UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

March 22, 1993

Deborah Stockdale, RPM
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

RE: EPA Comments on the Quality Assurance Project Plan Navy Pier 33/Berth 16 Residential Wells and Background Soil Investigation, dated March 1993.

Dear Ms Stockdale:

The purpose of this letter is to transmit EPA's comments on the proposed Quality Assurance Project Plan Navy Pier 33/Berth 16 Residential Wells and Background Soil Investigation.

Attached you will find a copy of EPA's comments which consist of specific comments; these comments are numbered for future reference.

If you have any questions regarding these comments, you should feel free to call me at (617) 573-9614.

Sincerely,

Andrew F. Miniuks, Geologist
Federal Facilities Superfund Section

Attachments

cc: William Mansfield, NSBNL
Paul Jameson, CTDEP
Dale Weiss, TRC
Charles Porfert, EPA

Specific Comments

1. Page 7, Section 3.1: Data Quality Parameters

   To be consistent in showing changes to revision 0 as underscored information, underscore the expression: "and Matrix Spike recovery advisory limits are:".

   The Laboratory Control Sample shown in the text indicates five compounds which are similar to the matrix spiking solution specified in the SOW with the exception of 1,1-dichloroethene. Clarify whether the Navy intends to use 1,1-dichloroethane as provided in the SOW.

2. Page 8, Target Compound List for Volatiles in Water

   The list shows 34 analytes, of which one is repeated. The additional analyte is compound 1,2-dichloroethane listed as entries numbered 9 and 12. Revise the list to show only one of these entries.

3. Page 11, Target Compound List for Volatiles in Soil

   The list repeats 1,2-dichloroethane, yet does not include 1,1-dichloroethane and 1,2-dichloroethene. Remove the repeated analyte and add the two missing compounds to the list.

4. Page 13, Section on List of Semivolatile Compounds

   The text lists the percent recoveries for compounds in matrix spikes and shows 10-105% for 4-nitrophenol in water. Revise this range to show the recovery as 10-80% to be consistent with the SOW. This comment also applies to this compound in MS/MSD recoveries as shown in Table 7-2 on page 34 of 63.

5. Page 16 of 63

   The text lists RPDs for compounds in matrix spike and matrix spike duplicates. Add 4-nitrophenol at 50% each for water and soil for consistency with the SOW.

6. Page 28 of 63, Table 5-1, Preservation and Holding Time Requirements

   The table shows sulfuric acid as the preservative for TPH parameter. Revise this table to indicate that the pH will be adjusted to <2.

7. Page 34 of 63, Table 7-2, Quality Control Criteria for Organic Analyses

The table shows toluene in Matrix Spike/Matrix Spike duplicate for volatiles in WATER as having recovery to be in the range of 71-125%. Modify this range to show the recovery as 76-125% to be consistent with the SOW.

8. Page 37 of 63, Table 7-3, Quality Control Criteria for Metals and General Chemistry Analyses

The title for this table on page 37 is not the same as appears on page 38 of 63. The first title infers that all criteria are tabulated and the second suggests that only typical examples of criteria are tabulated. Clarify this apparent discrepancy.

Beneath the column heading of Type, revise "continuing calibration" to "continuing calibration verification" for all the metal parameters listed on pages 37 and 38. Also, for each metal parameter, include "Continuing calibration blank" to the Type column with "1/10 samples" and "± CRDL" entered, respectively, in the Frequency and in the Performance Criteria columns.

Include "Analytical spike" to the Type column for the Furnace AA parameter with "every sample" and "85-115%" added, respectively, in the Frequency and in the Performance Criteria columns.

Performance Criteria column entries for the ICP Metals and for the Furnace AA Parameters associated with the " Lab control sample" in the Type column, need to be: "80 to 120% or vendor specified for soil."

Entry associated with the Performance Criteria column for the Furnace AA parameter's "Duplicate injections" needs to be "± 20% RSD."

Entry in the Performance Criteria column for "Sample duplicate" associated with the Total Cyanide parameter needs to be given as: "follows protocol (±20% RPD/±10 ppb)."

9. Page 42 of 63, Section 7.1.4, Chloride

The text states that sample duplicates RPD should be within ±20%. Table 7-3, page 38 of 63, shows RPD criteria as ±30%. Clarify this discrepancy.

The text states that recoveries for Laboratory Control Samples should be within 80-120% of expected value. List this criterion for chloride in Table 7-3, page 38 of 63.

10. Page 46 of 63, Section 7.1.9, Total Cyanide

The text states that for Laboratory Control Samples the expected recovery is 80-120% or as specified by the vendor. Include this information for cyanide in Table 7-3, page 38 of 63.