

HAFB

 ENTERED

Allen, Pam, NMENV

From: Strasser, David, NMENV
Sent: Wednesday, April 27, 2011 9:46 AM
To: Allen, Pam, NMENV
Subject: FW: Background Study Radiological Issues
Attachments: AQS rad comments.doc

Pam:

Found it imbedded in other e-mails.

Dave

From: Strasser, David, NMENV
Sent: Friday, March 18, 2011 1:17 PM
To: David Scruggs, HAFB
Cc: Moats, William, NMENV
Subject: Background Study Radiological Issues

Dave:

Attached are issues that our contractor has presented that need clarification regarding the radiological constituents of the Background Study. As per our previous agreement, these issues should be addressed by 5/13/11.

Thanks,
Dave

The review of each response was based upon the information provided in the written response from Holloman Air Force Base (HAFB) as well as discussions from the January 4, 2011 conference call. Since most of the data needed to resolve the radiochemical NODs are similar for each comment, an attached matrix is not being provided, to reduce redundancy. The initial responses as provided by HAFB are not adequate as provided. However, the outstanding issues may be resolved by providing the requested information contained in the following discussion.

Additional Clarification Required from HAFB

The responses to NMED NOD Comments Part 1, No. 5 and all of Part 2 (Comment Nos. 1-9) were not adequate as provided. In order to resolve data quality issues and render a determination on the usability of the radiochemical data, the following must be addressed.

For the HAFB Basewide Background Study Report, radiological data for one sample delivery group and its associated data validation report were reviewed (SDG D8I090195). Additional cursory reviews showed that the issues presented apply to all other radiochemical data (as outlined in Part 1 Comment 5 and Part 2 Comments 1-9). In order to approve the background values provided, NMED seeks to further understand the analytical methods that were used, the extent and effect of matrix interferences observed, and the overall usability of the radiochemical data.

1. For all non-Environmental Protection Agency (EPA) or modified methods used (C-01-1, E903.0, E904.0, STL-RC-0211, A-01-R), please provide a copy of the method including details regarding modifications and non-standard approaches. For example, describe how samples were prepared and results calculated for soil samples that were analyzed using drinking water methods such as Methods 903.0/904.0.
2. For all radiological data, provide a detailed assessment of the matrix interference issues. Provide a detailed review of all radiochemical data for failed matrix spike/matrix spike duplicate (MS/MSD) recovery, carrier recovery, or other evidence of significant matrix interference. Acceptable laboratory control sample (LCS) recovery is not a valid rationale to overlook other quality control (QC) failures. This assessment should include:
 - a. Specific data that are affected for each method, matrix, and analyte,
 - b. Severity of the matrix effects and likely bias,
 - c. Usability of affected data for the background study, and
 - d. Suggested method improvements to reduce matrix effects.

Qualify or reject radiochemical data as necessary. Reissue data validation (DV) reports, amended data tables, and completeness reports as necessary.

3. Either reject the Radium-226 result for sample BWBG-SB20-20 or provide additional rationale for its inclusion. Review all radiochemical data for similar co-precipitation failures and reissue the DV reports, amended data tables, and completeness reports as necessary.
4. Provide a written description of the "truncation" procedure. It must be sufficiently detailed to allow an independent laboratory to reproduce the data. Include available references to EPA or other peer-reviewed scientific literature approving this practice.

The discussion must indicate when and how the procedure is to be used and the impact on resulting data.

5. In addition, to ensure the consistency and usability of project data, future work plans and investigation reports should address the following:
 - a. Evaluation of method alternatives to reduce matrix interferences.
 - b. Comparability of background and site data from different labs using proposed method modifications.
 - c. Specific data validation guidelines including:
 - i. Treatment of MS/MSD and other QC failures,
 - ii. Use of “Reason codes” for DV qualifiers, and
 - iii. Use of statistical tests for the evaluation of quality control sample outcomes as described in industry standard radiological guides.

DRAFT

Allen, Pam, NMENV

From: Strasser, David, NMENV
Sent: Wednesday, April 27, 2011 8:25 AM
To: Allen, Pam, NMENV
Subject: FW: HAFB Rad comments
Attachments: Draft rad comments.doc

Pam:

Attached are the comments we sent on 3/18/11 to HAFB. I couldn't open the disc they sent, so I'm hoping this is what you need.

Dave

From: Moats, William, NMENV
Sent: Friday, March 18, 2011 10:34 AM
To: Strasser, David, NMENV
Subject: HAFB Rad comments

Dave,

I talked with John. Let's send the attached draft comments on rad to HAFB so that they can attend to these issues. Don't put the comments on NMED letterhead.

--Will