

M00263.AR.000722
MCRD PARRIS ISLAND
5090.3a

EMAIL REGARDING U S EPA REGION IV COMMENTS ON ANALYTICAL LIMITS FOR FISH
TISSUE SAMPLING AND ANALYSIS PLAN FOR SITE 3 CAUSEWAY LANDFILL MCRD
PARRIS ISLAND SC
6/23/2009
U S EPA REGION IV

From: Llamas.Lila@epamail.epa.gov
To: [Sladic, Mark](#)
Cc: [Meredith Amick](#); [Charles Cook](#); [Heber Pittman](#); [Annie Gerry](#); [Zimmerman, Greg](#); [Mac McRae](#); [Pat Franklin](#); [Churchill, Peggy](#); [Timothy Harrington](#); Tom.Dillon@noaa.gov; [Priscilla Wendt](#); Llamas.Lila@epamail.epa.gov
Subject: Fish SAP and Analytical limits
Date: Tuesday, June 23, 2009 12:40:58 PM

PLEASE FORWARD THIS AS NEEDED.

Hi Mark and Team,

I heard back from my lab program manager. I am also following a lead on some resources in our Athens lab that may have some insight for us. Will provide another update if I hear anything more specific. Also wondering if the State has info, although I recognize that the state does not typically sample for subsistence level screens. Meredith? And maybe NOAA as well, but Tom is out this week, I think.

I guess the synopsis is that some of the larger labs have the capabilities to meet all our needs, and could also act as a coordinator for all the analytical procedures (from sample prep through analysis) for all COCs, even if specific COCs have to be analyzed at different locations. They should also give us feedback as to how many grams of tissue will be needed for each complete set of analysis, based on how they prep the tissue and the complete list of data we want from each fish. The fish may need to be a minimum size to have enough grams to analyze everything we need from one fish. Based on input from the state, they do not want composites. So if the size is not large enough, we may have to revisit getting both filets instead of just one side. Although, I believe the fishing limits from the state already place minimum size for game fish, so this may not be an issue. Or we may need to increase the number of fish taken and understand that each fish may not have its' own complete set of results. Something to ponder as we find out more about what is required from the lab you end up choosing. This all may cause us to slightly modify the SAP as we get direction from the lab, and may also call for additional flexibility in the field as they see what size fish they get. Not to mention what this may do to the sampling budget....

Here's the specifics of what was told to me:

Here are some suggestions for these contaminants:

Mercury: The standard CVAA method is capable of achieving low levels. However, my understanding is that the limiting factor in being able to report ultra-trace Mercury is the availability of a clean lab environment specifically set up for this purpose. Athens maintained one during the Everglades work. So, the Navy should inquire with the potential vendor about their experience with this. I would try vendors that specifically do eco-type work (such as laboratories in the Northwest).

PCBs: There are multiple ways to approach PCBs, depending on what is needed. For Fish Advisory, I am anticipating that you would need to be able to calculate the 12 WHO congeners rather than just a Total PCB #. Generally, Aroclors can be performed by a routine GC/ECD, but congener work requires the more sensitive HRGC/HRMS instrumentation. Only about a dozen laboratories in the U.S. and Canada have this instrument, which

runs about \$500,000 per instrument. The same laboratories which offer Dioxin would be able to do PCB congener work.

DDX: GC/ECD which is the standard Pesticide method should be fine. This one should not be too difficult to achieve.

Copper: The Fish Advisory Table doesn't mention copper, but generally speaking GFAA and ICP-MS are more sensitive than ICP-AES for Metals. The ICP-MS are now fairly common and there should be a sufficient number of vendors able to do this. The GFAA is an older technique, which has been abandoned by many laboratories as too labor-intensive. So, it may be harder to find, though a few laboratories still operate one. Hopefully, the ICP-MS would meet the needs for Copper.

"Sladic, Mark"
<Mark.Sladic@tetratech.com>
To
Meredith Amick
06/22/2009 02:15 PM <AmickMS@dhec.sc.gov>, Annie Gerry <GerryAM@dhec.sc.gov>, Priscilla Wendt <wendtp@dnr.sc.gov>, Lila Llamas/R4/USEPA/US@EPA, Pat Franklin <pat.franklin@mail.com>, Charles Cook <charles.cook2@navy.mil>, "Tom.Dillon@noaa.gov" <Tom.Dillon@noaa.gov>, Mac McRae <mmcrae@TechLawInc.com>, Heber Pittman <darrel.pittman@usmc.mil>, Timothy Harrington <timothy.j.harrington@usmc.mil>
cc
"Zimmerman, Greg" <Greg.Zimmerman@tetratech.com>, "Churchill, Peggy" <Peggy.Churchill@tetratech.com>
Subject
RE: July Agenda

