

QUALITY ASSURANCE PROJECT PLAN

STATESBORO HIGHWAY CREOSOTE SYLVANIA, SCREVEN COUNTY, GEORGIA

Revision 0

Prepared for:

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 4
61 Forsyth Street
Atlanta, Georgia 30303**

Prepared by:

**Oneida Total Integrated Enterprises
1220 Kennestone Circle, Suite 106
Marietta, Georgia 30066**

Contract No.	:	EP-W-05-053
Task Order No.	:	TNA-05-003-0160
Date Submitted	:	February 28, 2012
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QUALITY ASSURANCE PROJECT PLAN
U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)
REGION 4 SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
ONEIDA TOTAL INTEGRATED ENTERPRISES (OTIE) – CONTRACT EP-W-05-053

SECTION A: Project Planning Elements			
A1. Title (Project Name):	Statesboro Highway Creosote		
Project Location:	6476 Statesboro Highway, Sylvania, Screven County, Georgia (GA) (see Figures 1 and 2)		
Location Description:	The site can be reached by taking Interstate 75 South to Highway 16 East at Exit 165 going towards Savannah. Take US 301/US-25, Exit 116, towards Statesboro. Turn left at the exit and follow US-301/25N/73N. Turn right at US-301N/GA-73N/E Parrish Street and follow the highway for a few miles. Turn into the second residence (driveway after the intersection of Statesboro Highway and GA-17 at 6476 Statesboro Highway. The current owner of the property, Mrs. Sandra Jeffers, inherited the property from her parents.		
Originating Organization:	OTIE, 1220 Kennestone Circle, Suite 106, Marietta, Georgia (GA)		
Document Version/Date:	Revision 0 / February 23, 2012		
<i>Approvals</i>			
Approved By:	Nairimer Berrios-Cartegena	Date:	Signature:
Title	OTIE Project Manager		
Approved By:	Limari Krebs	Date:	Signature:
Title	OTIE Quality Assurance Manager		
Approved By:	Greg Kowalski	Date:	Signature:
Title	OTIE START III Program Manager		
Approved By:	Karen Buerki	Date:	Signature:
Title	USEPA On Scene Coordinator (OSC)		
A2. Table of Contents	See Page i		
A3. Distribution List	Katrina Jones	USEPA Region 4 Contract Manager	
	Darryl Walker	USEPA Region 4 Contract Manager	
	Karen Buerki	USEPA Region 4 OSC	
	OTIE Files	OTIE, Marietta, GA	

QUALITY ASSURANCE PROJECT PLAN
U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)
REGION 4 SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
ONEIDA TOTAL INTEGRATED ENTERPRISES (OTIE) – CONTRACT EP-W-05-053

QUALITY ASSURANCE PROJECT PLAN
U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)
REGION 4 SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
ONEIDA TOTAL INTEGRATED ENTERPRISES (OTIE) – CONTRACT EP-W-05-053

