PARSONS ENGINEERING SCIENCE, INC.
A UNIT OF PARSONS INFRASTRUCTURE & TECHNOLOGY GROUP INC.

8000 Centre Park Drive, Suite 200 • Austin, Texas 78754-5140 • (512) 719-6000 • Fax: (512) 719-6099

December 20, 2000

Via U.S. Mail
Ms. Jo Jean Mullen
Quality Assurance Evaluator
AFCEE/ERD
3207 North Road
Brooks AFB, TX 78235-5363

Subject: Action Items for CSSA Analytical Data Packages and Reporting
Camp Stanley Storage Activity (CSSA), Texas
Contract F11623-94-D0024, Delivery Orders RL17, RL33, RL53, RL74, and RL83

Dear Jo Jean:

Enclosed please find five copies of the agreed-upon action items regarding data validation and verification of CSSA analytical data package submittals. These items resulted from discussions between AFCEE, CSSA, and Parsons ES at the 15 December 2000 working meeting at CSSA. Also included are copies of the sign-in sheet, and based upon AFCEE comments at the meeting, a revised "secondary review of DVR and data package" checklist.

Please call me at (512)719-6051 if you have any questions or comments. We plan to use the action items and checklist in preparing data packages for submittal and review.

Sincerely,

Susan Roberts
Sr. Project Manager

encl.

xc: Brian Murphy, CSSA (1 copy)
Nancy Stine, AMC (1 copy)
Jonathan Decker, Parsons ES-St. Louis (1 copy)
Julie Burdey, Parsons ES-Austin
Tammy Chang, Parsons ES-Austin
Project files, Parsons ES-Austin

Action Items from the CSSA/AFCEE Meeting with Parsons ES
December 15, 2000

Parsons ES will implement the following actions immediately.

Data Package Submittal

1. After final approval and submittal of all data packages, all raw data will be sent to Brian Murphy for storage at CSSA.
2. All associated primary and secondary checklists will be submitted with each data package.
3. The secondary checklist will be modified as follows:
    a) The data usability section will be made a separate topic and will be expanded to include line items based on the EPA guidance provided by Joe Fernando.
    b) A line item will be added to the "AFCEE Items" section to verify that the %D is used for assessment of recovery tests. (The %RPD criteria should not be used for recovery tests.)
4. The following comment will be added to all DVRs to document the absence of ambient blanks for this project:

    "No ambient blanks were collected for this project. During the initiation of this project, it was determined that ambient blanks were not necessary due to the absence of a source at the site."
5. If samples from more than one project were submitted on the same COC, the discrepancy will be clearly indicated on the COC form and an explanation will be included in the DVR.
6. For all problems or issues that arise during data verification, Parsons will investigate data trends through the examination of laboratory QC (including that from other SDGs). This information will be used to assess data usability during validation.
7. Any GFAA dilutions based on ICP screening will be mentioned in the DVR. (This item is only applicable to data from O'Brien & Gere Laboratories (OBG).)
8. Review OBG ICAL for metals to determine why different metals use different ICAL points.

Technical Report Submittal

1. Any GFAA dilutions based on ICP screening will be footnoted in the summary tables. (This item is only applicable to data from OBG.)
2. All summary tables will be reviewed against the laboratory reports.
3. Reference to data package number (RL## - ##) should be added to each report.
4. Cross-reference table should include mention of the sample ID / SDG number relationship.

Parsons ES will address the following items for future work at CSSA.

1. The use of electronic chain of custody forms will be investigated to eliminate transcription errors caused by hand-written COCs.
2. Samples from only one project will be included on a particular COC.
3. Sample collection will be planned in advance to allow for proper grouping of matrix and to facilitate the association of MS/MSD samples, to the extent possible and practical.
4. The laboratory will report only the target list of analytes and only the QC that is applicable to that list of analytes.
5. The laboratory will report only one LCS per analytical batch.
6. The initial calibration file name will be consistently referenced on all raw data files and AFCEE forms.
7. A standard at or below the RL will be included as part of the initial calibration for all analyses.
8. Method 6020 will be investigated as an option to reduce the matrix interference historically encountered by method 6010 when analyzing samples from this site.
9. The pH of sample containers will be checked in the field and documented in the field logbook prior to shipment to the laboratory. The pH will be adjusted as necessary for proper preservation.
10. The laboratory will be required to verify the pH of all samples and documentation of this will be provided as part of the raw data.
11. The work plan for sampling at Building 90 will include the collection of ambient blanks.
12. The primary checklists will be modified as follows:
    1) Blank lines for comments will be added after each item to allow for better documentation.
    2) A line item will be added for documentation of the communication with and the corrective action taken by the laboratory if any sample receipt issues were discovered.
    3) A line item will be added to document that laboratory calculations were spot checked by hand as part of the data verification process.
    4) The frequency of ICV/CCV analysis will be changed from 10% to reflect the proper frequency of once every 10 injections.

