MEMO

TO: Jennifer Morris, EPA Brownfield Project Manager

FROM: Mark Hogan, Environmental Management Services of Iowa

DATE: Monday, January 23, 2023

RE: Project Plan – Asbestos Containing Materials (ACM) Data Quality Objectives & Site-Specific Quality Assurance Project Plan – Revision No. 1 January 13, 2023

Below are comments from the EPA Region 7 Brownfield Program review of the East Central Intergovernmental Association SSQAPP dated October 28, 2022. Environmental Management Services of Iowa's remarks addressing the comments are in red text.

Critical Comments

1. § A.5 Problem Definition and Background, page 7. Because this SSQAPP appears to be limited to air sampling and visual confirmation of the removal of ACM, any additional asbestos sampling collection will need to be addressed in an addendum to this SSQAPP and submitted to EPA for review and approval prior to that sampling being performed. See also § B2 which refers to bulk asbestos.
   - There will be no additional asbestos sampling as all building materials will be disposed of a regulated asbestos containing materials. Have updated the text in the last paragraph of A5 and removed all mentions of bulk asbestos sampling. Also removed bulk sample reference materials from Appendix G.

2. § A.7 Quality Objective and Criteria for Measurement Date, pages 8-9.

   a. This section defines precision and how it can be measured with field blind replicate samples. However, the SSQAPP does not appear to address if field blind replicate samples will be collected for this project and at what frequency.
      - Updated. No field blind replicate samples will be collected for this project.
   b. This section states representativeness will be assessed thru the collection of field duplicates.
      i. The frequency of field duplicates and their associated acceptance criteria do not appear to be defined.
         - Updated. No field duplicate samples will be collected for this project.
      ii. It is not clear if field duplicates and field blind replicate samples are equivalent (i.e., duplicates can traditionally be used to refer to a field sample and its duplicate whereas replicates can traditionally be used to refer to three or more repeated samples/measurements).
         - Updated. No field duplicate or field blind replicate samples will be collected for this project.

   c. This section states for completeness, 100% validated data is need for all confirmatory analyses critical to a site investigation sampling program. However, it is not clear what confirmatory analyses have been defined as critical for this project and what the completeness goal may be for any analyses that are not identified as being critical.
      - Updated. As this is a RACM demolition without collection of air clearance samples there are no critical samples. For the purposes of this project, completeness will be confirmed by the lack of visible emissions during RACM demolition.

3. § A9. Documentation and Records, page 10. Site-specific reporting requirements, the turnaround time for receipt of deliverables, and site-specific requirements for retention of samples/laboratory records will be noted in requests for analytical services. Because this is information that would typically be defined as part of the project planning process and expected in a QAPP, it is not clear why this information cannot be included here.
   - Update to include requested laboratory turnaround time for this project and retention of laboratory records.

4. § B1.1 Sampling Methodologies, page 11.

   a. The first sentence in this section refers to air monitoring for characterizing airborne asbestos fiber and/or lead dust concentrations. This SSQAPP previously states the objective is to collect air samples to determine if ACM is being removed in accordance with specifications and regulations with no mention of lead dust or lead dust concentrations. Is reference to lead dust concentrations correct? If so, the SSQAPP needs to address the collection and analyses of these samples along with the intended use of the resulting data.
      - Removed reference to lead dust concentrations as it is not applicable to this project.
   b. This section refers to NIOSH Method 7400 (PCM) for analyzing samples whereas § B2 refers to samples being analyzed by OSHA's Method ID 160. Are these methods identical and both to be used for this project? Will one method be used for samples collected during the abatement process and the other for final clearance sampling? The reference to these two methods needs to be clarified.
      - Updated in Sections B2 and B4 – NIOSH Method 7400 (PCM) will be utilized for this project.

General Comments

5. § A3 Distribution List, page 4. Please note for EPA, the Distribution List identifies Jonathan Harrington rather than Jennifer Morris.
   - Updated.

6. § A9. Documentation and Records, page 10.

   a. Based on the information presented in § B1, it appears difficulties encountered in the field will be reported via the daily progress reports and no separate field narrative will be prepared. Is this correct?
      - Correct. The daily progress reports will be completed by the Field Supervisor and distributed to the Project Coordinator. Updated 1st paragraph of A9.
   b. This section should also address any laboratory narrative that may be prepared, even if that is simply thru reference to existing laboratory documentation such as their QA/QC Manual.
      - Updated to reference the EMSL QA/QC manual and also describe the narrative the laboratory will provide.

7. § B2 Sampling Method Requirements, page 12. Although Appendix B as referenced here does provide some general guidance about sample shipment, additional details should be addressed for how samples will be packaged for delivery or transport to the laboratory under this SSQAPP.
   - Updated to include sample packaging and shipping information.

8. § B4. Analytical Methods Requirements, page 13. This section should also address who will be responsible for corrective actions related to laboratory analyses even if that is simply thru reference to existing laboratory documentation such as their QA/QC Manual.
   - Updated.

9. § B5. Quality Control Requirements, page 13. This section should also include or reference the procedures for calculating QC statistics (e.g., the precision factor, percent completeness, etc.). Also, a reference to the attached method and laboratory QC requirements would be useful here.
   - Updated to include QC methods and reference statistical recount calculations and lab QC Standard Operating Procedures in the appendices.

10. § B5.1-6 Representative Samples through Accuracy, page 14. This section is identified as not being applicable but because this is not a traditional QAPP element, it is not clear to what this section is referring.
   - Updated – removed as not applicable.

11. § D3. Reconciliation with User Requirements, page 20. Conclusions may be based upon a statistical evaluation of the data. It would be useful to include a summary of this statistical analyses here.
   - Updated – included a table identifying data usability indicators and corresponding evaluation methods.