



United States Government

Department of Energy

# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221

DATE: May 29, 2003

REPLY TO  
ATTN OF: CBFO:QA:ALH:GS:03-1521:UFC 2300.00

SUBJECT: Transmittal of Observer Inquiry Form A-03-15-001

TO: Kerry Watson, Assistant Manager, Office of National TRU Program

The Carlsbad Field Office performed Audit A-03-15 of the Idaho National Engineering and Environmental Laboratory (INEEL), Analytical Laboratories at the INEEL the week of May 19-22, 2003. During the course of the audit, an Observer from NMED, Mr. Bob Thielke, expressed a desire for a clarification relating to 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. Mr. Thielke's concern is identified on the attached Observer Inquiry Form. Please consider this inquiry and document a response for it. The transmittal of your response will signify closure of the inquiry.

If you have any questions or comments, please contact me at (505) 234-7423.

Ava L. Holland  
Quality Assurance Manager

CC:  
M. Navarrete, CBFO \*ED  
D. Miehl, CBFO \*ED  
S. Zappe, NMED \*ED  
CBFO M&RC

030558



## Observer Inquiry Form

**Observer:** Bob Thielke

**Date:** May 27, 2003

**Tracking No.:** A-03-15-001

### **Discussion of Request:**

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.

### **ATL Response:**

This Observer Inquiry will be forwarded to the CBFO Assistant Manager of the National TRU Program (NTP) for consideration and/or action. The Assistant Manager of the NTP organization will determine the response required and will forward the response directly to NMED and the NMED Observer as appropriate.

Observer: Accept Response \_\_\_\_\_ Do Not Accept Response \_\_\_\_\_ (Provide Reason)

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Inquiry Closed: \_\_\_\_\_  
ATL Date