Responses to USEPA Comments on the
Comments regarding the OU-1/OU-2 Predesign Investigation Work Plan
Anniston, Alabama

Comments:		Response:
#	**General Comments to the Predesign Investigation Work Plan (PDIWP)**	
1.	Surface soil and subsurface soil should be defined. The disposal requirements for residential and special use soils should be clarified. See suggestions for Section 1.2.1 below. • Residential soils: The selected remedy for residential soils is removal and on-site or off-site disposal of surface soil (i.e., soil from ground surface to 12 inches below ground surface [bgs]) with polychlorinated biphenyl (PCB) concentrations greater than or equal to 1 milligram per kilogram (mg/kg) but less than 10 mg/kg, and removal and off-site disposal of surface and subsurface soil (i.e., soil deeper than 12 inches bgs) with PCB concentrations greater than or equal to 10 mg/kg. The selected remedy also includes long-term soil management for (1) properties with residual PCBs greater than or equal to 1 mg/kg, (2) properties with PCB concentrations in soil greater than or equal to 1 mg/kg that have been designated as "unsuitable for removal," and (3) properties that potentially have residual PCBs beneath a structure (i.e., a building, shed, or paved area) that limits exposure. • Special use properties: For high-activity special use properties, the selected remedy includes removal and on-site or off-site disposal of surface soil with PCB concentrations greater than or equal to 1 mg/kg but less than 10 mg/kg, and removal and off-site disposal of subsurface soil with PCB concentrations greater than or equal to 10 mg/kg. For low activity special use properties, the selected remedy includes removal and on-site or offsite disposal of surface soil with PCB concentrations greater than or equal to 1 mg/kg but less than 10 mg/kg and removal and off-site disposal of surface soil with PCB concentrations greater than or equal to 10 mg/kg and subsurface soil with PCB concentrations greater than or equal to 97 mg/kg. The selected remedy also includes long-term soil management for (1) properties where residual PCBs are greater than or equal to 1 mg/kg, (2) properties with PCB concentrations in soil greater than or equal to 1 mg/kg that have been designated as "unsuitable for removal," and (3) properties that potentially have residual PCBs beneath a structure (i.e., a building, shed, or paved area) that limits exposure.	The requested revisions (shown in red font in this response to comment matrix) have been incorporated into Section 1.2.1.

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2.	**Section 1.2 Remedial Action Summary, Interim Measure**, last sentence. The EPA should be consulted about determination of next steps.	The last sentence of the interim measure (IM) areas bullet has been revised to indicate the specific approach to address the principal threat waste (PTW) materials will be developed in coordination with USEPA during the remedial design (RD).
3.	The revisions to Figure 2-3e in response to comment 6 cannot be verified. Elaborate on what was changed based on the initial comment.	Additional changes have been made to Figure 2-3e and Figure 3-3e with cross-hatching over the shading to clarify that remediation efforts for the Miller property portion includes removing a 1-foot layer of soil and replacing that soil with clean backfill. Consistent with other elements of the Operable Unit 1/Operable Unit 2 (OU-1/OU-2) remedy for soil, the area will also be restabilized with vegetation. The other shaded areas on these figures reflect planned remediation footprints for the IM areas based on the OU-1/OU-2 Record of Decision (ROD) including where soil samples will be collected.

