

[This text replaces similarly numbered paragraphs in the Model Remedial Investigation/Feasibility Study [Statement of Work.](#)]

U.S. Environmental Protection Agency

Office of Site Remediation Enforcement

August, 2001

QA/QC INSERTS FOR RI/FS SOW

TASK 1 - SCOPING

Sampling and Analysis Plan (2.3.2)

The respondent will prepare a sampling and analysis plan (SAP) to ensure that sample collection and analytical activities are conducted in accordance with technically acceptable protocols and that the data meet DQOs. The SAP provides a mechanism for planning field activities and consists of a field sampling plan (FSP) and a quality assurance project plan (QAPP).

The FSP will define in detail the sampling and data-gathering methods that will be used on the project. It will include sampling objectives, sample location and frequency, sampling equipment and procedures, and sample handling and analysis. The QAPP will describe the project objectives and organization, functional activities, and quality assurance and quality control (QA/QC) protocols that will be used to achieve the desired DQOs. **The QAPP will be prepared in accordance with “EPA Requirements for Quality Assurance Project Plans (QA/R-5)” (EPA/240/B-01/003, March 2001) and “EPA Guidance for Quality Assurance Project Plans (QA/G-5)” (EPA/600/R-98/018, February 1998).** The DQOs will at a minimum reflect use of analytic methods to identifying contamination and remediating contamination consistent with the levels for remedial action objectives identified in the proposed National Contingency Plan, pages 51425-26 and 51433 (December 21, 1988). In addition, the QAPP will address sampling procedures, sample custody, analytical procedures, and data reduction, validation, reporting and personnel qualifications. Field personnel should be available for EPA QA/QC training and orientation where applicable. The respondent will demonstrate, in advance to EPA's satisfaction, that each laboratory it may use is qualified to conduct the proposed work. This includes use of methods and analytical protocols for the chemicals of concern in the media of interest within detection and quantification limits consistent with both QA/QC procedures and DQOs approved in the QAPP for the site by EPA. The laboratory must have and follow an

approved QA program. If a laboratory not in the Contract Laboratory Program (CLP) is selected, methods consistent with CLP methods that would be used at this site for the purposes proposed and QA/QC procedures approved by EPA will be used. **The respondent shall only use laboratories which have a documented Quality Assurance Program which complies with ANSI/ASQC E-4 1994, "Specifications and Guidelines for Quality Systems for Environmental Data Collection and Environmental Technology Programs," (American National Standard, January 5, 1995) and "EPA Requirements for Quality Management Plans (QA/R-2)" (EPA/240/B-01-002, March 2001) or equivalent documentation as determined by EPA.** If the laboratory is not in the CLP program, a laboratory QA program must be submitted for EPA review and approval. EPA may require that the respondent submit detailed information to demonstrate that the laboratory is qualified to conduct the work, including information on personnel qualifications, equipment and material specifications. The respondent will provide assurances that EPA has access to laboratory personnel, equipment and records for sample collection, transportation and analysis.

TASK 3 - SITE CHARACTERIZATION

Investigate and define site physical and biological characteristics (3.2.2)

The respondent will collect data on the physical and biological characteristics of the site and its surrounding areas including the physical physiography, geology, and hydrology, and specific physical characteristics identified in the work plan. This information will be ascertained through a combination of physical measurements, observations, and sampling efforts and will be utilized to define potential transport pathways and human and ecological receptor populations. In defining the site's physical characteristics the respondent will also obtain sufficient engineering data (such as pumping characteristics) for the projection of contaminant fate and transport, and development and screening of remedial action alternatives, including information to assess treatment technologies.

Define sources of contamination (3.2.3)

The respondent will locate each source of contamination. For each location, the areal extent and depth of contamination will be determined by sampling at incremental depths on a sampling grid. The physical characteristics and chemical constituents and their concentrations will be determined for all known and discovered sources of contamination. The respondent shall conduct sufficient sampling to define the boundaries of the contaminant sources to the level established in the ~~QA/QC plan~~ **QAPP** and DQOs.

