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Consulting Engineers, Inc.



April 20, 1992

Western Division
Naval Facilities Engineering Command
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Contract No: N62474-88-D-5086
CTO 0134

File: 2738.0365/2.1/3.11/3.8

**Subject: NAS Moffett Field Remedial Investigation/Feasibility Study
Draft Final Quality Assurance Project Plan
Response to Comments**

Dear Stephen:

Please find enclosed three copies of our response to comments on the Draft Final Quality Assurance Project Plan (QAPP) by the US Environmental Protection Agency (EPA) and the Department of Toxic Substances Control (DTSC). These comments incorporate items discussed in a conference call on May 6, 1992 among the EPA, Science Applications International Incorporated (SAIC), PRC Environmental Management, Inc., and JMM. The Final QAPP will be submitted after EPA review of these responses to comments. This document is in partial fulfillment of Contract No. N62474-88-D-5086, Contract Task Order 0134. Call us if you have any questions.

Sincerely,

JAMES M. MONTGOMERY, INC.

Joseph P. LeClaire for VVP

Veronica Petrovsky
Project Chemist

Joseph P. LeClaire

Joseph P LeClaire, Ph.D.
Project Manager

cc: Roberta Blank	EPA	(1 copy)
Cyrus Shabahari	DTSC	(1 copy)
Elizabeth Adams	RWQCB	(1 copy)
Fred Molloy	SAIC	(1 copy)
James Haas	NAS Moffett Field	(1 copy)
Don Chuck	NAS Moffett Field	(2 copies)
Joshua Marvil	PRC Environmental Management, Inc.	(2 copies)
Lynn Valdivia	PRC Environmental Management, Inc.	(1 copy)
Paula Pritz	MMES	(1 copy)
C. Keith Bradley	IT Corp.	(1 copy)

**RESPONSE TO COMMENTS OF THE EPA TO
NAVAL AIR STATION MOFFETT FIELD
MOUNTAIN VIEW, CALIFORNIA**

**REMEDIAL INVESTIGATION/FEASIBILITY STUDY
DRAFT FINAL QUALITY ASSURANCE PROJECT PLAN
MAY 1992**

No. ¹	Page ²	Section ²	Response ³
General	NA	NA	<p>The initial comments received from Lewis Mitani of EPA on the first draft of the QAPjP were responded to by JMM and submitted with the Final Draft of the QAPjP. The responses received by JMM from Roberta Blank of EPA did not match the comments initially received because EPA's reviewer SAIC was not aware that the initial comments they submitted to Lewis Mitani were revised by him and then submitted to JMM. Thus, SAIC reviewed JMM's responses by their version of their initial comments and not by the comments submitted by EPA to JMM. To resolve this communication error, SAIC reviewed again the responses submitted by JMM with comments submitted by Lewis Mitani of EPA. As a result of this review, SAIC found the following responses by JMM to be acceptable: 2, 3, 4, 7, 11, 12, 13, 16, 17, 18, 20, 21, 22, and 23. The QAPjP has been revised in accordance with the responses provided below and is submitted concurrently as a final document.</p>
1	5	1.3	<p>The intent of the collection of field data is to provide information as to the nature and extent of any possible contamination present at NAS Moffett Field. Data collected will be used for the following purposes:</p> <ul style="list-style-type: none"> • Selection of areas for source control and subsequent monitoring of the implemented source control measures; • Monitoring the operable units (OUs); • Feasibility Studies; • Monitoring of remediation activities; • Determination of soil physical and chemical properties that effect remediation activities; • Preparation of the Quarterly Reports which includes the determination of the extent of contamination and the delineation of the contamination plume boundaries.
1	57	6.2.3	<p>Traceability of the calibration standards and their sources are not discussed in the USEPA Region 9 Guidance for preparing Quality Assurance Project Plans for Superfund Remedial Projects, DC No. 9QA-03-89. However, calibration standards will be obtained by the laboratory from the EPA repository or commercial vendors for both inorganic and organic compounds and analytes. Stock solutions for surrogate parameters and other inorganic mixes will be made from reagent grade chemicals specified in the method. Stock standards will also be used to make intermediate standards from which calibration standards are made. All documentation relating to the receipt, mixing, and use of standards will be recorded in the appropriate laboratory logbook. Specific handling and documentation requirements for the use of standards will be provided in the selected laboratory's quality assurance manual.</p>

