

Freeman Christine D CNIN

From: Ramanauskas.Peter@epamail.epa.gov
Sent: Monday, August 11, 2003 3:52 PM
To: Freeman Christine D CNIN
Cc: gateswh@efdsouth.navfac.navy.mil
Subject: Re: Crane MFB

Christine,

Thanks for the response to MFB IMR comments. Allen & I have looked over the responses and we still have a couple of points to make:

1. Practically all of the post-excavation soil data was qualified as 'J*', so this is still a matter of concern especially if the samples were held longer than, say, (arbitrarily speaking) 7 days - data representing samples approaching these time frames probably should have been considered for rejection. What were the actual holding times for data flagged 'J*'?
2. Precision of MFB explosives data for field duplicates was often very poor - (i.e. 200%). What is missing here are the units and to what extent these particular field QC samples were used in making management decisions when precision was poor. For example, there were several cases where the % RPD for a compound was 200%, with '0' reported in the results column and a high level reported in the results column for the same compound. Especially if the field duplicate result exceeded the target level for soil for any respective compound, then what was the decision made if there was nothing detected in the non-QC sample corresponding to its field duplicate?

Toltest should be encouraged to label their tables more fully and present units of measure as well as annotate all qualifiers used, including such pseudo-qualifiers as the 'NO' code seen in Table H-3. Also, if the data quality seemed poor, then resampling should have been ordered instead of simply writing up the report after back-filling had already occurred.

Thanks,
Pete