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G-000-104.258

**LETTER REGARDING RECENT PARTICIPATION IN 1996 DISCHARGE  
MONITORING REPORT - QUALITY ASSURANCE (DMR-QA) STUDY 16**

12/16/96

USEPA  
8  
LETTER

DOE-FEMP



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

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FERNALD  
100 K-0754  
JAN 27 10 34 AM '97  
FILE: 5472.3  
OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

DEC 16 1996

Dear NPDES Permit Holder:

Thank you for participating in the 1996 Discharge Monitoring Report - Quality Assurance (DMR-QA) Study 16. This program covers all major permittees within the National Pollutant Discharge Elimination System (NPDES). The United States Environmental Protection Agency's evaluation of your results is enclosed. **Please provide a copy of the enclosed performance evaluation report to any laboratory which performed analyses for you.**

On the enclosed report, each result you reported has been placed in one of four categories: "acceptable," "not acceptable," "unusable," or "check for error." **You are required to provide a written response which explains the reason(s) for all "not acceptable" or "unusable" data evaluations to your State or Regional Coordinator.** A "check for error" evaluation is advisory and does not require an official response.

Use the attached check lists to identify data handling and analytical problems for all reported values that are "not acceptable." Where sources of error are not readily apparent, your laboratory should make a systematic examination of all portions of its analytical system.

If any of your reported values are "unusable," this does not mean your data are incorrect. Check your reporting procedures and the detection limits of your analytical system and **provide a written justification for any "less than" or "greater than" response.**

To make sure problems have been adequately resolved we strongly recommend that your laboratory **demonstrate correction of analytical problems by analyzing a QC sample for each analyte for which performance was "not acceptable."** Suitable chemistry QC samples are commercially available. If toxicity reference samples are needed the laboratory may use solids and unopened ampuls left over from the study, or obtain additional reference toxicant samples from the USEPA contractor (ManTech Environmental Technology, Inc., phone (919) 406-2114, FAX (919) 406-2246).

**Send documents of corrective actions and results from analyses of QC samples to your State or Regional Coordinator** (as specified in the attached pages). **Your response is due no later than March 17, 1997,** and will be considered by the USEPA/State in determining the need for further follow-up. Please refer to your NPDES permit number in all correspondence. Contact your coordinator with any questions or to request "true" values for additional analytes present in the samples. On behalf of the USEPA and your state environmental agency, thank you for your cooperation and participation in this QA program.

Sincerely yours,

Elaine G. Stanley, Director  
Office of Compliance

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
DMR-QA LABORATORY PERFORMANCE EVALUATION STUDY 16**

**CHECK LIST FOR FOLLOW-UP ON NOT ACCEPTABLE CHEMISTRY DATA**

**1. CHECK YOUR METHODS**

- a. EPA has approved specific methods for effluent monitoring. The list of approved methods is contained in 40 CFR Part 136, Table 1B, although official exemptions are possible, check to see that you are using an approved method.
- b. Check to determine that your personnel are properly trained to perform these analyses.
- c. If you are using an approved method and your personnel are properly trained, check to be sure the method is being performed properly.

**2. CHECK THE DATA FROM YOUR ROUTINE QUALITY CONTROL PROGRAM**

- a. Assess your QC program. Are you employing appropriate QC checks (methods blanks, calibration check samples, quality control samples, etc.) with your sample?
- b. Assess your QC data results. Are they within or outside of appropriate control limits? If outside, check factors that may have caused the abnormal reading (for example: check if your method blank shows interfering substances, check the purity of your reagents, reagent water, glassware, etc.)
- c. For further information on intralaboratory quality control programs and other good laboratory practices, see D 3856 Standard Guide for Good Laboratory Practices for Laboratories Engaged in Sampling and Analysis of Water, Vol. 11.01 of the Annual Book of ASTM Standards, ASTM, 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959.

**3. CHECK YOUR CALCULATIONS**

Be sure your calculations were properly done and that you reported the results in the proper units, e.g., for trace metals were micrograms/liter ( $\mu\text{g/L}$ ) used instead of milligrams/liter (mg/L). Check the original instruction packet and have a colleague perform independent calculations to verify your results.

**4. CHECK FOR DATA REPORTING ERRORS**

Data reporting errors should be taken seriously. If you had a data reporting problem, e.g., transcription error, etc., how are you going to strengthen your system for reporting routine DMR data to avoid similar problems in the future.

**5. CHECK TO SEE IF THE DMR-QA STUDY SAMPLES WERE PREPARED AND ANALYZED ACCORDING TO THE STUDY INSTRUCTIONS.**

**6. DOCUMENTATION**

Submit all identified problems with supporting information and corrective actions, to your State or Regional Coordinator (as specified in the previous pages).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
DMR-QA LABORATORY PERFORMANCE EVALUATION STUDY 16

CHECK LIST FOR FOLLOW-UP ON NOT ACCEPTABLE DATA FROM  
WHOLE EFFLUENT TOXICITY TESTS

1. CHECK TO SEE THAT STUDY INSTRUCTIONS WERE FOLLOWED

- a. Were the dilution water and "Simulated Effluent" prepared according to the study instructions?
- b. Was the test conducted according to the instructions?
- c. Check to be sure you reported the correct method code for your test procedure.

