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August 31, 2012

Earl Liverman, On-Scene Coordinator
United States Environmental Protection Agency, Region 10
1910 Northwest Boulevard, Suite 208
Coeur d'Alene, Idaho 83814

RE: Contract No. EP-S7-06-02; Technical Direction Document No. 12-05-0006
Site-Specific Sampling Plan Alteration Form and Site-Specific Data Management Plan,
Avery Landing Site Removal Action, Avery, Idaho

Dear Mr. Liverman:

Enclosed please find the Site-Specific Sampling Plan Alteration Form and the Site-Specific Data Management Plan for the Avery Landing Site Removal Action in Avery, Idaho. If you have any questions, please call me at (206) 920-1739.

Sincerely,

ECOLOGY AND ENVIRONMENT, INC.

Steven G. Hall
START-3 Project Leader

enclosure

cc: Kathy Parker, Quality Assurance Coordinator, EPA Region 10, Seattle, Washington

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

OFFICE OF ENVIRONMENTAL CLEANUP
EMERGENCY RESPONSE UNIT

Site Specific Sampling Plan Alteration Form

Project Name: Avery Landing Site Site ID: 10FT

Author: Steve Hall Company: Ecology and Environment, Inc. Date Completed: August 31, 2012

Changes from Final Site-Specific Sampling Plan (SSSP) (include rationale, decision area, matrices, parameters, equipment, personnel, etc.):

Before Excavation Activities

1. Prior to excavation, six composite soil samples were collected from the ground surface as a part of "Before Excavation Activities" sampling/decision area. The six composite samples were collected from areas outside the planned excavation area, including the three contaminated soil stockpiles in the west (i.e., the lower landing), the overburden stockpile area, the site laydown and command post area, and the Bentcik property east of the planned excavation area. The planned excavation area was not included in these surface composite samples because the overburden will be sampled from the overburden stockpile. The six samples were analyzed for semivolatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), and diesel-range total petroleum hydrocarbons. All were collected as 10-point composite samples, except for the VOC samples, which were collected as grab samples from one sub-location near the center of each composite area.

Water Treatment

2. Samples of treated water are being analyzed for compounds of concern to confirm that discharge criteria are met. Because of the certainty required for these results, the validated results will rely on the reporting limit and not the method detection limit to determine whether the compound is present at a detectable concentration.

3. The treated water discharge criteria targets in the Final Draft Work Plan were based on the Criteria for Toxic Substances (Idaho State Water Quality Standards (IDAPA 58.01.02). Many of these water quality criteria are less than the laboratory's reporting limits for those compounds. For those compounds, the site discharge criteria will be the laboratory's reporting limits. See the attached Table 1 for the revised site discharge criteria.

4. Treated water samples will be collected from the actual discharge point rather than from the sample port between water treatment system and the treated storage tanks to better reflect the actual treated water being discharged.

Excavated/Contaminated Soil

5. Per the receiving landfill's requirements, 10 samples were collected from the first 2,000 tons of stockpiled contaminated soil. These samples were analyzed for SVOCs, PCBs, VOCs, and Toxicity Characteristic Leaching Procedure (TCLP) metals. Upon receipt of the results of these analyses, the landfill agreed that the sampling and analysis for VOCs and TCLP metals from the contaminated soil stockpile was to be discontinued. For the remainder of the project, the landfill requires that one sample be collected for every 5,000 tons of contaminated soil for PCBs and SVOCs analysis.

Field Duplicates

6. Field duplicates for water and soil samples will be collected at an approximate frequency of 1 per 20 samples per matrix (soil and water), regardless of site decision or sampling area.

Approvals of SSSP Alteration Form		
Name	**Title**	**Signature**
Earl Liverman	On-Scene Coordinator (OSC)	
Kathy Parker	Emergency Response Unit (ERU) Quality Assurance Coordinator (QAC) or alternate	Kathy Parker Kathy Parker cn=Kathy Parker, o=USEPA, ou=OSC, email=parker.kathy@epa.gov, c=US 2012.12.19 09:33:27 -08'00'

Table 1
Avery Landing Site
Treated Water Discharge Criteria

Analytes	Idaho Surface Water Criteria (µg/L)	Laboratory Reporting Limit (approximate) (µg/L)	Site Discharge Criteria (µg/L) (1)
Arsenic	10	5.00	10
Cadmium	0.6	1.000	1
Chromium	11	10.00	11
Copper	11	1.000	11
Lead	2.5	2.000	2.5
Thallium	0.24	2.000	2
Zinc	120	10.00	10
Benzo[a]anthracene	0.0038	1.000	1
Benzo[a]pyrene	0.0038	1.000	1
Benzo[b]fluoranthene	0.0038	1.000	1
Chrysene	0.0038	1.00	1
n-Nitrosodiphenylamine	3.3	10.00	10
Total PCBs	0.000064	0.010	0.01

Note: (1) Where the laboratory's reporting limit exceeds the surface water criteria, the reporting limit will be the discharge criteria.

Key:

µg/L = micrograms per liter

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OFFICE OF ENVIRONMENTAL CLEANUP
EMERGENCY RESPONSE UNIT

Data Management Plan

Project Name: Avery Landing Site Site ID: 10KZ

Author: Michael Worden / Steve Hall Company: E & E Date Completed: 06/27/2012

This data management plan (DMP) is intended to provide guidance for data collection by field personnel and subsequent data management activities. The data collection and management practices presented in this plan are designed to ensure data integrity and consistency for all data collection personnel and from operational period to the next. Listed in this DMP are data elements, data collection equipment, and data management processes, and end-use products appropriate for supporting the EPA On-Scene Coordinator (OSC). Electronic tools and files used during data management at the site may include a GPS with a data dictionary to gather site specific data, EDD files for laboratory results, an XRF database used to validate the data, field monitoring equipment (such as air monitoring equipment), a Scribe database to manage all field data and analytical results, and ArcGIS to manage geospatial data. Manual data entry or Excel spreadsheets will be used to incorporate field notes and historic data when electronic data is not available.

