

Quality Assurance

Quality assurance is an integral part of every activity at BNL. A comprehensive Quality Assurance/Quality Control (QA/QC) Program is in place to ensure that all environmental monitoring samples are representative and that data are reliable and defensible. QC in the analytical laboratories is maintained through daily instrument calibration, efficiency and background checks, and testing for precision and accuracy. Data are verified and validated as required by project-specific quality objectives before being used to support decision making.

In 2004, BNL used the on-site Analytical Services Laboratory (ASL) and five off-site contract laboratories to analyze environmental samples. All analytical laboratories were certified by New York State for the tests they performed for BNL and were subject to oversight that included state and national performance evaluation testing, review of QA programs, and audits. The ASL ceased performing analyses in January of 2004. For the remainder of the year, all samples were sent to off-site analytical laboratories.

The multilayered components of QA monitored at BNL ensure that all analytical data reported for the 2004 Site Environmental Report are reliable and of high quality.

9.1 QUALITY PROGRAM ELEMENTS

As required by DOE Order 450.1, *Environmental Protection Program*, BNL has established a QA/QC Program to ensure that the accuracy, precision, and reliability of environmental monitoring data are consistent with the requirements of 10 CFR 830, Subpart A, *Quality Assurance Requirements* and DOE Order 414.1A, *Quality Assurance*. The responsibility for quality at BNL starts with the Laboratory director, who approves the policies and standards of performance governing work, and extends throughout the entire organization. The purpose of the BNL Quality Management (QM) System is to implement QM methodology throughout the various BNL management systems and associated processes, in order to:

- Plan and perform BNL operations in a reliable and effective manner to minimize any impact on the health and safety of the public, employees, and the environment
- Standardize processes and support continual improvement in all aspects of BNL operations

- Enable the delivery of products and services that meet customers' requirements and expectations

For environmental monitoring, QA is deployed as an integrated system of management activities. These activities involve planning, implementation, control, reporting, assessment, and continual improvement. QC activities measure each process or service against the QA standards. QA/QC practices and procedures are documented in detail in manuals, plans, and a comprehensive set of standard operating procedures (SOPs) for environmental monitoring (EM-SOPs). Staff members who must follow these procedures are required to document that they have reviewed and understand them.

The ultimate goal of the environmental monitoring and analysis QA/QC program is to ensure that results are representative and defensible, and that data are of the type and quality needed to verify protection of the public, employees, and the environment. Figure 9-1 depicts the flow of the QA/QC elements of BNL's

Environmental Monitoring Program and indicates the sections of this chapter that discuss each element in more detail.

BNL environmental personnel determine sampling requirements using the EPA Data Quality Objective (DQO) process or its equivalent. During this process, the project manager for each environmental program determines the type, amount, and quality of data needed to support decision making, legal requirements, and stakeholder concerns. An environmental monitoring plan or project-specific sampling plan is then prepared, specifying the location, frequency, type of sample, analytical methods to be used, and a sampling schedule. These plans or the EM-SOPs also specify data acceptance criteria. Contracts with off-site analytical laboratories are established. Detailed EM-SOPs direct sampling technicians on proper sample collection, preservation, and handling requirements. Field QC samples are prepared as necessary. Samples are analyzed in the field or at certified laboratories in accordance with EM-SOPs. The results are then validated or verified in accordance with published procedures. Finally, data are reviewed and evaluated by environmental professionals and management in the context of expected results, related monitoring results, historical data, and applicable regulatory requirements (e.g., drinking water standards, permit limits, etc.). Data are then used to support decision making. Data are also reported as required and summarized in this annual report.

9.2 SAMPLE COLLECTION AND HANDLING

In 2004, environmental monitoring samples were collected as specified by EM-SOPs, the *BNL Environmental Monitoring Plan Update January 2004* (BNL 2004a), and project-specific work plans, as applicable. For example, the *BNL Groundwater Monitoring Program Quality Assurance Project Plan (QAPP)* (BNL 1999a) describes the QA program and QC requirements that must be followed for groundwater monitoring. This plan documents organizational structure, documentation requirements, sampling requirements, field QA/QC sample collection, acceptance criteria, sample custody

requirements, data validation procedures, and general data handling and database procedures.

