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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

APR 16 1993

4WD-FFB

Mr. Byron Brant
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1822
Norfolk, Virginia 23511-6287

RE: Marine Corps Base Camp Lejeune NPL Site
Jacksonville, North Carolina

Dear Mr. Brant:

EPA has reviewed the document titled "Data Validation Report for Sites 43, 44, 63, and 65.

If you have any questions or comments, please call me at (404) 347-3016.

Sincerely,

A handwritten signature in cursive script that reads "Michelle M. Glenn".

Michelle M. Glenn
Senior Project Manager

Enclosure

cc: Peter Burger, NCDEHNR
Neal Paul, MCB Camp Lejeune

GENERAL COMMENTS

The Data Validation Report makes conclusions but does not include a complete data package which is required to verify the conclusions. Missing from the data package are the raw data, the proper chain-of-custody forms (COCs) and the Contract Laboratory Program (CLP) forms that are required in the CLP Statement of Work for Organic and Inorganic Review, 1991 (CLP SOW). The CLP SOW requires that before data can be validated, a complete data package must be evaluated to determine if certain criteria are met.

Since the Data Evaluation Report does not contain a complete data package, criteria for conducting a data validation and actual data cannot be validated for this TRC Report.

Following are a few examples of information missing from the data package and the criteria that information affects:

Without the appropriate COCs, it is not possible to determine if the samples were analyzed within their respective holding times; and

Without the CLP forms, it is not possible to determine if any initial or continuous calibration checks were made, if surrogate spikes were used and if matrix spike/matrix spike duplicates were analyzed to determine if the results were within their limits. Furthermore, the CLP forms are to be completed by the laboratory and used by the reviewer to validate the raw data.

CONCLUSIONS

The Data Validation Report could not be thoroughly reviewed because it did not contain a complete data package which is required to verify its conclusions. Until a complete data package is included in the Data Validation Report, the conclusions made in that report cannot be evaluated.