

Frye, Curtis A. CIV ENGFLDACT NORTHEAST EV23/CF

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Sent: Tuesday, June 01, 2004 2:05 PM
To: Frye, Curtis A. CIV ENGFLDACT NORTHEAST EV23/CF; pkulpa@dem.state.ri.us; Mueller, Cornelia A CIV N8N, Env Off; Bober, Todd A CIV ENGFLDACT NORTHEAST
Subject: comment on Coddington Cove Rubble Fill Area Tech Memo (May 2004)

FYI - EPA has some concerns about the data validation for Codd. Cove. I understand that this was mostly for internal Navy use, but if you want to use the info for regulatory decision-making or changing cleanup priorities we have concerns about that.

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Chau Vu

05/27/2004 10:43
AM

To: Kymerlee Keckler
cc:
Subject: comment on Coddington Cove Rubble
Memo (May 2004)

Fill Area Tech

My only comment for this Tech Memo is follows:

Page 4-2 on Analytical Data Validation:

You should double check with our chemist on data validation requirement. I think the rule of thumb is Tier I and PE (performance evaluation) as the minimum requirement for all data validation. However, all or most data I have seen used for risk assessment have gone through Tier II validation and some with a subset of maybe 10% of the data for Tier III. And our regional chemists that I worked with have recommended Tier III validation for sediment, biota, PCBs and dioxin analysis. Full data packages are also usually important to have so if a problem is identified during Tier II, we can request a Tier III if necessary. We follow the Region I Compendium of QAPP Requirements and Guidance and I am comfortable as long as the data are approved upon by our chemists that the validation follows our guidance.

Section 4.4 refers to EPA Region I guidances that will be used but mention Tier I validation for PCBs, which I would defer to a chemist for approval.

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