

Scope of Work
for the Site Investigation of Powerhouse #2 Ash Pit
at the former Plum Brook Ordnance Works

15 May 1995

List of Acronyms

AE	Architect Engineer
AOC	Area of Concern
bgs	Below Ground Surface
CEORH	Huntington District Corps of Engineers
CEORN	Nashville District Corps of Engineers
COC	Contaminant of Concern
CCQC	Contractor Chemical Quality Control
COE	Corps of Engineers
CSM	Chemical Surety Material
CWM	Chemical Warfare Material
DCQCR	Daily Chemical Quality Control Report
DoD	Department of Defense
DQO(s)	Data Quality Objectives
FSP	Field Sampling Plan
HTRW	Hazard Toxic and Radiologic Waste
LeRC	Lewis Research Center
MK	Morrison-Knudsen
NASA	National Aeronautics and Space Administration
OSHA	Occupational Safety and Health Administration
OEW	Ordnance and Explosive Waste
PA	Preliminary Assessment
PAH(s)	Polynuclear Aromatic Hydrocarbons
PBOW	Plum Brook Ordnance Works
PBS	Plum Brook Station
PCB(s)	Polychlorinated Biphenyls
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality Control
SAP	Sampling and Analysis Plan
SI	Site Inspection
SOW	Scope of Work
SSL(s)	Soil Screening Levels
SSHP	Site Safety and Health Plan
SVOC(s)	Semivolatile Organic Compound
TNT	Trinitrotoluene
USACE	United States Army Corps of Engineers
USCG	United States Coast Guard
USEPA(V)	United States Environmental Protection Agency Region V
VOC(s)	Volatile Organic Compound

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1.0 Introduction

Chemical contamination related to former Department of Defense (DoD) activities has been documented at the former Plum Brook Ordnance Works located near Sandusky, Ohio. The PBOW was operated from 1941 to 1945 as a manufacturing plant for 2,3,6-Trinitrotoluene (TNT), dinitrotoluene, and pentolite. Some of the areas used by the DoD were decontaminated in the 1950s and 1960s; other areas have been decommissioned, but not decontaminated. The site is currently owned by the National Aeronautics and Space Administration (NASA) and is operated as the Plum Brook Station (PBS) of the Lewis Research Center (LeRC). The NASA LeRC is located in Cleveland, Ohio.

1.1 Site Description

Powerhouse #2 is located west of Campbell Street at PBS (reference Figure 2). Historical Drawing No. 1764-653 (E.B. Badger & Sons, 1941) and Drawing No. 1764-T-401-2 (TPC, 1945) show the layout of Powerhouse #2, including an ash pit. Aerial photographs taken in 1950 and 1968 show an impoundment in the same location as that shown on the historical drawing dated 1941. Review of the referenced 1941 E.B. Badger & Sons Co. drawing indicates that the surface impoundment was rectangular-shaped and measured 400 feet long by 200 feet wide. The 1945 TPC drawing of the configuration of the proposed ash pit in this same location indicates that a cinder pile existed at the eastern end of the pit which was approximately two (2) feet deep. Based upon observations made during a field reconnaissance, the drawing also indicated the pit to be surrounded by a five (5) foot wide and approximately four (4) foot high, earthen embankment.

Ash from coal fired boilers was dumped into an ash sump and then transported, by a 100 psig water jet, to the ash pit through a six (6) inch sluice pipeline. Settable portions of the ash sank to the bottom of the pit and the "treated" water drained from an eight (8) inch drain pipe located at the southwest corner of the pit. It is possible that this treated water drained into Pipe Creek which is located less than fifty (50) feet from the western edge of the ash pit embankment.

The bermed area described above was observed during the field reconnaissance of this area conducted in the fall of 1994 by representatives of Dames & Moore and CEORN. Black cinders up to one (1) foot in depth were observed inside the eastern two thirds of the bermed area and outside the bermed area (possibly near the cinder pile referenced on the 1945 TPC drawing. No black soil

was observed in the western third of the impoundment or near the discharge pipe.

1.2 Project Planning Overview and Objectives

The purpose of the site investigation is to provide information that can be used in making initial management decisions and for designing a more detailed and comprehensive sampling investigation, should further work be necessary. Since the data collected during this site investigation will be used to make important decisions about the site, it is essential that the reliability of the data be demonstrated through incorporation and implementation of adequate Quality Assurance (QA) and Quality Control (QC).

The preliminary site investigation is the foundation upon which other studies in hazardous waste site assessment should be based. As part of this study, it is essential to determine whether or not soils are the sample media of importance to the total assessment. The total assessment must provide data which will enable decision makers to decide whether the soil contaminants pose an imminent and substantial endangerment to human health requiring emergency action, and whether there is an unacceptable long-term risk to man or the environment. If soils are determined to be below Region V soil screening levels in this site investigation, it is likely that no further attention will be directed to them.

1.2.1 Site Strategy Development

The long term objective of the site investigation is to determine whether the Powerhouse #2 Ash Pit is contaminated and whether this contamination poses a threat to human health and the environment. The data generated to support decisions regarding the Powerhouse #2 Ash Pit should definitively support all decisions made regarding this site. Additionally, data collected should be useful for any succeeding environmental investigations (i.e. Remedial Investigation).

1.2.2 Data Quality Objectives (DQOs)

1.2.2.1 Data Quality Objective Conceptual Site Model

As stated previously Powerhouse #2 Ash Pit is located in the Southwestern Portion of PBS. Several site reconnaissance have been performed and visual indications of the existence of the ash pit have been identified. This area is near Pipe Creek and slopes toward Pipe Creek. The area is not accessible without clearing and grubbing, due to trees and dense undergrowth. Contaminants of concern (COCs) at this site include PAHs (semivolatiles), polychlorinated biphenyls (PCBs), Volatile Organic Compounds (VOC), and metals.

