

**MEMORANDUM**

**SUBJECT:** Asbestos Containing Materials (ACM) Data Quality Objectives and Site-Specific Quality Assurance Project Plan (SSQAPP) 211 and 213 East Broadway Street; Stanwood, Iowa - Approved with Condition

**FROM:** Diane Harris  
Regional Quality Assurance Manager  
Laboratory Services and Applied Science Division

**TO:** Jennifer Morris  
EPA Project Manager  
Land, Chemical and Redevelopment Division  
Brownfields, SMM, P2 and Redevelopment Branch

The review of the subject document prepared by Environmental Management Services of Iowa and dated 10/28/2022 has been completed according to “EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations,” EPA QA/R-5 March 2001.

Based on the comments below, the document is approved with conditions. The document was found to be incomplete in addressing some key areas to the extent of potentially jeopardizing the quality of the data. These areas are fully described in this review memorandum as critical comments and can be adequately addressed by incorporation into the document but without resubmission. The document would not be approved without addressing these issues. General comments identify opportunities for strengthening the document but do not affect approval.

**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.
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.
  - 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.
    - ii. It is not clear if field duplicates and field blind replicate samples are equivalent (i.e.,

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NAME	DIANE HARRIS <small>Digitally signed by DIANE HARRIS Date: 2022.12.07 09:48:08 -06'00'</small>			
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