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5085

SEP 19 2003

Mr. James Saric, Remedial Project Manager  
United States Environmental Protection Agency  
Region V, SRF-5J  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

DOE-0520-03

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5<sup>th</sup> Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**SITEWIDE CERCLA QUALITY (SCQ) ASSURANCE PROJECT PLAN RESPONSE TO  
U. S. EPA COMMENTS AND DOCUMENT CHANGE REQUESTS INCORPORATION**

- Reference: 1) Letter, J. Saric, U. S. EPA, to J. Reising, DOE/FCP, SCQ  
Document Change Requests 2, dated July 24, 2003
- 2) Letter, G. Griffiths, DOE/FCP to J. Saric, U. S. EPA and T. Schneider,  
OEPA, "Request for Extension of Submittal of the Response to U. S. EPA  
Comments and the Sitewide CERCLA Quality Assurance Project Plan,"  
Dated August 25, 2003

Enclosed are the responses to the U. S. EPA's comments and a revised Sitewide CERCLA  
Quality (SCQ) Assurance Project Plan with Document Change Requests (DCRs)  
incorporated.

Most of the changes are minor technical corrections (such as the replacement of cancelled  
DOE Orders, the removal of analytical methods no longer used, or the addition of  
references to the Integrated Safety Management).

SEP 19 2003

Mr. Saric  
Mr. Schneider

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If you have any questions or need further information, please contact Joe Neyer at (513) 648-3178 or Johnny Reising at (513) 648-3139.

Sincerely,

Glenn Griffiths  
Acting Director

Enclosure: As Stated

cc w/enclosure:

N. Hallein, EM-31/CLOV  
T. Schneider, OEPA-Dayton (three copies of enclosure)  
G. Jablonoswski, USEPA-V, SR-6J  
F. Bell, ATSDR  
M. Cullerton, Tetra Tech  
J. Sattler, OH/FCP  
M. Shupe, HSI GeoTrans  
R. Vandegrift, ODH  
J. Reising, OH/FCP  
J. Neyer, OH/FCP  
D. Carr, Fluor Fernald, Inc./MS1  
J. Chambers, Fluor Fernald, Inc./MS90  
J. Jameson, Fluor Fernald, Inc./MS1  
T. Hagen, Fluor Fernald, Inc./MS1  
T. Poff, Fluor Fernald, Inc./MS65-2  
B. Varchol, Fluor Fernald, Inc./MS30  
D. Whitaker-Sheppard, Fluor Fernald, Inc./MS1  
AR Coordinator, Fluor Fernald, Inc./MS6  
ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO U.S. EPA COMMENTS ON  
THE SITEWIDE CERCLA QUALITY (SCQ) ASSURANCE PROJECT PLAN  
DOCUMENT CHANGE REQUESTS**

**FERNALD CLOSURE PROJECT  
FERNALD, OHIO**

**SEPTEMBER 2003**

**U.S. DEPARTMENT OF ENERGY**

Method 5035 VOA Soil Collection Options

DRAFT  
April 2003

The USEPA Analytical Operations/Data Quality Center (AOC) is proposing the following options for the collection of soil samples for Volatile Organic Analysis (VOA) for the Contract Laboratory Program (CLP).

Each proposed option is provided below along with a rationale for the number of containers (vials or samplers) required for the field sample and the required laboratory Quality Control (QC).

**A. The Preferred Options for the CLP are Options 1, 2, and 3:**

**Option 1. Closed System Vials: Container - tared or preweighed 40 mL VOA vials**

5 g of soil - iced or frozen in the field

**Regular Samples:** 3 Total Vials

**QC Samples Only:** 3 regular vials  
8 QC vials  
11 Total Vials

**Rationale for Regular Vials:** 1 vial for low-level analysis (water purge)  
1 vial for backup low-level analysis  
1 vial for medium-level analysis (methanol extraction)

**Rationale for QC Vials:** 2 vials for Matrix Spike (MS) and Matrix Spike Duplicate (MSD) low-level analysis  
2 vials for backup MS and MSD low-level analysis  
2 vials for MS and MSD medium-level analysis  
2 vials for backup MS and MSD medium-level analysis

**Option 2. Closed System Vials: Container - tared or preweighed 40 mL VOA vials**

5 g of soil + 5 mL water - iced

**Regular Samples:** 2 vials with water  
1 vial-dry\*  
3 Total Vials (2 vials with water and 1 vial-dry\*)

**QC Samples only:** 2 regular vials with water + 1 vial-dry\*  
4 vials with water + 4 vials-dry\*  
11 Total Vials (6 vials with water and 5 vials-dry\*)

\* No water added to these samples.

