



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

30 January 1995

William Radzevich
Engineering Field Activity, West
900 Commodore Drive, Code 09AR1WR
San Bruno, CA 94066-2402

Subject: Hunters Point Annex, Parcel A DDT Investigation

Dear Mr. Radzevich:

Enclosed please find U.S. EPA's review of the data validation reports for data collected as part of the DDT investigation in Parcel A, Hunters Point Annex. In general, our chemist believes that the data collected as part of the DDT investigation in Parcel A appears to be valid and useable for decision-making purposes. As such, we concur with your observation that the Parcel A lot currently under investigation can now be backfilled with clean fill.

However, after further consideration, we continue to believe that the Navy should better confirm that it has identified the full extent of DDT contamination by collecting three more samples to be analyzed by immunoassay in the vicinity of the 0.43 ppm DDT finding at the back end of the lot. Because the Navy will be collecting samples at the weep holes along the retaining wall, we believe that collection of these additional three samples will not be a significant added effort. Please note that these three samples should be collected outside the boundary of the lot in an arc so as to more clearly define a 0.2 ppm DDT hot spot boundary.

As a final matter, you and your contractors have requested the citation used by our toxicologist to justify the 0.2 ppm DDT action level. The following is the reference used in this case:

"DDE Thins Eggshells of Captive American Kestrel," Stanley Weiman, Abstract from Nature, Volume 227, August 15, 1970

Our toxicologist used the concentrations associated with biological effects as noted in this article as a basis for extrapolating a concentration at which no observable effects would be predicted.

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Please review the enclosed comments and submit your responses to us no later than February 18, 1995. If you have any questions regarding this matter, please contact me at (415) 744-2385. You may reach Roxy Barnett, Toxicologist, at (415) 744-2308. Thank you for your continued attention to this matter.

Sincerely,



Alydda Mangelsdorf
Remedial Project Manager

Enclosure

cc: M. McClelland, EFA West
R. Powell, EFA West
C. Shabahari, DTSC
R. Hiatt, RWQCB
A. Brownell, SFDPH
S. Weber, PRC
M. Malone, HLA



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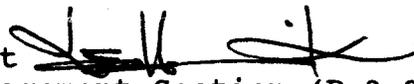
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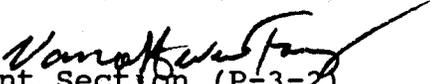
75 Hawthorne Street
San Francisco, Ca. 94105-3901

January 26, 1995

MEMORANDUM

SUBJECT: Data Validation Reports, Hunters Point Annex,
California (QAMS Document Control Number
P3CA004095LNH1)

FROM: Lisa Hanusiak, Chemist 
Quality Assurance Management Section (P-3-2)

THROUGH: Vance S. Fong, P.E., Chief 
Quality Assurance Management Section (P-3-2)

TO: Alydda Mangelsdorf, Remedial Project Manager
Navy Section (H-9-2)

The subject data validation reports, prepared by PRC Environmental Management, Inc. and dated December 15, 18, 26, 29, and 30, 1994 and January 4, 7, 9, 11, 12, and 13, 1995, were reviewed. The data validation reports address the review of data generated from the analysis of samples included in sample delivery groups (SDGs) 9427C341, 9429H600, 9431H603, 9435X415, 9435X431, 9436K128, 9440G815, 9440G825, 9441G853, 9443G886, 9444H682, 9444H706, and 9445G893. Also reviewed was the PRC Statement of Work (SOW) for Analytical Services, dated January 31, 1994, that was submitted with the data validation reports. The review of the data validation reports and PRC SOW was based on the following documents: "USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review," (EPA 540/R-94-012, February 1994); "USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review," (EPA 540/R-94-013, February 1994); "USEPA Contract Laboratory Program (CLP) Statement of Work (SOW) for Organics Analysis," (Document Numbers OLM01.0 through OLM02.0); and "USEPA CLP SOW for Inorganics Analysis," (Document Numbers ILM02.0 through ILM03.0).

Overall, the data validation procedures outlined in the PRC SOW are consistent with the requirements of EPA guidance. The information presented in the data validation reports indicates that the site data were reviewed according to the procedures outlined in the PRC SOW and EPA Functional Guidelines documents. In all instances where the professional judgement of the data reviewer was required for determining data usability, the conclusions reached by the data reviewer(s) appear to be

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reasonable and valid. Comments on the data validation reports are provided below.

