



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Rocky Mountain Arsenal National Wildlife Area
Building 111
Commerce City, Colorado 80022-2180

IN REPLY REFER TO:

July 29, 1994

Ms. Susan Maret
Sierra Club, Rocky Mountain Chapter
777 Grant Street, Suite 606
Denver, Colorado 80203

Dear Ms. Maret:

Your June 20, 1994 request for information is particularly addressed by information in the attached letter summarizing Building 111 bird mortalities and analytical data from other areas. Hopefully this letter, shared with the Parties, addresses your first two questions.

To answer your other questions, in 1993, the U.S. Fish and Wildlife Service (Service) submitted biological samples collected as part of the Biomonitoring Program to an Army contract laboratory. The Army discovered that this facility was potentially falsifying results in order to meet Army analytical requirements. This commercial laboratory was also a contract laboratory for the U.S. Navy, U.S. Environmental Protection Agency, University of California-Davis, and several state Environmental Health Departments. The Service retrieved these samples and is awaiting authorization to ship them to another commercial laboratory. In addition, Army is currently attempting to secure another laboratory to conduct long-term chemical analyses on biota samples collected by the Service. In the interim, we have now begun to submit existing samples under an emergency contract with a local laboratory.

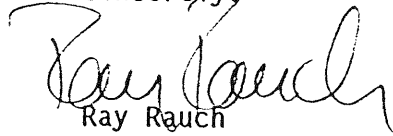
The reason the Service uses Army contract laboratories is to maintain data quality consistency. All samples (air, water, soil, structures, and biota), past and present, have been analyzed by Army approved analytical methods and laboratories. Army has funded the majority of the chemical analyses performed on Arsenal samples. The Service has reviewed the methods, QA/QC program, proposals, and reporting limits for biota and has been satisfied that Service needs are met.

The Service formerly had laboratory facilities, but those facilities (Patuxent Analytical Control Facility (PACF), National Fisheries Contaminant Research Center, and National Wildlife Health Research Center) are now under the control of the National Biological Survey. These facilities were meant to support research programs and were not intended for routine chemical analyses for the purposes of environmental monitoring. The Service does have contracts, administered by PACF, with several commercial laboratories to support its Environmental Contaminants Program. However, the Service contract laboratories and Service QA/QC programs would need to be upgraded and analytical methods made consistent with those previously used for Arsenal programs. Use of alternative methods or laboratories could pose problems

regarding data comparability and quality because different agencies use different methods, require different reporting limits, and use different QA/QC procedures. These issues could also lead to the data being rejected as not credible because certain data quality criteria established by the other agencies involved at the Arsenal were not met.

If we have overlooked or not adequately addressed your questions, please feel free to call.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Rauch". The signature is written in a cursive style with a large initial "R".

Ray Rauch
Project Leader

Attachment

Table 1. Analytical results (ug/g wet weight) from Rocky Mountain Arsenal fortuitous specimens.

Sample Number	Species	Collection		Location	Tissue	Dieldrin	Mercury
		Date					
HF-21	House Finch	6/93		Building 111	whole body	0.048	sc ^a
HF-24	House Finch	6/93		Building 111	whole body	bcr ^b	sc
09	House Finch	6/93		Building 111	whole body	bcr ^b	bcr ^b
04	American Robin	6/93		Building 111	whole body	3.100	0.089
05	American Robin	6/93		Building 111	whole body	0.187	0.110
AR-19	American Robin	6/93		Building 111	whole body	2.400	bcr ^b
03	Western Kingbird	6/93		Building 111	whole body	9.800	bcr ^b
02	Sharp-shinned Hawk	4/93		Building 111	whole body	bcr ^b	1.00
001	American Kestrel	7/93		Building 111	brain	1.300	sc
001	American Kestrel	7/93		Building 111	liver	1.500	sc
11088-1	Barn Owl	10/92		Section 25	brain	0.740	sc
11088-2	Barn Owl	10/92		Section 25	brain	0.440	sc
93b0028	Barn Owl	10/93		Section 36	liver	2.800	sc
923-05002	Badger	9/92		Section 36	brain	2.500	sc
923-05002	Badger	9/92		Section 36	liver	9.200	bcr ^b
MA1	Badger	10/93		Section 4	brain	0.051	bcr ^b
11298-1	Great Horned Owl	7/92		Section 1	brain	0.095	sc
11298-1	Great Horned Owl	7/92		Section 1	liver	0.093	0.060
10943-1	Great Horned Owl	7/92		Section 1	brain	5.200	sc
93GH034	Great Horned Owl	11/93		Section 1	brain	1.100	sc
93GH034	Great Horned Owl	11/93		Section 1	liver	2.400	bcr ^b
93GH035	Great Horned Owl	12/93		Section 35	brain	4.200	sc
93GH035	Great Horned Owl	12/93		Section 35	liver	3.600	sc
11410-1	Bald Eagle	2/93		Buckley	brain	bcr ^b	0.357
11410-1	Bald Eagle	2/93		Buckley	liver	bcr ^b	0.860
93SH015	Swainson's Hawk	7/93		Section 12	egg	0.063	bcr ^b
94b003	Ferruginous Hawk	1/94		Section 19	brain	1.600	sc
94b003	Ferruginous Hawk	1/94		Section 19	liver	0.023	sc
93RP027	Ring-necked Pheasant	10/93		Section 26	brain	0.300	sc
93RP027	Ring-necked Pheasant	10/93		Section 26	liver	2.300	sc
93PD001	Prairie Dog	3/93		Section 26	whole body	bcr ^b	bcr ^b
93PG005	Pocket Gopher	6/93		Section 26	whole body	1.800	bcr ^b

^asc = sample consumed; analytical priority was for organochlorine pesticides, then mercury, then arsenic.
^bbcr^b = below certified reporting limit