

DRAFT

**Memorandum for the Record:**

**Prepared by James Riley and Glenn Schuster**

**Date:** 2/20/01

**Subject:** Technical Oversight Committee (TOC) meeting in West Palm Beach, February 9, 2001, discussion of Corps Data on C-111 project area.

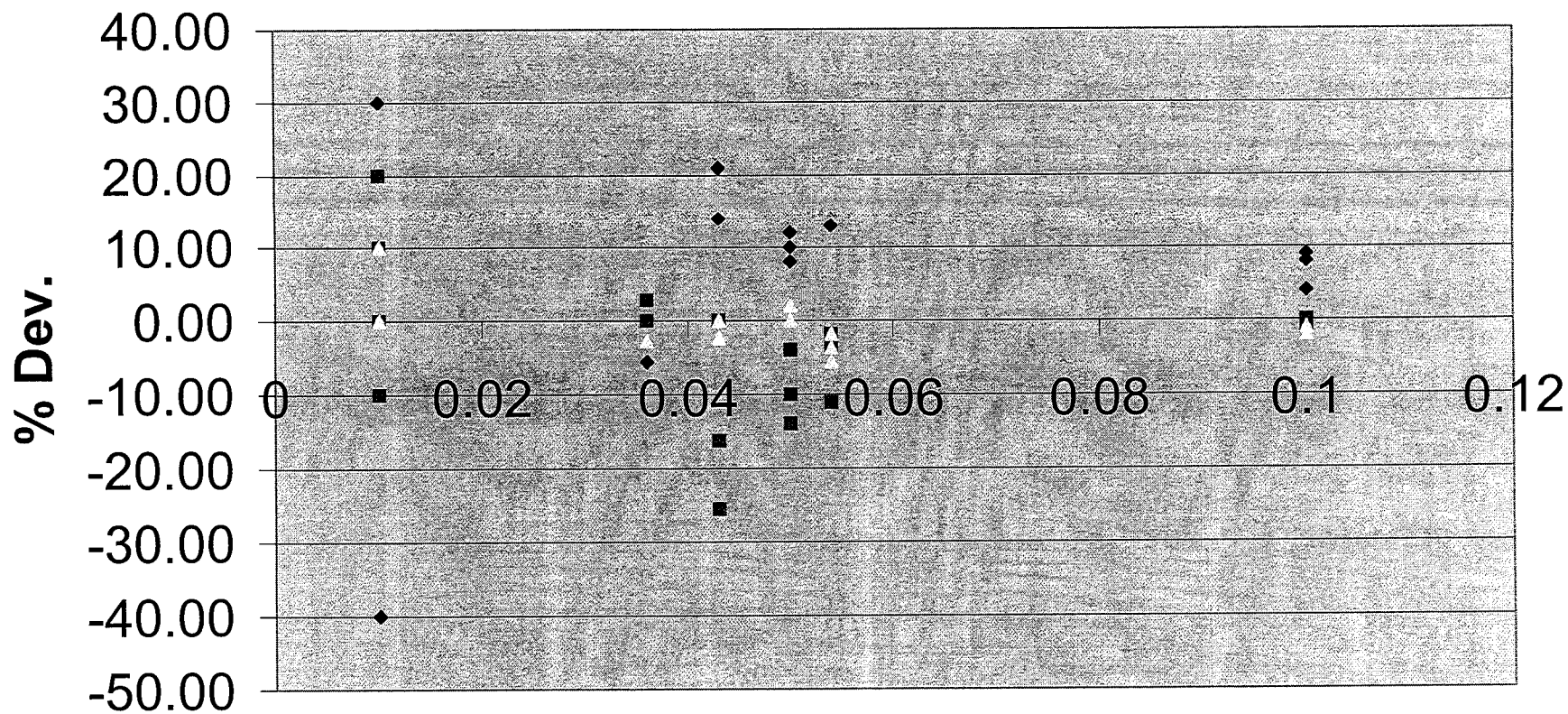
**Background:** A Corps contractor, PPB, has been collecting water quality samples in the C-111 project area since July 1999 with a one-month break in December of 1999 as the emergency order had expired and new emergency order was issued in late December 1999). This monitoring was a requirement of the FDEP emergency orders for S-332B and S-332D. The monitoring plan was coordinated with the SERA WQ group ( now disbanded). Lab analysis was performed by the SFWMD from June through Aug 10, 1999. The Corps contractor, PPB has been performing the analysis since Aug 10, 1999. The SFWMD declined to participate in the analysis or split sampling ( a quality control check of the labs) starting in Jan 2000. The SFWMD agreed, after a request from FDEP to participate in continuous split sampling in June 2000. Subsequently the FDEP and SFWMD identified data differences with the Corps data. At the Feb 2001 TOC meeting, FDEP proposed that 1) the Corps total phosphorus data set be flagged with a “?” (“data is rejected and not to be used”) for the period prior to June 2000 (assumed to be primarily the Corps data set from Aug 10, 1999 through May 2000, collected in compliance with the Emergency Order for S-332D/B); and. 2) Any Corps total phosphorus data below 16 ppb from June 2000 to present be qualified with an “T” (Estimated value between the method detection limit (MDL) and the practical quantification limit (PQL)). There has been an ongoing effort to resolve this issue.

Discussion: We do not agree with the finding (#1 above) that Corps total phosphorus data should be rejected. Our conclusion is based on a careful review of FDEP's evaluation, the quality control data for this data set, and current information from the split sample study of known values. We have found that data variations demonstrated between PPB, FDEP and SFWMD are not unacceptably wide; samples were properly analyzed; some variance may be attributed to differences in sampling regimens; splits of known samples between all three labs have demonstrated precision and accuracy; and recent FDEP audits of PPB have demonstrated that PPB is executing analysis and QA/QC in accordance with FDEP approved guidelines.

We agree with FDEP position 2 above that the data below 16 ppb should be qualified as estimated values between the MDL and PQL in accordance with standard procedures being used by FDEP and SFWMD for data in this range (as per discussion with FDEP and SFWMD staff). PPB has been instructed to flag all future data between the MDL and PQL as estimated. The recent USGS audit report on the SFWMD lab recommends that the SFWMD flag their data below the PQL in the same way. All the values above 16 ppb are considered to be valid based on the quality control information we have.

**Action:** The Corps has taken the lead in resolving data differences between the SFWMD/DEP/COE. A technical working group (COE, SFWMD and FDEP) has been established to continue the process of standardization of all laboratory and field collection practices.

# % Deviation from Known



◆ PPB    ■ FDEP    ▲ SFWMD