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NAB LITTLE CREEK
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LETTER TRANSMITTING U S EPA REGION III'S COMMENTS ON DRAFT MASTER PROJECT PLANS VOLUMES 1 AND 2 NAB LITTLE CREEK VA
3/15/2000
U S EPA REGION III

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103

March 15, 2000

Commander, Atlantic Division
Naval Facilities Engineering Command
Environmental Quality Division, Code: 1823
1510 Gilbert Street
Norfolk, Virginia 23511-2699
Attn.: Robert Schirmer

SUBJECT: Review *Draft Master Project Plans*
NAB Little Creek, Virginia Beach, Virginia

Dear Mr. Schirmer:

The EPA has reviewed the *Draft Master Project Plans Naval Amphibious Base Little Creek Volumes 1 and 2* (March 1999), Little Creek Amphibious Base, Virginia Beach, Virginia. The document was prepared for the Navy by CH2M HILL.

GENERAL COMMENTS

The document needs to have approval signatures with approvals from the project manager and the quality assurance officer, at a minimum.

SPECIFIC COMMENTS

1. Volume 1, Section 2.2.2, Page 2-5: Please update this section to indicate that NAB Little Creek has been listed on the National Priorities List (NPL) with final listing published on May 10, 1999 in the Federal Register (64 FR 24949). Also, please mention that there were seven potential sources or contamination areas that were evaluated for an HRS score.

2. Volume 1, Section 4, Page 4-1: Please include a discussion concerning Risk-Based Concentrations (RBCs) as identified in Table 4-1. Also, update the Table with the current version of Region III RBC table and please add a column for the Soil-Residential data.

3. Volume 1, Section 5.1.4, Page 5-4: This section addresses the project organization; however, the information provided is vague. Although individuals will be assigned during specific projects (identified in site-specific plans), the text

in the Master Work Plan and QAPP (Section 3.0) indicate that some of these individuals will oversee all phases of projects (e.g., Quality Assurance Manager). At a minimum, these individuals (with names and qualifications) need to be identified in the site-specific plans. The contractors, sub-contractors, laboratory(s), data validators, and key field personnel need to be provided. All roles and responsibilities need to be described.

4. Volume 1, Section 5.1.4, Page 5-4: Training requirements and/or qualification statements are needed for key functions (e.g., Project Manager, QA Manager, Data Validator, and key field personnel).

5. Volume 1, Section 5.2.1, Page 5-4: Please reference that the laboratories selected as subcontractors as part CERCLA activities are also CLP laboratories.

6. Volume 1, Section 5.4, Page 5-7: Please reference that the data validators will also follow EPA Region III guidance.

7. Volume 1, Section 5.4.1, Page 5-7: When selecting a laboratory this section states that the laboratory will be a CLP laboratory (along with meeting NFESC requirements). When using the SW-846 methods or other methods for any non-CLP parameters this requirement may not be appropriate. For those site-specific QAPPs that address the use of non-CLP methods, include documentation from the laboratory that demonstrates their capability of analyzing for the non-CLP method/parameter(s) (i.e., method detection limit study, performance evaluation results, and certifications).

8. Volume 1, Section 5.5.2, Page 5-10: Please update this section to reflect any changes in the current discussion of Ecological Risk Assessment Approach . Also, reference the use of the Screening Tables during step 3.0 of an ERA.

The Quality Assurance Project Plan (QAPP) and Field Sampling Plan (FSP) were reviewed for compliance to the requirements outlined in the EPA Requirements for Quality Assurance Project Plans for Environmental Data - Operations, EPA QA/R-5 (November 1997). Deficiencies or issues were noted for the following elements.

9. Volume 1, Master Quality Assurance Plan: The Master (and site-specific) QAPP might be more controlled if they had document control formatting. Refer to EPA QA/G-5. A distribution list identifying who is to receive copies, as well as any addenda, would also be useful.

10. Volume 1, Master Quality Assurance Plan: In the Field Sampling Plan, biota sampling is included. However, the QAPP lacks discussion of biota sampling and analysis. Table 4-1 and Table 8-2 in the Master QAPP needs to incorporate the biota sampling. The Master QAPP is written to address quality assurance

requirements for the analysis of samples using CLP and/or SW-846 but needs to be inclusive of data quality objectives for biota samples.

11. Volume 1, Master Quality Assurance Plan: Monitoring Well samples are unaddressed in Table 4-1 in the Master QAPP.

12. Volume 1, Master Sampling and Analysis Plan, Section 2.1, Page 2-12: This section of the Master Work Plan states that monitoring well samples will be filtered. Filtering of samples for volatile analysis is usually not recommended. Some discussion should be provided for low-flow sampling of the monitoring wells.

13. Volume 1, Master Quality Assurance Plan: Figure 6-1 of the QAPP provides an example of the Chain-of-Custody Form; please provide examples of other types of required documentation (e.g., field logs, sample tags/labels, etc.).

14. Volume 1, Master Quality Assurance Plan, Section 9.2, Page 9-1: More discussion on the use of electronic means to record data or process/interpret data (Section 5.4.4 of the Master Work Plan - GIS) is needed. Specifically list equipment and software needs and processes used to assure accuracy of data (i.e., Information Resource Management requirements are met).

15. Volume 1, Master Quality Assurance Plan: Provide data reporting requirements for data obtained from non-CLP methods.

16. Volume 1, Master Quality Assurance Plan: SOPs for field measurements (e.g., pH) need to state what is to be reported (what and where).

17. Volume 1, Master Quality Assurance Plan, Section 11, Page 11-1: Include a discussion of schedules of field and laboratory audits and reference that specific schedules will be provided in the site-specific QAPPs.

18. Volume 1, Master Quality Assurance Plan, Section 13, Page 13-1: Expand this section (Data Assessment) to address the process for reconciling reported data with site-specific requirements (DQOs).

If you have any questions concerning any of these comments, please call me (215) 814-3364.

Sincerely,

Bruce W. Beach
Remedial Project Manager

cc: Robert Weld, VDEQ
Scott MacEwen, CH2M HILL
Donna Caldwell, CH2M HILL