

M-196
091281 01

Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for Maywood, New Jersey



U.S. Department of Energy

091281

Department of Energy

Field Office, Oak Ridge
P.O. Box 2001
Oak Ridge, Tennessee 37831— 8723

July 2, 1992



Mr. Jeffery Gratz
Federal Facilities Section
U.S. Environmental Protection Agency
Region II
Jacob K. Javits Federal Building
New York, New York 10278

Dear Mr. Gratz:

DATA VALIDATION REQUIREMENTS FOR THE MAYWOOD AND WAYNE SITES

The purpose of this letter is to document the discussions of May 20, 1992 between members of the Department of Energy's (DOE) project management contractor, Bechtel National, and EPA Region II (Hanif Sheikh). These discussions were held as a followup to the discussions of January 16 and my letter to you dated April 22, 1992. The purpose of the teleconference was to clarify a couple of issues at the request of Hanif Sheikh which were identified in the April 22 correspondence.

The specific issue related to the validation procedures to be used for approximating or rejecting data based upon the contract required detection limit (CRDL) standard. The DOE procedure, which is a modified version of the USEPA Functional Guidelines, differs from the Region II procedure in that data qualification will rely on technical judgement based on a review of the CRDL rather than a specified recovery criteria for the CRDL. Points of clarification included that the DOE procedure applied only to AA-furnace CRDL standards (not ICP standards) and that the laboratory uses a fourth standard which is within the CRDL of the CRDL (e.g., 2x CRDL) with a 5 percent variance criteria. This fourth standard is a part of the laboratory's QA/QC program (i.e., not required by CLP-SOW). For example, arsenic has a CRDL of 10 ug/L; two times the CRDL is 20 ug/L; and the laboratory's fourth standard must be 15 +/- 0.75 ug/L (which is within the 2x CRDL range). If the CRDL recovery is poor, then the fourth standard will be used to evaluate the associated data since this standard has a more stringent criteria than the CRDL. Given the more stringent criteria for this standard than the CRDL, it is more appropriate to evaluate the data against this standard than the CRDL. It was also noted that validation involves much more than the CRDL standard such as continuing calibration blanks, continuing calibration verification standards, and the coefficient of correlation for the curve which must be at least 0.995 under the USEPA functional validation guidelines.

Mr. Jeffery Gratz

2

July 2, 1992

Mr. Sheikh stated that it is not EPA's intention to reject sample data with elevated concentrations based on poor recovery of CRDL standard. Mr. Sheikh also stated that the DOE procedure was appropriate for evaluating and validating data. He further indicated that the Region II procedure for validation had been revised. He has forwarded a copy of the revised procedure to Mr. Mike Redmon of Bechtel National, Inc. for our use.

Based on these and previous discussions with EPA Region II, an agreement was reached for DOE to use the approach described in the April 22 correspondence for the validation of the Maywood and Wayne remedial investigation data. If you have any questions or need additional information, please contact me at 615-626-5724.

Sincerely,



Susan M. Cange, Site Manager
Former Sites Restoration Division