4.	The previous PDIWP document proposed to collect an ISM sample at PB-RR-37. The current document proposes to collect a discrete sample at PB-RR-37 and a composite sample that covers the whole ditch leading to Snow Creek. The EPA prefers that the surface samples at PB-RR-37 and each location for ditch sampling be an ISM or composite sample. Clarify what the green box around location PB-RR-37 on Figure 2-3e and Figure 3-3e means.	As discussed with USEPA on April 29, 2022, the scope of work for soil sampling within the PB-RR-37 area and drainage ditch downstream of the PB-RR-37 area will include the following: - A boring will be advanced at PB-RR-37 until the soil–groundwater interface is reached. Discrete soil samples will be collected and analyzed for PCBs on 1-foot intervals beginning with the 1–2-foot horizon. Soil from the 0–1-foot horizon will be included as one of the five aliquots that will be used to form a composite sample from the PB-RR-37 area (as described in next bullet). - A 5-point composite sample will be collected from the PB-RR-37 area and will include aliquots from the soil boring advanced at PB-RR-37 as one of the five aliquots that will form the composite sample. The surface soil results will be used to determine if the upper foot of soil is to be removed based on a comparison to the remedial goal of 21 mg/kg. If the surface soil composite has a PCB concentration greater than or equal to 21 mg/kg, the initial subsurface soil increment (1–2 feet) will be analyzed for comparison with the subsurface remedial goal of 97 mg/kg. The surface soil PCB results and the subsurface soil PCB results (if applicable) will also be used to support decisions regarding off-site disposal relative to the soil having PCB concentrations greater than or equal to 50 mg/kg. - There will be 5-point composite samples collected from the area downstream of PB-RR-37. - At two of the 5-point composite locations from the drainage ditch, discrete samples closest to Snow Creek will be collected from the 0–1-foot below grade surface (bgs) interval. Composite samples will be collected from four sample depths: 0–1 foot bgs, 1–2 feet bgs, 2–3 feet bgs, and 3–4 feet bgs. PDIWP text, Table 3-1, and Figure 3-5 have been revised in response to this comment. The green box around location PB-RR-37 is the “Interim Measure Area Remediation Footprint” from the OU-1/OU-2 Feasibility Study as indicated in legend entries included on Figure 2-3e and Figure 3-3e. As noted on Figure 3-5, composite sampling of surface soil

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		in the area defined by the green box will be conducted to confirm if surface soil remediation is required. Subsurface composite soil samples will also be collected in this area and will be analyzed if the PCB concentrations in surface soil are greater than or equal to 21 mg/kg. Additional composite sampling has been included for the portion of ditch located south of the railroad tracks and west of McDaniel Street as shown on Figure 3-3e. Samples will be collected for both the surface and subsurface intervals and will be analyzed for PCBs.
5.	**Section 2.1.3 Snow Creek Sediment**, second full paragraph page 10. It is noted that the culvert beneath Quintard Mall was not sampled during the RFI. Please also note that it will be sampled as part of this PDI.	Section 2.1.3 has been revised to note that the culvert beneath Quintard Mall will be probed and sampled as part of the PDI as described in Section 3.3.2.2 of the PDIWP.
6.	**Section 2.1.4 Snow Creek Surface Water**. Include the year that the second surface water sampling program was conducted.	The second surface water sampling program was completed in 2007 (March and June) under the Nonresidential Properties Field Sampling Plan and associated addenda. This detail has been added to the second paragraph of Section 2.1.4 as requested.
7.	**Section 2.2.2 Groundwater**. Delete the last sentence and indicate that the EPA will be consulted about next steps based on the results.	As requested, the sentence has been deleted and replaced with the following language: “Following receipt of soil sampling results, P/S will consult with USEPA on the need for a groundwater investigation at the PB-RR-37 area. Depending on laboratory testing results, possible outcomes for this area may include no further investigation or installation of a groundwater monitoring well.”
8.	**Section 2.2.2.1 Eastside Properties**. Delete the conclusion that “no further monitoring will be conducted” if groundwater concentration is less than 0.5 µg/L. Instead indicate that the EPA will be consulted about next steps based on the results.	As requested, the concluding two sentences have been deleted and replaced with the following language: “Following receipt of groundwater monitoring results and interpretation, P/S will consult with USEPA on the need for and extent of additional PDI activities. Depending on laboratory testing results, possible outcomes may include no further investigation, confirmation resampling, or additional investigation to support the OU-2/OU-2 RD.”

