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HUNTERS POINT  
SSIC NO.5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street  
San Francisco, Ca. 94105

MAR 22 1988

Commander, Western Division  
Naval Facilities Engineering Command  
Attn: Mr. Alex E. Dong Code 1146  
P.O. Box 727  
San Bruno, CA 94066-0720

Dear Mr. Dong:

Recently, the Navy submitted the proposed Quality Assurance/Quality Control (QA/QC) requirements for the analytical program supporting the RI/FS at Naval Station, Treasure Island, Hunter's Point Annex, for evaluation by EPA. We have reviewed the document, and request additional information be provided. In addition, we have the following comments regarding the contents of the document.

The EPA will require that the Navy designate, prior to sampling, those groups or types of samples which will require data validation. In addition to designating groups of samples, the rationale for selecting samples which will require data validation as well as rationale for those samples which will not require data validation must be provided.

The Attachment describes in more detail additional QA/QC requirements and modifications which should be incorporated into the QA program. The parameters of interest, which were not stated in the letter, should be stated along with the analytical method(s) to be used for each parameter. For the purpose of reviewing the proposed analytical program, we assumed the parameters of interest to be Volatile Organics and Base/Neutral & Acid Compounds analyzed by GC/MS. Additional parameters or matrices (i.e. metals and pesticides, air) will require specific QA/QC requirements and should be included.

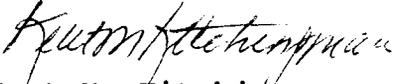
"CLP-type Deliverables" must be clearly defined as to the type and quantity of documentation required from the laboratory. It must also be clear what documentation the laboratory will maintain and the length of storage. The Navy should be responsible for making certain that the laboratory has a thorough understanding of these requirements.

REPRODUCED AT GOVERNMENT EXPENSE

E/N 7

If you have any questions regarding this information, please call me at 415/974-0924.

Sincerely,



Kent M. Kitchingman  
Quality Assurance Officer

Attachment

cc: Steve Farley, Harding Lawson Associates

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ATTACHMENT

RECOMMENDED QA/QC for ANALYTICAL PROGRAM  
U.S. NAVY, HUNTER'S POINT ANNEX

Additional Laboratory Deliverables

Analytical Results-reported in CLP Form I format or include all Form I information.

Instrument/Method Detection Limits

Laboratory will describe how limits were determined.

Sample Quantitation Limits

QA Summary

Incorporate CLP acceptance criteria in summary, if possible. CLP Format Forms are included for reference, however the laboratory should meet these acceptance criteria for:

GC/MS Tuning BFB (VOA); DFTPP (Semi-Volatiles)

Blank Summary

Matrix Spike/Matrix Spike Duplicate

Surrogate Recoveries - all samples, including blanks, QC samples.

Identification and semi-quantitation of 10 largest non-target compound peaks for each fraction of organics analyzed by GC/MS. These compounds are to be reported as Tentatively Identified Compounds (TIC's). Provide the total number of TIC's for each sample.

Recommended Requirements

Initial Calibration RRF's; %RSD for each compound

Continuing Calibration RRF's; %D for each compound

Raw Data for all analyses

Quantitation reports for all analyses

Mass Spectra for each Reported Compound

Raw, enhanced and compound standard

For TIC's (Tentatively Identified Compounds)

Spectra for the 3 best matches resulting from an NBS library search, along with the spectra

Internal Lab QC

GC/MS Tuning - every 12 hours or each day prior to the analysis of any samples; whichever is more frequent.

Initial Calibration - a 5 point calibration curve which meets CLP criteria.

Continuing Calibration - every 12 hours or each day prior to analysis of any samples; whichever is more frequent. The continuing calibration should meet CLP requirements.

Lab Blanks - 1 every 12 hours or each day prior to sample analysis; whichever is more frequent. Additional blank analyses may be required to demonstrate that the system is free from contamination after highly contaminated samples have been analyzed.

#### Matrix Spike/Matrix Spike Duplicate (H<sub>2</sub>O and Soil)

These QC samples will be designated by project manager and adequate sample must be taken in the field to perform the additional analyses. Samples selected for QC should have expected ranges of concentration of 10-100 ppb, if possible. The designated QC samples are an attempt to avoid having the QC work done on the "field blanks".

Spiking compounds and levels should follow the CLP protocol. or be designated in the QC document.

One MS/MSD per 20 samples of the same matrix and similar concentration, OR  
One per week of the same matrix and similar concentration.

#### Surrogates

Surrogates will be added to all samples blanks and QC samples for Volatiles and Semi-Volatiles analysis. The samples should meet CLP acceptance criteria for surrogates or be reanalyzed once.

#### External QC Requirements

A Trip Blank for volatiles analysis will be included daily for each shipment of samples and analyzed once a week or every 10 samples, whichever is more frequent.

Field Blanks and Equipment Blanks will be collected and analyzed once a week or every 20 water samples analyzed for CLP target compounds (TCL's) whichever is more frequent.

Blind Duplicates for soil and water samples will be required for one in every 10 samples. The method used for collecting the duplicates should be defined.

Blind Spikes prepared by the QC laboratory will be submitted one for every 20 samples collected. The spiking compounds and the levels should be defined.

It is recommended that all of these external QC samples be submitted as blind samples to the laboratory.