



MEMO

TO: Jennifer Morris, EPA Brownfields Project Manager

FROM: Jon Reis, Eocene

DATE: November 25, 2025

RE: Data Quality Objectives & Site-Specific Quality Assurance Project Plan, Regulated Asbestos Containing Materials Demolition – Former YMCA 306 5th Avenue South, Clinton, Iowa 52732 – Revision No. 0 October 8, 2025

Below are comments from the EPA Region 7 Brownfield Program review of the City of Clinton Site-Specific Quality Assurance Project Plan dated October 8, 2025. Eocene's remarks addressing the comments are in blue text.

Critical Comments

1. A7 Quality Objective and Criteria for Measurement Data, page 9.

- a. This section first states that no field blind replicate samples and no field duplicate quality control air sample will be collected as part of this project. However, the following page describes a precision factor for a field blind replicate/field duplicate samples for air samples which implies the collection of field blind replicate or field duplicate samples. Which is correct?**
 - No field blind replicate sample or field duplicate quality control air samples will be collected. The reference to a precision factor for a field blind replicate/field duplicate sample for air samples has been removed from page 10.
- b. It is not clear how analytical quality assurance/quality control methods will be used to determine if bulk field duplicate samples are acceptable.**
 - Bulk field duplicate sample QA/QC for accuracy, representativeness, and completeness was included. Write-ups/language was added to page 10 to address how QA/QC methods will be used to determine if bulk field duplicate samples are acceptable for precision and comparability.

2. **Section B5, Quality Control Requirements, page 16.** This section describes field auditing being conducted by the Project Coordinator and they are to be completed randomly but not less than once a week during cleanup activities. Later in section C1.1.1, the SSQAPP indicates the QA/QC reviewer will execute all internal audit activities and these audits will be done quarterly. The field audits to be conducted for this project need to be clarified, including how often they will be conducted and by whom. If the audits described in section B5 are separate from and in addition to the internal audits described in section C1.1.1, the QAPP needs to clearly describe this.
 - Clarification language was added to sections C1.1.1, C1.1.2, and C1.1.3. The field audits referenced in section B5 will be conducted by the Project Coordinator not less than once a week during cleanup activities. C1.1.1 has been revised to state the QA/QC reviewer will oversee internal performance audits (field activities) and direct and execute all internal system audit activities. C1.1.2 has been revised to point out performance audits of field activities will be conducted by the Project Coordinator. C1.1.3 has been updated to clarify a review of field audits and audits of internal systems will be conducted quarterly.
3. **Section B5.1-6, Representative Samples through Accuracy, page 17.** Because section A7 addresses representativeness and accuracy including field QC samples for assessing accuracy (field blanks and field duplicates) and representativeness (field duplicates), it is not clear what is meant by the statement here indicating that this section is not applicable to the Cleanup SSQAPP.
 - Sections B5.1-B5.6 were added and compared to section A7 to match.

General Comments

1. **QAPP Format.** Please note a new QAPP Standard was issued in July 2023 and for future grants, a QAPP should be in conformance with the QAPP Standard. A crosswalk outlining suggested edits to an R-5 QAPP to ensure conformance with the QAPP Standard has been developed and is available upon request.
 - Noted and will request for future QAPPs.
2. **Section A6, Project Description, page 8.** This section of a QAPP should include a project schedule.
 - Noted. Did not add as project schedules are often unpredictable and likely would not be accurate.
3. **Section B1.1, Sampling Methodologies, page 14.** This section lists equipment needed for air monitoring. Similar information should also be addressed for bulk sampling, should it be needed.
 - Added a section addressing bulk sampling.
4. **Section C2, Reports to Management, page 21.** Will any significant QA problems, that may be encountered, be part of any of the reports summarized here?
 - Added a sentence to C2 stating which reports will include QA problems.