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9.	**Section 2.2.3 Snow Creek Sediment**. It is noted that the culvert beneath Quintard Mall was not sampled during the RFI. Please also note that it will be sampled as part of this PDI	Section 2.2.3 has been revised to note that the culvert beneath Quintard Mall will be probed and sampled as part of the PDI as described in Section 3.3.2.2 of the PDIWP.
10.	**Section 2.2.5 Snow Creek Surface Water**. How many samples will be collected upstream and downstream for baseline conditions? Refer to section 3.5.2. Metals (chromium and lead) should be included in the baseline monitoring. If samples are filtered, unfiltered samples should also be analyzed.	Details for the baseline surface water sampling program are described in Section 3.5 of the PDIWP. The baseline surface water sampling program will include collecting up to eight grab samples (one sample quarterly for 2 years) from each upstream and downstream location and quality assurance/quality control samples. As described in Section 3.5.2 of the PDIWP, the grab sampling will include collecting samples to measure total (unfiltered) and dissolved (filtered) concentrations in surface water. In addition, as described in Section 3.5.2, the baseline surface water sampling program will include collecting up to four passive samples (twice per year for 2 years) from each upstream and downstream location. Section 3.5.2 has been revised to indicate that the filtered and unfiltered grab samples from the baseline PDI surface water sampling will also be analyzed for lead, total chromium, and hexavalent chromium.

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11.	**Revise Section 3.1.2.1** to provide specificity given to the laboratory. Standard operating procedures (SOPs) for soil processing were provided in SOP NC-OP-044. The SOPs are included but are generic. The PDIWP did not specify which methods will be used. Will there be sample reduction in the field? Will the laboratory grind the samples? How will samples be disaggregated? SOP NC-OP-044 indicated that various means of soil disaggregation and sieving are possible. Walk us through what happens at the laboratory. How will the laboratory get the 2-gram sample for analysis? The procedures for subsampling are contained in SOP NC-OP-046. Several different options for subsampling are possible, from slab cakes to alternate scoops. Identify specific procedures Solutia will request the laboratory to perform. The EPA is looking for confidence that these have been thought through. Some coordination with the laboratory will probably be needed.	Please see below responses to questions from USEPA regarding the Incremental Sampling Methodology (ISM) sampling and processing procedures that have been developed with communication from Eurofins-TestAmerica (North Canton) in accordance with Interstate Technology and Regulatory Council (ITRC) ISM-2 guidance. Please note that standard operating procedures (SOP) NC-OP-044 and SOP NC-OP-046 are SOPs provided by the laboratory and thus not subject to revision other than by the laboratory. Clarifications have been incorporated into the PDIWP as appropriate.
a.	Will there be sample reduction in the field?	Yes, sample reduction will be completed in the field. As discussed in Step 5 of the general procedures for collecting ISM samples, a representative subsample from each increment will be collected using subsampling methods in accordance with ITRC ISM-2 guidance (i.e., core wedge subsampling, plug subsampling, or core slice subsampling). Plug subsampling is the preferred subsampling technique; however, if challenges are observed in the field for this technique, subsampling will be collecting using either core wedge or core slice subsampling techniques. These representative subsamples will then be combined and homogenized prior to shipment to the laboratory. Approximately 900 grams will be submitted per ISM sample to the laboratory.
b.	Will the laboratory grind the samples?	No, the laboratory will not grind the samples. As discussed in ITRC ISM-2, grinding (or milling) is not universally recommended for organic contaminants due to high temperatures that occur during the grinding process. Additionally, the usefulness of particle size reduction achieved by grinding for organic compounds is limited because larger masses of soil are extracted and analyzed by the laboratory.

