

**Adequacy Evaluation of the Corrective Action Report presented by the O'Brien & Gere Laboratories on August 18, 1999.**

**In order to bring the laboratory evaluation process to a successful close, the following items are required to be presented to Parsons ES as soon as possible. All itemized numbers used in this documentation agree with the numbers listed in the Parsons ES On-Site Evaluation Report (June 1999).**

### **SW-846 Method 8260B**

- 1. The revised SOP for 8260B does not include the detail description of the following issues:**
  - Proper manual integration procedures with multi-tiered review and approval process. Signature of the analyst and supervisor are both required by the AFCCE for each manual integration event. The revised SOP only requires one signature by the analyst. Proper manual integration procedures for different situations such as undetected peaks, baseline interference, base line raise or drop, negative spikes, fused peaks, skimmed peaks, misidentified peaks...etc. should be demonstrated as examples in the SOP.**
  - Manual integration documentation shall include not only "how" but also "why" the target compound report has been altered by the analyst.**
  - Section 7.11.3 of the SOP does not specify which automatic integration shall be followed with when manual integration is required.**
- 2. Accepted**
- 3. Accepted**
- 4. Example of documentation must be presented to show when and how control charts for LCS samples have been monitored.**
- 5. The SOP must be revised and presented to show the corrected concentration of LCSs.**
- 6. Accepted**
- 7. Accepted**
- 8. The SOP must be revised accordingly and presented to Parsons ES.**

### **SW-846 Method 6010B**

- 1. Accepted**
- 2. The SOP must be revised accordingly and presented to Parsons ES.**
- 3. Accepted**

## **SW-846 Method 7470A/7471A**

1. Accepted

## **SW-846 Method 8270C**

1. The revised SOP for 8270C does not include the detail description of the following issues:

- Proper manual integration procedures with multi-tiered review and approval process. Signature of the analyst and supervisor are both required by the AFCEE for each manual integration event. The revised SOP only requires one signature by the analyst. Proper manual integration procedures for different situations such as undetected peaks, baseline interference, base line raise or drop, negative spike, fused peaks, skimmed peak, misidentified peak...etc. should be demonstrated as examples in the SOP.
- Manual integration documentation shall include both why and how the target compound report has been altered by the analyst.
- Section 7.11.3 of the SOP does not specify which automatic integration shall be followed with when manual integration is required.

2. Accepted

3. Accepted

4. The lab needs to present an estimated date for the completion of the Chemical Hygiene Plan.

5. Accepted

6. The SOP must be revised accordingly and presented to Parsons ES.

## **SW-846 Method 8081A**

1. The revised SOP for 8081A does not include the detail description of the following issues:

- Factors that constitute technically acceptable manual integration events, such as description of the acceptance criteria for manual integration.
- Proper manual integration procedures with multi-tiered review and approval process. Signature of the analyst and supervisor are both required by the AFCEE for each manual integration event. The revised SOP does not require any signature. In addition, proper manual integration procedures for different situations such as undetected peaks, baseline interference, base line raise or drop, negative spike, fused peaks, skimmed peak, misidentified peak...etc. should be demonstrated as examples in the SOP.

- Manual integration documentation shall include why and how the target compound report has been altered by the analyst.
2. Personnel training records do not include the acceptance criteria for initial demonstration of each analyst's ability to generate acceptable accuracy and precision data using four LCSs.
  3. Accepted
  4. An example of recent issued case narrative which include analyst's initial and date is required.
  5. Accepted

### **SW-846 Method 7060A/7131A/7421**

1. Accepted

### **Sample Receipt, Storage, Preservation, Custody & Disposal**

1. Accepted
2. Accepted
3. Accepted
4. When head space is present in VOC aqueous sample containers, the sample custodian must document on the sample receiving form and fax it with the COC to Parsons ES. The proposed procedures do not prevent any non-compliant samples being analyzed.
5. Accepted
6. Accepted
7. Accepted

### **LIMS**

1. The Section 2.1 of the SOP does not indicate when the LIMS final testing is done by the laboratory section. The Section 2.3 of the SOP does not include the identification and corrective action for all affected data. The Section 2.6 of the SOP does not indicate who keeps the documentation from vendors in file.

### **Security of the Facility**

1. A copy of the currently used Visitor Sign In and Out Record needs to be presented to Parsons ES.
2. Accepted

## **Instrument Maintenance and Equipment Monitoring/Calibration**

1. An example of filled daily check record for re-pipetors is required.
2. Accepted
3. An invoice for MIN/MAX thermometers is required.
4. Not addressed

## **QA/QC Function**

1. Accepted
2. Will be accepted upon completion
3. Will be accepted upon completion
4. An example of a recent case narrative that contain analyst's initial and date is required.
5. Accepted
6. Accepted
7. Will be accepted upon completion
8. An example page is required.
9. An updated organization chart is required.
10. Accepted

## **Corporate Safety Program**

In general, O'Brien & Gere Laboratories needs to provide a proposed completion date for updating or completion of the Health and Safety Program and the Chemical Hygiene Plan.

1. A copy of the audit report by the Certified Safety Professional from O'Brien & Gere Engineers is required.
2. Ongoing
3. Ongoing
4. Ongoing
5. Ongoing

6. Accepted
7. Accepted
8. Accepted
9. Ongoing
10. Accepted
11. Ongoing
12. Ongoing
13. Ongoing
14. Ongoing
15. Ongoing
16. Ongoing
17. Accepted
18. Ongoing
19. Ongoing
20. Ongoing
21. Ongoing