Potential pathways for human exposure are direct contact from contaminated surface soils via the transport of contaminated surface soil by stormwater runoff into the Pipe Creek; the entrainment and transport of contaminated soils by wind; and direct contact of surface soil by NASA workers, hunters, and trespassers. Potential pathways for indirect human exposure are the infiltration/percolation of rain water through contaminated soils, which could be further transported to the groundwater, and by the harvesting of contaminated aquatic and terrestrial organisms for consumption.

1.2.2.2 Soil Screening Levels

Soil screening levels (SSLs) for several PAH compounds are presented in Table 1. If the average of the detected values for any of these compounds are higher than the SSLs, or background conditions for inorganic constituents, then further investigations of the site will be warranted. Background concentrations of many inorganic constituents are currently being evaluated and shall be available by the end of May 1995.

Table 1: Soil Screening Criteria for the Powerhouse #2 Ash Pit.¹

Compound	Soil Ingestion	Transfer from Soil to Air (Inhalation) ¹	Transfer from Soil to Ground Water
Acenaphthene	4700	120	200
Anthracene	23000	6.8	4300
Benzo(a)anthracene	0.9	27	0.7
Benzo(b)fluoranthene	0.9	23	4
Benzo(k)fluoranthene	8.8	NA	4
Benzo(a)pyrene	0.088	11	4
Dibenzo(a,h)anthracene	0.088	7.2	11
Fluoranthene	3100	68	980
Fluorene	3100	89	160
Indeno(1,2,3-cd)pyrene	0.88	280	35
Pyrene	2300	56	1400

¹ Units for all concentrations are mg/kg

² Please reference Draft Guidance for soil screening level framework (July 1994) and Risk Based Concentration Table, (January-June 1995) for information regarding the derivation of SSL.

1.2.2.3 Decision Criteria.

Soils at PBOW shall be considered contaminated if any contaminant

is detected at concentrations above any of the screening levels listed above. If a compound is detected that is not listed in Table 1, then the Risk Based Screening Criteria developed by USEPA Region (III) shall be consulted.

1.2.2.4 Sampling Design.

In future investigations it may be necessary to determine the average concentration of contaminants that may be present in the ash pit, it is necessary to collect samples that allow for the calculation of an unbiased estimate of the population mean.

1.3 Summary of Site Investigations Task

The Architect/Engineer (AE) Firm selected for this investigation shall be obligated to perform the following work, unless otherwise directed by the Contracting Officer (CO):

- Task 1 - Records Review;
- Task 2 - Site Visit and Coordination Meeting;
- Task 3 - Contractor Work Plan Preparation/Submission (Including the Sampling and Analysis Plan and Site Specific Health and Safety Plan);
- Task 4 - Field Investigations/Kickoff Meeting;
- Task 5 - Sample Analyses, Data Assessment/Validation and Reporting;
- Task 6 - Preparation and Submission of Draft Site Investigations Report;
- Task 7 - Draft Site Investigations Report Meeting;
- Task 8 - Preparation and Submission of Final Site Investigations Report.

2.0 Project Requirements

2.1 Task 1 - Records Review

The AE shall review aerial photographs and the "Records Review Report, Plum Brook Ordnance Works, Sandusky, Ohio", dated 27 April 1995, prepared by Dames & Moore. The AE shall pay particular attention to Chapter 7 of this report. The AE shall be allowed six man-days for review of pertinent site records.

2.2 Task 2 - Site Visit and Coordination Meeting

The AE shall visit the former Powerhouse #2 Ash Pit to gather more information for the preparation of the work plans. The AE shall take still photographs of the site during this visit and record pertinent information in a field logbook. If necessary the AE shall utilize these photographs in the development of the Site Investigations Report. During this site visit the AE shall also meet with representatives from PBS to discuss any coordination requirements with the facility. Two (2) people

shall be allowed to travel to PBS for this task. Two days (2) shall be allowed for each person to travel from Knoxville, attend the meeting, and return to Knoxville. One clerical person shall be allowed an additional one half day (four hours) to prepare travel arrangements before the trip and to prepare travel reimbursement vouchers after the trip. A meeting attendee shall be allowed one half day (four hours) after the trip to summarize the meeting minutes and formally submit them to COE.

2.3 Task 3 - Contractor Workplan Preparation/Submission

The AE shall prepare the workplans as directed in the following paragraphs of this section.

2.3.1 Safety and Health

2.3.1.1. General. The AE shall review all available site information and develop the necessary safety and health documents sufficient to protect on-site personnel, the environment, and potential off-site receptors. The AE shall utilize the services of qualified personnel, as defined in Appendix B of ER 385-1-92, to oversee the development and implementation of required safety and health documents.

2.3.1.2. Regulatory Requirements. All site investigation activities and safety and health documents required by this scope of work shall comply with pertinent sections of the following regulations and reflect the following guidance publications:

(1) Federal Acquisition Regulation, F.A.R. Clause 52.236-13: Accident Prevention.

(2) U.S. Army Corps of Engineers (USACE), Safety and Health Requirements Manual, EM 385-1-1.

(3) U.S. Army Corps of Engineers (USACE), ER 385-1-92, Appendix B, Safety and Occupational Health Document Requirements for Hazardous, Toxic, and Radioactive Waste (HTRW) Activities.