A4. Project/Task Organization		
Project Personnel	Organization	Responsibilities
Nairimer Berrios-Cartegena	OTIE	Project Manager/Field Project Leader (FPL)
A5. Project Definition and Background		
<p>The purpose of this investigation is to collect information to determine whether hazardous wastes identified in an on-site in-ground open creosote tank pit during site discovery in August 2005 as well as a follow-up trip in July 2011 have impacted the surface and subsurface soil at the site.</p> <p>The site was discovered due to a public complaint. There is an old abandoned shed behind the owner's house where the creosote pit is located. The pit is an in-ground open tank approximately 25 feet by 4 feet by 4 feet. The tank contains a dark liquid waste with a naphthalene type of odor, suspected to be creosote. Mrs. Jeffers explained that her father, who is deceased, used creosote to treat wood posts in the tank during the early 60's and that the posts were used for fences on the property. The liquid waste is about one foot deep in the tank. Mrs. Jeffers was advised by GEPA to cover and secure the tank in August 2005 in order to prevent children from coming into contact with the waste until GEPA evaluated the situation.</p> <p>During the evaluation performed by GEPA in July 2011, the pit appeared to be covered and secure.</p>		
A6. Project Description:		
<p>START anticipates collecting four surface and four subsurface soil samples. Additional quality assurance/quality control (QAQC) samples including field duplicates will also be collected. Samples will be submitted to a USEPA non-Contract Laboratory Program (CLP) laboratory for semivolatile organic compounds (SVOCs) base neutral acids, volatile organic compound (VOCs), Resource Conservation and Recovery Act (RCRA) 8 metals, polychlorinated biphenyls (PCBs), and pesticides. In addition, two waste samples are also expected to be collected at the site. These samples will be submitted to a USEPA non-CLP laboratory for toxicity characteristic leaching procedure (TCLP) VOCs, TCLP SVOCs, TCLP pesticides, TCLP herbicides, TCLP metals, PCBs, flashpoint, and pH. Tables 1 and 2 provided summarize the samples to be collected during this investigation and the analysis to be performed.</p>		
Applicable regulatory information, actions levels, etc.	RCRA Maximum Allowable Levels Regional Screening Levels (RSLs) for residential soil	
Field Study Date:	March 1 and 2, 2012	
Projected Lab Completion Date:	21 calendar days from the date of sample receipt at the laboratory.	
Final Report Completion Date:	Six weeks following receipt of final results from the laboratory.	

QUALITY ASSURANCE PROJECT PLAN
U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)
REGION 4 SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
ONEIDA TOTAL INTEGRATED ENTERPRISES (OTIE) – CONTRACT EP-W-05-053

A7. Quality Objectives and Criteria	
<i>Problem Statement</i>	Elevated concentrations of hazardous constituents associated with an in-ground open tank pit at the site have been identified .
<i>Identify the Decisions</i>	<p>This removal investigation will focus on determining the presence or absence of contamination in the surface and subsurface soil on site. Therefore, the following primary decisions have been identified:</p> <p>(1) Are contaminants of concern present in the soil within the study area of the site?</p> <p>(2) What is the horizontal and vertical extent of soil contamination?</p> <p>(3) Do the concentrations of the detected contaminants in soils exceed the RSL for residential soil?</p>
<i>Decision Inputs</i>	<p>The primary input needed to support the decision making process are reported analytical concentrations of contamination in soil.</p> <p>Analytical results used in the decision-making process will come from a non-CLP laboratory.</p>
<i>Study Boundary</i>	The study areas within the site (sample locations) will be determined in the field.
<i>Decision Rule</i>	<p>The primary decisions in the DQO process for the site relating to soils are:</p> <p>(1) Do soil sample results indicate contamination within the study areas at the property as compared to the associated RSLs?</p> <p>(2) What is the vertical and horizontal extent of the soil contamination in the area (i.e. surface and subsurface soil samples)?</p>
<i>Error Limits</i>	This sampling effort is designed to sample in areas of suspected contamination based on evidence gathered during previous investigations. Therefore, the data are thought to detect the worst case scenario for the site. However, random and systematic errors could be introduced during sample collection, sample handling and storage, sample analysis and data reduction. The QC measures set forth in this QAPP and the specific analytical methods will serve to minimize these errors. QC samples will be used to monitor the accuracy and precision of the sampling activity as well as the analytical process.
<i>Optimize Sampling Design</i>	The data collection activities will focus on identifying the presence or absence of contamination in the study area. Section B will describe the soil sampling design in detail.
A8. Special Training/Certifications	
Individuals implementing this QAPP must receive, at a minimum, orientation to the project’s purpose, scope, and methods of implementation. This orientation is the responsibility of the Project Manager or designee.	

QUALITY ASSURANCE PROJECT PLAN
U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)
REGION 4 SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
ONEIDA TOTAL INTEGRATED ENTERPRISES (OTIE) – CONTRACT EP-W-05-053

Any field team members involved with sample collection or handling will have received 40-hour hazardous waste operations and emergency response (HAZWOPER – 29 CFR 1910.120) training.

