



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
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Mr. Narendra Prasad  
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Environmental Services Department  
200 East Randolph Street, 24th Floor  
Chicago, IL 60601

January 4, 2018

Subject: Review of Multi-Site Quality Assurance Project Plan Addendum Number 3 (QAPP Addendum No. 3), dated November 3, 2017 for Multi-Site Former Manufactured Gas Plant Program, The People's Light and Coke Company (PGL), North Shore Gas Company (NSG), and Wisconsin Public Service Corporation (WPSC).

Dear Mr. Prasad,

Thank you for providing EPA the Multi-Site QAPP Addendum No. 3 for review. EPA has the following comments:

1. The purpose of the QAPP Addendum No. 3, as stated in the first paragraph of the letter, is to incorporate changes or additions to the following elements of the program:
  - laboratories,
  - vapor intrusion (VI) and soil gas evaluation,
  - sample duplicate evaluation, and
  - to address slow groundwater recharge in Chicago site monitoring wells.

However, other than the update to the laboratories, this Addendum 3 does not appear to contain modifications to the field duplicate evaluation (previously modified in the Multi-Site QAPP Addendum No. 1 dated March 2012), or the slow groundwater recharge (previously presented in the Multi-Site QAPP Addendum No. 2 dated August 2014). Both of these addendums were attached, but have been previously approved by EPA. It is unclear whether there were new changes in Addendum 3 to the field duplicate or slow groundwater recharge sections, or if Addendums 1 and 2 were simply included for reference purposes. Please clarify.

2. Organization Chart: Recommend inserting names in the darker blue boxes (WBS and Consultant) to be consistent with the approval page. Please also check pagination of the document, as QAPP Worksheet 6 starts on Page 10 rather than 9, and the organization chart is on page 11.
3. Table 1A: The text for some of the table footnotes appears to be cut-off and could not be reviewed.

4. Tables 1A-1D, 2A-2D, 3, 4, (Footnote "c"): Not all of the analytical methods referenced in the table refer to SW-846 Test Methods for Evaluating Solid Waste as indicated in table footnotes. Suggest adding the applicable method references.
5. Table series 1A-1D & 2A-2D have footnotes pertaining to "PQLs" (footnotes 1. and 2.). However, PQLs are not presented in the tables. Please explain the intent of presenting this PQL information in the table footnotes. Also, the PQL footnotes refer to "Surface water and sediment", while the content of the tables is either water or soil/sediment. For example, footnote No. 2 in tables 1A-1D (specific to the water matrix) includes 'normalizing to 1% TOC', 'sediments are reported on a dry weight basis', and 'RLs will vary based on the percent solids of the sediment samples'. The footnotes should be adjusted to pertain to the matrix being presented in the table.
6. Multiple Tables (1A-1D and 2A-2D): "Pesticides" and "PCBs" are presented only by analyte class with a 'range' of laboratory limits. Suggest including the individual analytes for pesticides and PCBs consistent with the other analyte groups.
7. Multiple Tables (1A-1D): Hexavalent chromium is erroneously presented as "Chromium IV" and should be "Chromium VI". Table 1B appears to have been revised, but the edit is visible. (Another edit was observed in Table 2B, see the CAS Number for Chlordane.)
8. Multiple Tables: The "Bold Underline Text" footnote indicates the laboratory will provide an alternate method than what is identified in the method column. In some tables "Alternate Methods Provided" are presented at the end of the table. The alternate methods provided at the end of each table do not appear to include some of the analytes indicated with the bold underline text. Please provide proposed laboratory methods.
9. Tables 1D and 2D: The last column pair is labeled "Pace Grand Rapids", what lab location are the other three column pairs in these tables?
10. Multiple Tables (especially tables 1D and 2D): Please provide further explanation when "na" (not applicable) is presented in the table in the RL or MDL fields, or update the fields containing "na" as appropriate.
11. Tables 2A-2B: The first column of each table "Project Compound List" has an asterisk, defined in the footnotes as, "MDLs and RLs for alkylated PAHs are based on associated parent PAHs." Please place the "\*" in the MDL or RL column or on the actual compounds that are affected for clarity. Also, please justify the appropriateness of using lab limits for parent samples, but not specifying them for the specific alkylated PAHs.
12. Table 2B: Why are the MDL and RL cells shaded grey for available cyanide?
13. Tables 3 and 7: The intent of tables 3 and 7 are unclear as they both appear to present the same information. The table 7 title indicates the table should present "Analytical Methods, Method Detection Limits and Reporting Limits" (similar to table series 1 and 2), however these laboratory limit values are not presented in table 7; while the multi-site QAPP Addendum No. 3 letter states tables 5 through 7 present the laboratories and range of services. Footnote A in Table 4 states the list of analytes, laboratory method and the method detection limit for each parameter are included in Tables 1-3 of the QAPP Addendum 3. Please clarify.
14. Tables 3 and 7: The compound list for each analytical group, MDLs, and RLs should be presented in either table 3 or 7.

15. Tables 3 and 7: There appears to be some discrepancies between tables 3 and 7. The table 7 title includes air, vapor, and soil gas matrices, while table 3 only indicates soil gas and vapor; and different method references including which methods include SIM.
16. Table 3, The text for some of the table footnotes appears to be cut-off and could not be reviewed. Where is the reference in the table located for footnote A?
17. Table 4 (first page): The row directly under Gasoline Range Organics does not have an analysis name presented in the first column. In the same row, please spell out or define the acronym "AK" in the "Minimum Volume/Size" column; AK is also presented in the "Method(s)" column for multiple rows in table 4.
18. Table 4: Many of the analytical method references in table 4 do not match the methods referenced in tables 1 & 2. Please revise and clarify.
19. Table 4: the "Note for Soils", in the row for Total Petroleum Hydrocarbons is cut-off.
20. Tables 5, 6, and 7: The table titles state, "Analytical Methods, Method Detection Limits (MDL), and Reporting Limits (RL)", however MDLs and RLs are not presented in these tables. Please revise accordingly.
21. Tables 5 and 6: It appears no labs are checked for Parameter/Method "Method 8021B (Act 201 List)" in table 5, or in the last two rows of table 6, "solid phase microextraction for PCBs" and "solid phase microextraction for other". Please revise or delete row.
22. Table 6: What is the intent of the expanded PAH list in footnote 2? There are 51 analytes listed in the footnote, 16 of which are not presented in the MDL and RL tables (1A-2D). Please revise and clarify.
23. Table 8, last row: There appears to be a typo, the reporting unit for Strength is presented as "pounds per foot inch" in the table. Please verify the units and abbreviation are correct.

Please address the comments provided and resubmit the document.

Best regards,



Margaret Gielniewski

Electronic cc:

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