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5	14	3.0	<p>Section 3.0 DATA QUALITY OBJECTIVES has been revised as follows:</p> <p>The purpose of this QAPjP is to facilitate the implementation of comprehensive QA procedures. Data Quality Objectives (DQOs) are qualitative and quantitative statements which provide a means for control and review of the data and to ensure that the data obtained are of the quality and quantity capable of meeting the intended data uses for the site specific investigation. Refer to Section 1.3 for the intended data uses.</p> <p>As also discussed in Section 1.3, specific data quality objectives will be provided in the FWP for every site investigation. The DQO process will be used to establish statistically-derived DQOs for sampling locations and frequencies, numbers and types of samples, and parameters and criteria. The problem will be stated, decisions will be identified that address the problem, elements affecting the decision will be selected, the logic statement will be developed, constraints on uncertainty will be established, and a design for optimizing data collection will be implemented.</p> <p>Provided in this document are some general data quality objectives including: quality assurance objectives; analytical data required; action levels; analytical levels; and precision, accuracy, representativeness, completeness, and comparability objectives (PARCC).</p>
5	17	3.4	<p>Specific Routine Procedures Used to Assess Data Precision, Accuracy, and Completeness are provided in Section 3.4.</p>
6	5	1.3	<p>As stated in Section 1.3, the FWP is intended to supplement the QAPjP and the FSP, and will be reviewed independently of the QAPjP and FSP, following the same procedures used for these documents. If site-specific FWPs require methods or procedures not discussed in the QAPjP, the QAPjP will be amended as appropriate and submitted concurrently with the FWP for review. Existing data and detailed site characterizations are provided in the FSP. (Also note that Baseline FSP and WP have been changed to FSP and Field Work Plan (FWP), respectively to maintain consistency with the FSP.)</p>
8	18	3.4.1	<p>RPDs precision criteria have been established in Section 3.4.1 for field measurements, Section 6.4.1.1 for field duplicates, and in Appendix C for MS/MSD. The precision data collected in support of this project will be assessed using these precision goals.</p>

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RESPONSE TO COMMENTS ON THE
DRAFT FINAL QUALITY ASSURANCE PROJECT PLAN
REMEDIAL INVESTIGATION/FEASIBILITY STUDY

THE ABOVE IDENTIFIED PAGE IS NOT
AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY
NAVFAC SOUTHWEST TO LOCATE THIS PAGE.
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PLACEHOLDER AND WILL BE REPLACED
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QUESTIONS MAY BE DIRECTED TO:

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19	79	7.1	<p>Review and Validation of Data has been revised to include the following:</p> <p>Upon receipt of the Level IV sample delivery groups (SDGs) from the laboratory, project personnel under the guidance of the analytical coordinators will initially check whether the SDGs include all requested deliverables, and that the samples were analyzed as requested. Data will then be reviewed as described below by either the analytical coordinators or an independent data validation subcontractor. The review and validation of the SDGs for CLP RAS methods will be performed according to the CLP criteria as specified in the following documents:</p> <ul style="list-style-type: none"> • Laboratory Data Validation Functional Guidelines for Evaluating Inorganic Analyses (EPA, 1988b) • Laboratory Data Validation Functional Guidelines for Evaluating Organic Analyses (EPA, 1988c) <p>CLP inorganic data validation will include the following:</p> <ul style="list-style-type: none"> • Holding times • Calibration (initial and continuing) • Blanks (initial, continuing, and preparation; field blanks) • ICP interference check sample • Laboratory control sample • Laboratory and field duplicate sample analysis • Matrix spike sample analysis • Graphite furnace atomic absorption (GFAA) QC • ICP serial dilution • Sample result verification • Overall assessment of data for a case <p>CLP organic data validation will include the following:</p> <ul style="list-style-type: none"> • Holding times • GC/MS tuning • Calibration (initial and continuing) • Blanks (laboratory and field blanks) • Surrogate recovery • Laboratory control sample • Field duplicate sample analysis • Matrix spike sample/matrix spike duplicate analysis • Internal standard performance • Target compound list (TCL) compound identification • Compound quantitation and reported detection limits • Tentatively identified compounds (TICs) • System performance • Overall assessment of data for a case <p>Non-CLP organic and inorganic analyses data validation will include the following applicable parameters:</p> <ul style="list-style-type: none"> • Method compliance • Holding times • Calibration (initial and continuing) • Blanks (laboratory and field blanks) • Surrogate recovery • Laboratory control sample • Field and laboratory duplicate sample analysis • Matrix spike sample/matrix spike duplicate analysis • Other laboratory QC specified by the method • Detection limits • Compound identification • Sample result verification • Overall assessment of data for a case
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24	C-2, C-3, C-4, C-5, C-8, and C-9	Appendix C	Tables C-2, C-3, C-4, C-7, and C-8 have been revised to include relative percent difference precision limits of 50%. This precision limit will be used until the selected laboratory has collected enough data to establish its own limits.
25	14	3.0	As also discussed in Section 1.3, specific data quality objectives will be provided in the FWP for every site investigation. The DQO process will be used to establish statistically-derived DQOs for sampling locations and frequencies, numbers and types of samples, and parameters and criteria. The problem will be stated, decisions will be identified that address the problem, elements affecting the decision will be selected, the logic statement will be developed, constraints on uncertainty will be established, and a design for optimizing data collection will be implemented.
26	43	Table 6-5	Table 6-5 has been revised to include the entire target compound list (TCL) provided in SW-846 Method 8010. However, specific laboratory TCLs may not include the entire list presented here. It will, however, include all target compounds of concern at NAS Moffett Field.
1	DTSC ⁴ Cover Page	NA	In order to save in reformatting expenditures, "Revision No." will be added to the cover page which will include the corresponding number of the revision.
2	DTSC ⁴ 6.1.1	41	In order to meet California MCLs for Vinyl Chloride, 1,2-Dichloroethane, Carbon Tetrachloride, and trans-1,3-Dichloropropene (Table 6-4) the following procedures will be applied: The CLP-RAS VOC analysis is initially screened, if the results show no high concentrations of target compounds, the sample will be reanalyzed using a 25 mL purge volume (CLP-SAS VOC). Only the 25 mL results will be reported. If the initial 5 mL run does contain contaminants these results as well as any applicable dilution factors (as per CLP SOW requirements) will be reported. However, if concentrations of the aforementioned four compounds are detected between the instrument detection limit and the CRDL of 1 µg/L during the 25 mL analysis, the laboratory will be required to reanalyze all applicable samples for these compounds by SW-846 Method 8010 in order to obtain accurate quantification below the MCL. Prior to sampling, if any of the four aforementioned compounds are suspected to be present in the samples collected from a particular site, the CLP VOC analyses will be replaced by SW-846 Method 8010 in order to achieve the California MCLs. This variance will be indicated in the WP.
3	DTSC ⁴	NA	The analytical laboratory is not presented in the project organization chart or described in the project organization text because the analytical laboratory as well as the data validators, drilling crews, surveyors,...are considered to be subcontractors. In accordance with Section II, Subsection 3, p 10 of the USEPA Region 9 Guidance for preparing Quality Assurance Project Plans for Superfund Remedial Projects, DC No. 9QA-03-89, only data users should be included in these sections. The aforementioned subcontractors are considered data generators for all intensive purposes.

1 Refers to Lewis Mitani/EPA comment number.

2 Refers to document previously reviewed.

3 Refers to JMMs response to the responses made by SAIC for Roberta Blank/EPA.

4 Refers to EPA's responses to initial comments received by JMM from the Department of Toxic Substances Control