The Health and Safety Officer will have received 8-hour supervisor training course (HAZWOPER – 29 CFR 1910.120). Any other safety-related training is defined in the project HASP.

The laboratory performing analytical services must hold certification by Georgia Environmental Protection Division (GEPD) and/or the National Environmental Laboratory Accreditation Program (NELAC) as a requirement for this project. In addition, the laboratory manager is responsible for ensuring that personnel training are current and documented as defined in the laboratory's SOPs. It is the laboratory's manager's responsibility to determine specific training and certification needs, and for ensuring that any required training is documented.

A9. Documents and Records

Field records that may be generated include the following:

- | | |
|---|---|
| <input checked="" type="checkbox"/> Chains-of-Custody Forms | <input checked="" type="checkbox"/> Field Instrument Calibration Logs |
| <input type="checkbox"/> Field Monitoring and Screening Results | <input type="checkbox"/> Soil Borings and Well Logs |
| <input checked="" type="checkbox"/> Site Maps and Drawings | <input checked="" type="checkbox"/> Health and Safety Plan |
| <input checked="" type="checkbox"/> Photographic Log | <input checked="" type="checkbox"/> Site Logbook |
| <input checked="" type="checkbox"/> Waste Manifests | <input checked="" type="checkbox"/> Access Agreements |

Field documentation and records will be generated and maintained in accordance with the requirements presented in the following EPA Region 4 Science and Ecosystem Division (SESD) Field Branches Quality System and Technical Procedures: Control of Records (SESDPROC-002-R5), September 2010; Sample and Evidence Management (SESDPROC-005-R1), November 2007; and Logbooks (SESDPROC-010-R4), October 2010. These documents can be found at the following web address: <http://www.epa.gov/region4/sesd/fbqstp/index.html>.

START will retain all file information related to the site in the Marietta, Georgia, OTIE office. Upon EPA request, the entire site file, including all documents generated under the work assignment, will be inventoried and submitted to EPA or to an EPA-designated location within three weeks of the request. In addition, START will provide digital copies of all documents generated under the work assignment, including reports, e-mails, and figures if requested by EPA. All documents generated for the work assignment are the property of EPA and will be retained as part of EPA files. All EPA files will be delivered to EPA at the conclusion of the START contract.

START will use the information collected at the site to complete a Removal Investigation Report, which summarizes the existing conditions at the site, the field investigation activities, and the nature of contamination at the site. Environmental and QA/QC analytical data will be evaluated and data tables will be attached to the report. Significant QA/QC issues regarding sample collection, handling, and analysis will be identified in the report.

A draft version of the report will be available for review and commenting by EPA within six weeks following

QUALITY ASSURANCE PROJECT PLAN
U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)
REGION 4 SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
ONEIDA TOTAL INTEGRATED ENTERPRISES (OTIE) – CONTRACT EP-W-05-053

receipt of final analytical results from the laboratory. A final version of the report will be available within one week following receipt of comments by EPA. Laboratory data will be released to the EPA OSC as it becomes available, if desired. Table 3 lists the schedule for the deliverables and investigation.

**QUALITY ASSURANCE PROJECT PLAN
U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)
REGION 4 SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
ONEIDA TOTAL INTEGRATED ENTERPRISES (OTIE) – CONTRACT EP-W-05-053**

SECTION B: Data Generation and Acquisition

B1. Sampling Design

START has developed a sampling design to ensure that DQOs are fulfilled for the sampling investigation. Specifically, the design takes into account data needs, key decisions, and environmental variables, such as physical and site constraints, and how the spatial and temporal boundaries of the contamination and population at risk will be identified. The sampling design presented in the following sections has been developed based on the information obtained during trip reports conducted in September 2005 and July 2011 by GEPD personnel as well as a letter report from GEPD to EPA, Superfund Division requesting removal activities be performed at the site.

