



DEPARTMENT OF THE NAVY
CRANE DIVISION
NAVAL SURFACE WARFARE CENTER
300 HIGHWAY 361
CRANE INDIANA 47522-5001

N00164.AR.000887
NSWC CRANE
5090.3a

IN REPLY REFER TO:

5090/S4.7
Ser RP3/4241

19 AUG 2004

U.S. Environmental Protection Agency, Region V
Waste, Pesticides, & Toxics Division
Waste Management Branch
Corrective Action Section
Attn: Mr. Peter Ramanauskas
77 West Jackson Blvd.
Chicago, IL 60604

Dear Mr. Ramanauskas:

Crane Division, Naval Surface Warfare Center (NSWC Crane) submits the following letter in response to the United States Environmental Protection Agency, Region V (U.S.EPA) letter dated July 21, 2004. The letter requested resolution on the possible data quality issue of volatile organic compound (VOC) analysis from Southwest Laboratory of Oklahoma (Southwest) and Pace Analytical Services (Pace).

NSWC Crane requested a formal summary of the issues relating to Southwest and Pace from TolTest, Inc. (TolTest), who held the contracts with the referenced labs. TolTest has provided the summary and it has been included as enclosure (1). From the summary, NSWC Crane concludes that none of the analysis has been compromised and all data should be regarded as valid and usable.

If you require any further information, my point of contact is Ms. Christine Freeman, Code RP3-CF, at 812-854-4423, or email freeman_cd@crane.navy.mil.

Sincerely,

JAMES M. HUNSICKER
Manager, Environmental Protection
By direction of the Commanding Officer

Encl:

- (1) TolTest Response to VOC Data Quality Uncertainty
- (2) Certification Statement

Copy to:

Administrative Record
IDEM (Griffin)
SOUTHNAVFACBGC (Code ES31)
TolTest

Enclosure (1)

TolTest Response to
VOC Data Quality Uncertainty



*Solutions for Your Site Development,
Construction, and Environmental Projects.*

August 18, 2004

TolTest Project No. 37324.01

Ms. Christine Freeman
Naval surface Warfare Center
Code RP3-11 B-3245
300 Highway 361
Cane, IN 47522-5001

Re: U.S. EPA letter dated July 21, 2004, Southwest Lab Data Quality

Dear Ms. Freeman:

This letter is in response to the July 21, 2004 United States Environmental Protection Agency's (U.S.EPA) letter concerning the Quality of Data from Southwest Laboratory of Oklahoma (Southwest) and Pace Analytical Services (Pace). Following are the questions from USEPA and TolTest's response.

USEPA: We would like to know the suspect nature of the problem leading to closure of the laboratory including an explanation of how data validity was manipulated, falsified, or compromised.

TolTest: The following responses were received from Pace and former owner of Southwest.

Pace – Mr. Clarence L. Haile, PhD, Director of Quality, Safety, & Training. “Pace Analytical operated the Tulsa laboratory from October 1, 2003 to April 2004. The decision to close the laboratory was based on an investigation of a method compliance issue related to 8260 analyses. The specific issue related to failure to use a second source standard for initial calibration verification and lab control samples. Our investigation included a rigorous review of all 8260 testing conducted since October 1, 2003 and verified that all calibrations were correct. As a result, no client data were impacted. As part of the shutdown of the Tulsa operation, we reviewed all projects completed during this period. Even though no client results were impacted, communications were sent to each client for which this analysis was conducted.”

Southwest – Mr. Jack Wright former owner Southwest laboratory of Oklahoma, August 10, 2004, “Pace claims that the operator was improperly running the second source calibrations standard for method 8260. The operator either mislabeled or ran the original calibration standard instead of a verified second source calibration standard. It is the Navy’s NELAC program that requires a second source calibration verification standard for method 8260. The EPA method only requires initial and continuous calibrations. The laboratory also periodically analyzed independently prepared and certified performance evaluation samples that would have identified any chronic calibration problem. In addition, the DOE has sent blind, and spike samples all have passed. Although the certification may be impacted the data is not impaired.”

USEPA: Detailed description of all affected sample groups and types, Crane project phases.

TolTest: The three projects at NSWC Crane that were potentially affected include:

- Mine Fill B (MFB) pre and post-excavation sampling associated with the Biofacility;
- Mine Fill A (MFA) Battery Site; and
- Building 369 Fire Cleanup.

Review of VOC analytical results for these three projects revealed that all results were either not detected or in the low ppb range. All results were well below cleanup objectives. MFB analytical results dating back to 1999 indicate there has been no history of VOC contamination. At the MFA Battery Site there were no VOCs detected. Building 369 Fire Cleanup only had one VOC sample analyzed for purposes of waste disposal characterization. This sample was also non-detect.

Based on this review, TolTest concludes that there is no quality control issue regarding Southwest and Pace Laboratories, and the validity of the VOC data for projects at NSWC Crane.

USEPA: How quality control samples can be used to vouch for validity of data sets which should be retained.

TolTest: Mr. Clarence L. Haile of Pace responds: The specific quality issue related to a failure to use a second source standard for initial calibration verification and lab control samples. The use of second source standards is to verify that calibrations are acceptable. As part of our investigation of impact on client projects, calibrations data and calibration check samples were reviewed for bias in comparison with an independently verified calibration. No bias was identified. Also, the Tulsa operation performed successfully on a blind performance evaluation samples in October 2003 and February 2004. Based on these results, no project results were impacted.

USEPA: Which samples are no longer regarded as valid or useable?

TolTest: TolTest considers all samples to be useable.

If you have any questions concerning this response please contact Karen Helman (330) 847-7683 or Peter Chevalier (812)636-8501.

Sincerely,
TOLTEST, INC.

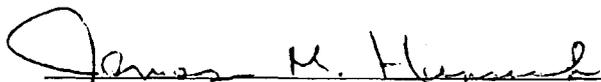


Karen Helman
Quality Assurance Director



Peter Chevalier
Project Manager

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



SIGNATURE

MANAGER, ENVIRONMENTAL PROTECTION
BY DIRECTION OF THE COMMANDING OFFICER

TITLE

8/19/04

DATE