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c.	How will samples be disaggregated?	Samples will be disaggregated and sieved by Eurofins-TestAmerica (North Canton) laboratory staff using an automated soil disaggregator with a built-in sieve in accordance with laboratory SOP NC-OP-044.
d.	How will the laboratory get the 2-gram sample for analysis?	Please note a 10-gram sample (per laboratory SOP NC-OP-040), not a 2-gram sample as noted in USEPA comment #11, is needed for Soxhlet extraction prior to analysis of the extract using USEPA SW-846 Method 8082A (PCB as Aroclors). In order to achieve a 10-gram subsample, Eurofins-TestAmerica (North Canton) will use a two-dimensional slabcake subsampling procedure in accordance with laboratory SOP NC-OP-046.
e.	Several different options for subsampling are possible, from slab cakes to alternate scoops. Identify specific procedures Solutia will request the laboratory to perform.	Eurofins-TestAmerica (North Canton) uses one-dimensional and two-dimensional slabcake subsampling techniques for ISM sampling. Based on the subsample volume needed for extraction prior to analysis using USEPA SW-846 Method 8082A (PCB as Aroclors), the laboratory will use the two-dimensional slabcake subsampling procedure in accordance with laboratory SOP NC-OP-046.
12.	Regarding the revisions to Table 3-1, check the use of superscript numbering for the notes. Superscript 4 regarding Incremental Sampling Methodology (ISM) is used for samples that are not ISM. Superscripts are not used for sample locations on page 1 of the table, though notes are applicable. Table 3-1 references 'replicates' for Note 5. Be more specific and use triplicates per the revisions to Section 3.1.2.1.	Table 3-1 has been revised as requested (i.e., use of the superscript 4 has been removed from IM areas and nonresidential areas with surface areas less than 0.5 acres, and Note 5 has been revised to use the word "triplicate" instead of "replicate").
13.	In the last sentence in the first paragraph under "Discrete Boring at PB-RR-37" on page 23, the word potential should be deleted.	The requested revision has been completed.
14.	**Section 3.2.1 Rationale and Objectives**, page 29, second sentence first paragraph. Delete the word potential.	The requested revision has been completed.

Comments:		Response:
15.	Soil samples should be collected for at least one of the groundwater monitoring wells installed in the Eastside IM Area. As described in a telephone conversation on April 29, 2022, two piezometers and two monitoring wells should be installed. Figure 3-8 should be revised to reflect the discussion on April 29, 2022.	These revisions have been incorporated into Figure 3-7, Figure 3-8, Section 3.2.1, and Section 3.2.2.1. Attachment A-6 (Subsurface Drilling and Monitoring Well Installation Procedures) has also been slightly revised to incorporate the use of two temporary override casings (i.e., isolation casing) instead of a single override casing. The temporary override casings will be used to isolate shallow soil from the inner casing where the monitoring well will be installed, thereby minimizing the risk of PCB drag down during drilling.
16.	**Section 3.3.2 Scope of Work and Investigative Methods**. Phase I sediment results should be provided to the EPA prior to collecting Phase II sediment samples	Section 3.3.2 was revised to indicate that the Phase 1 sediment probing results will be provided to USEPA prior to commencing the Phase 2 sediment sampling program described in Section 3.3.2.2.
17.	**Section 3.3.2.1 Phase 1: Sediment Probing and Reconnaissance**. Is the culvert under the Quintard Mall accessible? Provide the dimensions of the culvert.	The Quintard Mall culvert is accessible during periods of low or normal stream flow. At a minimum, access can be made by walking into the culvert from the downstream end. Details for access from the upstream end of the culvert will be confirmed during PDI preparation tasks. Based on culvert foundation plan design drawings, the culvert is trapezoidal with an upper width of approximately 100 feet. The height of the culvert varies and is estimated to be between 9 and 11 feet. Dimensions of the culvert will be confirmed during the PDI. The estimated dimensions of the culvert have been added to Sections 3.3.2.1 and 6.2 of the PDIWP and to the Quintard Mall Confined Space Plan (Appendix E).