Defining the source of contamination will include analyzing the potential for contaminant release (e.g., long term leaching from soil), contaminant mobility and persistence, and characteristics important for evaluating remedial actions, including information to assess treatment technologies.

Describe the nature and extent of contamination (3.2.4)

The respondent will gather information to describe the nature and extent of contamination to describe the nature and extent of contamination as a final step during the field investigation. To describe the nature and extent of contamination, the respondent will utilize the information on site physical and biological characteristics and sources of contamination to give a preliminary estimate of the contaminants that may have migrated. The respondent will then implement an iterative monitoring program and any study program identified in the work plan or SAP such that by using analytical techniques sufficient to detect and quantify the concentration of contaminants, the migration of contaminants through the various media at site can be determined. In addition, the respondent will gather data for calculations of contaminant fate and transport. This process is continued until the area and

depth of contamination are known to the level of contamination established in the ~~QA/QC plan~~ **QAPP** and DQOs. EPA will use the information on the nature and extent of contamination to determine the level of risk presented by the site. Respondents will use this information to help to determine aspects of the appropriate remedial action alternatives to be evaluated.

b. Data Analysis (3.4)

Evaluate site characteristics (3.4.1)

The respondent will analyze and evaluate the data to describe: (1) site physical and biological characteristics, (2) contaminant source characteristics, (3) nature and extent of contamination and (4) contaminant fate and transport. Results of the site physical characteristics, source characteristics, and extent of contamination analyses are utilized in the in the analysis of contaminant fate and transport. The evaluation will include the actual and potential magnitude of releases from the sources, and horizontal and vertical spread of contamination as well as mobility and persistence of contaminants. Where modeling is appropriate, such models shall be identified to EPA in a technical memorandum prior to their use. All data and programming, including any proprietary programs, shall be made available to EPA together with a sensitivity analysis. The RI data be presented in a format (i.e., computer disc or equivalent) to facilitate EPA's preparation of the baseline risk assessment. The Respondent shall agree to discuss and then collect any data gaps identified by the EPA that is needed to complete the baseline risk assessment. (See "Guidance for Data Useability in Risk Assessment - OSWER Directive # 9285.7-05 - October 1990.) Also, this evaluation shall any information relevant to site characteristics necessary for evaluation of the need for remedial action in the baseline risk assessment and for the development and evaluation of remedial alternatives. Analysis of data collected for site characterization will meet the DQOS developed in the ~~QA/QC plan~~ **QAPP** stated in the SAP (or revised during the RI).

REFERENCES FOR CITATION

The following list, although not comprehensive, comprises many of the regulations and guidance documents that apply to the RI/FS process:

The (revised) National Contingency Plan

"Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA," U.S. EPA, Office of Emergency and Remedial Response, October 1988, OSWER Directive No. 9355.3-01

"Interim Guidance on Potentially Responsible Party Participation in Remedial Investigation and Feasibility Studies," U.S. EPA, Office of Waste Programs Enforcement, Appendix A to OSWER Directive No. 9355.3-01.

"Guidance on Oversight of Potentially Responsible Party Remedial Investigations and Feasibility Studies, **Volume I**" U.S. EPA, Office of Waste Programs Enforcement, **July 1, 1991**, OSWER Directive No. 9835.31(c).

"Guidance on Oversight of Potentially Responsible Party Remedial Investigations and Feasibility Studies, Volume II" U.S. EPA, Office of Waste Programs Enforcement, July 1, 1991, OSWER Directive No. 9835.1(d).

"A Compendium of Superfund Field Operations Methods," Two Volumes, U.S. EPA, Office of Emergency and Remedial Response, EPA/540/P-87/001a, August 1987, OSWER Directive No. 9355.0-14.

~~"EPA NEIC Policies and Procedures Manual," May 1978, revised November 1984, EPA-330/9-78-001-R.~~

~~"Data Quality Objectives for Remedial Response Activities," U.S. EPA, Office of Emergency and Remedial Response and Office of Waste Programs Enforcement, EPA/540/G-87/003, March 1987, OSWER Directive No. 9335.0-7B.~~

"Guidance for the Data Quality Objectives Process (QA-G-4)," (EPA/600/R-96/055, August 2000).

