



June 14, 2011



New York State Department of Environmental Conservation  
1130 N. Westcott Road  
Schenectady, New York 12306  
Attn: Mr. Howard Brezner

**RE: Quality Assurance Project Plan for the Remedial Design Work Plan, Phase 1 Site Preparation, Operable Unit Number 2, for the Congress Street Facility of SI Group, Inc.  
NYSDEC Site Code: HW447007  
CHA Project #: 15091.4007.44000**

Dear Mr. Brezner:

On behalf of SI Group, enclosed is the revised Quality Assurance Project Plan (QAPP) for the Remedial Design Work Plan for Phase I Site Preparation, Operable Unit Number 2 at the Congress Street Facility of SI Group, Inc. The QAPP was revised based on the comments received from New York State Department of Environmental Conservation (NYSDEC) on June 8, 2011. Also enclosed are responses to the comments that have been incorporated into the QAPP.

Revised pages to the QAPP are being provided and should be inserted in Appendix I of the Remedial Design Work Plan with the original pages removed and discarded. In addition, an electronic copy of the latest revision of the Remedial Design Work Plan, including the revised QAPP, is being provided on the enclosed CD. Hard copies of the complete Revised Remedial Design Work Plan can be provided upon request.

If you have any questions, please call me at (518) 453-2897.

Sincerely,

Laury Bibighaus  
Associate

cc: Mr. Robert Cozzy  
Remedial Bureau B  
Division of Environmental Remediation  
New York State Department of Environmental Conservation  
625 Broadway, 12<sup>th</sup> Floor  
Albany, New York 12233-7016

Chief  
USEPA  
NY Section, RCRA Program Branch  
290 Broadway  
New York, NY 10007

ecc: Mr. Christopher M. Doroski, NYSDOH, [cmd16@health.state.ny.us](mailto:cmd16@health.state.ny.us)  
Mr. Charles Gardner, SI Group, [chuck.gardner@siigroup.com](mailto:chuck.gardner@siigroup.com)  
Mr. Kevin Kogut, SI Group, [kevin.kogut@siigroup.com](mailto:kevin.kogut@siigroup.com)  
Mr. Andy Barrett, SI Group, [andy.barrett@siigroup.com](mailto:andy.barrett@siigroup.com)  
Mr. Keith Cowan, CHA, [kcowan@chacompanies.com](mailto:kcowan@chacompanies.com)



---

**Response to DEC Comments  
on the  
Quality Assurance Project Plan  
for the Remedial Design Work Plan, Phase 1 Site Preparation,  
Operable Unit 2  
SI Group's Congress Street Facility  
Site #447007  
Dated June 8, 2011**

**Comment 1:**

*On page 18 of the QAPP, Table 1: Analytical Methods/Quality Assurance Summary:*

- a. The technical holding time for waste soil TCLP VOCs of 14 days is incorrect and should be corrected to 7 days as stated in the NYSDEC ASP (2005).*
- b. The technical holding time for virgin soil VOCs (EPA Method 8260B) of 7 days to extract and 14 days to analyze is incorrect and should be corrected to 14 days since VOCs are either purged directly or extracted (for high level soils) and analyzed the same day.*

**Response:**

The technical holding times for soil TCLP VOCs and virgin soil VOCs have been revised as noted.

**Comment 2:**

*On page 24 of the QAPP, Section 7.3 Laboratory Reporting: Reporting and deliverables should be in accordance with NYSDEC July 2005 ASP, not the June 2000 ASP.*

**Response:**

Section 7.3 has been revised as noted.

**Comment 3:**

*On page 25 of the QAPP, Section 7.5 Data Validation: The data validation should be performed in accordance with "USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review EPA 540/R-99-008, October 1999" and "USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review EPA 540/R-04-004, October 2004". These are the most recent versions of this document.*

**Response:**

Section 7.5 has been revised as noted.

# Remedial Design Work Plan

## Phase 1 Site Preparation Operable Unit No. 2

### SI Group Congress Street Facility Site No. 447007

---

---

*CHA Project Number: 15091*

*Prepared for:  
SI Group, Inc.  
100 Main Street, Route 5S  
Rotterdam Junction, New York*

*Prepared by:*



*III Winners Circle  
Albany, New York 12205  
(518) 453-4500  
(518) 453-4773 - Fax*

*January 2011  
Revised April 2011  
Revised June 2011*

### WORK PLAN REVISION LOG

Work Plan Date	Revision #	Date Submitted to NYSDEC	Description of Revisions
January 2011	0	February 3, 2011	Original
April 2011	1	April 25, 2011	Major modifications made to the Work Plan, including the submission of a QAPP, based on comments received from NYSDEC in a letter dated February 24, 2011
June 2011	2	June 14, 2011	Minor revisions were made to the QAPP based on comments received from NYSDEC in a letter dated June 8, 2011 (Work Plan was not recertified since the changes were not technically significant)

