



RMT, Inc.
744 Heartland Trail
P.O. Box 8923
Madison, WI 53708-8923
Phone: 608-831-4444
FAX: 608-831-3334

November 1, 1991

Mr. Robert Dean Smith
Remedial Project Manager
United States Environmental Protection Agency
230 S. Dearborn Street (5 HR-12)
Chicago, IL 60604

RE: Cook Composites & Polymers, Pre-QAPjP Meeting Minutes

Dear Mr. Smith:

Enclosed are the pre-QAPjP meeting minutes documenting our meeting held on September 30, 1991. Three extra copies are enclosed for your distribution to David Payne, Mike DeRosa, and Stephanie Nguyen. Jill Fermanich and Tim Mulholland will also receive these meeting minutes.

On behalf of CCP, we intend to send the QAPjP for your review around November 20, 1991. Please contact us at 608/831-4444 with any comments or concerns.

Sincerely,

James S. Rickun
Program Manager
Air Pollution Engineering

kk

Enclosure

cc/enc: Craig Bostwick
Tim Mulholland
Jill Fermanich

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**MEETING MINUTES
QUALITY ASSURANCE PROJECT PLANS
Cook Composites and Polymers**

The purpose of these minutes is to document the pre-QAPjP meeting discussions held on September 30, 1991, among Cook Composites and Polymers (CCP), RMT, Inc. (RMT), and the United States Environmental Protection Agency (USEPA). The meeting was held at 536 South Clark Street in Chicago, Illinois. Issues concerning the Quality Assurance Project Plans were discussed for the CCP site in Saukville, Wisconsin. The list of attendees is attached as Table 1. The Wisconsin Department of Natural Resources (WDNR) was invited to attend but was unable to make the meeting because of prior work commitments.

Background

The Revised Project Plans Tasks 3A, 3B, and 3C (Hatcher-Sayre, April 1991) and the laboratory QAPjP (Enseco, January 1991) were previously prepared by Hatcher-Sayre and Enseco Laboratories, respectively. The project QAPjP consists of these two documents, which have been under development since 1987. The USEPA commented on both of these documents in a memorandum dated June 25, 1991. As CCP's new consultant, RMT will address these comments to obtain USEPA approval of the QAPjP.

Purpose of the Meeting

The pre-QAPjP meeting was held for the following purposes:

1. To resolve laboratory issues concerning elevated detection limits for organic constituents analyzed in ground water samples collected from within the contaminant plume.
2. To present RMT's proposed sampling and analysis objectives and ground water monitoring program.
3. To discuss how the USEPA comments will be incorporated into the existing Project Plans by RMT.
4. To discuss the content and preparation of laboratory QAPjP procedures for RMT Laboratories to perform analyses for remedial measures at the Saukville site.

The meeting agenda is attached as Table 2. The minutes that follow summarize the agreements made between CCP and the USEPA concerning the QAPjP. If no consensus was reached on an issue, then the various opinions are stated from each group.

Appendix IX Sampling and Analysis

The USEPA stated that Appendix IX testing would be required at the Saukville site as a matter of policy for the purpose of characterizing the nature of contamination under RCRA. RMT proposed a truncated Appendix IX list, which excluded contaminants that are not a result of past operations at the

site, such as pesticides and herbicides. Bob Smith/USEPA discussed this proposal with RCRA Enforcement following the meeting, but the result of these discussions was that the full Appendix IX list must be analyzed for in ground water.

The number, location, and frequency of Appendix IX testing was also discussed. Hatcher-Sayre had formerly proposed a one-time sampling event at one location, according to the Project Plans. The USEPA stated that one sample would not be sufficient to characterize the nature of contamination at the site. RMT and CCP acknowledged this and proposed that three ground water samples be collected from within the plume for Appendix IX analyses.

Sample dilutions will be required for Appendix IX volatile and semivolatile analyses because of the high levels of toluene, xylene, and ethylbenzene compounds present within the plume. It was agreed at this meeting that dilution of the ground water samples collected from within the plume was more representative than analyzing samples collected from the perimeter of the plume, which do not require dilution for analysis.

The following procedures will be used for sample dilution prior to Appendix IX volatile and Appendix IX semivolatile analyses.

