0530532

United States
Environmental Protection
Agency

Region 10
1200 Sixth Avenue
Seattle WA 98101

Alaska
Idaho
Oregon
Washington

EPA

May 23, 1990

Reply To
Attn Of: HW-113

Dennis M. Scott, P.E., Director
Spokane County Public Works
N. 811 Jefferson Street
Spokane, Washington 99260-0180

Dear Mr. Scott:

The U.S. Environmental Protection Agency (EPA) and Washington Department of Ecology (Ecology) are concerned over the quality control problems associated with the Domestic Well Monitoring program. This problem was identified in a letter from the Colbert Landfill Citizens' Committee (CLCC) and discussed further at their April 26, 1990, meeting which representatives from EPA, Ecology, and the County attended.

The Domestic Well Monitoring program is a part of the Scope of Work which is incorporated into the Consent Decree dated February 28, 1989, between EPA, Ecology, Key Tronic Corporation, and Spokane County. In this decree, Spokane County agreed to continue the residential well sampling program. In a letter to Dean Fowler dated February 14, 1990, (b) (6) [redacted], Chair, Colbert Landfill Citizens' Committee, stated that several wells had been sampled incorrectly producing erroneous data. For example, according to the letters from the citizens' committee and the County, sample results were obtained for two wells where no sample of the drinking water was actually taken.

Mr. Fowler, Project Manager, responded to the CLCC in both a letter to (b) (6) [redacted] on April 16, 1990, and at the April 26 meeting that there was a problem with the field sampling. The solution he described was to let your consultant, Bruce Austin, correct the problem with some input from the Colbert Sampling Committee. This action was not received well by the Citizens' Committee since neither Mr. Austin nor his sampling staff are qualified to evaluate this type of problem or to develop technical solutions. The current Sampling Committee does not have a technical groundwater representative who could help with the quality assurance (QA) of the program. Questions remained unanswered about the current and past sampling practices and how much data is questionable.

EPA and Ecology are both concerned about the Quality Assurance and Quality Control (QA/QC) for this important program. The Domestic Well Monitoring program is covered under the Consent Decree as a part of the Scope of Work that is attached to the decree. To resolve QA/QC issues EPA and Ecology are requesting that Spokane County:

USEPA SF
1503740

1. Submit by June 6, 1990, for our review, the existing quality assurance project plan (QAPP) for the Domestic Well Monitoring program, or identify documents that have already been submitted that are used to describe this activity.

2. Submit the Sampling and Analysis Plan (SAP) by June 6, 1990. The SAP may be included as part of the QAPP. The sampling plan must have an overall purpose and then explain how and why each sample needs to be taken. The SAP also has to include the analytical procedures that are being used to obtain the quality of data desired. EPA has provided specific guidance on QAPPs and SAPs, and it should be utilized in the Domestic Well Monitoring program. EPA and the state will be providing some comments based on the agency review of any QAPP documents that are submitted.

3. Develop within two weeks after receipt of agency comments on the existing QAPP and SAP, a schedule to correct the existing sampling problems. This schedule must contain a plan for when the county expects to implement the changes to the sampling program and when any revised QAPP documents will be submitted to EPA and Ecology. We recommend that a detailed review of the entire domestic well sampling and analysis program be performed. It is the county's responsibility to correct the identified problems in the Domestic Well Monitoring program.

If you have any questions or comments concerning this letter or other aspects of the project, please do not hesitate to contact Neil Thompson, EPA Project Manager, or Michael Kuntz, Ecology Project Manager.

Sincerely,

Carol Rushin

Carol Rushin, Chief
Superfund Site Management I
U.S. Environmental Protection Agency

Glynnis Carrozzino for

David B. Jansen, P.E., Section Head
Site Clean Up Section
Department of Ecology