

Bechtel Los Angeles FACSIMILE TRANSMISSION REQUEST

SEND TO: ALAN LEE	FROM: ÖMER KADASTER	
LOCATION: SWDIV	LOCATION: Bechtel - Norwalk	
	Phone: 562 / 807 - 2178	
FAX NO: 619.532.4743	DATE: DEC 12, 97	CHARGE TO JOB/OVERHEAD ACCT NO: -
	NO. OF PAGES (EXCLUDES COVER SHEET): 3	

REMARKS

JUST RECEIVED THIS LETTER FROM WESTON (dated Dec 12, 97)
RESPONDING TO US ON THE TBT ISSUE.

TOM & I HAVE BEEN DEALING WITH THIS ALREADY -
WE WOULD LIKE TO TALK TO YOU MONDAY (12/15)
AND RESOLVE THIS ISSUE.

REGARDS, ÖMER

PS: THIS CAME w/o COVER LETTER OF USEPA.



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TO: Omer Kadaster
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COMMENTS:

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December 12, 1997

Mr. Martin Hausladen, SFD-8-2
U.S. EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

W.O. #04900-006-008-2000
DCN: 4900-06-08-AACD

Subject: Comments on Bechtel Final Responses to Organotin Data Validation Issues
Site 7, Long Beach Naval Shipyard

Dear Mr. Hausladen;

The Navy's contractor, Bechtel, has sent responses to EPA's letter of 5 August 1997 which provided additional clarification and rationale for recommending rejection of selected organotin data.

WESTON had recommended rejection of organotin results from three sample delivery groups (CK3104, CK3122, and CK3072) due to laboratory exceedance of sample holding times and improper sample preservation and handling by field sampling personnel. Sample holding times ranged from 28 to 48 days. Sample holding times of 14 days for organic analytes are specified by the U.S. EPA Contract Laboratory Program (CLP), *Test Methods for Evaluating Solid Waste (SW-846)*, and *Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act (40 CFR 136)*, however the laboratory SOP apparently allows a holding time of 28 days. Samples in the same sample delivery groups were received at the laboratory with temperatures ranging from 17.8 to 20.7 °C. The above references specify sample preservation with ice or refrigeration at a temperature of 4 °C ± 2 °C. Organometallic compounds such as tributyltin have chemical properties more like organic compounds than metals and, thus, are readily subject to both thermal and microbial degradation.

The argument made by Bechtel in the second paragraph of the response to Comment 1 does not adequately address the issue of sample temperature. It takes time to collect sediment samples; if each sample had been properly put on sufficient ice as it was collected over the sampling day, then only the final sample(s) would have been warmer than 4°C. This normal sample preservation procedure does not appear to have been followed.

The Navy's contractor indicated that organotin results for three of the samples (26006101, 26006201, and 26005801) in delivery group CK3122 were not used due to holding times of 133 days. Instead, new samples were collected and analyzed (see response to Comment 2). However, new sample identification numbers were not assigned even though samples were



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collected during an additional sampling event. WESTON recommended that new sample numbers be assigned to these three samples to prevent confusion with earlier results. All other sample results in delivery group CK3122 should still be rejected due to holding time exceedances (28 days) and improper preservation (17.8 °C).

Use of data recommended for rejection would result in organotin results being reported as non-detected with normal laboratory detection limits. The samples potentially could have contained higher concentrations of target organotin analytes which, due to holding time exceedance and improper preservation, may have degraded to levels below laboratory reporting limits by the time samples were analyzed. This is in contrast to data which were qualified as undetected due to on-going laboratory blank contamination. In those cases reported detection limits were elevated.

WESTON still recommends that the data in question be rejected. A determination must be made if there are sufficient non-rejected data to properly evaluate the site or if resampling and reanalysis are required. If you would like additional information regarding organotin chemistry and/or analysis from a nationally known expert, I recommend you contact Dr. Cheryl Krone at NOAA's Montlake Laboratory in Seattle, Washington. Please contact Dr. Roger McGinnis at (206) 521-7668 if you have questions about this letter.

Very truly yours,

ROY F. WESTON, INC.

Karla Brasacmle, R.G.
Site Manager

KB/ed