Hi everyone. Kudos to Meredith for pushing us to start thinking this stuff through earlier. Unfortunately, I was out on vacation most of the time between when the original note came out and the comments-requested-by date (today). I'll provide some answers here, but beg for an additional day to check off with a couple more people on some other questions. Here's my agenda items, in order they appear on the draft agenda:

(1) Site 3 - we have checked with a couple labs for our wished-for detection limits, and I think the first indication is that the labs do not have detection limits as low as we'd like. I need to confirm that and then check into what that does to our decision statements. In addition, I just forwarded EPA's 6/17 markups on the conference call minutes to Peggy. I need to see if there is anything there that changes where she thought we were going. Whatever comes out of these questions would be a large part of the basis of the meeting discussion, including if there are questions that will need to be resolved to complete the SAP.

(2) Site 5 - For goals, I'd propose a site visit, with some support by Tim to point out the original paint shop building, describe (again) modifications to the bank that I think are being caused to extend the parking area. Because we viewed this as a simpler site, Peggy and another DQO facilitator (Tom) already proposed a complete draft DQO in the draft SAP. Obviously, we still expect changes and revisions - it was just easier to make assumptions on this one. We could walk through the DQOs either at the meeting, if this appeals to Team, or at some other time on a dedicated conference call.

(3) Site 14 - I over-committed to a date for the next draft of the scoping plan when we were assigning action items at our last meeting. When I got back and checked off with the guy doing the work, I found he had several weeks in the field already scheduled for another job. This is coming together, but not likely to be in time for significant review ahead of the meeting. However, I can discuss other updated parts of the scoping document like the grouping and the original FFA intent for this site at the meeting. If we drag Peggy to the meeting, which I'd mostly base on our need for her at Sites 3, 5, maybe 27, then she could help us start to frame the SAP here too. For example, I've seen Lila's comments about wanting to include Tom and Priscilla early, but there may be other options they consider a better use of their time. For example, considering that this is just an SI, which broadly speaking is just to answer yes/no for contamination, maybe they want to let the rest of the Team mobilize the SI, then they'll help us frame the results and shape whatever recommendations are required about which, if any, outfalls will require additional information. One thing I think sometimes gets missed at this site is that at this time we're setting up for an SI, and not remedy selection as at other sites.

(4) Site 27 - The CSM is on track for its 30 June completion date. We can review this at the meeting. If Peggy comes, we can also feel out some groundwork for the Team's expectations on the DQO's here too. We can probably do this even if Peggy doesn't come, but if she's here, we're certainly plugging her in. We have to submit a proposal to Navy shortly before the meeting for follow-up work at this site, which currently focuses on providing the remediation contractor with additional characterization data, and additional sampling under the Motor-T footprint.

(5) Site 45 - Vapor intrusion CSM/ GSI Study. I can walk through the CSM, but I doubt that provides much benefit. The CSM will probably need updated following the GSI Study. The GSI Study is not Tetra Tech, so I will not be able to update the Team on that.

(6) MRP DQOs - Either I or Peggy can provide the update.

(7) SMP - I can walk through the schedule as we usually try to do. Since I did not do the SMP this year, I am not able to update the Team

specifically on that FFA deliverable.

Hope this helps. More tomorrow, and comments appreciated in the meantime. thanks. MS

-----Original Message-----

From: Meredith Amick [<mailto:AmickMS@dhec.sc.gov>]

Sent: Thursday, June 11, 2009 3:42 PM

To: Annie Gerry; Priscilla Wendt; Llamas.Lila@epa.gov; Pat Franklin; Charles Cook; Tom.Dillon@noaa.gov; Mac McRae; Sladic, Mark; Heber Pittman; Timothy Harrington

Subject: July Agenda

Hi team,

Attached is our preliminary agenda for the July meeting. Please respond to me by June 22 with your changes, so that I can finalize the agenda and send out by June 29. This is end of year crunch time for me, so I wanted to give plenty of time to get this finalized.

Also I have highlighted two questions: Where at PI will the meeting be? and I need a Goal for one of the discussions from Mark.

Additionally, I am wondering if it is realistic to have the all the discussions that are presented on the agenda in July. Will the team be at a point to discuss these items (SWMU 27, 14, 5, etc)? If we need the 1 or 2 hours that is allotted I am all for that; however, if we are not at that point and could just have a 10 minute status update, then I think changing the time frames would be appropriate. I believe in the past we have had some extended time frames that have not been necessary and they end up getting filled in with hypothetical discussions that don't accomplish much.

If you feel that there will be significant changes to this agenda and we need a conference call, we can schedule that.

Meredith