BNL has sampling procedures for all environmental media, including groundwater, surface water, soil, sediment, air, flora, and fauna. These procedures contain detailed information on how to prepare for sample collection; what type of field equipment to use and how to calibrate it; how to properly collect, handle, and preserve samples; and how to manage any wastes generated during sampling. The procedures ensure consistency between samples collected by BNL sampling personnel and samples collected by outside contractors in support of the environmental restoration, compliance, and surveillance programs.

QC checks of sampling processes include the collection of field duplicates, matrix spike samples, field blanks, trip blanks, and equipment blanks. For example, field readings of water quality parameters are taken until all parameters are within acceptable limits when sampling groundwater. Also, specific sampling methodologies include QC checks. An example of this is the low-flow groundwater sampling technique, which includes checks to ensure that monitoring wells are properly purged before readings are taken.

All wastes generated during sampling (contaminated equipment, purge water from wells, etc.) are managed in accordance with applicable requirements. One factor considered during sample collection is minimizing the amount of waste generated, consistent with the Pollution Prevention Program described in Chapter 2.

9.2.1 Field Sample Handling

To ensure the integrity of samples, chain-of-custody (COC) was maintained and documented for all samples collected in 2004. A sample is considered to be in the custody of a person if any of the following rules of custody are met: 1) the person has physical possession of the sample, 2) the sample remains in view of the person during possession, 3) the sample is placed in a secure location by the custody holder, or 4) the sample is in a designated secure area. These procedures are outlined in EM-SOP 109, "Chain-of-Custody Procedure" (BNL 2003).

