STATE OF CALIFORNIA - ENVIRONMENTAL PROTECTION AGENCY

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
700 HEINZ AVENUE, SUITE 200
BERKELEY, CALIFORNIA 94710

January 21, 1992

Mr. Stephen Chao
Department of the Navy
Western Division
Naval Facilities Engineering Command
900 Commodore Bldg. 101
San Bruno, California 94066-0720

Dear Mr. Chao:

MOFFETT FIELD QAPP, AND HEALTH AND SAFETY PLAN

The Department of Toxic Substances Control (Department) has reviewed the QAPP, H&SP and Field Sampling Plan and has the following comments:

Comments on QAPP

1. The QAPP does not contain the document control format outlined in EPA QAMS-005/80: Interim Guidelines and Specification for Preparing Quality Assurance Project Plans, as follows:

   Section No._____
   Revision No._____
   Date_____
   Page_____

   The document control format should be placed in the upper right-hand corner of each document page.

2. On page 35, the reporting limits, 0.5 ug/L, of vinyl chloride, 1-2-dichloroethane, carbon tetrachloride, and trans-1,3-dichloropropene were stated in the table 6-4 for water sample provided by CLP SAS method. In this case, reporting limits are equivalent to CLP Contract Requires Quantitation Limits (CRQL). However, in appendix D, the CRQL are found to be 1.0 ug/L, instead of 0.5 ug/l, for water samples in CLP SAS method. This discrepancy should be clarified.

3. On page 12, it indicated that sample analyses will be performed by the selected laboratory certified by the California Department of Toxic Substances Control (DTSC). Please note that environmental analyses for regulatory purposes should be done by laboratories certified/accredited by the Environmental Laboratory Accreditation Program of the California Department Health Services (phone: 510-540-2800).

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D/N 25

Comments on Health and Safety Plan

1. Appendix A does not provide chemical hazards or general types of monitoring for each location.

2. The drilling safety procedures are needed.

3. Personal monitoring section needs additional information such as how to calibrate individual monitoring equipment and what types of personal monitoring will be used. The media to be used for each activity needs to be indicated.

Should you have any questions, please call me at (510) 540-3821.

Sincerely,

/s/ Cyrus Shabahari

Cyrus Shabahari
Waste Management Engineer
Site Mitigation Branch
Region 2

cc: U.S. Environmental Protection Agency
Region IX
Attn: Mr. Lewis Mitani
Mail Code H-5-3
75 Hawthorne Street
San Francisco, California 94105

Regional Water Quality Control Board
San Francisco Bay Region
Attn: Mr. Wil Bruhns
2101 Webster Street, Suite 500
Oakland, California 94612

Admin Record

RESPONSES TO COMMENTS FROM DEPARTMENT OF TOXIC SUBSTANCES CONTROL (January 21, 1992) FOR THE MOFFETT FIELD QAPjP

1. The QAPjP was written following, USEPA Region 9 Guidance for Preparing Quality Assurance Project Plans for Superfund Remedial Projects, DC No. 9QA-03-89, which is similar to but more extensive than what was required by the QAMS 005/80 guidance for QA project plans. Under the Region 9 procedures, the document control format commented on, is optional; therefore, this optional format was not elected by the author to be used in this QAPjP.

2. It is understood that the CLP-SAS method for VOC has a CRQL of 1.0 µg/L; however, this level is not low enough to meet regulatory action levels. Thus, the reporting limits of 0.5 µg/L included in Table 6-4 for vinyl chloride, 1,2-dichloroethane, carbon tetrachloride, and trans-1,3-dichloropropene are flagged, "A detection limit of 0.5 µg/L is required to meet the California MCL. However, this limit may not be achievable.", to demonstrate a good faith attempt to achieve the MCL using CLP methodologies.

3. Reference in text to "California Department of Toxic Substances Control" for laboratory accreditation has been changed accordingly to Environmental laboratory Accreditation Program of the California Department of Health Services."

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(See DIN 25)

RESPONSES TO COMMENTS FROM UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX (February 3, 1992) FOR THE NAVAL AIR STATION MOFFETT FIELD QUALITY ASSURANCE PROJECT PLAN (QAPjP)

1. Project objectives and scope are included in Section 1.1; intended data usage is addressed in Section 1, specific data requirements will also be addressed in the work plan produced for each investigation; names of key personnel are provided in Section 2.1; sample collection and decontamination procedures are referred to in Section 4.0 and are discussed in detail in the Baseline FSP; calibration standards and their sources will be addressed in the chosen laboratory's Quality Assurance Plan; specific data validation criteria for internal consistency is provided in Section 7.1; transmittal errors are addressed in Section 7; verification of lab performance and capability are discussed in Section 3.2; auditor selection is discussed in Section 8.0.

2. The JMM Navy CLEAN Quality Control Facilitator, Scott J. Weber, will review and sign-off on the final version of the QAPjP.

3. Errors have been corrected in the pagination of Table of Contents.

4. Approval of the QAPjP by the project QA officers has been removed from their list of responsibilities.

5. The referenced section entitled "Specific Routine Procedures Used to Assess Data Precision, Accuracy, and Completeness" is taken from the QAMS-005/80 guidance document. The QAPjP was written following, USEPA Region 9 Guidance for Preparing Quality Assurance Project Plans for Superfund Remedial Projects, DC No. 9QA-03-89, which is similar to but more extensive than what was required by the QAMS-005/80 guidance for QA project plans. Under the Region 9 procedures, the information sought after in the aforementioned section is included in Section 3.3 of the QAPjP.

