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February 26, 2010

Martha Innes, QA/QC Director
Alpha Omega Environmental Laboratory
1233 Dublin Road
Columbus, OH 43215

**Re: Kilgore Manufacturing Dry Creek Road Plant
Licking County
Project I.D. No. 145-002652-001
Revised Laboratory Analytical Report**

Dear Ms. Innes:

The Ohio Environmental Protection Agency's (Ohio EPA) has reviewed Alpha Omega Environmental Laboratory's (formerly Stantec Consulting Services) December 14, 2009 submittal of a revised laboratory analytical report in response to Ohio EPA's November 10, 2009 comment letter. The November 2009 comment letter requested corrections to Alpha Omega Environmental Laboratory's August 17, 2009 corrections to the original laboratory report (Work Order No. 0904449) submitted by Stantec Consulting Services to Ohio EPA on June 2, 2009. Ohio EPA's review of the revised (August 2009) and original (June 2009) report's Method 6010B metal results found numerous issues and concerns with the quality assurance/quality control (QA/QC) sections in these reports that were summarized in Ohio EPA's November 2009 comment letter's nine points.

Alpha Omega Environmental Laboratory's (Alpha Omega) December 2009 revised analytical report included corrections for comments two and four in Ohio EPA's November 2009 letter; however, the laboratory failed to provide adequate responses to the remaining seven comments. For those comments that remain outstanding, we have included the original comment with our "findings" provided in *italics*. Additional findings are also provided in the closing paragraphs of this memorandum.

Specific Comments:

- 1) Both the original (June 2009) and revised (August 2009) reports either: (a) failed to include the dilution factors used for the analysis; or (b) included the wrong dilution factors used to calculate the sample results. Both reports have several errors when it comes to reporting the dilution factors used for all analyses (*i.e.*, inorganics and organics). Some of the dilution factors provided in the original report were correct, but subsequently changed to incorrect values in the revised (August 2009) report.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

The December 2009 revised report still includes dilution factor (DF) errors. For example, Area C KM04-Iron was analyzed and reported at a 10,000x dilution as written in the notes section of the analytical report; however, the DF is listed as 100,000x in the "DF" column on the analytical result sheet. The raw data was reviewed and confirmed that the correct analytical result was provided in the revised report.

- (3) On May 28, 2009, the laboratory failed to comply with the procedures provided in its standard operating procedure (SOP) as it pertains to the frequency, criteria and corrective actions for continuing calibration standards and continuing calibration blanks (CCB). As a result of these deviations, the laboratory failed to demonstrate that the calibration was still valid and that the system was free of contamination. The laboratory reported the sample results associated with these calibration deviations/outliers instead of taking corrective actions as required by the SOP. The reports do not include any narration of these deviations.

Alpha Omega provided a brief narrative discussing the failing calibration standard, but did not discuss the CCB outlier in the December 2009 revised report. The laboratory also failed to discuss whether or not the samples were reanalyzed once the analyst recalibrated the instrument. If the samples were not reanalyzed, the laboratory should have explained why and the impact these outliers have on the data set.

- (5) The original report included "J" qualified results for detections below the PQL; however the revised report's results do not include the "J" qualifier. As such, sample results previously reported with the "J" qualifier are now reported as being less than the PQL.

The December 2009 revised report was not reviewed to determine if the laboratory consistently applied the "J" qualifier to the sample data (comment five in the November 2009 letter). This review would have been very time consuming since it would require review of the other two previous reports (June and August 2009). Please refer to General Comment 2 for a summary of the problems the laboratory is still having with data qualifiers in the December 2009 revised analytical report.

- (6) The case narratives in both (June and August 2009) reports are vague and do not discuss all of the problems associated with the analysis of these samples such as the outliers in the analytical quality control summary report. The laboratory also failed to discuss their concerns regarding the validity of the sample results for those samples requiring high dilutions for analysis.

The narrative provided in the December 2009 revised report is still too vague and does not discuss all of the problems associated with this project's analytical results (e.g., quality control, calibration outliers, etc...).

