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LETTER REGARDING THE U S NAVY RESPONSE TO DECEMBER 7, 2010 REVIEW COMMENTS ON THE UNIFORM FEDERAL POLICY SAMPLING AND ANALYSIS PLAN FOR GROUNDWATER SAMPLING FOR SITES 6 AND 17 NWS EARLE NJ
2/9/2011
TETRA TECH

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PHIL-24116

February 9, 2011

Project Number 00573

United States Environmental Protection Agency
Region 2
290 Broadway, 20th Floor
New York, New York 10007-1866

Attn: Ms. Jessica Mollin

Reference: Contract No. N62472-03-D-0057
Contract Task Order (CTO) No. 059

Subject: Response to December 7, 2010 Review Comments
Sites 6 and 17 Groundwater Sampling and Analysis Plan
Naval Weapons Station (NWS) Earle, Colts Neck, New Jersey

Dear Ms. Mollin:

As requested by the Navy, enclosed are responses to the comments issued by the United States Environmental Protection Agency (USEPA) Region 2 following review of the September 2010 Draft Sampling and Analysis Plan for Groundwater Sampling at Site 6-Landfill West of Normandy Road and Site 17-Disposal Site Behind Training Barge. The sites are located within the Waterfront Area of the Naval Weapons Station (NWS) Earle. For ease of review, each original USEPA comment is presented in the review document followed by the proposed response. Three copies of the response document are provided for your use.

Should you have any questions on the enclosed please do not hesitate to contact Roberto Pagtalunan or me.

Sincerely,

Mary M. Mang

Mary M. Mang
Project Manager

MMM/nfs

Enclosure

c: Roberto Pagtalunan (NAVFAC Mid-Atlantic) (1 copy)
Bonnie Capito (NAVFAC Atlantic) (no enclosure)
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Response-to-Comments (RTC) Document
on
Uniform Federal Policy-Sampling and Analysis Plan (UFP-SAP) for
Groundwater Sampling for Sites 6 and 17
Naval Weapons Station Earle, Colts Neck, New Jersey

USEPA Comments Dated November 4, 2010
On September 2010 Draft Version

Navy Receipt of Comments - December 7, 2010

RTC Prepared by Tetra Tech NUS, Inc.
Date Issued: February 9, 2011

Note that where the comment response provides revised text, text additions are shown in bold italics and deleted text is shown as strikethrough.

Comments on Worksheet #12:

1. Comment: *This worksheet should not be limited to field QC samples. If there are measurement performance criteria which apply to laboratory QC, it should also be identified.*

Response: Under the UFP-SAP format, Worksheet #12 is designed specifically to address the measurement performance criteria for field QC samples. Worksheet #28 (Laboratory QC Samples Table) addresses the measurement performance criteria which apply to laboratory QC samples.

Comments on Worksheet #15:

2. Comment: *Please explain the terms: Limit of Quantitation (LOQ), Limit of Detection (LOD) and Detection Limit (DL) and how they are used in the context of making environmental decisions.*

Response: Limit of Quantitation (LOQ), Limit of Detection (LOD), and Detection Limit (DL) are terms that were established and are defined in the Department of Defense Quality Systems Manual for Environmental Laboratories (DoD QSM), Version 4.1 (April 22, 2009) and are used by all laboratories that are accredited under the DoD Environmental Laboratory Accreditation Program (DoD ELAP) to support environmental projects for the various branches of the DoD, including the Navy.

These values are used during the development of the SAP and during the laboratory selection process to ensure that the methods selected are adequately sensitive to meet the project-specific needs. The laboratory is made aware of the project-specific requirements regarding Project Screening Levels (PSLs) or Project Action Limits (PALs) to ensure the usability of the data with regard to detection limits. In some cases, risk-based PSLs or PALs are lower than the limits that are typically achievable by currently available technology in the environmental analysis market. In those cases, the SAP addresses how such data will be handled in the uncertainty section of the project report.

The following terms are described as follows in Appendix B - Glossary of the DoD QSM:

Detection Limit (DL): The lowest concentration or amount of the target analyte that can be identified, measured, and reported with confidence that the analyte concentration is not a false positive value.

Detection Limit (DL) (Clarification): The smallest analyte concentration that can be demonstrated to be different from zero or a blank concentration at the 99% level of confidence. At the DL, the false positive rate (Type I error) is 1%.

Limit of Detection (LOD): An estimate of the minimum amount of a substance that an analytical process can reliably detect. An LOD is analyte- and matrix-specific and may be laboratory-dependent.

Limit of Detection (Clarification): The smallest amount or concentration of a substance that must be present in a sample in order to be detected at a high level of confidence (99%). At the LOD, the false negative rate (Type II error) is 1%.

Limits of Quantitation (LOQ): The minimum levels, concentrations, or quantities of a target variable (e.g., target analyte) that can be reported with a specified degree of confidence.

Limit of Quantitation (Clarification): The lowest concentration that produces a quantitative result within specified limits of precision and bias. For DoD projects, the LOQ shall be set at or above the concentration of the lowest initial calibration standard.

Comments on Worksheet #31:

3. Comment: *It is noted that no field audits are to be performed for this project. Please describe the method that will be used to ensure the requirements documented by the SAP are incorporated during field work.*

Response: While a field audit is not a requirement for each specific project, field audits are conducted at least annually as part of the UFP-SAP program in support of the Navy under this contract. Elements of quality assurance that are designed to ensure that the requirements documented by the SAP are incorporated during field work include the communication pathways (Worksheet #6), numerous verification steps (Worksheet #34), and validation steps (Worksheet #35) identified in the SAP.