Volatiles - Method 8240

All samples will be screened using a HP 5890 gas chromatograph with a flame ionization detector (FID).

The purgeable organics screening procedure will show approximate concentrations of major sample components. After the screening is completed, a dilution factor, if necessary, will be calculated such that the concentration of the major sample component in the mass spectrometer run shall be within the upper half of the initial calibration range of that particular instrument.

If a dilution was needed to achieve the upper range requirement, a secondary analysis will be required. This analysis will require the sample to be run 10 times more concentrated than that of the primary analysis. When the primary dilution factor is 10 or smaller, the sample will be analyzed undiluted (straight).

Since o and p xylene overlap, the upper calibration limit for these isomers is 400 µg/L.

Semivolatiles - Method 8270

All samples will be screened by GC/FID on a Shimadzu GC-14A to determine the level of BTEX. Based on that preliminary information, an initial dilution may be employed to prevent saturation of the GC/MS.

The initial GC/MS analysis for the following Appendix IX analytes may be performed on a diluted extract:

| | |
|---------------------------|------------------------|
| 1,4-dioxane | methylmethacrylate |
| n-nitrosodimethylamine | pyridine |
| ethylmethacrylate | 2-picoline |
| n-nitrosomethylethylamine | methylmethanesulfonate |
| n-nitrosodiethylamine | ethylmethanesulfonate |

These analytes will have elevated reporting limits due to the dilution factor required to prevent chromatographic saturation of BTEX. If the initial analysis is required, the first surrogate, namely 2-fluorophenol, may be outside RMT's Quality Control limit.

Based on the initial GC/MS analysis, reanalysis of the sample may be performed at a higher concentration for the remaining Appendix IX analytes.

The procedures described for Appendix IX volatile analyses were agreed to at the meeting with David Payne/USEPA. The procedures described for Appendix IX semivolatile analyses are proposed by RMT Laboratories.

Sampling and Analysis Objectives and Ground Water Monitoring Program

RMT restated the following objectives for remedial ground water monitoring at the Saukville site, in addition to the RCRA Enforcement policy of Appendix IX ground water characterization:

- Quarterly receptor monitoring to protect potential receptors, i.e., municipal wells and the POTW.
- Perimeter monitoring to provide early warning if contaminants are transported further than expected at the perimeter of the ground water contamination.
- Remediation progress monitoring to determine the effectiveness of the ongoing ground water remediation efforts.

Copies of the ground water monitoring program were distributed to each of the attendees. Sampling locations, monitoring frequency, and analytes were presented for each of the objectives listed above. The monitoring program is very similar to that presently contained in the Project Plans. The main clarification is the rationale for performing the ground water monitoring. It was agreed at this meeting that Table 3 volatiles would be analyzed for by method 8240 and that Table 4 volatiles would be analyzed for by Method 8020.

The USEPA's initial reaction to the restated objectives and monitoring program appeared to be favorable. Upon Bob Smith's request, RMT clarified the objectives and plan with the WDNR at a meeting held on October 3, 1991, at RMT in Madison, Wisconsin. At this meeting, Jill Fermanich and Tim Mulholland of the WDNR both expressed their initial approval of the sampling objectives and monitoring program.

Clarification of the sampling and analysis objectives and ground water monitoring program will be included in the Project Plans, along with a one-time Appendix IX sampling event, based on preliminary approval from the USEPA and the WDNR.

Laboratory QAPJP

It was agreed at this meeting that a new laboratory QAPJP will be developed for RMT Laboratories and that the existing laboratory QAPJP for ENSECO Laboratories will be discarded, since RMT Laboratories will be assuming the analytical work for the site. The new laboratory QAPJP will be appended to the existing Project Plans and will replace Appendix D. QAPJP elements that are specific to laboratory

QA/QC procedures will be developed in general conformance with the most recent version of the model RCRA QAPjP (USEPA, May 1991).