- (7) The laboratory did not qualify the sample results or narrate the potential causes for the negative spike recoveries for Chromium in sample Trench 2; KM012 and Calcium in sample Area B, KM02. This applies to the matrix spike and precision outliers below and above the acceptable recovery range for antimony on the report's page 75; for calcium, magnesium, potassium and sodium on both page 84 and page 85; for chromium, vanadium and zinc on page 88; and for cadmium, cobalt, nickel and vanadium on page 89. The possible reasons for these recovery outliers are: (a) spiking errors by the analyst, (b) possible matrix interferences, or (c) differences in element concentrations in the separate aliquots due to inadequate homogenization of the samples.

Alpha Omega failed to provide a response to this comment in the December 2009 revised analytical report.

- (8) The concentration reported for Iron in the sample labeled Trench 4 KM014 exceeded the calibration range of the instrument. The laboratory failed to provide narrative about this or qualify the concentration provided in the reports. The sample should have been diluted to bring the element within the calibration range. The analyst failed to perform the analysis in accordance with the laboratory's SOP. Similarly, samples Black Soil KM03 and Area C KM04 also had elevated concentrations reported for Iron.

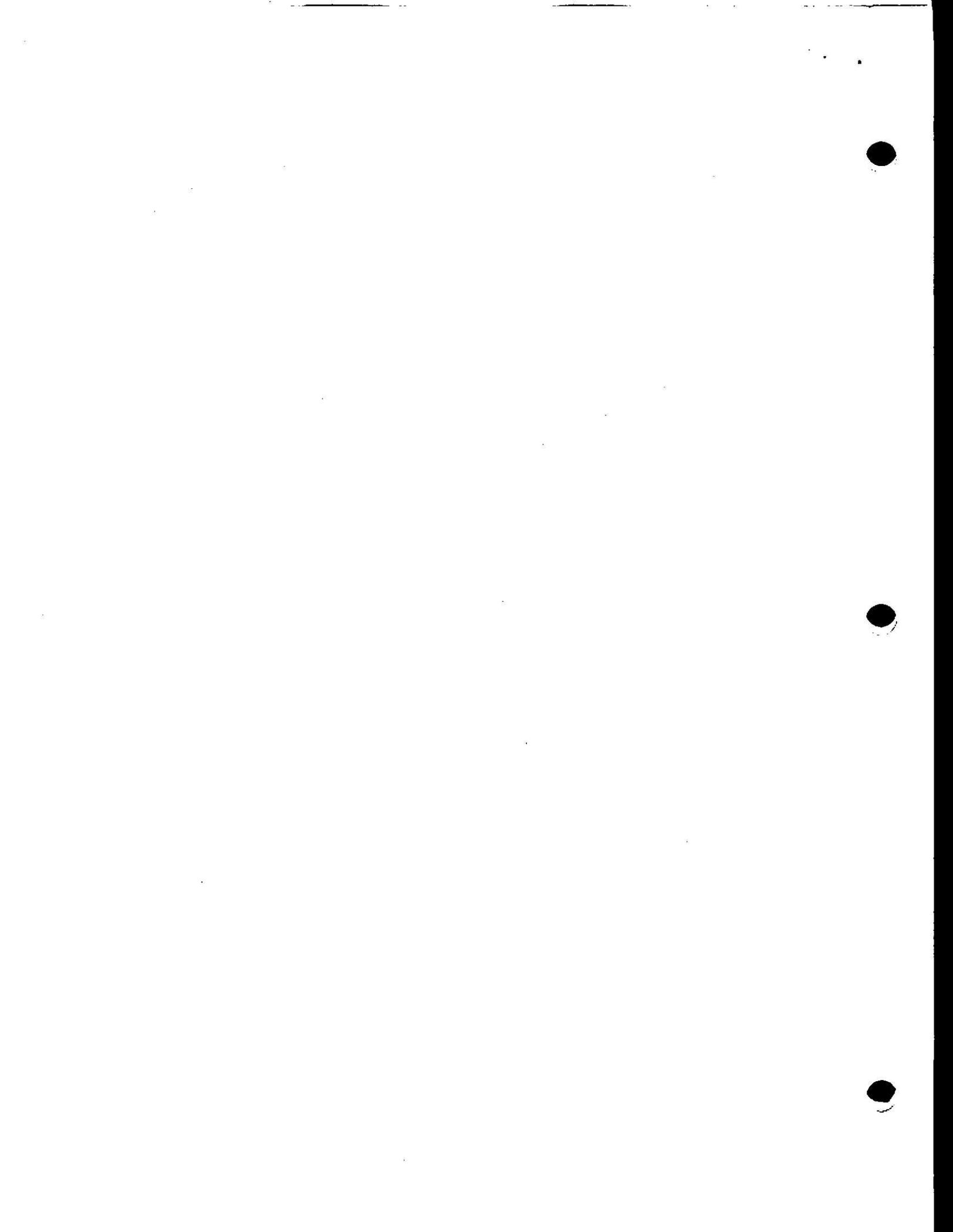
Alpha Omega failed to provide a response to this comment in the December 2009 revised analytical report.