Concerns

1. [Data Validation Report for SDG 9431H603, Non-CLP Analyses, Total Organic Carbon] The discussion of total organic carbon (TOC) analyses by the Lloyd Kahn method does not provide sufficient detail to determine the scope of the data review that was performed. The PRC SOW briefly addresses TOC analyses; however, the discussion is based on Standard Method 5310B and actual data review procedures are not presented.

The text of the data validation report states that "all applicable QC (quality control) criteria were met." However, the Lloyd Kahn method does not explicitly outline QC requirements for TOC analyses; acceptance criteria for various routine analytical requirements, including method blanks analyses, continuing instrument calibration, precision and accuracy, are not addressed. Therefore, the types of laboratory QC analyses that were performed and the QC criteria which were applied are unclear. As a result, the accuracy of the statement in the data validation report indicating that the TOC data are of usable quality could not be verified.

2. [Data Validation Report for SDG 9435X415, CLP Organic Analyses, Semivolatile Organic Compounds (SVOCs), Sample 9435X441] The qualification of SVOC results in the CLP Form I (Semivolatile Organics Analysis Data Sheet) for sample 9435X441 is inconsistent with the evaluation of data presented in the data validation report. All results reported in the Form I for sample 9435X441 are flagged either "UJ" or "J." However, the data validation report indicates that only results for the following analytes should be qualified for this sample:

- 2,2'-oxybis(1-chloropropane), 2,4-dinitrophenol, 4,6-dinitro-2-methylphenol, and 4-nitroaniline (due to continuing calibration problems)
- bis(2-ethylhexyl)phthalate, di-n-butylphthalate, and butylbenzylphthalate (due to contamination problems)
- di-n-octylphthalate, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene, indeno(1,2,3-cd)perylene, benzo(g,h,i)perylene, and

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dibenzo(a,h)anthracene (due to internal standard recovery problems).

3. [Data Validation Reports for SDGs 9435X415, 9441G853, and 9443G886, CLP Inorganic Analyses] Discrepancies between the information presented in the data validation reports listed below and the CLP Form Is (Inorganic Analysis Data Sheet) for the following samples were noted:

- The text in the data validation report for SDG 9435X415 states that magnesium in sample 9435X433 should be considered non-detected (U); however, the list of target metals that were detected in the associated blank for aqueous samples does not include magnesium, and the magnesium result was not flagged "U" in the CLP Form I (Inorganic Analysis Data Sheet) for sample 9435X433.
- The text in the data validation report for SDG 9441G853 states that the result for cadmium in sample 9441G853 should be flagged "J" due to problems with the interference check sample (ICS) solution analysis; however, the result for cadmium in the CLP Form I is not qualified.
- The text in the data validation report for SDG 9443G886 states that the results for antimony, chromium, manganese, nickel, and zinc in sample 9443G890 should be flagged "J" or "UJ" due to accuracy (matrix spike recovery) problems; however, the results for these parameters in the CLP Form I are not qualified.

Based on the information provided, it was not possible to determine whether the results for magnesium in sample 9435X433; cadmium in sample 9441G853; and antimony, chromium, manganese, nickel, and zinc in sample 9443G890 are correctly reported.

4. [Data Validation Report for SDG 9444H682] The CLP Form I (Pesticide Organics Analysis Data Sheet) for organochlorine pesticide/polychlorinated biphenyl (PCB) results was omitted for sample 9444H682.

Comments

1. [Data Validation Report for SDG 9431H603, CLP Organic Analyses, System Performance] The text in the data validation report states that alpha-BHC and gamma-chlordane were not detected in sample 9431H605DL. However, these

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analytes were detected at concentrations less than the contract required quantitation limits (CRQLs).

2. [Data Validation Reports for SDG 9435X431] CLP Form Is (Semivolatile Organics Analysis Data Sheet) for tentatively identified compounds (TICs) were not submitted with the data validation report for SDG 9435X431.
3. [Data Validation Reports for SDGs 9435X431, 9441G853, and 9445G893, Non-CLP Analyses, TPH-Motor Oil] A discussion of surrogate recoveries for samples analyzed for total petroleum hydrocarbons as motor oil (TPH-motor oil) was omitted from the data validation reports for SDGs 9435X431, 9441G853, and 9445G893. This omission is not expected to affect the conclusions presented in the data validation reports.
4. [Data Validation Report for SDG 9444H706, Non-CLP Analyses, TPH-Gasoline and TPH-Diesel/Motor Oil] The sentence addressing the quality of data for TPH-gasoline for sample 9445N636 in the data validation report is incomplete. Based on the preceding discussion of method compliance, the data appear to be of acceptable and usable quality.

If you have any questions concerning this memorandum, please feel free to call me at (415)744-1528.