



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103

June 12, 2007

Raymond E. Lees
Malcolm Pirnie, Inc
630 Freedom Business Park, Suite 203
King of Prussia, PA 19406

Re: Final Report, Extent of Contamination
Sauer Dump Site
4225 Lynhurst Road
Dundalk, Maryland

Dear Ray:

Thank you for your submission of the Final Report as required by the Administrative Order for Removal Response, Docket No. CERC-03-2006-0239DC. After review of the report I am forwarding you our comments as presented below. Please be aware that there may be conclusions or statements in the Report that we do not agree with, but we have chosen not to mention them or require their correction. Our review focused generally on the presentation of the data, and not on your conclusions.

1. **Section 4.7 Background Investigation Parcel 137.** In section 4.7 you refer to a Background Investigation on Parcel 137: Background can not be established on an area of fill material, nor can background be established on an area that is subject to be contaminated from the area that Mr. Sauer land filled. Thus, no background has been established for the Site. Please correct the language in the Report to reflect that data from parcel 137 is not considered background.
2. **Tables 6, 7, and 8 in comparison to Appendix C, Laboratory Analytical Reports.** Much of the PCB homolog level results for the sediment, surface water and groundwater samples had multiple qualifiers in the laboratory reporting; however, only the J qualifier was applied in the Report tables. The commonly applied qualifiers in the laboratory reports were B, indicating detections in the method blank, and Q, equivalent to "Estimated Maximum Possible Concentration" or EMPC. EMPC means that the result is from chromatographic data that did not meet all qualitative criteria for positive identification in the method. These qualifiers should have been shown in the Report tables; it is not acceptable to replace these qualifiers with the J qualifier. Please revise accordingly.
3. **Appendix B, Data Verification Summary** Section 1.1, Data Quality Assessment. This section states that sample results were subject to a Level III data review that included evaluating sample receipt temperatures, holding times, method blanks, laboratory control samples, matrix spike/matrix spike duplicates, field duplicates, and surrogates. However, a Level III review as defined by EPA, and equivalent to the EPA Region III

M3 review, includes the following items: performance check, initial calibration, continuing calibration, laboratory blank, matrix spike/matrix spike duplicate, field quality control (dup, blank, PE sample), sample paperwork, holding time, retention time, surrogate recovery, dilution factor, moisture content, pesticide cleanup checks, chromatograms, mass spectra, and raw data (see *Innovative Approaches for Validation of Organic and Inorganic Data – Standard Operating Procedures*, June 1995, USEPA Region III, Analytical Services and Quality Assurance Branch). Therefore, a Level III data review was not, in fact, conducted on the sample results and should have been, since these data will support risk management decisions. Please revise accordingly.

4. **Section 1.5, Blank Contamination.** This section states that, in the case of method blank detections, when those same detections occurred in sample results at less than 5x the method blank, the result was qualified J to indicate a potential high bias. However, according to *Innovative Approaches for Validation of Organic and Inorganic Data – Standard Operating Procedures*, the result should be qualified B. Please revise accordingly.
5. **Section 1.7, MS/MSD Recovery and RPD.** This section describes several data qualification actions taken based solely on MS/MSD recoveries. However, the *Innovative Approaches for Validation of Organic and Inorganic Data – Standard Operating Procedures* states: “No action is taken on MS/MSD data alone. However, using informed professional judgment the data reviewer may use the MS and MSD results in conjunction with other QC criteria and determine the need for some qualification of the data.” It would therefore appear that some data has been inappropriately qualified. Please revise accordingly.
6. **Section 1.9, Surrogates.** This section states that J qualifiers were applied to results from batches in which the surrogates were recovered below limits. However, according to *Innovative Approaches for Validation of Organic and Inorganic Data – Standard Operating Procedures*, the results should have been qualified L for low bias. Please revise accordingly.
7. **Section 5.0 Recommended Path Forward Approach** As this section was not required by the Order, EPA is will discuss the content of the section at an appropriate time.

Please make corrections as indicated above and resubmit corrected Report by 6 pm on June 26, 2007. Please note from Section 8.11 of the Order:

Within five (5) business days of receipt of notification by EPA, or as otherwise specified by EPA in its discretion, Respondents shall, as directed by EPA, amend the Final Report, develop an additional plan or amend the existing RAP to address such discrepancies or deficiencies.

Please note for your convenience, I have extended the time for your response. Please contact me either by e-mail or by my cell phone (215 514-8773) with any questions.

Sincerely,



Richard Rupert, OSC
Eastern Response Branch
(3HS31)

cc C. Nadolski (3RC40)
R. Prince