



Environmental Services Assistance Teams
Region 2

2890 Woodbridge Avenue, Building 209
Edison, New Jersey 08837

Laura Scalise, Project QAO
ESAT (QAPP) Task Monitor
MMB, USEPA Region II
2890 Woodbridge Avenue, Building 209
Edison, New Jersey 08837

24 February, 1992

RE: Tutu Well Field
TID #02-920217/Charge #231-24-028

Dear Ms. Scalise:

Enclosed please find review comments regarding the Oversight Short Form QA Plan, for the above referenced site in St. Thomas, U.S. Virgin Islands.

This Short Form QA Plan was prepared by CDM Federal Programs Corporation, dated June 12, 1991 and received on December 18, 1991. If you have any questions in regards to the enclosed, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Syed M. Quadri".

Syed M. Quadri.
LESC/ESAT

Enclosure
cc: File

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General Comments:

1. Pursuant to my meeting of 2/19/92 with Caroline Kwan, Remedial Project Manager and Laura Scalise, QA Officer, the PRP is going to analyze TPH, TCL volatile organics, MTBE, and total/dissolved TAL metals in both soil and water. Revise the Oversight QA Plan throughout its entirety, to include split samples for the above parameters only. No additional parameters are to be analyzed as split samples by the oversight personnel.
2. Special Analytical Service (SAS) request must be submitted for the analysis of MTBE by purge and trap GC/MS. CLP QA/QC requirements must be met. Note the lag time for SAS samples is between 4-6 weeks. This lag time must be taken into consideration when scheduling SAS samples through CLP.
3. User's Guide to Contract Laboratory Program was revised in January 1992. References given to this document are outdated and are to be corrected throughout the Work Plan.

Section 7C - Sampling Locations, Page 2.

1. The oversight sampling program should not include any field duplicates, since all split samples are themselves considered duplicate of PRP samples. Delete all sections and statements throughout the Work Plan, specifying that field duplicates will be collected.

Section 7D - Analytical Parameters and their Rationale, Page 2.

1. Re-define the entire text in this section based on the new list of parameters, given in my comments above.
2. Note that cyanide and pest./PCBs are not being analyzed by the PRP and should be deleted from the QA Work Plan.

Section 7F - Trip Blanks, Page 3.

1. Analytical results of deionized water for all blank samples must be submitted to the EPA for approval before sampling starts. A copy of these results must be available on-site for audit.

2. Trip blanks are to be preserved with 1:1 HCl to pH < 2 just like any other aqueous field sample. These must also be maintained at 4° Celsius until received by the laboratory.
3. One MS/MSD sample per matrix is required per 20 field samples in a case, which are submitted to the lab within a 14 calendar day period.

Section 11B - Groundwater Sampling, Page 5.

1. Geraghty and Miller have recently revised their Work Plan and Field Operations Plan. Specify that the PRP will be performing the field operations in accordance with their approved and revised Work Plan and Field Operations Plan.
2. As stated above, pest./PCBs and cyanide samples will not be collected. Delete Procedure Nos. 3 and 7 specifying the splitting of pest./PCBs and the preservation of cyanide samples, respectively.

Section 12E - Samples Bottles, Page 7.

1. State from what source CDM FPC will obtain the sample bottles. Samples bottles are to be prepared in accordance with OSWER Directive # 9240.0-05, Specifications and Guidance for Obtaining Contaminant-Free Sample Containers.

Section 12F - Sample Handling, Packaging, and Shipping, Page 8.

1. The samples are to be shipped to the laboratory within 24 hours of collection via an overnight carrier.
2. Specify that each sample label will be covered with clear waterproof tape to protect it from water and solvent attack. A custody seal is to be placed over the lid of all sample bottles and also the shipping cooler, before shipping it to the laboratory. This will ensure that the samples are not opened prior to their arrival at the laboratory.

Section 16 - Data Validation, Page 10.

1. Specify that the following revised SOPs are to be followed for data validation:

SOP No. HW-2: Inorganic Data Validation, Revision 11,
January 1992

SOP No. HW-6: Organic Data Validation, Revision 8,
January 1992

Table 1 - Parameter Table for Soil, Pages 12 & 13.

1. The extraction of soil for TPH analysis is to be performed according to EPA/Army Corps of Engineers approved Oil and Grease Procedure for Sediment Samples given in Attachment I. After extraction proceed to Step 7.6 in Method 418.1 for TPH analysis.
2. As given in the attached SAS request, VTSR holding time for TPH analysis in soil and groundwater is 26 days and not 24 days.

Table 2 - QA/QC Sample Summary Table, Page 15.

1. The collection of 14 field blanks for 14 investigative samples is excessive. Obtain 2 randomly selected field blanks only as split samples.

Attachment I - EPA/Army Corps of Engineers
Oil and Grease Procedure for Sediment Samples

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