2. CHECK THE DATA FROM YOUR ROUTINE QUALITY CONTROL PROGRAM

- a. Assess if you are performing reference toxicant testing at an appropriate frequency.
- b. CHECK YOUR CULTURE CONDITIONS: Were culture/holding conditions (temperature, hardness, salinity, pH, etc.) similar to test conditions?
  - i. Was your test water less than 48 hours old or more than 2 weeks old?
  - ii. What was the hardness (or salinity) of the culture versus the test water?
- c. TEST ORGANISMS: Were the test organisms of suitable age and condition (e.g., free from disease, taken from adequate brood size, low holding mortality, healthy condition upon arrival from supplier)?
- d. TEST CONDITIONS:
  - i. Check all required test conditions and make sure they have been met, e.g., temperature  $\pm 1^{\circ}\text{C}$ .
  - ii. Were test conditions (temperature, dissolved oxygen, hardness or salinity, pH, etc.) within acceptable limits?
  - iii. Was a performance control (water of known or proven quality) employed in addition to that specified in the instructions? If so, did it perform as expected?
  - iv. Was a reference toxicant series included in the study? If so, how did the results compare to the control data chart?

3. CHECK YOUR CALCULATIONS

- a. Did you use the correct amount of toxicant and dilution water in making your "simulated effluent"?
- b. Was a simulated data set (with known endpoints) subjected to statistical manipulations?
- c. Check your computer program or hand calculations to verify your reported results. Are your programs working properly? Are you using them properly?
- d. Be sure you reported the results properly on the data reporting form.
- e. Did you use the correct analysis method according to the study directions and analysis flowchart? In other words, did you check hypothesis testing assumptions, etc.?

4. CHECK FOR DATA TRANSCRIPTION ERRORS

5. CHECK TO DETERMINE THAT YOUR PERSONNEL ARE PROPERLY TRAINED TO PERFORM THESE ANALYSES

Were personnel experienced with test procedures? Have the personnel run at least five reference toxicant tests?

6. DOCUMENTATION

Submit all identified problems with supporting information and corrective action, to your State or Regional Coordinator (as specified in the previous pages).

Performance Evaluation Report  
DMRQA Study Number 016

Report: 7970  
Page: 1  
Date: 06JAN97

Permittee: OH0009580 USDOE FERNALD ENV. MGMT. PROJECT

Conc. No.	V A	Reported Value	True Value*	Acceptance Limits	Warning Limits	Performance Evaluation
TRACE METALS IN MICROGRAMS PER LITER:						
004-CADMIUM						
01		138	131	113- 148	117- 144	Accept.
006-CHROMIUM						
01		261	250	218- 289	227- 280	Accept.
007-COPPER						
01		629	552	515- 618	528- 605	Not Accept.
009-MERCURY						
01		4.44	4.70	3.53- 5.91	3.83- 5.61	Accept.
011-NICKEL						
01		1970	1812	1660- 2030	1710- 1990	Accept.
012-LEAD						
01		412	375	332- 429	344- 417	Accept.
015-ZINC						
01		1250	1203	1100- 1370	1140- 1340	Accept.
MISCELLANEOUS ANALYTES:						
019-PH-UNITS						
02		8.80	8.73	8.54- 9.01	8.6- 8.95	Accept.
072-NON-FILTERABLE RESIDUE(IN MG/L)						
01		263.0	30.0	20.1- 31.4	21.5- 30	Not Accept.
073-OIL AND GREASE(IN MG/L)						
01		19.1	19.5	11.9- 23.9	13.4- 22.4	Accept.
098-TOTAL RESIDUAL CHLORINE(IN MG/L)						
01		0.57	0.690	0.543-0.834	0.581-0.796	CK. for Err.
NUTRIENTS IN MILLIGRAMS PER LITER:						
031-AMMONIA-NITROGEN						
01		8.93	10.0	8.05- 12	8.52- 11.5	Accept.
035-TOTAL PHOSPHORUS						
02		2.90	2.90	2.46- 3.43	2.58- 3.31	Accept.
DEMANDS IN MILLIGRAMS PER LITER:						
102-CARBONACEOUS BOD						
01		13.25	11.3	5.33- 17.3	6.93- 15.7	Accept.
FATHEAD MINNOW ACUTE DATA AS % OF SAMPLE:						
754-LC50 - MHSF, 25 DEG.						
01		31.5	43.7	D.L. - 88	NA	Accept.
FATHEAD MINNOW CHRONIC DATA AS % OF SAMPLE:						
756-SURVIVAL, NOEC - MHSF						
01		25.0	25	12.5- 50	NA	Accept.
757-GROWTH, IC25 - MHSF						
01		41.7	31.3	19.3- 43.3	NA	Accept.
758-GROWTH, NOEC - MHSF						
01		12.5	25	12.5- 50	NA	Accept.

000007

Performance Evaluation Report  
DMRQA Study Number 016

Report: PE005  
Page: 2  
Date: 06JAN97

Permittee: OH0009580 USDOE FERNALD ENV. MGMT. PROJECT

Conc. No.	V A	Reported Value	True Value*	Acceptance Limits	Warning Limits	Performance Evaluation
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CERIODAPHNIA ACUTE DATA AS % OF SAMPLE:

764-LC50 - MHSF, 25 DEG.

01		21.0	30.8	2.95- 58.6	NA	Accept.
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CERIODAPHNIA CHRONIC DATA AS % OF SAMPLE:

766-SURVIVAL, NOEC - MHSF

01		50.0	25	12.5- 50	NA	Accept.
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767-REPROD., IC25 - MHSF

01		31.3	28.2	14.5- 41.9	NA	Accept.
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768-REPROD., NOEC - MHSF

01		25.0	25	12.5- 50	NA	Accept.
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\*\*\*\*\* END OF DATA FOR OH0009580 \*\*\*\*\*

NOTE: FOR LIMITS AND TRUE VALUES, ASSUME THREE SIGNIFICANT DIGITS.

\*\*\*\*\* END OF REPORT FOR OH0009580 \*\*\*\*\*

\* Based on gravimetric calculations, or a reference value when necessary.  
D.L. Means detection limit.