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NAS CECIL FIELD, FL
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EMAIL OF TRANSMITTAL AND 13 FEBRUARY 1996 LETTER AND OUTLINE FOR
PROPOSED REDUCTION IN SAMPLING QUALITY ASSURANCE AND DATA VALIDATION
NAS CECIL FIELD FL
8/12/2002
NAVAL FACILITIES ENGINEERING COMMAND SOUTHERN DIVISION

-----Original Message-----

From: Davidson, Mark (Efdsouth) [SMTP:DavidsonME@EFDSOUTH.NAVFAC.NAVY.mil]
Sent: Wednesday, August 21, 2002 11:19 AM
To: Hansel, Wayne (Efdsouth); David Grabka; Dawn Taylor; Debbie (E-mail); Speranza, Mark; Paul; Scott
Subject: Advanced data package- QA reduction memo

Attached is a memo which the BCT adopted in 1996 regarding reduction in QA activities. This memo is pertinent to the Fred Slone oversight parking lot item, and we may want to review it to see how relevant it is today in a LTM scenario (vs. an investigation scenario back in 96)



QA_reduc.pdf

Mark D.

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Code 1879
13 Feb 96

Mr. Mike Deliz
FDEP-Remedial Project Manager
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subj: REDUCTION OF QUALITY ASSURANCE SAMPLE COLLECTION AND DATA
VALIDATION, NAS CECIL FIELD

Dear Mr. Deliz:

Enclosed is an outline of the proposed reduction in sampling quality assurance and data validation for the Installation Restoration (IR) and BRAC programs at NAS Cecil Field (NASCF). Subject reductions were discussed during the 6 Nov 95 telecon and at the 27 Nov 95 BCT meeting at NASCF, Quarters B. During the 27 Nov meeting it was agreed, by the BCT, to proceed with the proposed reduced sampling protocol.

If you should have any additional questions, do not hesitate to contact me at (803) 820-5526.

Sincerely,

MARK E. DAVIDSON
Remedial Project Manager
BRAC IR Branch

Enclosure (1): Reduction of Quality Assurance Sample Collection and Data Validation, NAS
Cecil Field

Copy to:

EPA Region IV-Bart Reedy
ABB-ES (Tallahassee), Rao Angara/Eric Blomberg
ABB-ES (Orange Park), Lisa M. Routhier/Jerry Girardot
NASCF-Dave Kruzicki
BECHTEL-Hermann Bauer

Blind Copy:

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**PROPOSAL FOR REDUCTION OF QA SAMPLE COLLECTION AND DATA
VALIDATION
NAS CECIL FIELD, JACKSONVILLE, FLORIDA**

NAS Cecil Field Installation Restoration (IR) and Base Realignment and Closure (BRAC) programs are proposing a new approach to the collection and analysis of Quality Assurance (QA) samples and the validation of analytical data. The proposed approach focuses on the QA samples that are needed to assess the performance of the measurement systems used in the IR and BRAC programs over a given field program. A similar reduction in the QA sample program has been implemented at the Los Alamos National Laboratory with the approval of United States Environmental Protection Agency (USEPA) and the State of New Mexico. The implementation of the reduced QA sampling program has resulted in the savings of millions of dollars in analytical costs per year.

INTRODUCTION

The QA sampling program at NAS Cecil Field has historically included the collection of the following samples at the given frequencies:

Rinsate Blanks:	1 per site per day
Field Blanks:	1 per source per event
Trip Blanks:	1 per cooler that contains VOC samples
Field Duplicates:	1 per 10 samples (10%)
MS/MSD:	1 per 20 samples (5%)

This frequency of QA sample collection was followed at all sites without consideration of the site conditions. This proposed approach incorporates judgement in the selection of appropriate QA samples where they will provide the largest benefit.

In addition to the above QA sampling program, 100% of environmental data was sent to a subcontractor for validation per the CLP criteria.

QA SAMPLING PROPOSAL AND RATIONALE

The proposal for the reduction of the QA sampling program will vary slightly between the IR and BRAC programs. The variation is a function of the data quality requirements for each program. The IR program will be using the data to delineate the nature and extent of contamination and to support risk assessments while the BRAC program will be using data to screen each site (i.e. assess the presence or absence of contamination). Therefore, the following proposal will address the IR and BRAC separately, when appropriate.

It should be noted that laboratory QC samples will continue to be used. The results of these samples will provide information on the validity of the environmental data (i.e. identify laboratory contamination).

1. The proposed reduction of QA samples is as follows:

Elimination of rinsate , field, and trip blanks from the BRAC program.

As stated above, the data for the BRAC program is primarily going to be used to screen for the presence or absence of contamination at a given site. Therefore, extensive QA sampling and a high level of data quality is not necessary. However, the QA sampling program will include duplicate, MS and MSD samples. By employing this QA sample reduction, analytical costs can be greatly reduced without compromising the data which is necessary to make decisions on the disposition of BRAC sites.

Rinsate Blanks: Elimination of rinsate blanks in the IR program.

Rinsate blanks provide little value to the QA program and are the most expensive because of their high frequency of collection (1 per day). Rarely has contamination been detected in rinsate blanks collected at NAS Cecil Field. In the rare occurrence in which contamination was detected, it has been traced to laboratory contamination. Even if contaminants do infiltrate into environmental samples, the use of rinsate blanks will not provide conclusive evidence regarding whether contamination entered any given sample. Instead of collecting rinsate blanks daily, more training and field audits or reviews could be conducted to ensure that the approved decontamination standard operating procedures are being followed.

Field Blanks: Reduced frequency of field blanks during the IR program.

Similar to rinsate blanks, contamination has rarely been detected in field blanks at NAS Cecil Field and in the rare occurrence when contamination was detected, it has been attributed to laboratory contamination. The source of the decontamination water has been and will continue to be the same at Cecil Field. The water comes from the installation water supply and run through an onsite water treatment unit to produce organic-free water. It is recommended that the frequency of field blank be reduced from 1 per event per source to one every 6 months or if the source of water changes.

Trip Blanks: Elimination of trip blanks from the IR program.

Again, contamination has rarely been detected in trip blanks at NAS Cecil Field and when it has been detected, it has been traced to laboratory contamination. Even if contaminants do infiltrate into environmental samples, the use of trip blanks will not provide conclusive evidence regarding whether contamination entered any given sample.

2. Reduction of data quality levels is as follows:

Data quality Level D has historically been used at Cecil Field. Level D analytical services are typically used for NPL sites that are likely to undergo litigation. The Navy has entered into an

agreement with the USEPA to assess and remediate (if necessary) contaminated sites at all Navy Installations. Therefore, litigation is not anticipated at Cecil Field IR sites and the data quality level can be reduced to Level C. This data quality reduction will not compromise the data quality needs of the RI/FS investigation.

The BRAC program is essentially a screening program to determine presence or absence of contamination and Level C analytical services are appropriate.

3. The proposed reduction in data validation is as follows:

Historically 100% of Level D analytical data from Cecil Field has been validated offsite by a validation subcontractor. Validation of data is a NEESA requirement and at approximately 10% of the analytical cost, a large amount of money is being obligated to validation. However, only a very small fraction of the data is rejected through the validation process, mainly because qualified and NEESA certified laboratories are performing the analyses. NEESA is currently in the process of substantially reducing the amount of required data validation (somewhere between 10 and 30% of the data) but the new requirements will not be published until sometime in 1996.

It is proposed that formal offsite data validation be eliminated from the BRAC and the IR programs.

Although formal data validation will be eliminated, a qualified chemist or scientist will evaluate the data from the laboratory and assess if the data is usable.