

Mr. Keith Piontek, P.E.
Principal Engineer
TRC Companies
415 South 18th Street, Suite 105
St. Louis, Missouri 63103

RE: Updated O&M Plan and Updated QAPP Review
Frit Industries, Inc.
Humboldt, Iowa
EPA RCRA I.D. No. IAD041103193

Dear Mr. Piontek:

The U.S. Environmental Protection Agency is in receipt of the updated Operations and Maintenance Plan and updated Quality Assurance Project Plan prepared by TRC Companies, both dated October 2021. Based on the EPA's review of the documents, the EPA is hereby providing approval of the updated Operations and Maintenance Plan; however, the following comments must be sufficiently addressed prior to the EPA approval of the updated QAPP.

- 1) **Approval Page.** Please include an empty signature block for the EPA Regional Quality Assurance Manager's signature.
- 2) **Section 2.3, Data Quality Objectives for Measurement Data.** This section references the EPA *Contract Laboratory Program National Functional Guidelines for Inorganic Data Review*, EPA540/R-94/013 (February 1994). A more recent version of this document was found. The version of the Inorganic Data Review document and, if the corresponding Organic Data Review document for the organic analyses requested is to be utilized, both need to be verified and appropriately referenced.
- 3) **Section 3.4, Analytical Methods Requirements.** This section states that ALS Laboratory Group of Houston, Texas and Test America of Cedar Falls, Iowa will provide analytical testing services; however, this section does not reference which analyses are to be ran at each laboratory. Also, according to Section 2.0 and the updated Operations and Management Plan - Section 4.1.5, laboratory services are to only be provided by Eurofins Test America out of Cedar Falls, Iowa, while Section 2.3 references Test America/ALS Laboratory. Appendix A only includes the Eurofins/TestAmerica Quality Assurance Manual. Therefore, the laboratories to analyze the requested analyses need to be specified, appropriately referenced consistently throughout the QAPP, and the appropriate quality assurance manuals should be included in Appendix A.
- 4) **O&M Plan, Section 4.1, Groundwater Monitoring.** This section references objectives according to the Statement of Basis and Public Notice from 1998 and states that the initial monitoring period for the containment cell will be thirty years at a frequency of once per year. Since this is to be a long-term QAPP it needs to state that periodic, preferably annual, review of the QAPP will be performed to ensure it remains up-to-date during the time period and that the QAPP will be resubmitted for re-approval every five years if it will continue to be utilized.
- 5) Please include a copy of the chain-of-custody form.

Please submit a revised QAPP within 30 days from your receipt of this letter. If you have any questions, please contact me at (913) 551-7403.

Sincerely,

Lisa Messinger, PG
Project Manager
RCRA Oversight, Authorization Grants
& PCB Branch
Land, Chemical & Redevelopment Division

cc: Amie Davidson, IDNR
Alissa O'Connor, HCDA