"Guidance for the Data Quality Objectives Process for Hazardous Waste Sites (QA/G-4HW)," (EPA/600/R-00/007, January 2000).

"Guidance for the Preparation of Standard Operating Procedures (QA-G-6)," (EPA/240/B-01/004, March 2001).

~~"Guidelines and Specifications for Preparing Quality Assurance Project Plans," U.S. EPA, Office of Research and Development, Cincinnati, OH, QAMS-004/80, December 29, 1980.~~

~~"Interim Guidelines and Specifications for Quality Assurance Project Plans," U.S. EPA, Office of Emergency and Remedial Response, QAMS-005/80, December 1980.~~

"EPA Requirements for Quality Management Plans (QA/R-2)," (EPA/240/B-01/002, March 2001).

"EPA Requirements for Quality Assurance Project Plans (QA/R-5)" (EPA/240/B-01/003, March 2001).

"Guidance for Quality Assurance Project Plans (QA/G-5)" (EPA 600/R-98/018, February 1998).

"User's Guide to the EPA Contract Laboratory," U.S. EPA, Sample Management Office, ~~August 1982.~~**January 1991, OSWER Directive No. 9240.0-01D.**

~~"Interim Guidance with Applicable or Relevant and Appropriate Requirements," U.S. EPA, OFFICE of Emergency and Remedial Response, July 9, 1987, OSWER Directive No. 9234.0-05.~~

"CERCLA Compliance with Other Laws Manual," Two Volumes, U.S. EPA, Office of Emergency and Remedial Response, August 1988 (draft), OSWER Directive No. 9234.1-01 and -02.

"Guidance on Remedial Actions for Contaminated Ground Water at Superfund Sites," U.S. EPA, Office of Emergency and Remedial Response, (draft), OSWER Directive No. 9283.1-2.

"Draft Guidance on Superfund Decision Documents," U.S. EPA, Office of Emergency and Remedial Response, March 1988, OSWER Directive No. 9355.-02

"Risk Assessment Guidance for Superfund - Volume I Human Health Evaluation Manual (Part A), EPA/540/1-89/002

~~"Risk Assessment Guidance for Superfund - Volume II Environmental Evaluation Manual," March 1989, EPA/540/1-89/001~~

"Ecological Risk Assessment Guidance for Superfund: Process for Designing & Conducting Ecological Risk Assessments," U.S. EPA, OSWER Directive, No. 9285.7-25, February 1997.

"Guidance for Data Useability in Risk Assessment," October, 1990, EPA/540/G-90/008

"Performance of Risk Assessments in Remedial Investigation/Feasibility Studies (RI/FSs) Conducted by Potentially Responsible Parties (PRPs)," August 28, 1990, OSWER Directive No.9835.15.

"Supplemental Guidance on Performing Risk Assessments in Remedial Investigation Feasibility Studies (RI/FSs) Conducted by Potentially Responsible Parties (PRPs)," July 2, 1991, OSWER Directive No. 9835.15(a).

"Role of the Baseline Risk Assessment in Superfund Remedy Selection Decisions," April 22, 1991, OSWER Directive No. 9355.0-30.

"Health and Safety Requirements of Employed in Field Activities," U.S. EPA, Office of Emergency and Remedial Response, July 12, 1981, EPA Order No. 1440.2.

OSHA Regulations in 29 CFR 1910.120 (Federal Register 45654, December 19, 1986).

"Interim Guidance on Administrative Records for Selection of CERCLA Response Actions," U.S. EPA, Office of Waste Programs Enforcement, March 1, 1989, OSWER Directive No. 9833.3A.

"Community Relations in Superfund: A Handbook," U.S. EPA, Office of Emergency and Remedial Response, ~~June 1988~~ **January 1992**, OSWER Directive No. ~~9230.0-3B~~ **9230.0-3C**.

"Community Relations During Enforcement Activities And Development of the Administrative Record," U.S. EPA, Office of **Waste** Programs Enforcement, November 1988, OSWER Directive No. 9836.0-1a.