6. The "memorandum" previously referred to in Section 1.3 has been changed, the name of the report is now the Work Plan (WP). The QAPjP and Baseline FSP are intended to supply the general QA/QC and field sampling procedures which will be followed for all investigations at NAS Moffett Field. The WP is not intended to replace the FSP or the QAPjP, but to provide rationale and other site-specific information (including objectives) for each site investigation in addition to the "base-line" information provided in the QAPjP and Baseline FSP. The WP will follow the same requirements for internal and external review as the QAPjP and the Baseline FSP.

7. "Verification and documentation of all changes to the existing data" has been added as a bulleted item in Section 2.2.12. Additional information is provided in Section 7.2 on Data Base Management.

8. Additional Data Quality Objectives (DQOs) have been added to Section 3, please note that additional DQOs will also be provided in the WP for individual sites for each investigation. A section on quality assurance objectives has been also been added.

   Appendix C tables do not contain RPD criteria for the evaluation of laboratory duplicates or matrix spike duplicates since none are provided in the CLP SAS analytical methods or the corresponding SW-846 methods. RPD control limits will be provided upon selection of

the laboratory and will also be included in the data packages provided to the consultant. A footnote to this effect is provided on each of these tables.

9. The Baseline FSP and the QAPjP will be provided together for final review. Refer also to the response to Comment 6.

10. CLP holding times will be followed as provided in the CLP-RAS and CLP-SAS methods; for those methods performed by other than CLP methods, the SW-846 holding times minus two days will be applied.

11. As stated in Section 6.1.1, CLP-RAS VOC analysis will be used when a faster turn-around-time (TAT) is required for water samples. Since the CLP-SAS requires additional effort by the laboratory to perform the analysis, this approach has been suggested in order for the laboratory to easily provide data for quick TATs. For water samples, the use of the CLP-SAS method will be the norm; whereas, the CLP-RAS method will be the exception – it is not expected that the latter method will be frequently used, due to the drawback of the higher detection limits.

12. CLP-RAS water units have been corrected to read µg/L.

13. Table 6-15 has been revised to include specific time intervals for each preventative maintenance task.

14. Based upon the data already collected at NAS Moffett Field, there are no reasons to suspect greater than 10 VOC TICs or 20 SVOC TICs; however, these numerical limits have been removed for TICs in Sections 6.1.1 and 6.1.3.

15. Field duplicate limits for precision are arbitrarily set by the author using best professional judgement at 25% for water matrices and 35% for solid matrices.

16. The QAPjP has adopted the RAS approach for the evaluation of surrogate data as suggested; appropriate changes have been made to Section 6.4.3.3.

17. Field data validation will be performed by project team personnel; however, laboratory validation (Section 6.5.2.2) refers to the procedures the laboratory will follow prior to the release of the data to the consultant. Validation of the data received by the consultant will also be performed by project team personnel and/or a third party as discussed in Section 7.1.

18. Comment noted and the text and "bullets" have been changed appropriately to include the use of CLP forms for data reporting.

19. The text in Section 7.1 has been changed to include the following clarification. The criteria for evaluation of the non CLP-RAS methods (CLP-SAS, ...) laboratory data will follow the criteria provided in the analytical methods. Field quality control data will be reviewed for all analyses following the criteria presented in Section 6.4.

20. The following has been added to Section 8.1.3: Field audits will be conducted for each sampling event; a schedule of the planned field audit will be included in the FSP. Section 8.1.1 has been modified to include the following: Navy will perform laboratory audits prior to the use of the laboratory for analyses for Navy CLEAN work (Refer to Section 3.2). Prior to the submission of samples for a field sampling event, PRC or JMM will also conduct a laboratory audit following the selection of the approved laboratory.

21. Bulleted item has been changed to "Notify the Navy of the problem and the corrective

action taken."

22. Percent recoveries for matrix spikes have been changed to 75 - 125 % in Tables C-7 and C-8 to reflect the CLP-SAS Methods for chlorinated herbicides and organophosphorus pesticides. Note that this limit is not specifically referenced in the organophosphorus pesticide method but has been provided by the author as an appropriate mid-range criteria.

23. Accuracy is defined as the degree of agreement between an analytical measurement and a reference accepted as a true value. Accuracy of the field measurements will be ensured through the appropriate calibration of the instruments at the recommended frequency (refer tp Section 6.2). Completeness goals for field measurements is 100 percent (Section 3.4.4). Goals for product and geochemical analyses fall into the category of laboratory analyses. The individual methods QC procedures required by the method will be evaluated for their adherence.

24. Tables C-2, C-3, C-4, C-7, and C-8 do not contain RPD criteria for the evaluation of laboratory duplicates or matrix spike duplicates since none are provided in the CLP SAS analytical methods or the corresponding SW-846 methods. RPD control limits will be provided upon selection of the laboratory and will also be included in the data packages provided to the consultant. A footnote to this effect is provided on each of these tables.

25. The QAPjP and Baseline FSP are intended to supply the general QA/QC and field sampling procedures which will be followed for all investigations at NAS Moffett Field. The WP will provide detailed rationale and other site-specific information (including, if appropriate, statistically derived data quality objectives for sampling locations and frequencies, ...) for each site investigation which are in addition to the "base-line" information provided in the QAPjP and Baseline FSP (Section 1.3).

26. As per the CLP-SAS method and its reference to the SW-846 method for purgeable halocarbons, the calibration standards shall include all target analytes. A list of the target analytes is provided in Table 6-5.