March 24, 2004

MEMORANDUM

SUBJECT: Comparison of Results of EPA Split Samples with Respondent's Primary Samples
Del Amo Park, California (Document Control Number [DCN] 36CA066004VSF1)

FROM: Marlon Mezquita, Chemical Engineer, PE
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THROUGH: Vance S. Fong, PE, Manager
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TO: Dante Rodriguez, Remedial Project Manager
Site Cleanup Section 1, SFD-7-1

A memorandum report prepared by CH2M Hill and dated March 09, 2004 was reviewed.

Comments

1. There appears to be general agreement between EPA and the Respondent's samples.

2. The report utilizes the Relative Percent Difference (RPD) as a quantitative measure for comparison. The percent differences are displayed next to the sample pair results in the tables provided. This can be a useful tool in judging the degree of disagreement between two results. However, great caution must be exercised in interpreting the RPD, especially as the sample values get smaller and smaller. It can be very misleading and cause one to conclude there is disagreement between two small values such as 0.1 and 0.3 ppm, as these have an RPD of 200%, however the difference between 0.1 and 0.3 ppm may be environmentally insignificant, depending on the health based level of interest.

3. To place the results in perspective, a qualitative comparison was conducted in which results were placed into three categories: low, med, and high values. Then in comparing the sample pairs, the question was asked, “when the Respondent’s sample was low was the EPA sample low, med, or high?” Within these ranges, the most of the samples pairs appear to be in agreement. Except for some individual differences for example, disagreements with samples # [SBL0300 at 6.5'], [SBL0330 at 2.5'], [SBL0353 at 2.5'], and [SBL0361 at 4'].

4. It appears all the Respondent samples were in the “low” range (i.e. non had significant hits) and the EPA samples identified above were in the “medium” range. Thus, there exists the potential of a “low bias” with the Respondent’s data. However, one single split sampling event may not be sufficient data to establish this trend. We agree with the
report’s recommendation that data be screened against regulatory or risk based criteria. This would be beneficial in determining whether differences in these sample pairs is of concern.

5. We agree with the report’s recommendation that, at a minimum, one URS analytical batch be obtained for data validation/review.

6. We agree with the report’s recommendation that future Respondent’s data be reported in “dry weight” basis as this is the industry standard practice.

If you have any questions or comments regarding this review please call Marlon Mezquita at (415) 972-3808.