(4) Nuclear Regulatory Commission Standards, 10 CFR 19 -- 171.

(5) Occupational Safety and Health Administration (OSHA) General Industry Standards, 29 CFR 1910, and Construction Industry Standards, 29 CFR 1926; especially 29 CFR 1910.120 / 29 CFR 1926.65 - "Hazardous Waste Site Operations and Emergency Response".

(6) NIOSH/OSHA/USCG/EPA, "Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities", October 1985. (DHHS (NIOSH) Publication No.85-115)

(7) Other applicable federal, state, and local safety and health requirements.

2.3.1.3 Documents. The following safety and health documents are required.

2.3.1.3.1 Safety and Health Program. The occupational Safety and Health Administration (OSHA) requires all employers performing on-site activities at hazardous waste sites to develop and maintain an ongoing written Safety and Health Program in compliance with OSHA Standard 29 CFR 1910.120(b)/29 CFR 1926.65(b). The program, including updates, shall be made available upon request.

2.3.1.3.2 Site Safety and Health Plan (SSHP). The SSHP required by 29 CFR 1910.120(b)(4)/29 CFR 1926.65(b)(4), and as defined by this SOW, shall be prepared and submitted. On-site activities shall not commence until the plan has been reviewed and accepted. The SSHP shall describe the site-specific safety and health procedures, practices, and equipment to be implemented and utilized in order to protect affected personnel from the potential hazards associated with the site-specific tasks to be performed. The level of detail provided in the SSHP shall be tailored to the type of work, complexity of operations to be accomplished, and hazards anticipated. The AE shall address all elements contained in Appendix B of ER 385-1-92 in preparing the SSHP. Where the use of a specific topic is not applicable to the project, the AE shall provide a negative declaration to establish that adequate consideration was given the topic, and give a brief justification for its omission. Information readily available in standard texts shall be repeated only to the extent necessary to meet the requirements of this SOW. The SSHP shall not duplicate general information contained in the Safety and Health Program which is not specifically related to this project.

2.3.1.3.3. Ordnance and Explosive Waste (OEW). If explosives or chemical surety and warfare material (CSM/CWM), or unexploded ordnance (UXO) are discovered at any time during operations, the AE shall immediately stop operations in the affected area, mark the location and notify the CO and all onsite personnel of the OEW hazard and the area's restrictions. The Government shall make appropriate arrangements for evaluation and proper disposal of the device(s). The SSHP shall specifically address procedures to be followed should known or potential CSM/CWM, UXO, or other such items be encountered during any phase of field work.

2.3.2 Sampling and Analysis Plan

The Sampling and Analysis Plan (SAP) shall be composed of the Field Sampling Plan (FSP) and the Quality Assurance Project Plan (QAPP). Guidance documents that the AE shall use to develop the SAP include Requirements for the Preparation of Sampling and

Analysis Plans (EM-200-1-3) and Region V Model Quality Assurance Project Plan. A computer disk that contains the model QAPP is included with this SOW. A copy of the referenced engineering manual can be obtained by request.

2.3.2.1 Format

The following format shall be used by the AE developing the SAP.

Title Page. The title page shall be the first page of the SAP. The following items shall appear on the title page: name of document, site name and location, USACE contract number, authority under which the activities are being performed and date of preparation.

Table of Contents. This shall be a general table of contents that outlines the layout of the SAP.

Field Sampling Plan. The following sections briefly describes the contents of the FSP:

(1) Title Page. The FSP shall have an abbreviated title page that includes the name of the document and the date it was prepared.

(2) Table of Contents. The table of contents shall include a of the FSP elements, any appendices that are required to augment the FSP, tables and figures.

(3) Project Description. This section of the FSP shall be as specific as possible. Sufficient information shall be included in this section to permit a technical person unfamiliar with the project to evaluate the sampling and analytical approach. A description of the location, size, and important physical features of the site shall be included. A figure showing the site location and layout shall also be included. A chronological site history including descriptions of the use of the site and use of chemicals should be provided. The historical data from previous sampling efforts at the site should be identified and summarized. The effects of this information on the current project shall also be discussed. The site background section of the FSP shall also indicate startup and ending dates, including those for preliminary studies and field and laboratory activities.

(4) Project Organization and Responsibilities. This element of the FSP shall identify all key field personnel or organizations that are necessary for each field activity. The organizational chart shall include all subcontractors and their key points of contact. The organizational chart should also identify QA managers. This section of the FSP

shall also describe the responsibilities of all project field personnel, including QA managers. This summary should designate responsibility for planning, coordination, sample collection, disposal of investigation derived waste, and sample custody.

(5) Scope and objectives. Specific objectives of a sampling effort that describes the intended uses of data shall be clearly and succinctly stated. General QA/QC procedures shall be discussed.

(6) Field Activities.

(a) Rationale. This section of the FSP shall discuss the rationale for each of the field activities. Subsections of the FSP that address each of the matrices to be sampled shall include the rationale behind the required number of field samples, depth of samples, the strategy for selection of the particular sampling location, a summary of the required number of field, and field QC samples, and the type of sample (discrete or composite). QC and QA samples shall be identified. QC samples shall be "disguised" as individual field samples by using a sample numbering system similar to that used for all field samples. This section of the FSP shall also include a list of all measurements that shall be made during the project. It is recommended that parameters planned for each sample be summarized in tabular form. This table shall indicate the total number of samples for each sample location, including Quality Assurance (Note: Please identify QA samples with the same number as the field sample that they are derived from with the addition of QA designator) and quality control samples. The discussion of field QC samples shall include the rationale for the QC samples (how the data will be used), as well as the frequency for collecting QA and QC duplicates, matrix/matrix spike/matrix spike duplicates and equipment rinsates blanks.

