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ENVIRONMENT
& HEALTH

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Land Quality Bureau
Iowa Department of Natural Resources
Solid Waste and Contaminated Sites Section (DNR) and
United States Environmental Protection Agency, Region 7 (EPA)
6200 Park Avenue, Site 200
Des Moines, Iowa 50321

Response To Comments on the 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

Date: November 26, 2024

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Dear Mr. Bucklin:

Ramboll Americas Engineering Solutions, Inc. (Ramboll), on behalf of Diamond Vogel, Inc. (Vogel), is submitting this letter to respond to comments received from the Iowa Department of Natural Resources, Solid Waste and Contaminated Sites Section (DNR) and United States Environmental Protection Agency, Region 7 (EPA) regarding 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),* dated August 2024, prepared for the site located in Maurice, Iowa.

Below are Iowa DNR and EPA's comments followed by Ramboll's responses. A revised QAPP incorporating the revisions presented below will be submitted under separate cover for review and approval in conjunction with this response to comments letter.

COMMENTS AND COMMENT RESPONSES

Work Plan:

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

   Response: The Figure 1 – the approximate property boundary has been updated to include all four parcels owned by Vogel.

QAPP:

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.*

   Response: The QAPP has been updated to include a project schedule (see Section 3.3).

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.*

   Response: No soil sampling is currently contemplated; the text of the QAPP has been updated to remove reference to soil. If sampling of soil or other media is required in the future, the QAPP will be updated accordingly.

3. *Section 4.2 Optimizing Design for Obtaining Data, Page 9 – This section refers to the sampling design presented in the PSWP and Ramboll Field Sampling Procedures. However, these references could not be verified and confirmed at the time of the review.*

   Response: Section 4.2 has been amended to remove reference to the Ramboll field sampling procedures; field sampling procedures are described in Section 5 of the updated QAPP.

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.*

   Response: Sample containers and samples volumes have been updated in Table 3 to be consistent with laboratory SOPs.

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.*

   Response: Microbial Insights maintains SOPs for analytical work but is unable to provide copies of the SOPs because they contain proprietary information that is considered business confidential.

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.*

   Response: The QAPP contains general information relating to field quality control. Specific quality control procedures for various work streams are outlined in the Work Plans. Specific to the ongoing groundwater monitoring, field equipment decontamination procedures for non-dedicated equipment are documented in Section 5.1.2.3 of the QAPP.

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.*

   Response: Section 6.2 has been revised to include a description of annual monitoring reports and post-injection monitoring reports.

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?*

   Response: Section 7.4 has been updated to include issue resolution procedures and personnel responsibilities for data usability issues. The data validator will inform the PM if data quality issues are identified during data validation that affect data usability. The PM is responsible for taking appropriate action. Any corrective actions will be documented in the data usability report.

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.*

   Response: The cross reference provided in QAPP Section 1.1 has been revised to reflect the 2023 QAPP EPA IT/IM Directive Standard CIO 2105-S-02.1.

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.*

    Response: Laboratory accreditation requirements have been added to Section 2.3.

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.*

    Response: Section 2.1.5 has been revised to state the QAO will be independent of data collection and data generation for the project.

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.*

    Response: The references for CLP National Functional Guidelines have been updated to 2020 versions in the QAPP.

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.*

    Response: QAPP version control has been added to Section 4.5.

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.*

    Response: Laboratory analytical turnaround time requirements for the project have been added to Section 5.2.

15. *Section 5.3 QC Requirements, Page 18 – The procedures used to calculate QC statistics should be referenced or included.*

    Response: Procedures used to calculate QC statistics have been added to Section 4.3 Measurement Performance Criteria.

16. *Section 5.4.2 Field Supplies and Consumables, Page 20 – If spare parts are of concern, their availability and location should be noted.*

    Response: Spare parts are not required for the activities covered in this QAPP.

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?*

    Response: See Section 5.6 (renumbered) of the revised QAPP.

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.*

    Response: Copies of standard field forms are not a required part of the QAPP.

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.*

    Response: A summary of the types of information to be recorded in field logbooks or field forms is not a required element of a QAPP.

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.

Response:

a. If statistical analysis, other than basic statistics, are determined to be necessary, the procedures and methodology will be summarized in an appropriate report or work plan.
b. Data usability is discussed in Section 7.4. The data usability report will include appropriate limitations, as needed.

CLOSING

We trust this is all the information required at this time. Please feel free to contact the undersigned for any questions regarding this submittal.

Sincerely,

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