START anticipates collecting four (4) surface and four (4) subsurface soil samples. Additional QAQC samples, including one soil field duplicate, may also be collected. These soil samples will be submitted to an EPA non-CLP laboratory for VOCs by SW846 Method 8260B, SVOCs (only base neutral acids) by SW846 Method 8270, RCRA Metals by SW846 Method 6000/7000, pesticides by SW846 Method 8081, and PCBs by SW846 Method 8082.

START also anticipates collecting two waste investigation samples for full suite TCLP, which includes TCLP VOCs (Method 1311/8260B), TCLP SVOCs (Method 1311/8270), TCLP Metals (Method 1311/6000/7000), TCLP pesticides (Method 1311/8081), TCLP herbicides (Method 1311/8151), PCBs (Method 8082), flashpoint (Method 1010), and pH (Method 9045). These waste samples will be submitted to the same EPA non-CLP laboratory as the surface and subsurface soil samples.

Tables 1 and 2 provided summarize the samples to be collected during this investigation and the analyses to be performed.

Sampling locations will be determined in the field by the EPA OSC and/or the FPL.

QUALITY ASSURANCE PROJECT PLAN
U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)
REGION 4 SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
ONEIDA TOTAL INTEGRATED ENTERPRISES (OTIE) – CONTRACT EP-W-05-053

B2. Sampling Methods, General Procedures

Sampling will be conducted in accordance with the following SESD FBSQTP:

- | | |
|--|--|
| <input type="checkbox"/> Ambient Air Sampling
(SESDPROC-303-R4) | <input type="checkbox"/> Benthic Macroinvertebrate Sorting and Taxonomic
Identification (SESDPROC-509-R1) |
| <input type="checkbox"/> Dye Tracer Measurements
(SESDPROC-504-R0) | <input type="checkbox"/> Fish Field Sampling
(SESDPROC-512-R3) |
| <input type="checkbox"/> Fluvial Sediment Sampling
(SESDPROC-500-R2) | <input type="checkbox"/> Groundwater Sampling
(SESDPROC-301-R2) |
| <input type="checkbox"/> Hydrologic Studies
(SESDPROC-501-R2) | <input type="checkbox"/> Marine Macroinvertebrates
(SESDPROC-511-R2) |
| <input type="checkbox"/> Multi-Habitat Macroinvertebrate Sampling
(SESDPROC-508-R2) | <input type="checkbox"/> Porewater Sampling
(SESDPROC-513-R0) |
| <input type="checkbox"/> Potable Water Supply Sampling
(SESDPROC-305-R1) | <input type="checkbox"/> Pump Operation
(SESDPROC-203-R2) |
| <input type="checkbox"/> Reaeration Measurement By Diffusion Dome
(SESDPROC-505-R2) | <input type="checkbox"/> Reaeration Measurement Using Krypton Gas
(SESDPROC-506-R2) |
| <input type="checkbox"/> Sediment Oxygen Demand
(SESDPROC-507-R2) | <input type="checkbox"/> Sediment Sampling
(SESDPROC-200-R2) |
| <input type="checkbox"/> Soil Gas Sampling
(SESDPROC-307-R2) | <input checked="" type="checkbox"/> Soil Sampling
(SESDPROC-300-R2) |
| <input type="checkbox"/> Surface Water Sampling
(SESDPROC-201-R1) | <input type="checkbox"/> Total Community Metabolism
(SESDPROC-503-R2) |
| <input type="checkbox"/> Trace Contaminant Sampling
(SESDPROC-502-R2) | <input checked="" type="checkbox"/> Waste Sampling
(SESDPROC-302-R1) |
| <input type="checkbox"/> Wastewater Sampling
(SESDPROC-306-R2) | <input type="checkbox"/> Water Column Oxygen Metabolism
(SESDPROC-504-R2) |
| <input type="checkbox"/> Wipe Sampling
(SESDPROC-304-R2) | <input type="checkbox"/> Other: |

Field measurements will be collected in accordance with the following SESD FBSQTP:

- | | |
|---|---|
| <input type="checkbox"/> Field DO Measurement
(SESDPROC-106-R2) | <input type="checkbox"/> Field Measurement of ORP
(SESDPROC-113-R0) |
| <input type="checkbox"/> Field Measurement of Total Residue Chlorine
(SESDPROC-112-R2) | <input type="checkbox"/> Field pH Measurement
(SESDPROC-100-R2) |
| <input type="checkbox"/> Field Specific Conductance
(SESDPROC-101-R3) | <input type="checkbox"/> Field Temperature Measurement
(SESDPROC-102-R3) |
| <input type="checkbox"/> Field Turbidity Measurement
(SESDPROC-103-R2) | <input type="checkbox"/> Field XRF Measurement
(SESDPROC-107-R2) |
| <input checked="" type="checkbox"/> Global Positioning System
(SESDPROC-110-R3) | <input type="checkbox"/> Groundwater Level Measurement
(SESDPROC-105-R1) |
| <input type="checkbox"/> In Situ Water Quality Mon
(SESDPROC-111-R2) | <input type="checkbox"/> Wastewater Flow Measurement
(SESDPROC-109-R3) |
| <input type="checkbox"/> Other: | |

QUALITY ASSURANCE PROJECT PLAN
U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)
REGION 4 SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
ONEIDA TOTAL INTEGRATED ENTERPRISES (OTIE) – CONTRACT EP-W-05-053

All equipment will be handled in accordance with the FBQSTP Field Equipment Inventory and Management procedure (SESDPROC-108-R3).

Non-dedicated equipment will be decontaminated in accordance with FBQSTP Field Equipment Cleaning and Decontamination (SESDPROC-205-R2) prior to mobilization to the site.

Sample containers used for sample collection will be provided by the private laboratory and will be prepared according to the procedures contained in the EPA Specifications and Guidance for Obtaining Contaminant-Free Sample Containers (OSWER Directive 93240.0-05).

The following lists the sampling equipment and supplies to be used during this investigation:

sampling equipment

- PID/FID - TVA 1000 by Thermo
- Handheld GPS - Trimble GeoXT

sampling supplies

- Stainless Steel bowls
- Stainless Steel scoop/spoons
- 1 Liter Ultra Pure Water (12)
- Coolers
- Ice
- Strapping tape
- Custody seals
- SCRIBE Chain of Custody
- Printer
- Sample Jar labels
- Vermiculite

decontamination supplies

- Buckets
- Brushes
- Garden Sprayers
- Water
- Aluminum foil
- Distilled water
- Paper towels

PPE

- Nitrile gloves
- hand sanitizer
- hand soap
- water
- insect repellent
- hand wipes
- sunscreen

Other Items

- Camera
- Logbooks

QUALITY ASSURANCE PROJECT PLAN
U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)
REGION 4 SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
ONEIDA TOTAL INTEGRATED ENTERPRISES (OTIE) – CONTRACT EP-W-05-053

All investigation derived waste (IDW) will be managed according to the procedures found in the FBQSTP Management of Investigation-Derived Waste procedure (SESDPROC-202-R2). Rinse water from equipment decontamination (if necessary) will be collected in 55-gallon drums and stored on site until laboratory results are received to determine proper disposal. All waste and other IDW will be properly disposed of according to best management practices and regulatory requirements.

B3. Sampling Handling and Custody

All samples will be handled and custody maintained in accordance with the FBQSTP Operating Procedure for Sample Evidence Management (SESDPROC-005-R1) and Packing, Marking, Labeling and Shipping of Environmental and Waste Samples (SESDPROC-209-R1).

Once collected, all samples will be placed in a custody-sealed container and held in a secure location. The FPL or his designee will ensure that custody of samples is maintained until they are shipped to the laboratory.

Chain-of-custody and associated field records will be used to document the samples from collection through delivery to the laboratory.

Samples will be processed using EPA Scribe software.

B4. Analytical Methods

The analytical parameters and associated laboratory analytical methods that will be used for this project are the standard lab target compound list (TCL)/target analyte list (TAL) for the surface and subsurface soil samples. For the waste samples, the standard TCLP list will be reported.