(b) Procedures. The subsections of the FSP that address each of the matrices to be sampled shall include the proposed procedures for installation of equipment, field measurements, sample collection, sample homogenization and/or splitting and decontamination. Field screening procedures, the screening criteria, and the required actions based on the screening criteria shall be addressed. The specifications and requirements for field instrumentation, the initial and continuing calibration verification of the equipment, the schedule of calibration verification, as well as the requirements for field data evaluation and reporting shall be outlined in the FSP. Each subsection shall discuss the sampling procedures; a description of containers, reagents, and procedures used for each matrix' sample collection, preservation, transport, and storage; and a

notation of any time constraints or other difficulties with sending samples to the laboratory, including contingencies in the event of delays and/or slippage in schedule.

(c) Subsurface Soil (any soil at depths greater than six (6) inches below grade. This section of the FSP shall discuss the rationale for each boring location, discrete and/or composite sampling, and any field analytical parameters to be measured. In addition, this section of the FSP shall discuss drilling methods, logging procedures and forms, and sampling methods for physical and chemical analyses.

(d) Surface Soil. This section of the FSP shall discuss the rationale for the location and frequency of discrete and/or composite samples and all procedures required for collecting samples.

(7) Sample Chain of Custody/Documentation. This section of the FSP shall describe appropriate sample custody/documentation procedures. Chain of Custody procedures shall always be used. Chain of custody procedures shall correspond to items identified in Appendix F of EM 200-1-3.

(a) Field Logbook. The AE shall include in the SAP the requirements for the field sampling logbook. The AE shall maintain a permanent bound logbook. The AE shall discuss the following: how the logbook shall be filled out, how corrections shall be made, the types of information to be included in the logbook, etc. The following items shall be included in the logbook, as applicable:

- Project Name and Number.
- Name and Title of author, date, and time of entry.
- Purpose of sample activity.
- Name and Address of Field Contact.
- Names and Responsibility of field crew members.
- Names and titles of any site visitors.
- Types of waste, suspected waste concentration if known, and sample matrix.
- Sample collection method.
- Number and volume of sample(s) taken.
- Location, description, and log of photographs of the sampling points.
- References for all maps and photographs of the sample site(s).
- Information concerning sampling changes, scheduling modifications, and change orders.
- Information concerning drilling decisions.
- Details of the sampling location.
- Date and time of sample collection.

- Field Observations.
- Any field measurements made.
- Sample identification number(s).
- Documentation of procedures for preparation of reagents or supplies that become an integral part of the sample.
- Sampling methodology, including distinction between grab and composite samples.
- Sample preservation.
- Sample distribution and transportation.
- A match list of Quality Assurance Split Samples and Field Samples.
- All sample documentation, such as:
 - Bottle lot numbers as received from repository,
 - Chain of Custody record numbers.
- Decontamination procedures.
- All documentation for investigation derived wastes, such as:
 - Contents and approximate volume of waste,
 - Disposal Method,
- Summary of daily tasks (including cost) and documentation on any cost or scope of work changes required by field conditions.
- Signature and date by the personnel responsible for observations.

(b) Photographs. This section of FSP shall describe how sampling points are to be marked and prepared for photographs. It shall also discuss how photographs shall be numbered and documented.

(c) Sample Identification System. The Contractor shall identify the methodology that shall be utilized to label/identify samples. A proposed methodology is shown in Table 2.

(d) Sample documentation. This section of the FSP shall discuss how each sample is to be documented in the permanent record. This section should include a discussion on sample labels or tags, sample field sheets, chain of custody records, custody seals, and cooler receipt forms. Examples of such items shall also be presented in this section.

Table 2: Sampling Identification Scheme.

Project Code	Year	Sample Type*	Site Number	Sample Number*	Depth
PBOW	95	XX	AP2	XXXX	XXXXX

*Sample Type: describes the matrix

of the sample.
Soil Samples = SO;
Sediment Samples = SD;

(e) Documentation procedures. This section of the FSP shall include a checklist of step-by-step procedures of how each sample is to be documented, i.e., filling out sample container air bills, chain-of-custody records, sample tracking matrices, etc.

(f) Corrections to documentation. This section of the FSP shall discuss how changes are to be made on sample documentation forms.

(8) Sample Packaging and Shipping. In the SAP the AE shall include the SOPs for sample labeling, sample packing, sample preservation, icing, document inclusion and shipping procedures such that the sample integrity is established and maintained throughout custody process. Sample handling that is not in accordance with the protocol established in Appendix F of ER-1110-1-263 shall result in the need for the AE to resample the location from where the invalid sample was collected. No additional charge shall be incurred by the Government for this resampling.

(9) Investigation Derived Waste (IDW). This section of the FSP shall discuss the procedures for collecting, labeling, storing, and disposing of IDW. All IDW from the installation of soil borings shall be drummed and properly labeled. All drums shall be labeled with the project name, date, contractor's name, USACE Nashville District, and contents of drum. Drummed material from different borings should not be mixed and neither should soil and water waste. All PPE which can not be decontaminated shall also be place in labeled sealable drums. All drums shall be kept within a secured area. Barrels containing drill cuttings, excess samples, and fluids shall not be left at various unsecured locations per EPA/540/G-91/009: Management of Investigation-Derived Wastes During Site Inspections, May 1991. The results of the primary analyses shall be used to characterize the IDW material. The AE shall develop a procedure for the sampling of the drummed material and make recommendations from the evaluation of the sampling results. If the analyses indicate that further evaluation of the IDW is necessary, modifications shall be made to this SOW. After the IDW has been sufficiently characterized, the AE shall determine the optimum method for disposing of these wastes and furnish a plan and an estimated cost for this work to CEORN.

