

December 21, 2023

United States Environmental Protection Agency
Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

Attn: Ms. Jennifer Morris, Project Officer

**RE: Response to EPA Comments
Quality Assurance Project Plan
Cooperative Agreement Number: 4B96705601
1000 Block of South 4th Street Project
Air Sampling During Building Demolition and Building Debris Removal and UST
Removal
1000, 1002, 1004, 1006 – 1008, and 1010 – 1012 South 4th Street
Clinton, Iowa**

Dear Ms. Morris:

Blackstone Environmental, Inc. (Blackstone) received the conditional approval memorandum (R7QAO Document Number: 2024020) regarding the Quality Assurance Project Plan (QAPP) for Brownfields Cleanup Grant 4B96705601. The QAPP was prepared on behalf of the City of Clinton. U.S. Environmental Protection Agency (EPA) comments and our response to each are provided below. A revised (redlined) version of the QAPP that includes the requested information/clarification as requested by the EPA has been prepared and is saved with the City of Clinton files. EPA comments and our response to each are provided below in bold text:

CRITICAL COMMENTS

1. *Table 2.2, Summary of Field and QC Samples to be Collected: This table needs to be completed to include the QC samples for the UST removal groundwater sample or state zero QC samples not just blank, if applicable.*

Blackstone has modified the table to include the QC samples for the underground storage tank (UST) removal groundwater sample. The revised table is below.

| Table 2.2 – Summary of Field and QC Samples to be Collected | | | | | | | |
|---|------------------|---------------------------|------------------------------|--------------------------------|----------------------------|--------------------------|-------------------------|
| Sampling | Matrix | Analytical Parameters | Number of Sampling Locations | Number of Field Duplicates | Number of Equipment Blanks | Number of MS/MSD Samples | Total Number of Samples |
| Debris Pile | Air | PCM | 3 | 1 every approximate 10 samples | Not Applicable | Not Applicable | 53 |
| During Demolition and Debris Pile Removal | Air | PCM | 8 | 1 | Not Applicable | Not Applicable | 90 |
| Personal – eight-hour TWA | Air | PCM | 2 | 0 | Not Applicable | Not Applicable | 20 |
| Personal – 30-minute excursion limit | Air | PCM | 1 | 0 | Not Applicable | Not Applicable | 10 |
| UST Removal – Testing of contents | Liquid or Sludge | Iowa Method OA-2 | 1 | 0 | 0 | 0 | 1 |
| UST Removal | Soil | Iowa Method OA-1 and OA-2 | TBD | 1 | 1 | 0 | TBD |
| UST Removal | Groundwater | Iowa Method OA-1 and OA-2 | 1 | 1 | 1 | 0 | 3 |

2. *Tables 2.4 and 2.6, Analytical Method, Container, Preservation, and Holding Time Requirements: These tables specify preservation 4 degrees Celsius and holding times 14 business days for TEH and/or BTEX for liquid/sludge and groundwater samples, however, for aqueous samples analyzed by Method OA-2 states samples cooled need to be extracted within 7 days and Method OA-1 states samples cooled but unpreserved analyzed within 7 days or if preserved with HCL within 14 days. Therefore, the holding times and preservation need to be verified and appropriately addressed.*

According to Teklab, Inc., the preservation for groundwater samples to be analyzed for Iowa Method OA-1 is cooled to 4 degrees Celsius and the holding time is seven days. For groundwater samples to be analyzed by Iowa Method OA-2, the samples are to be cooled to 4 degrees Celsius and analyzed within seven days or 14 days when preserved with HCL. The tables have been modified and are provided below.

| Table 2.4 – Analytical Method, Container, Preservation, and Holding Time Requirements | | | | |
|---|--------------------------|----------------|--------------|----------------------|
| Matrix: Liquid/Sludge | | | | |
| Analytical Parameter | Analytical Method Number | Containers | Preservation | Maximum Holding Time |
| TEH | Iowa Method OA-2 | 4-oz glass jar | 4° Celsius | 7 days |

| Table 2.6 – Analytical Method, Container, Preservation, and Holding Time Requirements | | | | |
|---|--------------------------|------------------|-------------------------------|---|
| Matrix: Groundwater | | | | |
| Analytical Parameter | Analytical Method Number | Containers | Preservation | Maximum Holding Time |
| TEH | Iowa Method OA-2 | 250 mL amber jar | 4° Celsius | 7 days |
| BTEX | Iowa Method OA-1 | 250 mL amber jar | 4° Celsius/4° Celsius and HCL | 7 days without HCL preservation/14 days with HCL preservation |

GENERAL COMMENTS

3. *Section 1.13.2, Labels and Section 2.3, Sample Handling and Custody: These sections state “A copy of an example label is included in Appendix A,” however, no example was found. Therefore, it would be helpful to include the example.*

A copy of an example label is included in Appendix A of this letter.

4. *Section 2.6, Instrument/Equipment Testing, Inspection, and Maintenance: It would be helpful if this section addressed the availability and location of spare parts.*

The section has been modified as follows:

Field equipment will be calibrated, tested, and inspected in accordance with the manufacturers’ specifications. Calibration and maintenance documents, battery chargers, and spare parts will be stored in the case alongside the associated field equipment or in a field logbook as appropriate.

We appreciate your comments and are confident we have addressed the issues. If you would like to discuss further or need additional information, feel free to contact either of the undersigned.

Respectfully,

BLACKSTONE ENVIRONMENTAL, INC.

A handwritten signature in blue ink that reads 'Eric Sonsthagen'.

Eric Sonsthagen, P.E.
Senior Project Engineer

A handwritten signature in blue ink that reads 'Krista A. Brodersen'.

Krista A. Brodersen
Senior Project Manager

Appendix A: Example Label

APPENDIX A

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Example Label

Client ID: Blackstone - Moline, IL

Project:

V_8260S_W

Samp ID: _____

Collected: _____

80425

Bottle: 40ml Vial, pre-cleaned, HCl, pH < 2