

July 30, 1992

HNP/51-7-2-166

Project Number 4367

Naval Facilities Engineering Command  
Northern Division Code 1821/GH  
10 Industrial Highway, Mail Stop #82  
Lester, Pennsylvania 19113

Attention: Gerald Hoover, Remedial Project Manager

Reference: CLEAN Contract No. N62472-90-1298  
Contract Task Order (CTO) 55

Subject: Response to United States Environmental Protection  
Agency's July 10, 1992 Comments;  
NWS Earle Letter Reports

Dear Mr. Hoover:

Thank you for allowing HALLIBURTON NUS the opportunity to provide a response to EPA comments regarding the quality of the data developed during sampling activities at the Child Development Center (CDC), NWS Earle. HALLIBURTON NUS' Data Validation Coordinator (Ms. Debra Scheib) for CLEAN projects has reviewed the NWS Earle Data Validation Report, with respect to Mr. Paul Ingrisano's comments, and offers the following:

1. Mr. Ingrisano states that the associated blank samples were extensively contaminated. Attached is a copy of the data validator's worksheet which summarizes the level and occurrence of blank contamination.

As noted, the laboratory blanks contained contaminants at contract acceptable levels of less than 5 times their respective CRQL (Contract Required Quantitation Limit) for methylene chloride, acetone, 2-butanone, and the common phthalate esters; and less than 1 times their respective CRQL for uncommon contaminants such as 1,1,1-trichloroethane, 4-methyl-2-pentanone, toluene and total xylenes. All contaminants found in the associated field quality control blanks, with the exception of methylene chloride, also occurred at levels below the limits within which the analytical laboratories are governed.

Mr. Gerald Hoover  
July 30, 1992  
Page 2 - HNPH/51-7-2-166

Consequently, with the exception of methylene chloride, the level of associated blank contamination cannot be appropriately termed "extensive", nor is there a significant problem with the occurrence of "atypical" blank contaminants.

With regard to methylene chloride, the significant amount detected in the trip blank does not impact the sample data in that all positive sample results qualified for blank contamination fall within a qualification action level of 27 ug/L (i.e. 2.74 ug/L x 10 times rule for common contaminants), as established by the highest amount of methylene chloride found in the laboratory method blanks.

Hence, given the information presented above, the data for NWS Earle as validated does meet EPA's QA/QC standards.

2. Mr. Ingrisano also commented about the extensive "legend" of data qualifiers used. Please note that HALLIBURTON NUS, at the Navy's request, has added explanatory codes to the traditionally used EPA - U, J, UJ, and R data qualification flags.

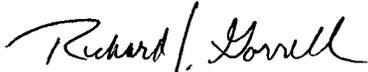
The purpose of the data qualifier codes is to provide, "at a glance", the information which is addressed in the text of the data validation report. Because of the impact of this presentation style, Mr. Ingrisano may have been misled to believe that the quality of the NWS Earle data is poor in comparison to the type of data he typically sees.

Mr. Gerald Hoover  
July 30, 1992  
Page 3 - HNPH/51-7-2-166

In summary, the NWS Earle data as validated does indeed meet EPA's QA/QC standards. Also, because the data were validated in accordance with EPA National Functional Guidelines and current analytical services Statement of Work protocol, this data is considered acceptable for use in risk assessment according to EPA policy. Hence, it should be clear that on the basis of data quality, no resampling effort is warranted.

Do not hesitate to contact me at (215) 971-0900, if you have any further questions regarding these issues.

Sincerely,



Richard J. Gorrell  
Project Manager

Attachment

cc: Nick Stencel (NORTHDIV)  
John Trepanowski, P.E. (HALLIBURTON NUS)  
Deb Scheib (HALLIBURTON NUS)

NW+Carroll

## BLANK ANALYSIS RESULTS FOR TARGET COMPOUNDS

FRACTION	TYPE	CONC	MATRIX	SAMPLE #	SOURCE OF H <sub>2</sub> O	CONTAMINANTS (CONCENTRATION / DETECTION LIMIT)
VOA	low SOLID LAB BLANK			VB1K08	lab	147 MeCl <sub>2</sub> 2.74 ug/l
						126 Acetone 23.7 ug/l
						516 4 M 2 Pent. 110 ug/l
						301 111 TCE 0.90 ug/l
VOA	low SOLID LAB BLANK			VB1K10	lab	147 MeCl <sub>2</sub> 2.3 ug/l
						251 2-butenes 1.1 ug/l
						514 toluene 4.77 ug/l
						676 xylenes 2.8 ug/l
VOA	low residue blank			ERB 0310	HAMS	147 MeCl <sub>2</sub> 7.0 ug/l
						128 acetone 26.5 ug/l
						334 benzene 4.8 ug/l
						116 CS <sub>2</sub> 16.8 ug/l
						301 111 TCE 6.1 ug/l
WA	low trip blk			ETB 0310	HAMS	146 MeCl <sub>2</sub> 16.7 ug/l
						126 Acetone 8.32 ug/l
						301 111 TCE 5.73 ug/l
BNA	low solid lab blk			SB1K09	lab	1467 DTPPh 0.90 ug/l
						2698 DEP 0.25 ug/l
						2861 DNP 0.11 ug/l
↓	↓			SB1K10	↓	2701 DEP 3.50 ug/l
						1455 OMP 0.60 ug/l
						1652 DEP 1.1 ug/l
↓	GC lab blk			SB1K11	↓	2680 DEP 0.20 ug/l
						1444 OMP 0.32 ug/l
						1839 DEP 0.90 ug/l
↓	Residue blank			ERB 0310	HAMS	1649 DEP 1.04 ug/l
						1447 OMP 0.40 ug/l
						2682 DEP 0.26 ug/l
Arochlor	SOLID blank			PB1K07	Lab	ND
Pests	solid blk			PB1K02	lab	ND
↓	residue blank			RB0310	HAMS	ND

LABORATORY REPORTED FIELD BLANK DATA IS COMPARED WITH THE SAMPLE DATA IN A TABULATION FORM WITHIN THE SAMPLE ANALYTICAL DATA SUMMARY. TENTATIVELY IDENTIFIED COMPOUNDS IN BLANKS ARE LISTED ON A SEPARATE FORM.

**COMMENTS:**

(1) RESULT REPORTED BY LABORATORY AND CONFIRMED BY REVIEWER.

(2) RESULT INFERRED FROM QUANTITATION LIST, DIAGNOSTICS, CHROMATOGRAM AND/OR SPECTRA.

ND = none detected

\* Validation action levels: MeCl<sub>2</sub> - 1670 ug/l; acetone - 26.5 ug/l; 4MCP - 5.5 ug/l; 2-butenes - 1.1 ug/l; 111 TCE - 8.65 ug/l; CS<sub>2</sub> - 8.4 ug/l; benzene - 2.4 ug/l; toluene - 4.77 ug/l; xylenes - 14.0 ug/l