



O'BRIEN & GERE
LABORATORIES, INC.

May 2, 2000

Mr. Edward Brown
AFCEE/ERC
Brooks Air Force Base
San Antonio, Texas

Re: On Site Evaluation Report

Dear Mr. Brown:

O'Brien & Gere Laboratories is committed to providing quality analytical support to their customers. We welcome your review of our procedures and mechanisms as they relate to the Camp Stanley environmental project under the direction of Parsons ES. The evaluation report has been received and the following responses are provided for your review.

II Sample Management

1. As stated in our response June 1999, coolers will be opened under a hooded area.
2. The sample custodian does monitor the condition of incoming samples. For AFCEE programs it is the responsibility of the VOA analyst to monitor the bubble formation in the sample bottles. When the presence of a bubble exists, the analyst informs the Project Manager, who informs the Parson's ES project manager. The analyst will replace that specific vial and analyze one that does not have a bubble present.
3. We will reinforce the staff of the necessity of the use of gloves and safety glasses.
4. We will monitor the IR temperature-measuring device on a monthly basis and record the information in the appropriate logbook.
5. We have instituted a numbering system that identifies the containers by method and preservation. The system incorporates an alphanumeric character affixed to the container following the sample number. This character is included on the work list logs and will be included on the internal sample tracking forms.
6. We currently record the temperature, preservation, custody seals and any anomalies on the case narrative form. There is no need to increase the paperwork and add an additional form, which duplicates the present information that is recorded.

III Quality Control

1. Internal data review is just that, to verify that all information is present and correct. We feel that the documentation of formatting, typing errors or verbiage preference is beyond the norm. To incorporate a form to track this information is unnecessary.
2. We feel that we had adequately reviewed the data and interpreted the qualifier system required in the contract. Our review process for AFCEE compliance, was confirmed by your statement identified in section B Data Package Review, We are certainly open to different interpretation and will incorporate any changes requested by Parsons ES.
3. Our current practice of the analyst preparing the case narrative was a direct result of an AFCEE recommendation. We will incorporate this change to our SOPs in the near future.

IV Volatile Organics

1. We have researched the practice of manual tune evaluation, and have not found a reference prohibiting this practice. The HP "autofind" tune evaluation algorithm is routinely utilized to evaluate GC/MS tune verifications. This program does not unequivocally identify the peak apex. When this occurs, usually as the result of non-gaussian peak shape, manual routines maybe employed. We are not manually integrating merely reidentifying the apex. The practice of manual evaluation will be continued and the analyst will record on the raw data the scan number of any background subtraction used in manual evaluation.
2. We had already identified the problem, which required the cleaning of the source. To date the internal standard areas have remained consistent. The data packages in question have been revised and resubmitted.
3. We have incorporated a control limit that the internal standard area of any sample be 20-200% for soils and 50-200% for waters of the area of the CCV analyzed to begin the sequence.
4. Your observation was correct that several analytes were outside of acceptable criteria. However that was the result of one analysis and the subsequent LCS results were in control. A review of that sample indicated that no AFCEE samples were analyzed during that excursion.
5. We will always use project approved control limits. If there is an excursion, the project manager will contact the customer to discuss the issue and determine the appropriate course of action.

VII Laboratory Information Management System(LIMS)

1. The LIMS program for the flagging AFCEE data is based on the conditions described in the QAPP 3.0. To provide the code would involve copying the entire LIMS. Description of all the variables and logic would require a significant amount of time. We would propose to introduce dummy data to verify the LIMS would flag properly the conditions described in the QAPP.
2. We are investigating the possibility of documenting the tampering of stored data. However, as in time traveling no system is foolproof. To date no one has incorporated and tested a program to guarantee that GC/MS data files have not been tampered with. This situation exists in any computer that stores and retrieves information. If someone can tamper with it they can circumvent the issue. We will attempt to incorporate a system to identify these infractions. The timeframe for this investigation will be at least six months.

VIII Corrective Actions

1. We will forward a new copy of the corrective action SOP.

IX AFCEE Program Requirements

1. Control charts will be generated quarterly and provided to the analyst to monitor trending.

We trust the preceding responses are acceptable to Parsons ES and AFCEE. Should you have any questions please feel free to contact the undersigned.

Very truly yours,

O'BRIEN & GERE LABORATORIES, INC.


David R. Hill
President