



November 24, 1999

Tammy Chang
Parsons Engineering Science
8000 Centre Park Drive #200
Austin, TX 78754

Re: FINAL RESPONSE to Second Adequacy Evaluation of the Corrective Action

Dear: Tammy Chang,

Below are itemized responses to the "Second Adequacy Evaluation of the Corrective Actions". The responses are listed in the exact order as received in your Second Adequacy report faxed on November 23, 1999.

SW846 Method 8330

1. None.
2. DataChem will place min/max thermometers in requested refrigerators
3. None
4. DCL will write down the lot number of sodium chloride in the extraction notebook in order to insure traceability for all compounds added to explosive samples.
5. Soil samples are dried in an operating fume hood at ambient conditions until the samples are, in the judgement of the analyst, dry. Attached is an email from the MICE Service stating that "In this case, the lab staff should use its professional analytical training and experience to determine a reasonable approach to the weight measurement being made and be able to defend their decision." The request for weighing to constant weight is at odds with the request to ensure temperature control on extracts and samples (See #2). Samples air dried to constant weight is done outside the required sample storage temperatures and a prolonging of this condition for the requirement of constant weight is unnecessary. It is DCL's position that the dryness of the sample is the analyst's judgement and that the unnecessary extension of uncontrolled temperature sample storage is more detrimental than beneficial.
6. None.
7. None.
8. None.
9. None.

10. None.

11. None.

12. None.

13. None.

14. None.

15. None.

16. None.

17. None.

18. A validation requirement of $\pm 15\%$ is impossible to comply with. DCL has verified the detection limit by running a low level standard and the only criteria is detection or not. DCL will use this approach at the RL. It is statistically impossible to use the same criteria used by a midpoint calibration standard at the reporting limit.

19. None.

Sample Receipt, Storage, Preservation, Custody & Disposal Action Items

1. None.

2. None.

LIMS Action Items

None.

Facility Security Action Items

None.

Instrument Maintenance and Equipment Monitoring/Calibration Action Items

1. None.

2. DataChem has not changed its position on this requirement. "Passing calibration criteria is more than enough documentation that a system is brought back in to control. No record is needed in the maintenance logbook."

QA/QC Functions Action Items

1. None.

2. None.

3. None.

Safety Program Action Items

1. None.

2. None.

END of Responses

Please feel free to call me anytime regarding these responses at (801) 266-7700. Thank you for your time and the efforts you have taken to approve DataChem for this important project.

Sincerely,



Robert P. Di Rienzo
Vice President
Quality Assurance / Information Technology
DataChem Laboratories, Inc.

Enclosures: SOP # QC-DC-002

CC: James H. Nelson, DCL Laboratory Director
Kevin Griffiths, DCL Project Manager
Richard Wade, DCL Organics Manager

From: EHS&G MICE <mice@cpmrx.saic.com>
To: "mitchellpeterson@juno.com" <mitchellpeterson@juno.com>
Date: Mon, 25 Oct 1999 20:29:37 -0400
Subject: RE: Explosive method 8330 question

Dear Mr. Peterson,

Thank you for your question. We believe that the intent of the method was to achieve "air dryness" of the sample to a "constant weight" relative to the analytical measurement being made.

You point out that Section 7.1.2.1 of Method 8330 states that samples must be dried to a constant weight. However, Section 7.1.2.2.1 of the method then states that a 2.0 g subsample should be placed in a 15 mL glass vial for extraction. A 2.0 g weighing means that the samples are only going to be weighed to +/- 0.1 g. Therefore, if the difference in weight between air dry weighings is less than 0.1 g, the weight should be assumed to be constant. Hopefully, any changes to the sample weight due to humidity or temperature would be less than 0.1 g and would make the measurement "possible".

This guidance is not formally a part of SW-846. In this case, the lab staff should use its professional analytical training and experience to determine a reasonable approach to the weight measurement being made and be able to defend their decision.

We hope you find this guidance helpful.

Sincerely,

The MICE Service

The Methods Information Communication Exchange (MICE) Service
E-mail address: mice@cpmrx.saic.com
Phone#: 703-821-4690 (leave a message) Fax#: 703-698-6101
Web Site and FAQs: <http://www.epa.gov/sw-846/mice.htm>
SW-846 methods can be downloaded from the web at:
<http://www.epa.gov/epaoswer/hazwaste/test/sw846.htm>