# QUALITY ASSURANCE PROJECT PLAN

**Phase 1 Site Preparation  
Operable Unit No. 2**

**SI Group Congress Street Facility  
SITE NO. 447007**

---

*CHA Project Number: 15091*

***Prepared for:***

*SI Group, Inc.  
Rotterdam Junction Facility  
Rotterdam Junction, New York*

***Prepared by:***



*III Winners Circle  
Albany, New York 12205  
Phone: (518) 453-4500*

*April 2011  
Revised June 2011*

Water	Wastewater	EPA Method 9045C	Corrosivity	1*	0/0	0/0	0/0	Composite sample from holding tank	Clear glass 4oz. wide mouth	Cool to 4°C	N/A	N/A
Air	Soil Vapor	EPA Method TO-15	VOCs	Three (3) samples from each extraction well during the SVE ROI test	1/0	0/0	SVE1-11 SVE2-11 SVE3-11	1 L Summa Canister	None	Compound Specific (0.5 – 5 ppbv)	30 Days	
	Waste Soil	EPA Method 1311/	TCLP VOCs	1*	0/0	0/0	1 discrete grab sample	4 oz. glass jar	Cool to 4°C	Compound Specific (1-40 µg/L)	7 days	
Solid	Waste Soil	EPA Method 1311/	TLCP SVOCs	1*	0/0	0/0	Composite sample comprised of 5 discrete samples	16 oz. glass jar	Cool to 4°C	Compound Specific (5-800 µg/L)	7 days extract; 40 days analyze	
	Waste Soil	EPA Method 8082	TCLP PCBs	1*	0/0	0/0	Composite sample comprised of 5 discrete samples	16 oz. glass jar	Cool to 4°C	0.5 µg/L	365 days	
	Waste Soil	EPA Method 8081	TCLP Herbicides	1*	0/0	0/0	Composite sample comprised of 5 discrete samples	16 oz. glass jar	Cool to 4°C	2 µg/L	7 days extract; 40 days analyze	

Solid	Waste Soil	EPA Method 8151	TCLP Pesticides	1*	0/0	0/0	0/0	Composite sample comprised of 5 discrete samples	16 oz. glass jar	Cool to 4°C	0.2 to 2 µg/L	7 days extract; 40 days analyze
	Waste Soil	EPA Method 6010, 7471, 9012	TCLP Metals	1*	0/0	0/0	0/0	Composite sample comprised of 5 discrete samples	16 oz. glass jar	Cool to 4°C	0.001 to 0.015 mg/L for 6010; 0.0002 mg/L for mercury; 0.01 mg/L for cyanide	180 days (6010) 28 days (mercury) 14 days (cyanide)
	Waste Soil	EPA Method 1030	Ignitability	1*	0/0	0/0	0/0	Composite sample comprised of 5 discrete samples	4 oz. clear glass jar	Cool to 4°C	N/A	N/A
	Virgin Soil	EPA Method 8260B	VOCs	TBD	0/0	0/0	0/0	One per every 5,000 yd <sup>3</sup> of soil†	4 oz. glass jar	Cool to 4°C	10 µg/kg	14 days
	Virgin Soil	EPA Method 8270C	SVOCs	TBD	0/0	0/0	0/0	One per every 5,000 yd <sup>3</sup> of soil†	8 oz. glass jar	Cool to 4°C	Compound Specific (330-830 µg/kg)	14 days extract; 40 days analyze
	Virgin Soil	EPA Method 8082	PCBs	TBD	0/0	0/0	0/0	One per every 5,000 yd <sup>3</sup> of soil†	8 oz. glass jar	Cool to 4°C	Compound Specific (33-67 µg/kg)	14 days extract; 40 days analyze
	Virgin Soil	EPA Method 8081	Herbicides	TBD	0/0	0/0	0/0	One per every 5,000 yd <sup>3</sup> of soil†	8 oz. glass jar	Cool to 4°C	2 µg/kg	7 days extraction 40 days analyze
Solid												



## **7.0 DATA REDUCTION, VALIDATION, ASSESSMENT AND REPORTING**

### **7.1 General**

The Contract Laboratory will perform analytical data reduction and validation in-house under the direction of the laboratory QA Officer. The laboratory's QA Officer will be responsible for assessing data quality and advising of any data which were rated "preliminary" or "unacceptable" or other qualifications based on the QC criteria outlined in the methods, which would caution the data user of possible unreliability.

Assessment of analytical and field data will include checks for data consistency by looking for comparability of duplicate analyses, laboratory QA procedures, adherence to accuracy and precision criteria, transmittal errors and anomalously high or low parameter values. The results of these data validations will be reported to the project managers, noting any discrepancies and their effect upon acceptability of the data.

### **7.2 Field Data**

Raw data from field measurements and sample collection activities that are used in project reports will be appropriately identified and appended to the report. Where data have been reduced or summarized, the method of reduction will be documented in the report. Field data will be reviewed for anomalously high or low values that may appear to be inconsistent with other data.

Field sampling data will be reviewed by the CHA QA/QC Officer in order to ensure the following information has been properly documented:

- Sample identification;
- Source;
- Date and time of sampling;
- Sampling equipment;
- Person(s) collecting the sample; and
- Results of field monitoring and/or observations.

In addition, the field sampling data will be evaluated to ensure:

- The use of approved sampling and sample handling procedures;
- Proper packing/shipping procedures were used; and
- Proper Chain-of-Custody was maintained.

### **7.3 Laboratory Reporting**

Reporting and deliverables for groundwater and air samples will be in accordance with NYSDEC July 2005 ASP, Category B. Reports will be received by CHA within 30 days of the last day of sampling. Sample data and its corresponding QA/QC data shall be maintained accessible to CHA

either in hard copy or on disk. All other reporting and deliverables (i.e. waste characterization samples) will be in accordance with Standard Laboratory Procedure.

#### **7.4 Electronic Data**

The laboratory will also provide the analytical data in an electronic format. The data will be added into the existing database maintained by CHA staff. From there the data can be processed and compared to existing standards using the existing software. An electronic copy of the analytical data in Category B format and in EQUIS format will be provided to NYSDEC.

#### **7.5 Data Validation**

A qualified third party will conduct an independent evaluation of the Category B data reduction and reporting by the laboratory. The data validation will be performed in accordance with the following documents: "USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review EPA 540/R-99-008, October 1999" and "USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review EPA 540/R-04-004, October 2004". Data analyzed using methods not covered in these documents will be validated using the general principles used in these documents, and the analytical requirements specified in the methods pertaining to USEPA Region 2 Data Validation.