Project Plans

The model RCRA QAPjP guidelines will not be used as the standard to review the Project Plans. This issue was discussed extensively at the September 30, 1991, meeting. Mike DeRosa explained that an attempt to alter the Project Plans to meet recent QAPjP format guidelines would almost certainly invite a new set of comments from QAS about conformance with those guidelines. RMT pointed out that the guidelines came out after the initial QAPjP submittal but before the QAS comments on the Project Plans, dated June 25, 1991. RMT noted that the new guidelines should not be applied to the Project Plans after the fact, and that QAS already had an opportunity to address format issues. RMT asked Mike for assurance that QAS not reopen the format issue at this late date in their review. Mike stated that Stephanie Nguyen would be reviewing the QAPjP but was unclear as to who else at QAS would review the QAPjP or whether he could direct that review. Mike was planning to leave QAS in the next two weeks. He then suggested some format changes despite his earlier comments about the risks of such changes. Mike also warned that, because the project was changing laboratories and because the objectives of the ground water monitoring program were being clarified, QAS may comment on the Project Plans again, potentially using the model RCRA QAPjP as the standard for review.

RMT contended that the monitoring program clarifications do not substantially change the Project Plans. David Payne noted that the documents had already received comments from QAS and should not be subjected to new comments on the same material. RMT agreed that the USEPA should be held to their most recent review comments on the Project Plans.

RMT plans to revise the Project Plans as follows:

- Incorporate the clarification of the sampling and analysis objectives and monitoring program, as proposed to the USEPA and the WDNR.
- Address previous USEPA comments on the Project Plans from the memorandum dated June 25, 1991.

CCP is concerned that the Project Plan approval will be delayed because of formatting issues, even though technical issues have been resolved.

Approval of RMT Laboratories

David Payne indicated that RMT Laboratories would receive approval for performing volatile analyses using Methods 8240 or 8020. Data submittal packages or a laboratory audit would be required prior to approval of other Appendix IX analyses (8140, 8150, and 8080). David also indicated that he would approve Triangle Laboratory for dioxin/furans analyses, which RMT Laboratories does not perform.

Summary

RMT will submit the revised Project Plans with RMT Laboratories QA/QC procedures appended as Appendix D before Thanksgiving of 1991. The USEPA has agreed to provide comments within three weeks of receipt of the document. A meeting will be held to discuss the USEPA's comments before incorporating these into the final QAPjP document.

**TABLE 1
LIST OF ATTENDEES
Pre-QAPJP Meeting
September 30, 1991**

| | | |
|-------------------|---|---|
| Robert Dean Smith | Remedial Project Manager | USEPA - RCRA Enforcement Branch |
| David Payne | | USEPA - Central Regional Laboratory (CRL) |
| Mike DeRosa | | USEPA - Quality Assurance Section (QAS) |
| Stephanie Nguyen | | USEPA - QAS |
| Craig Bostwick | Environmental Manager | CCP |
| Jim Rickun | Program Manager | RMT |
| Tom Stolzenburg | Project QA/QC | RMT |
| Mark Wirtz | Laboratory QA Officer | RMT |
| Stacy McAnulty | Assistant Project Manager/ Technical Coordinator | RMT |

TABLE 2
COOK COMPOSITES & POLYMERS
Quality Assurance Project Plans
Meeting Agenda
September 30, 1991

Attendees: See Table 1 for the list of attendees present.

Discussion: To present our proposed sampling and analysis objectives, ground water monitoring program, and an outline of the new laboratory QAPjP; and to discuss incorporation of the USEPA's comments into the existing Project Plans.

Objectives: To obtain USEPA approval of our rationale and approach for development of the laboratory QAPjP and revision of the Project Plans.

Agenda:

- I. INTRODUCTIONS (J. Rickun) Start at 9:30 a.m.
- II. BACKGROUND (S. McAnulty)
- III. DETECTION LIMIT PROBLEMS FOR ORGANIC CONTAMINANTS WITHIN THE PLUME (M. Wirtz)
- IV. PROPOSED SAMPLING AND ANALYSIS OBJECTIVES (T. Stolzenburg)
- V. PROPOSED GROUND WATER MONITORING PROGRAM (T. Stolzenburg)
- VI. LABORATORY QAPjP OUTLINE (M. Wirtz)
- VII. REVISION OF PROJECT PLANS (S. McAnulty)
- VIII. APPROVAL OF RMT LABORATORIES (M. Wirtz)
- IX. SUMMARY OF MEETING DECISIONS AND SCHEDULE (S. McAnulty)