



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

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AUG 21 1990

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Mr. James Malone
IR Section Manager
NAVFACENCOM
Southern Division
Mail Code 1151
2155 Eagle Drive
Charleston, SC 29411-0068

SUBJECT: Environmental Protection Agency Oversight of Navy
Analytical Laboratories

Dear Mr. Malone:

The Federal Facilities Section (FFS) transmitted your June 11, 1990, response to our request for oversight of analytical laboratories at Navy sites on the National Priorities List (NPL) to our Quality Assurance/Quality Control Officer at the Environmental Protection Agency's (EPA) Environmental Services Division (ESD). The FFS asked for a position from ESD on the Navy's opinion that submitting EPA spikes and blanks to laboratories under EPA's contract laboratory program (CLP) is unnecessary. Please find enclosed our request and the ESD response, which indicates that even contract laboratories need this type of oversight.

EPA's position is that the Navy will need to accept spikes and blanks for submission to laboratories used (CLP or non-CLP) at NPL sites. This includes NAS Pensacola, NAS Cecil Field, NAS Jacksonville and NAS Whiting Field. Since the Navy has agreed to accept EPA spikes and blanks at NAS Cecil Field, there will be no delay in approving the RI/FS Work Plan for this site due to dispute over laboratory oversight. However, EPA will dispute the RI/FS Work Plan for NAS Pensacola when it is resubmitted and for NAS Jacksonville if the Navy does not accept EPA spikes and blanks and submit them to their laboratories for analysis.

EPA must insure that data produced at sites on the NPL are of the highest quality because of the sensitive nature of decisions made at these sites. Decisions based on incorrect data could adversely affect human health and the environment. Therefore EPA must provide oversight of activities performed at NPL sites including laboratory analysis. Also enclosed is a recent newspaper article which shows the types of problems that can be encountered even with EPA contract laboratories.

The FFS would like to solve this matter as soon as possible so that the Navy can proceed with remedial investigations.

Please contact Ms. Nancy Dean at (404) 347-3016 if further discussion is required.

Sincerely yours,

James H. Scarbrough, P.E., Chief
RCRA & Federal Facilities Branch
Waste Management Division

cc: Eric Nuzie, FDER
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