1. **Conceptual Model for Data Management:**
   This is a general overview of the path your data will follow from collection, through processing, to its final output. Think in general terms.

What type of data is being Collected	How will it be Managed	Final Output of Data
Sample Information	The sample information will be collected using field sample collection forms and/or logbook. The information will then be entered into Scribe and stored there for future use. Sample numbers and location IDs will follow the guidance as posted in the job trailer. The forms will be scanned and stored in the site file structure.	Chain-of-Custody forms, labels, tabular reports, and/or maps
Monitoring Data	This data type will be transcribed either into a field monitoring form, logbook, or downloaded directly from the instrument, and either transcribed or uploaded into Scribe and stored there.	Tabular reports and/or maps
Field Screening Data	This data will be collected using the instrumentation outlined in the SSSP. The data will be recorded on field forms and uploaded into Scribe and stored there for future use. If the data output type is not compatible with Scribe, it will be transcribed and entered into Scribe and the electronic file will be stored in the site file structure.	Project archives (electronic and/or text file), data tables for final report.
Laboratory Analytical Data	This data will be generated using the analytical methods utilized at this site. The data will then be transcribed or uploaded into Scribe and stored there. If the data output type is not compatible with Scribe, it will be stored in the site file structure.	Tabular reports and/or maps
Sample Location Data	GPS data will be collected using a GPS device and transcribed into field collection forms or logbooks. The electronic file will be uploaded into Scribe and stored there for future use when available. Sample depth below ground will also be collected when	Tabular reports and/or maps

What type of data is being Collected	How will it be Managed	Final Output of Data
	applicable (i.e. Excavation Pit).	
Photographs	Photographs will be collected with digital cameras, and the descriptions will be collected on sample collection forms or field logbooks. The electronic files will be stored in the site file structure and descriptions will be scanned and stored in the file structure along with the photographs on a daily basis.	Photographic log
Best Management Plan (BMPs) Inspections	Observations about the condition of the site BMPs will be inspected daily, and START observations will be recorded on a site-specific field form. The filed forms will be maintained in the site files in the site job trailer.	Recommendations for corrective actions, if necessary, will be made to the OSC and ERRS as necessary. The observations will be summarized in the final report.

2. **What instruments/equipment/programs will be used to collect data and what is the required/needed information for that instrument/equipment/program?**
List the specific instrument/equipment/program used (e.g. GPS unit) (XRF)
List the specific outputs from a given source; each should have their own line (e.g. location information [lat/long], monitoring data, analytical data, chromatograms)
List the fields from each stream that will be required for your project (e.g. sample number, analyte, matrix, units, etc).
List the specific format the stream will generate (e.g. .xls, paper, .pdf)

Data Source	Data Stream	Required Information/Description of deliverable	File format
Horiba U-52	Field Screening Data	Location ID, Date, Time, pH, Turbidity, Electrical Conductivity, Dissolved Oxygen, Salinity, ORP, and TDS	Results recorded on field form, transcribed to an Excel spreadsheet, and then imported into Scribe.
DataRam (periodic field checks)	Field Screening Data	Location ID, Date, Time, Concentration, and TWA	Results recorded on field form, transcribed to an Excel spreadsheet, and then imported into Scribe.
DataRam (logged data)	Field Screening Data	Location ID, Date, Time, Mass, Temperature, Relative Humidity, and Particle Size, will be downloaded to a txt file and then imported to .xls.	.txt and .xls
MultiRAE (periodic field checks)	Field Screening Data	Location ID, Date, Time, CO, VOC, % O_2, % LEL, H_2S	Results recorded on field form, transcribed into an Excel spreadsheet, and then imported into Scribe.

3. **What are the process, frequency, and responsibility to process the data and prepare it for the final output?**

Data Source	Data Stream	Processing Instructions	Frequency	Responsibility
Scribe		Upload to Scribe.net	Daily	Scribe Manager
Site Files		Store on flyaway laptop and automatically back up to internet and other project laptops using cloud service (Dropbox)	Daily	Project Manager/Automatic
DataRam	Field Screening Data	Data will be downloaded from the unit, and the data will be processed and imported into Scribe using the DataRam Data Processing SOP.	Weekly upload of logged data and entry of periodic field check data	Site Manager
Digital Cameras	Photographs	Photographs will be downloaded to the flyaway or project laptop and stored in site file structure	Daily	Site Manager

GPS Unit	GPS files	Download to the flyaway laptop with Pathfinder and store in the site file structure.	Daily	Site Manager

4. Are there specific naming conventions, custom Scribe field mapping, or data dictionaries that are not detailed in the SSSP or in an SOP? If yes, detail those conventions below.

Data Source	Data Stream	Special Instructions
DataRam	Field Screening Data	When converting the test to a .csv file, the instrument ID should be the EPA Decal ID number

5. Specific Reporting Requirements:

Generic information that does not fit in other categories (e.g. report sample results in mg/kg not µg/kg; if you only want hour average for AreaRAE data include the SQL code here to document the process)

6. Archiving and Post-Site Close-out Procedures:

The project will be uploaded to Scribe.net.
Electronic files will be written to CD-ROM or DVD and provided to the Task Monitor.
Hard copy files will be assembled and provided to the Task Monitor.