The laboratory analytical data packages will be validated by OTIE project chemists.

SESD:	N/A
CLP:	N/A
Other:	All samples for this project will be submitted to an EPA non-CLP laboratory. Surface and subsurface soil samples will be analyzed for VOCs by SW846 Method 8260B, SVOCs (only base neutral acids) by SW846 Method 8270, RCRA Metals by SW846 Method 6000/7000, pesticides by SW846 Method 8081, and PCBs by SW846 Method 8082. Waste investigation samples will be analyzed for full suite TCLP, which includes TCLP VOCs (Method 1311/8260B), TCLP SVOCs (Method 1311/8270), TCLP Metals (Method 1311/6000/7000), TCLP pesticides (Method 1311/8081), TCLP herbicides (Method 1311/8151), PCBs (Method 8082), flashpoint (Method 1010), and pH (Method 9045)

B5. Quality Control

Field:	<p>Quality control for field monitoring and measurements will be conducted in accordance with FBQSTP Field Sampling Quality Control (SESDPROC-011-R3).</p> <p>The following QC samples will be collected as part of this investigation:</p> <ul style="list-style-type: none"> One soil field duplicate
Laboratory:	The laboratory SOPs describe the required accuracy, precision, and sensitivity of the VOC, SVOC, RCRA Metals, pesticides, PCB, flashpoint, and pH analyses as well as for the TCLP analyses (VOC, SVOC, Metals, pesticides, and herbicides).

QUALITY ASSURANCE PROJECT PLAN
U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)
REGION 4 SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
ONEIDA TOTAL INTEGRATED ENTERPRISES (OTIE) – CONTRACT EP-W-05-053

B6. Instrument/Equipment Testing, Inspection and Maintenance

All equipment will be handled in accordance with the FBQSTP Equipment Inventory and Management procedure (SESDPROC-108-R3).

B7. Instrument/Equipment Calibration and Frequency

All equipment will be calibrated according to the manufacture's instructions. In addition, all equipment will be handled in accordance with the FBQSTP Equipment Inventory and Management procedure (SESDPROC-108-R3).

B8. Inspection/Acceptance for Supplies and Consumables

All critical supplies and consumables for this field investigation are inspected and maintained by the OTIE Field Team Leader.

B9. Non-direct Measurements:

Optional (Applicability of this item is site-specific).

B10. Data Management

The project manager will be responsible for ensuring that all requirements for data management are met. The reference materials generated during this investigation and included in the final reports will be submitted to the OSC in electronic format on compact disc, and a Scribe database will be created for the analytical results. The Scribe database will be submitted to the OSC with the final reports. All field-generated data will be managed as part of the permanent field record for the project. All laboratory analytical data will be managed in accordance with the requirements of the methods, as well as the EPA Region 4 policy and applicable federal regulations. Finally, all field-generated data and other records generated or obtained during this project will be managed according to the requirements of EPA START III Contract No. EP-W-05-053.

**QUALITY ASSURANCE PROJECT PLAN
U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)
REGION 4 SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
ONEIDA TOTAL INTEGRATED ENTERPRISES (OTIE) – CONTRACT EP-W-05-053**

SECTION C: Assessment/Oversight

C1. Assessments and Response Actions

Assessments will be conducted during the field investigation according to the *SESD Operating Procedure for Project Planning*, SESDPROC-016-R1 to ensure the QAPP is being implemented as approved. The Project Manager is responsible for all corrective actions while in the field.

C2. Reports to Management

The Project Manager will be responsible for notifying the EPA Project Manager if any circumstances arise during the field investigation that may adversely impact the quality of the data collected.

SECTION D: Data Validation and Usability

D1. Data Review, Verification, and Validation

Validation will be performed by an OTIE START Chemist.

D2. Verification and Validation Methods

Validation will be performed using guidelines set forth in the U.S. EPA Contract Laboratory Program National Functional Guidelines (NFG) for Organic Data Review (EPA-540-R-08-01, June 2008), NFG for Inorganic Data Review (EPA-540-R-10-011, January 2010), and applicable methodologies.

