

Subject: RE: travel to Santa Fe for May 29 meeting w/ CBFO

From: "Thielke, Bob" <BThielke@TechLawInc.com>

Date: Fri, 23 May 2003 14:09:19 -0400

To: "Steve_Zappe@nmenv.state.nm.us" <Steve_Zappe@nmenv.state.nm.us>, "conniewalk@aol.com" <conniewalk@aol.com>, "Earl.Bradford@wipp.ws" <Earl.Bradford@wipp.ws>

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Earl:

-Here is the auditor inquiry form for the Accuracy QAO issue. I am sending this on behalf of NMED because I was the observer present at the audit. Steve indicated that in past audits our attached text could just be included as an attachment to an inquiry form. If you need something else Earl, just let me know.

After you pass this along to the appropriate persons in your organization, any future responses or questions should be directed through NMED.

Thanks

Bob Thielke



NMED Observer Inquiry: Target List for Matrix Spikes/Laboratory Control Samples in Organic Solids Sampling Program at INEEL

Permit Attachment B3, Sections B3-6 and B3-7, specifies the quality assurance objectives (**QAOs**) for volatile organic compounds (**VOCs**) and semivolatile organic compounds (**SVOCs**). These sections specify that the accuracy expressed as a percentage recovery (**%R**) is determined for laboratory operations by analyzing laboratory control samples (**LCS**), matrix spikes (**MS**), surrogates, and Performance Demonstration Program (**PDP**) blind-audit samples.

The results for LCS and MS must be compared to the %R criteria specified in Table B3-4 for VOCs and Table B3-6 for SVOCs. In addition, Section B3-1 states that accuracy is calculated as a percent recovery (**%R**) for *either* a Standard Reference Material (**SRM**) or a MS (equations B3-5 and B3-6). Table B3-4 lists twenty-four VOCs and Table B3-6 lists ten SVOCs (Table B3-6 includes eight additional PCB analytes that are only analyzed when PCB analysis is warranted). Each table specifies the accuracy limits for each compound and also has a footnote expressing that the limits apply to the LCS and MS.

As observed during Audit A-03-15, the INEEL solid sampling laboratory is only reporting LCS and MS results for five of the twenty-four VOCs (21%) and three of the ten SVOCs (30%).

Although the LCS and MS target lists are not exactly specified in the analytical methods required by the permit (due to the fact that relevant SW-846 language for methods 8260 and 8270 the LCS/MS target lists are offered as a recommendation), the permit indicates the reporting of accuracy expressed as %R applies to the entire target analyte list, not to a subset of analytes. NMED would like the Permittees to clarify how the accuracy QAOs for VOC and SVOC solids are met when reduced LCS and MS target lists are used at the generator/storage sites.