- (9) Lead was reported at a concentration of 2,940,000 mg/Kg in the sample labeled as Yellow Paint KM09. This concentration is equivalent to 2.94 Kg of Lead in 1 Kg of sample (*i.e.*, 294% Lead). The case narrative failed to include any discussion on why the laboratory chose to report Lead at this concentration knowing that it was incorrect. In addition, Chromium was reported at a concentration of 558,000 mg/Kg in the same sample. Some possible reasons for the high concentrations for Lead and Chromium may include: (a) magnification of trace contamination or interferences due to the unusually high dilution factor of 100,000; (b) the magnification of the errors introduced into the analysis because of the multiple serial dilutions and high dilutions factors, or more likely; (c) dilution or calculation errors.

The laboratory's serial dilutions of three elements (Lead, Chromium, and Iron) from this sample are listed below in the Table 1.

Table 1

Dilution	Lead	Chromium	Iron
10x	427,000	91,000	55,700
100x	41,800	7,990	5,440
1000x	5,850	1,130	775
10,000x	8,660	1,630	1120
100,000x	538	102	59.6





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Columbus, OH 43216-1049

February 25, 2010

Kobil and Associates
5900 Sharon Woods Boulevard
Columbus, OH 43229

**Re: Construction Storm Water Inspection at Holiday Inn Express
Permit Number 4GC02874*AG**

Dear Sir or Madame:

This letter is written in follow-up to a construction storm water inspection I conducted at Holiday Inn Express located on Orion Place in Columbus, Ohio on February 22, 2010. The purpose of the inspection was to evaluate your compliance with the General Storm Water Permit Associated with Construction Activities. During the inspection, I noted the following:

Sediment and Erosion Controls:

- Perimeter silt fence has failed due to recent storm events. Maintenance is required. Straw bales should back the silt fence for additional support.
- The sediment basin must be completed within 10 of the recommencement of construction.
- All affected areas which remain barren and idle in excess of 21 days must be protected from erosion. Given the current season, a crimped mulch cover is expected for temporary cover.

Post Construction Requirements:

- The General Storm Water Permit requires specific post construction water quality treatment for all sites. Guidance regarding the post construction requirements is found at:
[Http://www.epa.state.oh.us/dsw/storm/CGPPCQA.aspx](http://www.epa.state.oh.us/dsw/storm/CGPPCQA.aspx). Please submit to my attention (email preferred at harry.kallipolitis@epa.state.oh.us) which practice will be installed at this site to ensure compliance with the General Permit. Please include all design criteria and calculations in your submission.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



Kobil and Associates
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If you have any questions regarding this letter or my inspection, please do not hesitate to contact me at our Central District Office at 614-728-3844 or email at harry.kallipolitis@epa.state.oh.us. Please provide a response to this letter within seven (7) days of receipt.

Sincerely,



Harry Kallipolitis
Storm Water Coordinator
Division of Surface Water
Central District Office

HK/ct Holiday In Express 02-03-10 4GC02874