



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
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REPLY TO THE ATTENTION OF

May 5, 1999

DW-8J

Ms. Christine Freeman
Environmental Protection Department Code 095
Naval Surface Warfare Center
300 Highway 361
Crane, Indiana 47522

RE: NOD Draft Audit Demo Report
Field Test Kits & Wiley Mill
Bioremediation Facility
Naval Surface Warfare Center
Crane, Indiana

Dear Ms. Freeman:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the Draft Audit Demonstration Report – Field Test Kits and Wiley Mill Riffle Splitter, dated March 1999. Attached are our comments concerning the report that must be addressed. Revised report pages and a response to comments must be submitted within 30 days of the date of this letter. If you have any questions regarding this matter, please contact Mr. Allen Debus, our QAP Coordinator at (312) 886-6186, or myself at (312) 886-6146.

Sincerely,

A handwritten signature in black ink, appearing to read "Carol Witt-Smith".

Carol Witt-Smith
Corrective Action Expert
WMB, IL/TN/MI Section

Enclosure: NOD Comments
Filename: NODauditreport.usn

Page 2

CC: NSW Core Team Members:

Tom Brent, NSW
Bill Gates, SOUTHDIV

NSWC Project Team Members:

Allen Debus, WMB
Alan Fosdick, MK
B. Venky Venkatesh, MK
Bob Leduc, Toltest

NSWC Management Team:

Hak Cho, WMB
Jim Ferro, SOUTHDIV
Jim Hunsicker, NSW

Draft Audit Demonstration Report – Field Test Kits and Wiley Mill/Riffle Splitter Study
Dated March 1999
Naval Surface Warfare Center
Crane, Indiana
NOD Comments

1. Table 2-1

Two columns should be added indicating the standard variation in each of the five sample results that were averaged to produce the values shown in Columns 4 and 5. This added information will demonstrate how widely distributed the values are which have been used as the basis of procedural comparison. While the samples used to derive these numbers cannot be regarded as “replicates”, a lesser variance would fortify the proposed conclusions.

2. Table 2-2, Page 2-8

Data for Tetryl, is there a typo in the data for Sample B10S00500053, and its duplicate? (see 650 UX and 6500 UX).

3. Page 2-10, 3rd full Paragraph

Although the meaning is implicit, it should be stated whether these samples are Wiley Mill/Riffle Splitter samples or samples produced through regular homogenization.

4. Table 2-3

The RDX MSD data really is atrocious. There's no way to disguise this.

5. It would be meaningful if some Quality Control data representing the samples which were homogenized using conventional techniques could be summarized or tabulated as well in this report.

6. Page 2-14

There is a minor typo. The word “be” should be deleted from the last sentence in the 4th paragraph.

7. Table 3-1

The table indicates that 11 out of 12 RDX field test kits suffered from false negatives in Day 60 samples. Then, on page 3-15, it is noted that the detection limits for laboratory reporting limits were considerably less than was achieved in test kits. This same paragraph also indicates that "In cases where the laboratory detected either TNT or RDX below the level achievable by the appropriate field test kit, results were deemed to be in agreement since both the field test kits and off-site laboratory analysis achieved their specific objectives." However, this would appear to be a hanging conclusion because my impression is that the data in Table 3-15 may not reflect this reconsideration of whether or not "agreement" was achieved.

8. Page 3-14, last paragraph in Section 3.4.3

A verb should be inserted into the first sentence.

9. Page 3-15, second paragraph, 3rd sentence

It is mentioned that reanalysis was performed. Did this entail reextraction, and if so was this accomplished within proper sample holding times? Is this the sole reason for the RDX high false negative rate in Day 60 samples? Were detection limit differences between laboratory confirmatory and field test kit methods already factored into account?