Comments:		Response:
18.	**Section 3.3.2.2 Phase 2: Sediment Sampling and Analysis.** Please review the logic describing which deposits will be sampled. The EPA should be consulted about the sediment sampling plan before it is implemented. How will the field team determine if the sediment deposit volume is less than 1 cubic yard? At the top of page 39, what does "partial removal of sediment deposits is not anticipated during the remediation project" mean?	During Phase 1 of the Sediment PDI, the locations of each sediment deposit will be identified, and the dimensions will be measured. The Phase 1 measurements will then be used to calculate the estimated volume of each sediment deposit similar to the process that was followed during the Resource Conservation and Recovery Act (RCRA) Facility Investigation. The Phase 1 sediment probing and mapping results will then be reviewed and compared with the results from the previous field efforts to evaluate potential changes in the location and thickness of sediment deposits since the 1999 RFI. The Phase 2 sampling locations will be determined after this evaluation, as described in Section 3.3.2.2 of the PDIWP. The Phase 2 sampling will occur as a separate mobilization after the sampling locations are identified. The Phase 1 sediment probing results and the Phase 2 sampling plan will be submitted to USEPA prior to sampling. At this time, we anticipate that the full depth and width of the sediment deposits would be removed where samples indicate that PCB concentrations in the sediment are above the remedial criteria (absent deposits at the Highway 202 culvert and Quintard Mall). We do not currently anticipate performing a partial depth removal of a sediment deposit. This current assumption is based on the relatively shallow nature of the Snow Creek sediment deposits that has been previously observed. Final details regarding the extent of remediation will be based on the PDI results. Section 3.3.2.2 has been revised to clarify this anticipated approach.
19.	**In Section 3.1.2.2 Geotechnical Investigation (Geotechnical Borings, Page 21, Bullet 6**), UFP-QAPP Attachment A-6 is incorrectly referenced as A-5. Please clarify or revise.	PDIWP language has been corrected to refer to UFP-QAPP Attachment A-6.
20.	The response to Comment 27 states that the text has been revised. However, references are still included for Groundwater Data Quality Objective 5 in Section 4.1. Please clarify or revise.	Section 4.1 has been revised to correctly reference GW-DQOs 3 and 4 where appropriate instead of GW-DQOs 4 and 5, respectively.
21.	No revision was noted on Figures 3-6a through 3-6cc (now Figures 3-9a through 3-9cc) in response to comment 28. Please clarify or revise.	Figures 3-9a through 3-9cc have been revised to clarify the transect range for each figure, and match lines will be added to each figure.

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22.	Method 1668C for PCB congeners is preferred over homologs for the passive samplers. The method for estimating the surface water concentration from the passive sampler calculates the percentage of steady state that was achieved by the performance reference compounds and uses a chemical property like the octanol-water partition coefficient to relate the degree of steady state to the target compounds. Since homologs are a mixture of compounds, the chemical property to relate to the performance reference compounds will be unknow *(sic)*. Partitioning calculations are best performed on individual compounds.	In addition to passive sampler porewater concentrations being analyzed using USEPA Method 680 (PCB homologs), PCB congener concentrations from the same extract will also be analyzed and reported using USEPA Method 1668A.
23.	**Section 6.2 Confined Space Entry Plans**. Dimensions of culverts under Highway 202 are provided. Please provide dimensions of Quintard Mall culverts.	See response to Comment #17.
24.	The ROD included the remedial action objective to reduce COC concentrations in surface water to meet ambient water quality criteria (AWQC) for protection of aquatic life. ROD Section 8.2.5 listed AWQC for total PCBs, chromium VI and chromium III, and lead. Quality Assurance Project Plan (QAPP) Worksheet #11 indicated that baseline surface water results will be compared to post-remedy results. Dissolved phase samples from baseflow conditions are important for comparing to AWQC. The response to comments indicated that the metals exceeded the AWQC in unfiltered samples during high flow events. This conclusion is based on limited historical data. Baseline data for chromium species and lead in filtered samples for baseflow conditions can validate the assumptions. Revise the PDIWP to include baseline sampling for chromium species and lead in surface water.	Section 3.5.2 has been revised to indicate that the filtered and unfiltered grab samples from the baseline PDI surface water sampling will also be analyzed for lead, total chromium, and hexavalent chromium.
25.	**Section 8.2 Schedule**. If data validation is complete for one or two media before all media are complete, consider releasing in multiple reports rather than one final report next summer. This plan is complicated to review and comment on because it covers multiple media and areas of impact.	Section 8.2 was updated to reflect to several potential interim deliverables where USEPA consultation is necessary.
Comments to the UFP-QAPP Appendix A		
1.	**Worksheet (WS) 1 and 2**. Signatures are needed for final approval.	The signatures of Gayle Macolly, Pam Scully, Alan Fowler, and Julia K. Caprio have been included for final approval as requested.