Secondary Review of DVR and Data Package

Laboratory / Data Package ID: _____

Case Narrative

- ☐ Verify all exceptions noted in the DVR are also mentioned in the case narrative.
- ☐ Verify all details in the DVR match the details listed in the case narrative. (Details include compound names, percent recoveries, RPDs, etc.)

Chain of Custody

- ☐ Verify that cooler temperature met criteria upon receipt at laboratory.
- ☐ Verify all requested analyses were reported.
- ☐ Verify sample collection date listed in DVR matches COC.
- ☐ Verify all analytical hold times were met and that any violation is properly noted in DVR and case narrative.
- ☐ Verify field and QC samples listed on COC match the types and counts listed in the DVR.
- ☐ Verify that the laboratory documented all discrepancies.
- ☐ Verify that any instruction from Parsons regarding the resolution of discrepancies was documented.

DVR Exceptions

- ☐ Verify all exceptions referenced in the DVR correctly reflect the lab report.
- ☐ Verify that all flags mentioned in the DVR were properly applied.
- ☐ Spot check calculations used by laboratory and primary verifier.

AFCEE Items

- ☐ Verify the low standard was at or below the reporting limit.
- ☐ Verify the correct frequency was used for all QC samples.
- ☐ Verify that all AFCEE forms contain the correct ICAL reference and AAB number.
- ☐ Verify that the DVR contains discussion of all applicable QC.
- ☐ Cross out all organic RL verification pages in the lab report.
- ☐ Add comment regarding ambient blanks to introduction section of DVR.
- ☐ Verify that all report pages are numbered
- ☐ Verify that AFCEE form header is correctly, completely and consistently filled out.
- ☐ Add all necessary explanations to "Comments" section at bottom of report forms.

- ☐ Verify that all cross-outs are initialed and dated.
- ☐ Verify that all diluted results are accompanied by an undiluted result and that undiluted result contains "R" flagged data.
- ☐ Verify that any diluted result without an undiluted run is discussed in the DVR and case narrative.
- ☐ Verify that sequence logs contain proper dilution factors and sample descriptions as applicable.
- ☐ Verify that the parent sample concentration and %solid listed on the MS/MSD form matches the data on the sample result form.
- ☐ Verify that internal chain-of-custody forms are included and complete.
- ☐ Verify that the assessment of all recovery tests is based on the %D criteria (not on %RPD).

Data Usability

- ☐ Review qualified data for usability against the specific project DQOs.
- ☐ Consult with technical project staff regarding historical data and risk reduction criteria.
- ☐ Investigate trends in laboratory data that may affect data usability.
- ☐ Identify and document any data gaps. Determine if these data gaps prevent the user from making decisions regarding the DQOs.
- ☐ Add discussion of data usability with regard to the above items to the DVR.

Validator: _____ Date: _____

15 December 2000

CSSA - Analytical Data Package
Working Meeting

Person	Representing	Phone No.
Susan Roberts	Parsons ES	512-719-6051
Joe Fernando	Informatics	210-804-4332
Ed Brown	AFCEE/ERC	210-536-5665
Julie Burdey	Parsons ES	512-719-6062
BRIAN MURPHY	CSSA	(210) 698-5208
Jo Jean Mullen	AFCEE	(210)536-5940
Wissam Abdel-Saad	AFCEE/ERC	210-536-5676
KATHERINE LaPIERRE	PARSONS ES	512-719-6806
Tammy Clary	Parsons ES	512-719-6092
William Batchelet	AFCEE/ERC	210-536-5658