

<p align="center">US Environmental Protection Agency Responses to Comments Pertaining to the Standard Quality Procedures and Standard Operating Procedures from Review of the Responses to Additional Comments on the Draft Remedial Design/Remedial Action Work Plan for the Former Laboratory for Energy-Related Health Research (LEHR) Federal Facility, California, submitted by David Stensby, received October 15, 2010.¹</p>				
Subsequent Comment No.	Original Comment No.	Comment	Response	Revised SQP or SOP
2	General Comment 3 g	The response indicates that copies of the field and laboratory audit checklists have been added to SQP 12.1, but checklists are not included in the document. Further, the Audit Plan provided as attachment 6.1 to SQP 12.1 is not detailed enough to ensure a thorough evaluation of field or laboratory activities will be performed. Please revise the QAPP to include detailed audit checklists.	Field and laboratory audit checklists have been added to SQP 12.1.	Attachments 6.4 and 6.5 of SQP 12.1
4	Specific Comment (SC) 48	The response partially addresses this comment. Specifically, the data validation checklist for metals analyses provided in SOP 21.1 is insufficiently detailed.	The data validation checklist for metals analyses provided in SOP 21.1 was updated.	SOP 21.1, Validation of Metals Data
4	SC 48a	The initial calibration acceptance limits are not included. Please revise the checklist to include the acceptance limits for the initial calibration and indicate how exceedances will be qualified.	Calibration acceptance criteria were included in the checklist.	
4	SC 48b	It is unclear how data will be qualified when exceedances of laboratory duplicate acceptance limits occur. Please revise the checklist to include the qualifiers for laboratory duplicate exceedances.	Criteria for laboratory duplicates that exceed acceptance limits were added.	

¹ Note: Only comments regarding SOPs and SQPs are addressed herein. Comments pertaining to the Revised Draft Remedial Design/Remedial Action Work Plan are not covered. These comments were previously addressed in a separate *Response to Comments* document dated November 5, 2010.

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4	SC 48c	It is unclear which samples will be qualified when a matrix spike and/or matrix spike duplicate (MS/MSD) exceeds acceptance limits. Please revise the checklist to indicate that all data in the analytical group will be qualified when the associated MS/MSD exceeds acceptance criteria.	The checklist was revised to indicate which samples would be qualified when a matrix spike, matrix spike duplicate exceeds acceptable limits.	
4	SC 48d	The checklist indicates that a post digest spike (PDS) may be analyzed when the MS/MSD analysis does not meet control limits; however, a PDS analysis must be conducted when MS/MSD analyses exceed control limits. Please revise the checklist to indicate that a PDS will be performed when MS/MSD analyses exceed acceptance criteria.	The data validation checklist for metals analyses provided in SOP 21.1 was updated to address post-digest spike analysis.	SOP 21.1, Validation of Metals Data
4	SC 48e	The checklist indicates that the percent recovery (%R) acceptance limit for antimony is 10%. However, the referenced Contract Laboratory Program National Functional Guidelines for Inorganic Superfund Data Review (EPA, 2010) does not indicate that antimony should have a lower %R criterion than other metals analytes. Per the aforementioned guidelines, please revise the checklist to specify the %R acceptance limit for antimony as 30%.	The data validation checklist for metals analyses provided in SOP 21.1 was updated to remove the lower %R criterion for antimony.	

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Subsequent Comment No.	Original Comment No.	Comment	Response	Revised SQP or SOP
Additional Comment 8	NA	The response partially addresses this comment. The field duplicate acceptance limits are listed as 100% according to SOP 21.1. However, this limit appears to be elevated, especially for water samples. Consideration should be given to using an acceptance limit of 50% for soil samples and 35% for water samples. If sample heterogeneity is a concern, steps should be taken to reduce potential heterogeneity as it is otherwise unclear how reliable decisions can be made. Please revise SOP 21.1 to use lower acceptance limits when evaluating field duplicates.	Agree. Field duplicate acceptance limits were updated to 50% for soil samples and 35% for water samples.	SOP 21.1, Validation checklists.