Comments:		Response:
2.	**WS 3 &5**. On page 4, field team members do not receive a copy of the QAPP (noted by *). On page 7 Julia K. Caprio and Courtney L. Thomas, PhD need to sign off on reading QAPP, but neither one gets a copy?	Please see revisions to project organization chart that now indicates Julia K. Caprio (quality assurance/quality control manager) and Courtney Thomas (predesign/field investigation coordinator) receive copies of the UFP-QAPP.
3.	**WS 9**. Electronic data deliverables were not identified.	UFP-QAPP Worksheet #9 has been revised to include details regarding submittal of electronic data deliverables in accordance with the Consent Decree. Additionally, UFP-QAPP Worksheet #6 (Communication Pathways) has been revised to specify that electronic data deliverables, laboratory reports, and other data records will be submitted to USEPA in accordance with the Consent Decree. This revision has been incorporated as part of the procedure description provided for the data release communication driver between P/S and USEPA.
4.	**WS 11**. In response to Comment 42, clarify the details for the proposed sampling density. Soil alternatives should include the low-permeability cap and creek bank stabilization measures in the Step 2 (Identify the Goals of the Study) Question/Decision table. Also, the evaluation of the Hall Street Interim Measures should be included. Nonresidential soil is not listed for Step 5 (Develop the Analytical Approach). Please revise.	UFP-QAPP Worksheet #11 has been revised to 1) provide additional details on the proposed sampling density; 2) include discussion of low-permeability cap, creek bank stabilization measures, and the Hall Street IMs in Step 2 (Identify the Goals of the Study) Question/Decision table; and 3) include discussion of nonresidential soil in Step 5 (Development of Analytical Approach).
5.	**Comment 8 Response to Comment 45 (UFP-QAPP Worksheet 15)** – Add text and borders to the aluminum row in the water table. Make the header rows repeat at the top of the soil/sediment table. Add micrograms per kilogram (µg/kg) to the soil/sediment table notes.	Text and borders to the aluminum row under OU-1/OU-2 ROD remedial goals for surface water have been added as requested. Header rows have been repeated at the top of the soil/sediment table. The definition of micrograms per kilogram have been added to the soil/sediment table notes.