(10) Contractor Chemical Quality Control (CCQC). The AE is required to ensure that quality is maintained throughout all

field work by means of a three phase control process (ER 1180-1-6, EP 715-1-2). CCQC phase (preparatory, initial, and follow-up) shall be performed onsite by the AE whether or not a government representative is present. The AE shall summarize the activities of each CCQC phase in the daily chemical quality control report (DCQCR). The CCQC phases shall be performed for each definable feature of work. A definable feature is a task that is separate and distinct from other tasks and has separate control requirements. This section of the FSP shall contain the contractor's detailed plans for implementing the CCQC phases, including: identification of the CQC representative; listing of field equipment; description of activities during the phases; identification of the definable features of the work; and generation of a sample table that will be used to match up primary and QA samples.

(a) Preparatory phase. The CQC representative, in conjunction with sampling team shall conduct the preparatory phase prior to beginning any definable feature of work. This phase shall include a review of all work requirements; a physical examination of all required materials and equipment; an examination of work areas to ascertain completion of all preliminary work; and a demonstration of all field activities. If new sampling or technical personnel arrive onsite during the work effort, the CQC representative must repeat this phase before new personnel begin work.

(b) Initial phase. The CQC representative is responsible for overseeing every step of the definable feature of work when that work is first initiated.

(c) Follow-up phase. The CQC representative is responsible for continued daily contract compliance until completion of the particular feature of work.

(11) Daily Chemical Quality Control Reports (DCQCR). The Contractor is responsible for providing a daily report which contains the required performance and documentation of chemical parameter measurement. The Contractors DCQCR shall contain the following elements:

(a) Job Identification and Site numbers.

(b) Weather including temperature, wind speed and direction, barometric reading, significant wind changes, etc.

(c) Chemical Data acquisition work performed including QA samples collected and calibrations.

(d) Sampling and Sample delivery problems which may affect

project DQO requirements.

(e) Chemical parameter measurement problems which may affect project DQO requirements.

(f) Any sampling performed as contingency sampling and rationale.

(g) Corrective Actions and/or deviations from the identified problems including acceptance.

(h) Chemical quality control activities implemented. Confirmation that all deviations or actions jeopardizing project DQOs have been forwarded to the Contracting Officer.

(i) Signatures of responsible authority and initials of all persons conducting changes/actions.

(12) Corrective Action. The FSP shall include corrective action procedures to be taken in the event a discrepancy is discovered by field personnel, or during a desk or field audit, and/or the laboratory discovers discrepancies or problems.

(13) Project Schedule. The FSP shall include an outline of the schedule. Listed items shall include: project plan review periods, fieldwork, sample analysis, data management and validation, and investigation report writing.

Quality Assurance Project Plan. The Quality Assurance Project Plan shall be prepared using the model developed by United States Environmental Protection Agency Region V (USEPA V), which is included on the enclosed computer disk. All relevant sections shall be developed and explained.

2.4 Task 4 - Field Investigations and Kickoff Meeting

2.4.1 Kickoff Meeting. The the first day of the Field Investigations the AE shall conduct a Kickoff Meeting for CEORN, Plum Brook personnel, and regulators in Region V which have an interest in the field work.

2.4.2 Surface Soil Samples. One (1) surface soil sample shall be collected from each of twelve sampling (12) locations. The sample shall be obtained from 0'-6" below ground surface level. These samples shall be analyzed for the parameters shown in Table 3 of this SOW.

2.4.3 Subsurface Soil Samples. One (1) subsurface soil sample shall be collected from the same locations identified in Paragraph 2.4.2 Surface Soil Samples. This subsurface soil

sample shall be collected from a depth of 2'-3' bgs. These samples shall be analyzed for the parameters shown in Table 3 of this SOW.

2.4.4 Quality Assurance/Quality Control Samples. From one (1) location identified in paragraph 2.4.1 Surface Soil Samples, enough matrix material shall be collected so that three samples can be obtained. One sample shall be designated as the field sample, another as the field duplicate sample (and labeled accordingly), and the third as the quality assurance sample. From one (1) location identified in paragraph 2.4.2 Subsurface Soil Samples, enough matrix material shall be collected so that three samples can be obtained. One sample shall be designated as the field sample, another as the field duplicate sample (and labeled accordingly), and the third as the quality assurance sample.

2.4.5 Equipment Rinsate Samples. Two (2) equipment rinsate samples shall be collected during this field effort. The methodologies for the collection of rinsate samples shall be discussed in the SAP.

2.4.6 Surveying. All sampling locations shall be surveyed in according to methodologies referenced in Chapter 9 of Monitoring Well Design, Installation, and Documentation at Hazardous and/or Toxic Waste Site, EM 1110-1-4000, dated 31 August 1994.

2.4.7 Classification of All Soil Samples. The AE shall classify all soil samples according to USGS classifications. The actual boring (sampling location) does not have to be logged. However, the type of soil that composes the sample shall be identified.

2.5 Task 5 - Sample Analyses, Data Assessment/Validation and Reporting

2.5.1 Analytical Procedures.

2.5.1.1 General Analytical Requirements.

2.5.1.1.1 Analytical Methods. The AE shall establish in the SAP, the methods and procedures used to prepare and analyze the project samples and parameter measurement. Method selection shall be consistent with project DQOs for chemical measurements. In general, the preferred methods are the methods of analysis in SW-846, Test Methods for Evaluating Solid Waste Physical/Chemical Parameters. The preferred analytical methods for the analysis of soil/sediment matrices are presented in Table 3.