5. **Section D2.1, Field and Management Review, page 23. Because this SSQAPP describes the sampling design, it is not clear what Work Plan is being referenced in the second bullet point at the top of this page.**
 - Deleted the bullet referencing the Work Plan.
6. **Section D3, Reconciliation with User Requirements, page 23. If statistical evaluation of the data is planned as referenced in this section, it should be summarized in the SSQAPP.**
 - Noted.



REGION 7

LENEXA, KS 66219

November 5, 2025

MEMORANDUM

SUBJECT: Data Quality Objectives and Site-Specific Quality Assurance Project Plan Regulated Asbestos Containing Materials Demolition Former YMCA 306 Avenue South – formerly a part of 480 South 3rd Street; Clinton, Iowa– Approved with Condition

FROM: Diane Harris, Regional Quality Assurance Manager
Laboratory Services and Applied Science Division

**DIANE
HARRIS**

Digitally signed by
DIANE HARRIS
Date: 2025.11.06
06:52:06 -06'00'

TO: Jennifer Morris, Project Manager
Brownfields, Redevelopment and Reuse Branch
Land, Chemical and Redevelopment Division

The review of the subject document prepared by Eocene Environmental Group and dated October 8, 2025, has been completed according to the “EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations,” EPA QA/R-5 March 2001.

Based on the comments below, the document is approved with conditions. The document was found to be incomplete in addressing some key areas to the extent of potentially jeopardizing the quality of the data. These areas are fully described in this review memorandum as critical comments and can be adequately addressed by incorporation into the document but without resubmission. The document would not be approved without addressing these issues. General comments identify opportunities for strengthening the document but do not affect approval.

Critical Comments

1. A7 Quality Objective and Criteria for Measurement Data, page 9.
 - a. This section first states that no field blind replicate samples and no field duplicate quality control air sample will be collected as part of this project. However, the following page describes a precision factor for a field blind replicate/field duplicate samples for air samples which implies the collection of field blind replicate or field duplicate samples. Which is correct?
 - b. It is not clear how analytical quality assurance/quality control methods will be used to determine if bulk field duplicate samples are acceptable.

2. Section B5, Quality Control Requirements, page 16. This section describes field auditing being conducted by the Project Coordinator and they are to be completed randomly but not less than once a week during cleanup activities. Later in section C1.1.1, the SSQAPP indicates the QA/QC reviewer will execute all internal audit activities and these audits will be done quarterly. The field audits to be conducted for this project need to be clarified, including how often they will be conducted and by whom. If the audits described in section B5 are separate from and in addition to the internal audits described in section C1.1.1, the QAPP needs to clearly describe this.
3. Section B5.1-6, Representative Samples through Accuracy, page 17. Because section A7 addresses representativeness and accuracy including field QC samples for assessing accuracy (field blanks and field duplicates) and representativeness (field duplicates), it is not clear what is meant by the statement here indicating that this section is not applicable to the Cleanup SSQAPP.

General Comments

1. QAPP Format. Please note a new QAPP Standard was issued in July 2023 and for future grants, a QAPP should be in conformance with the QAPP Standard. A crosswalk outlining suggested edits to an R-5 QAPP to ensure conformance with the QAPP Standard has been developed and is available upon request.
2. Section A6, Project Description, page 8. This section of a QAPP should include a project schedule.
3. Section B1.1, Sampling Methodologies, page 14. This section lists equipment needed for air monitoring. Similar information should also be addressed for bulk sampling, should it be needed.
4. Section C2, Reports to Management, page 21. Will any significant QA problems, that may be encountered, be part of any of the reports summarized here?
5. Section D2.1, Field and Management Review, page 23. Because this SSQAPP describes the sampling design, it is not clear what Work Plan is being referenced in the second bullet point at the top of this page.
6. Section D3, Reconciliation with User Requirements, page 23. If statistical evaluation of the data is planned as referenced in this section, it should be summarized in the SSQAPP.

If you have any questions, please contact me at (913) 551-7258.

R7QAO Document Number: 2026007