

Comments Received from TetraTech February 27, 2014

From: Welge, Jon [<mailto:Jon.Welge@tetrattech.com>]

Sent: Thursday, February 27, 2014 4:36 PM

To: Leber, Bud

Cc: Gibbons, Harry; Brattebo, Shannon; Plotnikoff, Robert; afcr461@ecy.wa.gov

Subject: QAPP SAP Concerns & Comments

Hello Bud!

As you know, Tetra Tech is interested in proposing upon the upcoming SRRTTF PCB sampling work tentatively scheduled to begin on the Spokane River this coming summer. We have received draft copies of the QAPP and SAP produced by LimnoTech. We have briefly reviewed each document. As it stands, we do not find the QAPP and SAP to have been completed to an extent that allows contractors to prepare a meaningful bid for the work. We feel there are too many unknowns.

We also understand that time is of the essence and want to offer the following priority comments regarding the draft QAPP and SAP documents (see below). This is not a complete list. We understand that LimnoTech and the SRRTTF have been pressed hard for time and that these documents are not easy to complete – we hope this can help.

Sincerely,

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QAPP-SAP Comments:

1. The objectives of the QAPP/SAP as well as the overall monitoring program are not clearly stated. What is the mission of the project? What is the SRRTTF trying to accomplish with this monitoring? What is the objective of sampling every other day for 13 days?
2. There needs to be further explanation on data gaps. What are the data gaps? What, if any, quality PCB data exist for the Spokane River? Need to explain how the proposed monitoring will provide the data necessary to resolve data gaps. It is our understanding that there is very little quality PCB data for the river.
3. PCBs will be hard to find in surface water as they bind with organic material. The Spokane River has very little organic material in the water column. What will non-detects mean to this project?
4. There is a lack of consensus and in some cases contradiction between the QAPP and SAP.

5. According to the SAP, sampling methods are in accordance with “SOPs” which are not included. EPA Collection method 1669 is referenced. What modifications to 1669 will need to be made given the environmental conditions? Will the same SOPs be followed at each site under low-flow and high-flow conditions? Sampling logistics are missing from the SAP. How many crews will be needed? Where in the river will the samples be collected?
6. The DQOs should include what regulatory criteria is relevant, whether the samples are to be compared to MDLs or PQLs. The DQOs should state what we are trying to accomplish with this data.
7. Why are extra samples being collected at each site for compositing? What is the goal/benefit of compositing if discrete samples are being collected and analyzed? Please provide rationale.
8. Are all parameters proposed for composite analysis? The 7-day hold time for TSS/TDS will be violated if samples are held for compositing after sampling collection.
9. The documents are not “stand-alone” documents – additional description is recommended from past memos to illustrate the reasons for this work. Bring information from monitoring strategy and data gaps memos to help define objectives and rationale for proposed sampling.
10. What happens if there is a rain event during the period that sampling is occurring? Would the contractor stop sampling and proceed again after the storm event has passed? Would sampling just be halted?
11. It appears a duplicate sample is to be collected for every sample – in the effort to ensure completeness. Please explain. This is not standard monitoring practice. Where will the samples be stored? Does the consultant need to provide storage for these samples?
12. Who will be sampling the WWTP effluent streams? The consultant or the discharge? And how are effluent stream samples going to be collected. Twenty-four or 12-hr composites?