2.5.1.1.2 The AE shall define in the SAP, the source (reference) of the method, the method prep, the method number and the chemical parameter to be determined for all project samples acquired for chemical analysis. The AE shall also include the

Standard Operating Procedures for each method.

2.5.1.1.3 The AE shall define the source (reference) of the measurement method and method identification for all chemical parameters measured by instrumental means in the SAP.

2.5.2 Data Reduction, Validation, Documentation and Reporting Form. The AE shall discuss methods for data validation, documentation and report format in the SAP. At a minimum the following sections shall be included in the SAP. All analytical data generated by the Contract Laboratory shall be extensively reviewed prior to report generation to assure the validity of the reported data. This internal data review process shall consist of data generation, reduction, and a minimum of three levels of data review. In each stage, the review process shall be documented using an appropriate checklist form that is signed and dated by the reviewer. The analyst who generates the analytical data has the prime responsibility for the correctness and completeness of the data. Each step of this review process involves evaluation of data quality based on both results of the QC data and the professional judgement of those conducting the review. This application of technical knowledge and experience to the evaluation of data is essential in ensuring that data of quality are generated consistently. All data generated and reduced shall follow well documented AE Laboratory in-house protocols.

Table 3
Approved Analytical Methods for Soils/Sediments in the Powerhouse #2 Ash Pit

Analytical Parameter	Analytical Method
Volatile Organic Compounds	SW-846, 8260A
SemiVolatile Organic Compounds	SW-846, 3540/8270A
Target Analyte List (TAL) Metals ¹	SW-846, 3050/6010A ² SW-846, 3050/7471A (Hg)
PCBs/Pesticides	SW-846, 3540/8081

¹TAL metals include Ag, Al, As, Ba, Be, Ca, Cd, Co, Cr, Cu, Fe, Hg, K, Mg, Mn, Na, Ni, Pb, Sb, Se, Tl, V, Zn.

²The preparatory method for Sb is 3005.

2.5.2.1 Level 1, Technical Data Review. Each Contract Laboratory analyst shall review the quality of their work based on an established set of guidelines. The review criteria as established in each method, in this instruction, and as stated

within the Contract Laboratory Quality Management Manual shall be used. The review shall at a minimum ensure that : (1) Sample preparation information is correct and complete; (2) Analysis information is correct and complete; (3) The appropriate SOPs have been followed; (4) Analytical results are correct and complete; (5) QC samples are within established control appropriate QC limits; (6) Special sample preparation and analytical requirements have been met; (7) Documentation is complete (any anomalies have been documented and forms complete, holding times documented, etc.) Level 1 data review shall be documented by using a checklist form and by signature and date of reviewer.

2.5.2.2 Level 2, Technical Review. The level 2 review shall be performed by a supervisor or data review specialist whose function is to provide an independent review of the data package. This review shall also be conducted according to an established set of guidelines and is structured to ensure that; (1) All appropriate laboratory SOPs have been followed; (2) Calibration data are scientifically sound, appropriate to the method, and completely documented; (3) QC samples are within established guidelines; (4) Qualitative identification of sample components is correct; (5) Quantitative results are correct; (6) Documentation is complete and accurate (any anomalies have been documented and forms complete, etc.); (7) The data are ready for incorporation into the final report; (8) The data package is complete and ready for data archive. Level 2 review shall be structured so that all calibration data and QC sample results are reviewed and all of the analytical results from at least ten percent of the samples are checked back to the sample preparation and analytical bench sheets. If no problems are found with the data package, the review is complete. If any problems are found with the data package, an additional ten percent of the sample results shall be checked back to the sample preparatory and analytical bench sheets. This cycle then repeats until either no errors are found in the data set checked or all data has been checked. All errors and corrections noted shall be documented. Level 2 data review shall also be documented on a check list with the signature and date of the reviewer.

2.5.2.3 Level 3, Administrative Data Review. Level 3 review is performed by the QA Officer or the program administrator at the AE Laboratory. This review shall be similar to the review as provided in Level 2 except that it shall provide a total overview of the data package to ensure its consistency and compliance with this instruction. All errors noted shall be corrected and documented. Level 3 data review shall also be documented on a checklist with the signature and date of the reviewer.

2.5.2.4 Data Reduction. The AE shall report all data reduction procedures including the methods or equations of concentration calculations, reporting units of concentrations, moisture related

data and the procedure for calculating precision and accuracy.

2.5.2.5 Data Validation. The AE shall be required to provide data validation procedures used for all chemical data including the following paragraphs. Data validation shall be provided by a qualified member of the AE's staff who does not report to any laboratory personnel and has no responsibility for sample collection or analysis. Analytical data shall be validated in accordance with the following USEPA guidance documents:

USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review, Publication 9240.1-05-01, EPA-540/R-94-013, PB94-963502, February 1994.

USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review, Publication 9240.1-05, EPA-540/R-94-012, PB94-963501, February 1994.

Methodologies for validation shall be included in the QAPP. Fifty percent of all field samples shall be validated.

2.5.2.5.1 Data Reporting. The AE shall submit two data packages during this project; (1) a data package shall be submitted to the USACE Quality Assurance Laboratory for CQAR generation, and (2) a fully validatable package (i.e. similar to CLP) shall be submitted to the Contracting Officer. These standard reporting formats require the reporting of all data along with the supporting QC information. Fulfillment of minimum data reporting requirements including all QC sample/measurement results (See memorandum on the USACE Minimum Chemistry Data Reporting Requirements).