**Rationale for Regular Vials:** 1 vial for low-level analysis (water purge)  
1 vial for backup low-level analysis  
1 vial for medium-level analysis (methanol extraction)

**Rationale for QC Vials:** 2 vials for MS and MSD low-level analysis

- 2 vials for backup MS and MSD low-level analysis
- 2 vials for MS and MSD medium-level analysis
- 2 vials for backup MS and MSD medium-level analysis

Medium Level Analysis: Methanol added at the laboratory.

### **Option 3. EnCore™ Samplers**

EnCore sampler container.

All samples should be cooled to 4°C and bagged individually.

**Regular Samplers:** 3 Total Samplers

**QC Samplers Only:** 3 regular samplers  
 8 QC samplers  


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 11 Total Samplers

**Rationale for Regular Samplers:** 1 sampler for low-level analysis (water purge)  
 1 sampler for backup low-level analysis  
 1 sampler for medium-level analysis (methanol extraction)

**Rationale for QC Samplers:** 2 samplers for MS and MSD low-level analysis  
 2 samplers for backup MS and MSD low-level analysis  
 2 samplers for MS and MSD medium-level analysis  
 2 samplers for backup MS and MSD medium-level analysis

### **B. Options 4, 5, and 6 are NOT Preferred Options for the CLP:**

#### **Option 4. Closed System Vials: Container - tared or preweighed 40 mL VOA vials**

5 g of soil + 5 mL water + 1 g NaHSO<sub>4</sub> - iced

a. Samples preserved in the field:

**Regular Samples:** 2 vials with water  
 1 vial-dry\*  


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 3 Total Vials (2 vials with water and 1 vial-dry\*)

**QC Samples only:** 2 regular vials with water + 1 regular vial-dry\*  
 6 QC vials with water + 2 QC vials-dry\*  


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 11 Total Vials (8 vials with water and 3 vials-dry\*)

b. Samples preserved at the laboratory:

**Regular Samples:** 3 Total Vials-dry\*





QC Samples Only: 3 regular vials-dry\*  
8 QC vials-dry\*  
11 Total Vials

\* No water or NaHSO4 added to these samples.

**Option 5. Methanol Preservation (only medium level analysis): Container - tared or preweighed 40 mL VOA vials**

5 g of soil + 10 mL methanol - iced

Regular Samples: 2 Total Vials

QC Samples Only: 2 regular vials  
4 QC vials  
6 Total Vials

Rationale for Regular Samples: 1 vial for regular medium-level analysis  
1 vial for backup medium-level analysis

Rationale for QC Samples: 2 samples for MS and MSD  
2 samples for backup MS and MSD

**Option 6. Two Glass Containers 4 oz jars filled with sample - no head space.**

Samples must be iced.

**C. All options will include a 40 mL VOA vial or a 4 oz wide-mouth jar with no headspace for moisture analysis.**

**D. Notes:**

1. The holding time for all options is 7 days from the date of collection. AOC strongly recommends that all samples be cooled to between 1 and 4°C immediately after collection and samples should reach the laboratory within 24 hours of sample collection.
2. For Option 4, samples can be preserved with NaHSO4 either:
  - a. in the field; or
  - b. in the Laboratory upon receipt: In this case, the sampler must note in the comments section of the Traffic Report/Chain of Custody (TR/COC) Record that the Laboratory must preserve with NaHSO4. This Regional Request should also be communicated to the Sample Management Office (SMO) so that the Laboratory can be notified.
3. Quality Assurance Project Plans (QAPPs) may require the use of Option 5. Please note that this option is for medium-level analysis ONLY.