragraph 6. How will the laboratory be instructed to obtain the fraction to be analyzed from the brass liner? Suggested procedure is to discard the outer 1 inch and then take the aliquot from the center. Will both organic and inorganic analyses be performed on samples from the same brass liner, or will two liner required?
5. Section 6, page 1 of 3 paragraph 7. What will be the source of "clean water".
6. Section 6 page 2 of 3, paragraph 3. More detail as to the packaging and transportation of samples is needed. Ice should be double bagged, and the soil samples placed in plastic bags to limit the potential for water coming in contact with the soils. What provision will be made for weekend delivery of samples to the R/J/C or backup lab? Will packaging materials be included to assist in prevention of breakage?
7. Section 6, page 2 of 3, paragraph 6. What pump construction materials will be used?
8. Section 6, page 2 or 3, paragraph 8. What will the source of vacuum be?
9. Section 6, Table 6-2. Table is incomplete. Include such items as size of sample required for analysis, the total number of containers required, the pH to be attained by addition of HNO<sub>3</sub>, the quality of the HNO<sub>3</sub>.

10. Section 8, page 1 of 1, paragraph 1. What is meant by initial use? Each day?
11. Section 10, page 1 of 2, paragraph 1. The requirements for soils field data appear to be missing? All data and notations to be obtained in the field should be listed.
12. Section 11, page 1 of 3, paragraph 3. Field Blanks should be certified organic free water.
13. Section 11, page 1 of 3, paragraph 8. The requirement for field duplicates should be worded one per day per site per matrix minimum.
14. Section 11, page 1 of 3, last paragraph. Split samples should be obtained from each sampling round. Included split samples from first monthly sampling in addition to the quarterly sampling.
15. Section 11, page 2 of 3, first paragraph. Soil background samples should be included. Soil duplicates are also required.
16. Section 11, page 3 of 3, paragraph 2. See comments 3 and 4.
17. Section 14, page 1 of 3, paragraph 2. A 100% completeness objective does not allow for the possibility of breakage or mishandling during transportation.
18. Section 16, page 1 of 1. Include description of quality assurance report data to be given to EPA.