2.5.2.5.1.1 Data Reporting Format. Contract Laboratory reports shall be structured to clearly present all of the contract required items. This report shall be organized as follows.

2.5.2.5.1.1.1 General Discussion. Description of the sample types received, test performed, and problems encountered, and general comments shall be given here. This section shall include any case narratives. The project shall be clearly identifiable. A table shall be presented that clearly shows all samples received that includes the Contract Laboratory sample identification number, the sample matrix, and the tests assigned. Another table shall be presented that summarizes all failed QC parameters along with corrective actions taken by the Contract Laboratory. All pages shall be numbered and an index provided so that the Quality Assurance Laboratory can quickly and accurately review the data.

2.5.2.5.1.1.2 Analytical Data. The AE shall report data by sample or test. Pertinent information shall include, at a minimum, field sample identification number, Contract Laboratory sample number, date sample collected, date sample received at the

Contract Laboratory, date(s) sample extracted/digested/analysis performed, batch number(s), dilution factors, all analytes tested for and their associated reporting limits, any data qualifiers assigned, matrix, units, percent of solids for solid samples, and sample description, including preservation. Any other factors that could affect the sample results shall also be noted. Data for solid samples shall be reported on a dry weight basis. Both the original and diluted results shall be reported or samples that are reanalyzed due to certain analytes that have exceeded the calibration ranges. Results may be combined together on a single report. Data qualifiers used shall be referenced from the guidance document for data validation.

2.5.2.5.1.1.3 Calibration Information. All initial calibration curve data shall be presented by the AE. All continuing calibration verification data to include standards and blanks shall be presented with acceptance ranges clearly shown.

2.5.2.5.1.1.4 Laboratory Performance and Matrix Specific Information. The AE shall include all of the associated method QC information, even if this information was run on samples other than those associated with this project, shall be reported. This information shall include method blanks, laboratory control samples, matrix duplicates, matrix spikes, matrix spike duplicates, and other method specific QC samples that may have been run. Spiking levels shall be clearly shown. This QC information shall be specific to the batch that the field sample analysis was associated with. Batch numbers shall be clearly shown. Method specific QC information shall be reported with all acceptance criteria clearly shown. All method QC must meet the acceptance requirements as stated within the method or in this instruction. Any deviations from this acceptance criteria shall be identified with appropriate corrective actions that have been conducted, and documented.

2.5.2.5.1.1.5 Other Information. Any other information that is pertinent to project samples shall be reported. This shall include copies of the original chain of custody forms, copies of cooler receipt forms, copies of any telephone conversation records, and copies of any other forms (i.e. corrective action forms, Level 1, 2, and 3 review checklists, and validation forms, etc.). The AE Laboratory shall maintain on file all of the supporting data and documentation for these samples. The contract laboratory shall provide, upon request, copies of raw data for specific methods and samples at no additional cost.

2.5.2.5.1.1.6 Fully Validatable Data Reporting Package Format. The AE shall utilize the reporting format specified by the Data Quality Objectives Process for Superfund, EPA 540-R-93-071, September 1993, in order to allow a full independent validation of the data. The equivalent electronic deliverable shall also be included with the hard copy report.

2.5.2.5.1.1.7 Report Turnaround Time. The AE shall have twenty-one (21) calendar days for standard delivery from the time of sample receipt, unless accelerated turnaround times are requested and agreed upon.

2.5.2.5.1.1.8 Compliance. The AE shall be required to provide procedures to confirm the compliance with documentation requirements including field documentation, daily quality control reports, daily instrument and monitor outputs, standard form completion, authenticity of all document entries by signed or initialed entries, data reporting packages, QC documentation and production of deliverables.

2.5.2.5.1.1.9 Quality Assurance (QA) Laboratory Functions. The QA laboratory shall be obligated to perform the following functions: (1) Inspection of QA samples to insure that sampling procedures correspond to the SAP, with regard to sample container, preservation, labeling, and chain of custody, (2) Analyses of QA samples, (3) Evaluation of data deliverables specified in the SAP, (4) Comparison of analytical results obtained by the contract laboratory from split or replicate samples. The AE shall be responsible for collecting, packaging, and shipping quality assurance samples to the quality assurance laboratory. The Quality Assurance Laboratory for this removal action and all sampling events associated with this removal action is the U.S. Army Corps of Engineers, Ohio River Division Laboratory (CEORD-PE-GL) located in Cincinnati, Ohio. Samples collected for Quality Assurance Analysis shall be sent to

U.S. Army Corps of Engineers, Ohio River Division Laboratory
Mr. John Adams
11275 Sebring Drive
Cincinnati, OH 45240-2714

The results from the analytical data shall be sent to

U.S. Army Corps of Engineers, Ohio River Division Laboratory
Mr. Sam Mansy
11275 Sebring Drive
Cincinnati, OH 45240-2714

2.5.2.6 Data Reportables. The Contractor shall be required to deliver data reportables, submittals, etc. by specified reporting formats such as EPA SW-846 and USACE Minimum Data Reporting requirements.

2.5.2.6.1 SAP Deliverables. This section of the SAP shall indicate to the SAP user the required deliverables derived from the data acquired by the SAP activities and when and how the deliverables shall be reported. Deliverables include: Daily Quality Control Reports, Quality Control Summary Reports, Chemical Data Reports, Summary Chemical Data Reports and if

required, Interim Chemical Data Reports.

