



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

OCT 06 2004

Ms. Anne J. Crochet  
Taylor, Porter, Brooks & Phillips L.L.P.  
451 Florida Street, 8<sup>th</sup> Floor (70801)  
Baton Rouge, Louisiana 70821

Re: Response to Request for Correction (RFC #04021) regarding Combined Quality Assurance Project Plan and General Work Plan: Potential Ground-Water Flow Directions and Contaminant Fate and Transport in the Plaquemine Aquifer of Iberville Parish and West Baton Rouge Parish, Louisiana.

Dear Ms. Crochet:

This letter is in response to your Request for Correction (RFC) dated June 14, 2004, under the Environmental Protection Agency (EPA) Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency (Guidelines) concerning the document "Combined Quality Assurance Project Plan and General Work Plan: Potential Ground-Water Flow Directions and Contaminant Fate and Transport in the Plaquemine Aquifer of Iberville Parish and West Baton Rouge Parish, Louisiana." In your request you stated that the above mentioned document was published by EPA on August 15, 2003, and does not meet the EPA Guidelines.

The Quality Assurance (QA) Project Plan in question is a planning document that describes the quality assurance procedures, quality control specifications, and other technical activities that must be implemented to ensure that the results of the Plaquemine Aquifer groundwater study will meet project specifications. Project activities such as primary data collection, secondary data usage, model development, and other data processes conducted and funded by EPA are described and documented in this QA Project Plan. This document assists EPA staff in assessing accomplishment of the project's data quality objectives and documents the results of the project's technical planning process. This QA Project Plan, as is usual, was written prior to the commencement of work. It details the reason for the project, includes background information, identifies project responsibilities, and provides a general discussion of planned activities followed by specific activities and assessments pertinent to the project. The scope of this QA Project Plan is dependent upon the intended use of the information and the quality and quantity of existing data. This QA Project Plan was intended as an internal EPA planning document for intra- or inter-agency use or sharing. EPA does not consider this material to be an official agency dissemination under the Agency's Information Quality Guidelines.

The QA Project Plan was prepared by EPA Region 6 to develop a model to evaluate and simulate potential ground-water flow directions and contaminant fate and transport in the Plaquemine Aquifer. This QA Project Plan becomes part of the background material that is

documented in the project files. The results of the data collected and analyzed, if appropriate, are incorporated into the final product. The QA Project Plan helps to ensure that all final products meet EPA quality standards, including those of the EPA Information Quality Guidelines. The QA Project Plan is not amended upon completion of the project. The QA Project Plan for the Plaquemine Aquifer was not "published" as suggested by Dow. A Dow representative and one other person orally requested copies of the document. In response to these specific requests, EPA mailed a copy to Dow and to the other requester; EPA has never initiated public dissemination of this document. A final version of the QA Project Plan was provided to the Louisiana Department of Environmental Quality (LDEQ) for review and comment. This type of inter-agency sharing of information is not covered by the Guidelines and does not constitute dissemination of information (see Guidelines, Section 5.4). The QA Project Plan has not been placed on the Region 6 Web site, nor has it been otherwise distributed outside EPA.

This QAPP is only a planning tool for the much larger Plaquemine Aquifer groundwater study being finalized by the Region, and is not considered influential scientific, financial or statistical information. This QAPP is not an official agency dissemination under the Information Quality Guidelines. Based on the above analysis of the QAPP, I have concluded that the issues raised by Dow are outside the purview of the Guidelines and do not raise substantial technical concerns about the QAPP. Thank you for alerting the Agency to your concerns.

If you are dissatisfied with this decision, you may submit a Request for Reconsideration (RFR). EPA recommends that this request be submitted within 90 days of the date of this letter. To do so, send a written request to the EPA Information Quality Guidelines Processing Staff via mail (Information Quality Guidelines Staff, Mail Code 2811R, U.S. EPA, 1200 Pennsylvania Ave., N.W., Washington, DC 20460), electronic mail ([quality@epa.gov](mailto:quality@epa.gov)) or fax [(202) 565-2441]. The RFR should reference the request number assigned to the original request for correction (RFC #04021). Additional information that should be included in the request is listed on the EPA Information Quality Guidelines web site ([www.epa.gov/quality/informationguidelines](http://www.epa.gov/quality/informationguidelines)). Please contact Thomas Nelson at (214) 665-6695 should you have any questions about our response.

Sincerely yours,



Richard E. Greene  
Regional Administrator

cc: James H. Brent, Ph.D., LDEQ  
Wilbert F. Jordan, Jr., LDEQ  
Harold Leggett, Ph.D., LDEQ  
Mike McDaniel, Ph.D., LDEQ