September 24, 2024

MR JASON VORE
DIAMOND VOGEL
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JASON.VORE@DIAMONDVOGEL.COM

Re: Vogel Paint and Wax Company (Grant Avenue Between 490th and 500th Street, Maurice, Iowa 51036)
Contaminated Sites Database Site ID No. 339
Pilot Study Fourth Addendum Revision 1 and Quality Assurance Project Plan

Dear Mr. Vore:

The Iowa Department of Natural Resources, Solid Waste and Contaminated Sites Section (DNR) and United States Environmental Protection Agency, Region 7 (EPA) has reviewed the August 2024 Pilot Study Design Plan – Fourth Addendum: Additional Injection Along Southern Property Boundary Revision 1 (Work Plan) (Doc #41880) and the Quality Assurance Project Plan (QAPP) (Doc #41879) for the site located in Maurice, Iowa.

Work Plan

The work plan is accepted as written and has adequately addressed the comments submitted in the response to the original version of the PSDP. Please note one additional minor comment regarding the revised version:

1. Figure 1 – The property boundary is drawn incorrectly and includes only a portion of the four parcels owned by Vogel.

QAPP

The August 2024 QAPP was reviewed according to "EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations," EPA QA/R-5 March 2001. The document was also reviewed against the critical comments outlined in the previous QA review memo dated 03/19/2019. This is a five-year update of the previously approved generic QAPP for Vogel Paint & Wax Co. Superfund Site. DNR and EPA have the following comments regarding the QAPP that must be addressed prior to approval of the document:

1. Section 3.2 Project/Task Description, Page 6 – A QAPP needs to include a project schedule and because this is intended to be a long-term project, the generic QAPP needs to specify the following:
    a. The length of time the generic QAPP will be valid (i.e., the project period or up to five years, whichever is less).
    b. Annual review of the generic QAPP to ensure it remains up to date.
    c. Submittal of the generic QAPP for review and approval any time significant changes are made and upon the five-year anniversary if it will continue to be used beyond that timeframe.
2. Section 4 Project Data Quality Objectives and Measurement Performance Criteria, Page 7 – When defining the tasks and objectives for this project, most of this section seems to indicate only groundwater samples will be collected. However, the QAPP later refers to both soil and groundwater

samples making it unclear if groundwater and soil samples are planned or just groundwater samples. If soil samples are planned, they need to be added to the QAPP.

3. Section 4.2 Optimizing Design for Obtaining Data, Page 9 – This section refers to the sampling design presented in the PWSP and Ramboll Field Sampling Procedures. However, these references could not be verified and confirmed at the time of the review.
4. Section 5.1.1 Sample Handling and Custody Requirements, Page 15 – Table 3 provides information on sample containers and preservation. The following information needs to be verified to ensure an adequate volume of sample is collected:
    a. Table 3 lists 250 mL for TKN and TP but the laboratory SOP lists 500 mL.
    b. Table 3 lists 500 mL for DO but the laboratory SOP lists 1L.
5. Section 5.2.1 Laboratory Analytical Methods, Page 18 – Appendix A is referenced for laboratory SOPs and this appendix does include analytical SOPs for the laboratory performing the chemical analyses but not the micro analyses.
6. Section 5.3.1 Field QC, Page 18 – This section describes equipment blanks for evaluating the effectiveness of decontamination procedures. If equipment decontamination is required, the QAPP needs to clearly indicate this and either describe or reference the procedures to be followed.
7. Section 6.2 Reports to Management, Page 22 – This section only addresses reporting of QA/QC results from audits. However, other sections within the QAPP refer to data usability reports, semi-annual monitoring reports, and progress reports. As noted in the previous QA review comment memo dated 03/19/2019, project reports need to be summarized in the QAPP along with who will be responsible for preparing them and who will receive them.
8. Section 7.4 Data Usability Report, Page 24 – If issues that need to be resolved are identified, what is the issue resolution procedure and who will be responsible?

The following general comments are not required for approval of the QAPP, but will help to strengthen the document:

9. QAPP Format – Please note a new QAPP Standard was issued in July 2023 and which this generic QAPP comes due for reapproval, it will be reviewed against this Standard and should be taken into consideration when the generic QAPP is revised.
10. Section 2.3 Special Training/Certification Requirements, Page 5 – If any certification or accreditation is required of the laboratories, it should be noted here.
11. Section 2.4 Project Organization Structure, Page 5 – Although the organization chart shows the Ramboll QA Officer reporting directly to the Ramboll Project Manager, they do not appear to remain independent of the environmental information generation based on the information presented in Section 2.1.5 and it would be useful to note this independence.
12. Section 2.1.6 Ramboll Data Validation Staff, Page 4 – 2020 versions of the 2017 CLP National Functional Guidelines are available and so the reference to the 2017 versions in this section should be verified.
13. Section 4.5 Documentation and Records, Page 11 – This section of a QAPP should also address the process and responsibilities for ensuring that the most current approved version of the QAPP is available.
14. Section 5.2 Analytical Method Requirements, Page 18 – This section of the QAPP should also include the laboratory turnaround time, especially if it is important to the project schedule.
15. Section 5.3 QC Requirements, Page 18 – The procedures used to calculate QC statistics should be referenced or included.
16. Section 5.4.2 Field Supplies and Consumables, Page 20 – If spare parts are of concern, their availability and location should be noted.
17. Section 5.5 Non-Direct Measurements, Page 21 – Will the review of non-direct data as described here include determining and documenting any limitations on the use of such data?

18. Section 5.6 Data Management, Page 21 – It would be useful to attach copies of any standard forms like the chain-of-custody form and the standard field forms if possible.
19. Section 5.6.1 Field Data, Page 21 – In addition of the field data, it would be helpful to summarize all types of field information that will be recorded in field logbooks and/or field forms.
20. Section 7.4 Data Usability Report, Page 24
    a. If there will be any statistical analysis of the data other than calculating the basic statistics already defined for precision, accuracy, and completeness, it should be summarized in the QAPP.
    b. Because the data usability report will be used to note any DQOs not met, it appears this report may also be used to document any other limitations on data use. If this is correct, it would be useful to note this here.

Additionally, please note that the "Prepared by" signature page (page 3 of the QAPP) was missing from the unlocked version of the submittals, however it was included in the August 16, 2024 version of the QAPP.

Please submit a revised QAPP addressing the above comments by **November 15, 2024**. If you have any questions or need to discuss further, please contact me at (515) 415-0889 or jake.bucklin@dnr.iowa.gov.

Sincerely,

Digitally signed by Jake Bucklin
Date: 2024.09.24 13:50:47 -05'00'

Jake Bucklin
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