

**Kulis, Jerzy, NMENV**


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**From:** Kulis, Jerzy, NMENV  
**Sent:** Thursday, August 11, 2011 10:48 AM  
**To:** 'Shen, Hai'; Cobrain, Dave, NMENV  
**Cc:** Enid J. Sullivan (Jeri); pnakagawa@lanl.gov; 'Ardyth M. Simmons'; spchu@lanl.gov; Steven Paris  
**Subject:** RE: discussion with state

Hai,

Here is NMED's response to your questions:

1. The original sentence in Comment #5, part 4a of the NMED's 7/25/2011 letter should include 'and' instead of 'or'. It should read "Both filtered and unfiltered values exceed five times (5x) the quantitation limit . . . ." I apologize for the error and the resulting confusion.
2. ProUCL version 4.00.05 allows to calculate UTLs for 10 observations and no less than 25% detections (which is equivalent to minimum 3 detections). The *ProUCL Version 4.00.05 User Guide (Draft)* (EPA/600/R-07/038) states the following in Section 1.7.2 *Minimum Sample Size Requirements for Data Sets with NDs*: "[F]or data sets of size 5 or larger with 3 detected values, most nonparametric and parametric (except for gamma distribution based ) decision statistics will be computed and printed." NMED prefers to have UTLs calculated for as many constituents as possible. If you disagree with this determination, please provide justification based on *ProUCL Version 4.00.05 User Guide* or *ProUCL Version 4.00.05 Technical Guide*, with appropriate quotations from these documents. Please let me know if you would like to discuss this further.

Sincerely,

Jerzy Kulis  
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**From:** Shen, Hai [<mailto:Hai.Shen@nnsa.doe.gov>]  
**Sent:** Wednesday, August 10, 2011 12:57 PM  
**To:** Cobrain, Dave, NMENV; Kulis, Jerzy, NMENV  
**Cc:** Enid J. Sullivan (Jeri); [pnakagawa@lanl.gov](mailto:pnakagawa@lanl.gov); 'Ardyth M. Simmons'; [spchu@lanl.gov](mailto:spchu@lanl.gov); Steven Paris  
**Subject:** RE: discussion with state

Dave and Jerzy,

As I mentioned yesterday, we need some clarification on several comments regarding the NMED 7/25/2011 Approval with modification for the Groundwater Background Investigation Report. We are okay with either a written response from you or a phone conversation sometime this week. Please let us know.

Thanks.



Hai



Here are the questions:

1. Comment #5, part 4a: "Both filtered or unfiltered values exceed five times the quantitation limit, and the relative percent difference between filtered and unfiltered values exceeds 20%",

In this comment, the construction of this sentence leads to more than one potential interpretation. Normally one would use "and", not "or" following "Both". My interpretation is that "Both" refers not to the "filtered or unfiltered" part of the sentence, but to (my wording) "Values (EITHER filtered or unfiltered) that exceed five times the quantitation limit, AND the relative percent difference...."

If the state could verify that this interpretation is correct we would appreciate it.

2. Comment #23, regarding the explanatory footer on tables E-1 and E-2: Our intent was to calculate UTLs for constituents with more than 10 detections. The table contains some errors in that UTLs were calculated for a few constituents with more than 10 observations. We would prefer to correct the table and leave the footer unchanged.