Comments:		Response:
6.	**Comment 9 Response to Comment 53 (UFP-QAPP Worksheet 18)** – The response is confusing. The response initially states that sediment will only be analyzed for polychlorinated biphenyls (PCBs) Aroclors, but then subsequently states that the soil matrix will not be listed for PCBs homologs in Worksheet 23. Also, Worksheet 23 was not revised as indicated. Please revise	Sediment samples will be analyzed for PCB Aroclors (and not for PCB homologs) as described in Section 3.3 of the PDIWP. Only PCB Aroclors are listed in column 5 (Analytical Group) for sediment. No revisions are needed to UFP-QAPP Worksheet #18. UFP-QAPP Worksheet #23 (Analytical SOP References) has been revised to not list the sediment matrix for SOP BR-MS-010 (PCBs Homologs by GC/MS [USEPA 680]).
7.	**WS 20** – Still have not identified the number of samples being collected; it instead states TBD.	UFP-QAPP Worksheet #20 has been revised to include the number of sample locations being collected if known at this time. Three notes have been added to UFP-QAPP Worksheet #20. The first note has been added to explain that the exact number of soil samples cannot be determined at this time as several quantities depend on observed field conditions (e.g., number of samples collected from discrete boring at PB-RR-37 will be determined in the field based on depth to groundwater table). The second note has been added to explain that the number of sediment sampling locations cannot be defined at this time as the number of sediment deposits to be sampled will be decided following completion of Phase 1 of the sediment sampling scope of work (i.e., sediment probing and reconnaissance). The third note has been added to explain that specifying the number of sampling locations or areas is not relevant to toxicity characteristic leaching procedure (TCLP) leachate generated for groundwater and soil/sediment investigation-derived waste.
8.	**WS 22** – Identify the individual(s) responsible for field equipment.	The field team leads (Chris Yates, Ben Smith, and Courtney Thomas) will be responsible for the field equipment. Worksheet #22 has been revised accordingly.

Comments:		Response:
9.	**Comment 10 Response to Comment 58 (UFP-QAPP Worksheet 28)** – The National Functional Guidelines (NFG) and/or EPA Region 4 criteria are the limits that need to be included in Worksheet 28 unless the EPA or NFG do not have limits for the designated analyte or surrogate. Only if there is no government-required limit can the laboratory limits be used. Please check and revise as needed.	Note 2 has been revised for each UFP-QAPP Worksheet #28 to summarize that National Functional Guidelines (NFG) and/or USEPA Region 4 criteria either are not available or the analytical laboratory acceptance limits or measurement performance criteria are in accordance with the government-required criteria or limit.
10.	**Comment 11 Response to Comment 60 (UFP-QAPP Worksheets 28e and 28f [incorrectly listed as 28d in the comment])** – The revisions to Worksheets 28e and 28f cannot be verified. Elaborate on what was changed based on the initial comment.	UFP-QAPP Worksheet #28e (QC Samples Table for USEPA Method 6010C – Cations/Metals) was revised to include information (i.e., frequency/number, method/ SOP QC acceptance limits, corrective action, person(s) responsible for corrective action, and measurement performance criteria) for the following QC sample types included in Eurofins-TestAmerica SOP SA-ME-070 Rev. 19D (12/09/2020): - High standard - Percent (%) relative standard deviation (RSD) (calibration verification [CV]) of multiple exposures - Linear range - Interelement correction factors - Lower limit of quantitation check sample - Initial demonstration of capability (IDOC) - Continuous demonstration of capability (CDOC) - Reporting limit verification (RLV) - Instrument detection limit (IDL) UFP-QAPP Worksheet #28f (QC Samples Table for USEPA Method 7470A and 7471B – Mercury) was revised to include information for the following QC sample types included in Eurofins-TestAmerica SOP SA-ME-028 Rev. 15A (12/8/2020): - Reporting limit standard - Post-digestion spikes - IDOC - CDOC - RLV - IDL Additionally, the description of laboratory control sample duplicate (LCSD) was removed from UFP-QAPP Worksheet #28f to be consistent with Eurofins-TestAmerica SOP SA-ME-028.

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11.	**WS #19 and 30**. Provides a worksheet for each laboratory used and lists any required accreditations/certifications for the laboratory; attaches accreditations/certifications to the QAPP (from Workbook for Uniform Federal Policy for Quality Assurance Project Plans).	WS #19 and 30 have been reorganized into include a page for each laboratory (Eurofins-TestAmerica Pittsburgh, Eurofins-TestAmerica Knoxville, Eurofins-TestAmerica Savannah, and Excel Geotechnical Testing). Accreditations/certifications are listed in Worksheet #19 and #30 at the top of each page for each laboratory. Additionally, all labs have provided a quality assurance manual that includes these accreditations/certifications, and these documents have been submitted as part of Attachment B of the UFP-QAPP.