UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

July 17, 1997

Ms. Darlene Ige
Department of the Navy
Pacific Division
Naval Facilities Engineering Command
(Makalapa, HI)
Pearl Harbor, Hawaii 96860-7300

Re: Draft Final Phase II Remedial Investigation Sampling and Analysis Plan for the Red Hill Oily Waste Disposal Facility at the Fleet & Industrial Supply Center, Pearl Harbor

Dear Darlene:

The U.S. Environmental Protection Agency (EPA) has received the replacement pages for Draft Final Phase II Remedial Investigation (RI) Sampling and Analysis Plan (SAP) for the Red Hill Oily Waste Disposal Facility at the Fleet & Industrial Supply Center (FISC), Pearl Harbor, dated January 1997. We have reviewed the Navy's responses to our March 10, 1997 comments. The Navy's responses have addressed our concerns and we will consider this document as a final. It should be noted, however, that although this SAP contains site-specific information in the data quality objectives (DQO) steps presented, the information provided (specially in Step #6) does not adequately address the need to establish acceptance criteria for the data set that will be generated. Additionally, it is not clear how the data users will determine the level of confidence for using or accepting that the data set is representative of site conditions.

For sampling designs which are not statistically based, it may not be possible to determine "confidence" and "power" quantitatively; in these events, the data users may need to rely on professional judgement and past experience to gauge how reliably environmental decisions can be supported by the data set at hand. However, there is danger in abusing "professional judgement" to rationalize the use of data because such decisions will be more susceptible to challenge and may not be directly defensible.

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