2.5.2.7 Sample Information. Table 4 contains the number of field, QC, QA and equipment rinsate samples for each soil parameter that is tested at the site. Tables 5 lists Matrix Spike and Matrix Spike Duplicate requirements for soil and sediment samples during this field effort.

Table 4
Sample Information
(Soil)

Parameter	Field Samples	QC Samples	QA Samples
VOCs	24	2	2
SVOCs	24	2	2
PCB/Pesticides	24	2	2
Metals	24	2	2

Table 5
Matrix Spike/Matrix Spike Duplicate Information
(Soil)

Parameter	Field Samples	Matrix Spike	Matrix Spike Duplicates
VOCs	24	1	1
SVOCs	24	1	1
PCB/Pesticides	24	1	1
Metals	24	1	1

2.5.2.8 Detection Limits. Detection Limits for the compounds identified in Table 1 of this SOW shall be lower than the lowest value listed for each individual constituent. For volatile organic compounds that estimated quantitation limit shall be as described in Table 6 of this SOW. For inorganic elements analyzed by ICP the required reporting limits are contained in Table 8 of this SOW.

2.6 Task 6 - Preparation and Submission of Draft Site Investigations Report.

The AE shall prepare and submit the Draft Site Investigations Report to Corps of Engineers for review and comment. The report shall be a stand alone document with a discussion of purpose and organization of report, background information (including site

description and site history), data quality assessment, conclusions, and recommendations. The data quality assessment shall compare the results with the prescribe data quality objectives. The DQOs shall be provided by COE personnel.

2.7 Task 7 - Draft Site Investigations Report Meeting.

The AE shall be available for a meeting to be held at Nashville District - Corps of Engineers Facility two (2) weeks after the submittal of the Draft Site Investigations Report. The purpose of this meeting is to discuss the subject report. Two days shall be allowed for this meeting (One travel day and one meeting day). For cost estimating purposes two people shall attend this meeting.

2.8 Task 8 - Preparation and Submission of Final Site Investigations Report.

The AE shall revise the draft report to include any pertinent comments that arise from regulatory and COE review of the draft report. The AE shall formally respond in writing to all officially submitted COE and regulatory comments.

3.0 Schedule.

4.0 Submissions.

Table 6
Compound List and Reporting Limits for Volatile
Organics by GC/MS (SW-846, 8260A)

Volatiles	MDL ($\mu\text{g/l}$)	EQL ($\mu\text{g/kg}$) (Soil)
Benzene	0.04	5
Bromobenzene	0.03	5
Bromochloromethane	0.04	5
Bromodichloromethane	0.08	5
Bromoform	0.12	5
Bromomethane	0.11	5
n-Butylbenzene	0.11	5
sec-Butylbenzene	0.13	5
tert-Butylbenzene	0.14	5
Carbon Tetrachloride	0.21	10
Chlorobenzene	0.04	5
Chloroethane	0.10	5
Chloroform	0.03	5
Chloromethane	0.13	5
2-Chlorotoluene	0.04	5
4-Chlorotoluene	0.06	5
Dibromochloromethane	0.05	5
1,2-Dibromo-3-chloro- propane	0.26	10
1,2 Dibromomethane	0.06	5
Dibromomethane	0.24	10
1,2 Dichlorobenzene	0.03	5
1,3 Dichlorobenzene	0.12	5
1,4 Dichlorobenzene	0.03	5
Dichlorodifluoromethane	0.10	5
1,1-Dichloroethane	0.04	5
1,2-Dichloroethane	0.06	5
1,1-Dichloroethene	0.12	5
cis-1,2-Dichloroethene	0.12	5
trans-1,2-Dichloroethene	0.06	5
1,2-Dichloropropane	0.04	5
1,3-Dichloropropane	0.04	5
2,2-Dichloropropane	0.35	15
1,1-Dichloropropene	0.10	5
Ethylbenzene	0.06	5
Hexachlorobutadiene	0.11	5
Isopropylbenzene	0.15	5
p-Isopropyltoluene	0.12	5
Methylene Chloride	0.03	5
Napthalene	0.04	5
n-Propylbenzene	0.04	5
Styrene	0.04	5
1,1,1,2-Tetrachloroethane	0.05	5
1,1,2,2-Tetrachloroethane	0.04	5
Tetrachloroethane	0.14	5
1,2,3-Trichlorobenzene	0.03	5
1,2,4-Trichlorobenzene	0.04	5
1,1,1-Trichloroethane	0.08	5
1,1,2-Trichloroethane	0.10	5
Trichloroethene	0.19	10
Trichlorofluoromethane	0.08	5
1,2,3-Trichloropropane	0.32	15
1,2,4-Trimethylbenzene	0.13	5
1,3,5-Trimethylbenzene	0.05	5
Vinyl Chloride	0.17	10
o-Xylene	0.11	5
m-Xylene	0.05	5
p-Xylene	0.13	5

Table 7:
 Element List and Reporting Limits (Soil) for
 Metals by ICP (6010A, SW-846, 3rd Edition, Update 1, Rev.1,
 November 1990)

Metal	Instrument Detection Limit ($\mu\text{g}/\text{l}$)	Reporting Limit (mg/kg)
Aluminum	45	9
Antimony	32	6
Barium	2	0.4
Beryllium	0.3	0.06
Cadmium	4	0.8
Calcium	10	10
Chromium	7	1
Cobalt	7	1
Copper	6	1
Iron	7	1
Lead	42	8
Magnesium	30	6
Manganese	2	0.4
Nickel	15	3
Potassium		1
Selenium	75	15
Sodium	29	58
Thallium	40	8
Vanadium	8	2
Zinc	2	0.4