December 10, 2008

MEMORANDUM

SUBJECT: 19771 Magellan Dr. Subsurface Sampling Work Plan, Institutional Control Pilot Program, Del Amo Superfund Site, Los Angeles, California (Document Control Number [DCN] 36CA0070WV2)

FROM: Marlon Mezquita, Chemical Engineer, PE, Quality Assurance Office, MTSD-3

THROUGH: Eugenia McNaughton, Ph.D., Manager Quality Assurance Office, MTSD-3

TO: Dante Rodriguez, Project Manager, Private Site and DOE Section, SFD-8-2

The revised Subsurface Sampling Work Plan for 19771 Magellan Dr. prepared by URS Environmental, dated November 05, 2008 was reviewed. The review was based on joint Superfund/Quality Assurance Comments dated October 16, 2008.

The revised Work Plan is approved by the Quality Assurance Office. All QA comments have been adequately addressed. Below, please find the original comments in bold face type font followed by an evaluation of the response to comments in regular font.

If you have any questions or comments regarding this review, please call me at (415) 972-3808.

Comments

1) [Lab Quality Assurance]. Generally speaking, we need to establish the reliability and/or quality of the analytical systems (prime labs, subcontract labs) that we use. We had worked with the Respondents to do this for the lab used for the 2003 sampling activities by reviewing the laboratory's standard operating procedures manual. For the ongoing IC Pilot Program, we should do this by obtaining some or all of the documentation noted below, for any lab that we use. We should re-check the information every year or two if we are still using them. EPA QAMS will do the work, but the Respondents would need to obtain the information from the labs.
So, provide the following QC information, either in electronic format or hardcopy, that documents the analytical laboratory's historical level of performance:

a) Laboratory QA Manual and analytical standard operating procedures (Analytical SOPs), that clearly explain how the laboratory is implementing method QC and associated method acceptance QC limits.

This comment has been adequately addressed. Laboratory QA Manuals for Calscience and Air Toxics LTD laboratories have been included in the QA/QC trend charts CD provided.

b) Quality Control information documenting historical performance, this information is best summarized in QC control charts from laboratory's information management system (LIMS). The control charts should cover QC results for at least one year for proposed methods SW-846, 8015-TPH, 8260B-VOCs, and 8310-PAHs. Example important QC information includes:
   - ICAL (initial calibrations)
   - CCV (continuing calibration verification)
   - LCS (laboratory control samples)
   - Surrogate Recoveries

This comment has been adequately addressed. QC control charts for PAHs in soil by Method 8310, TPH-Diesel in soil by Method DHS-LUFT, TPH-Gas in soil by Method 5035, VOCs in Air by Method TO-15, and VOCs in Soil by Method 8260 have been included in the QA trend charts CD provided.

c) Additionally, if available, recent Performance Evaluation (PE) sample results.

This comment has been adequately addressed. Air and soil PE sample results for Calscience laboratory have been included in the QA trend charts CD provided.

2) [Data Validation]. Data validation is needed to ensure data quality is acceptable prior to presenting environmental recommendations based on such data. Add wording to this work plan that ensures data validation will follow US EPA National Functional Guidelines (NFGs) for data review, as applicable, and that data validation reports (DVR) documenting the data validation conclusions and recommendations will be provided to EPA.

This comment has been adequately addressed. Section 2.7, Laboratory and Data Validation, has been revised to state that data validation will be performed in accordance with EPA NFGs.

C:/data/projects/DelAmo/Magellan
3) [Signature Page]. A new requirement in recent guidance is to include a signature page within the sampling plans and QA plans for EPA's signature, approving the plan. This facilitates locating a final approved copy of a SAP or QAPP during future inquiries. Please add a signature page for EPA's Quality Assurance Management Section's approval signature.

This comment has been adequately addressed. An approval page has been added.

4) [Sampling Approach]. Section 2.6 of the work plan, Soil Sampling subsection, indicates that soil samples will be collected after the soil gas purging and sample collection. The QA concern here is that the soil sample is being collected from a disturbed condition and the soil sample may result in under-represented concentrations. The soil samples should be collected from undisturbed locations; therefore, we recommend that the project consider allowing the subsurface soil condition to re-equilibrate after soil gas sampling and prior to commencing soil sample collection for VOC analysis.

This comment has been adequately addressed. During a October 21, 2008 conference call it was explained that the concrete slab sits over a "sub slab fill" zone of sand. Soil gas samples will be collected from this sand zone and will have minimal impact on deeper VOCs in native soil.

5) [Sampling Approach]. In Section 2.6 of the work plan, Soil Sampling subsection, the first paragraph states that soil samples for subsequent VOC analysis will be collected from the soil core using EPA Method 5035 sampling equipment and techniques, as described in Appendix C. However, Appendix C, presents various options on how to collect soil samples for VOC analysis. It is important that the field team be prepared with specific sample collection vials, e.g., for low concentration VOC analysis, the plan should be clear on whether hermetically sealed Encore sample vials will be used, or whether 40 ml vials with sodium bisulfate preservatives will be used. Clarify this in the work plan.

This comment has been adequately addressed. The revised text explains that either Encore sampling containers or the Encore "Field Preservation Kit" will be available for use.
U.S. EPA has reviewed this work plan and determined that the described scope, procedures, and methods are acceptable and that the investigation can proceed upon providing EPA with at least one week notice prior to the start of field activities.

Eugenia McNaughton  
Name of authorized EPA representative (print)

[Signature]

Manager, Quality Assurance Office  
Title

[December 10, 2008]  
Date