D3. Reconciliation with User Requirements

N/A

****Footnotes:** This Quality Assurance Project Plan (QAPP) has been prepared and approved according to the EPA *Requirements for Quality Assurance Project Plans (EPA QA/R5 EPA/240/B-01/003)*, U.S. Environmental Protection Agency, Office of Environmental Information, Washington, DC, March 2001(USEPA, 2001). This document will be used to ensure that the environmental data collected for this project are of the type and quality for the intended purposes.

TABLE 1
STATESBORO HIGHWAY CREOSOTE
ANALYTICAL METHODS, CONTAINER TYPES, PRESERVATION, AND HOLDING TIMES

Matrix	Analysis	EPA Method	Sample Container	Preservative	Holding Times
Soil	VOC	8260B	pre-weighed 40-mL vial and stir bar	Sodium bisulfate	14 days until extraction; 40 days until analysis
	SVOC (BNAs)	8270D	One 8-oz glass jar	Cool to 4 °C	14 days until extraction; 40 days until analysis
	Pesticides	8081B			14 days until extraction; 40 days until analysis
	PCBs	8082A			14 days until extraction; 40 days until analysis
	RCRA 8 Metals	6010C/7471B	One 8-oz plastic		28 days for Hg 180 days for all other metals
Waste	TCLP VOC	1311/8260B	125-mL Amber glass	Cool to 4 °C	14 days
	TCLP SVOC	1311/8270D	125-mL Amber glass		14 days
	TCLP Pesticides	1311/8081B			14 days
	TCLP Herbicides	1311/8151A			14 days
	TCLP Metals	1311/6010C/7470A			
	PCBs	8082A	125-mL Amber glass		14 days until extraction; 40 days until analysis
	Flashpoint	1010A	125-mL Amber glass		Not applicable
	pH	9045D			7 days

Notes:

BNA - Base neutral analysis
°C - Degrees Celsius
Hg - Mercury
mL - Milliliter
PCB - Polychlorinated Biphenyl

RCRA - Resource Conservation and Recovery Act
SVOC - Semivolatile Organic Compound
TCLP - Toxicity Characteristic Leaching Procedure
VOC - Volatile Organic Compound

TABLE 2
STATESBORO HIGHWAY CREOSOTE
SAMPLE COUNTS

Matrix	Analysis	Field Samples	Field Duplicates	Trip Blanks	Total Number of Samples
Soil	VOCs	8	1	0	9
	SVOC (BNAs)	8	1	0	9
	RCRA 8 Metals	8	1	0	9
	Pesticides	8	1	0	9
	PCBs	8	1	0	9
Waste	TCLP VOCs	2	0	0	2
	TCLP SVOCs	2	0	0	2
	TCLP Metals	2	0	0	2
	TCLP Pesticides	2	0	0	2
	TCLP Herbicides	2	0	0	2
	PCBs	2	0	0	2
	Flashpoint	2	0	0	2
	pH	2	0	0	2

Notes:

NA - Not applicable
PCB - Polychlorinated Biphenyls
RCRA - Resource Conservation and Recovery Act
SVOC - Semivolatile Organic Compound
TCLP - Toxicity Characteristic Leaching Procedure
VOC - Volatile Organic Compound

TABLE 3
STATESBORO HIGHWAY CREOSOTE
SCHEDULE OF FIELD WORK AND DELIVERABLES

Activity	Due Date
Submit MPR	25 th of every month
Submit QAPP/SSP, Rev. 0	2/29/2012
Submit QAPP/SSP, Rev. 1	5 days after receipt of EPA comments
Initiate Field Work	3/1/2012
Complete Field Work	1 day after initiating work
Analytical Results	21 days after submittal of last sampling days samples
Removal Investigation Report, Rev. 0	6 weeks after receipt of final analytical data from laboratory.
Removal Investigation Report, Rev. 1	1 week after receipt of EPA comments