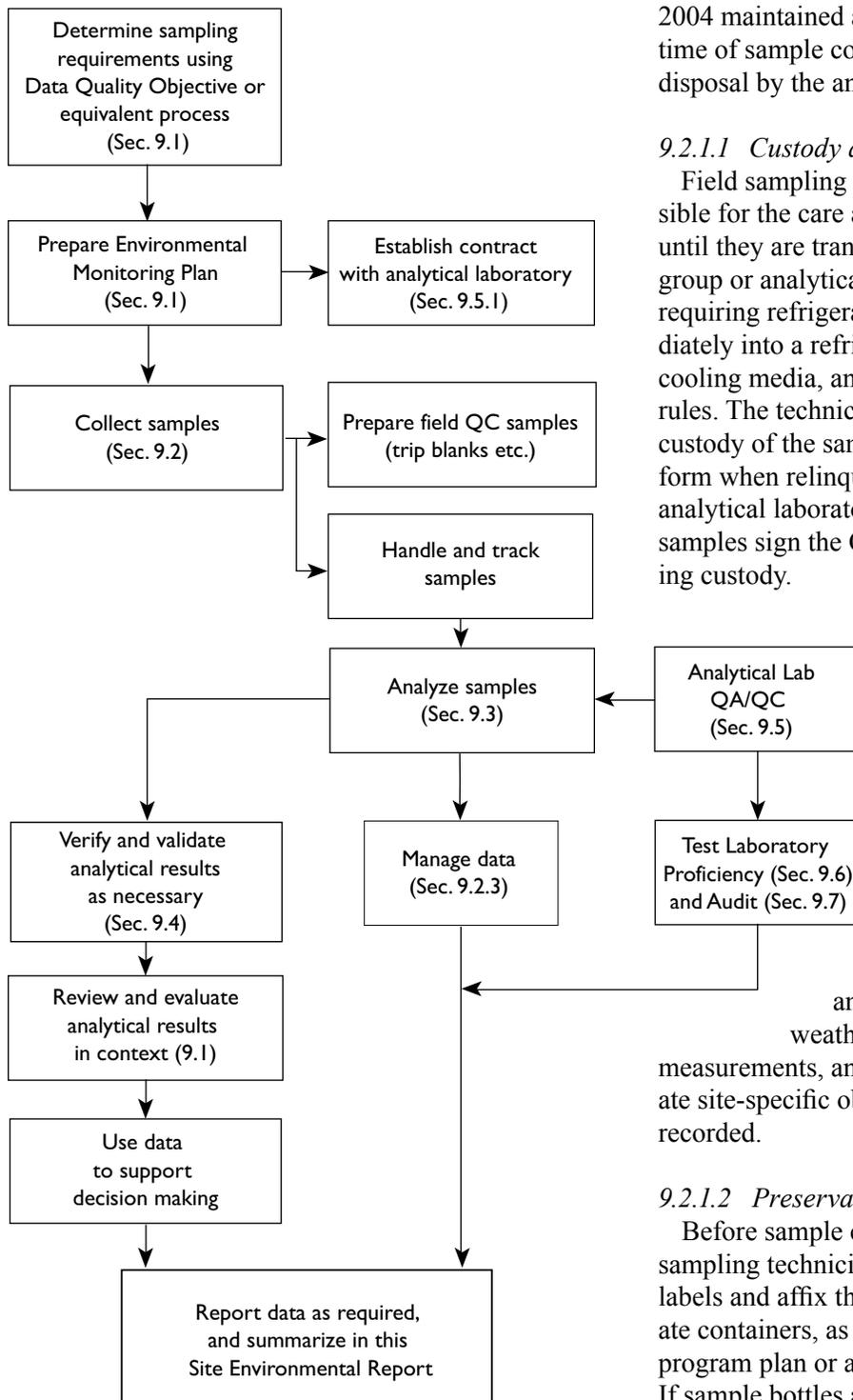


Figure 9-1. Flow of Environmental Monitoring QA/QC Program Elements.

All environmental monitoring samples in 2004 maintained a valid COC from the time of sample collection through sample disposal by the analytical laboratories.

9.2.1.1 Custody and Documentation

Field sampling technicians are responsible for the care and custody of samples until they are transferred to a receiving group or analytical laboratory. Samples requiring refrigeration are placed immediately into a refrigerator or a cooler with cooling media, and kept under custody rules. The technician who maintains custody of the samples signs the COC form when relinquishing custody, and analytical laboratory personnel receiving samples sign the COC form when accepting custody.

The field sampling technician is also required to maintain a bound, weatherproof field logbook, which is used to record the sample identification number, collection time, description, collection method, and COC number. Daily weather conditions, field measurements, and other appropriate site-specific observations also are recorded.

9.2.1.2 Preservation and Shipment

Before sample collection, the field sampling technicians prepare all bottle labels and affix them to the appropriate containers, as defined in the QA program plan or applicable EM-SOPs. If sample bottles are not prepreserved by the analytical laboratory, appropriate preservatives are added to the containers before or immediately after collection; in appropriate cases, samples are refrigerated. In the case of samples collected for

methylmercury, samples are cooled immediately and shipped to the analytical laboratory on the day of collection. After samples arrive at the analytical laboratory, they are preserved with hydrochloric acid.

Sample preservation is maintained as required throughout shipping. If samples are sent via commercial carrier, a bill-of-lading is used. COC seals are placed on the shipping containers; their intact status upon receipt indicates that custody was maintained during shipment.

9.2.2 Field Quality Control Samples

Field QC samples collected for the environmental monitoring program include equipment blanks, trip blanks, field blanks, field duplicate samples, and matrix spike/matrix spike duplicate samples. The rationale for selecting specific field QC samples and minimum requirements for their use in the environmental monitoring program are provided in EM-SOP 200, "Collection and Frequency of Field Quality Control Samples" (BNL 2004b) series, which addresses the collection and frequency of field QC samples. Equipment blanks and trip blanks (see below) were collected for all appropriate media in 2004.

An **equipment blank** is a volume of water (in this case, laboratory-grade water) that is used to rinse a sampling tool after decontamination. The rinse water is collected and tested to verify that the sampling tool is not contaminated. Equipment blank samples are collected, as needed, to verify the effectiveness of the decontamination procedures on non-dedicated or reusable sampling equipment.

A **trip blank** is provided with each shipping container of samples to be analyzed for volatile organic compounds (VOCs). Analysis of trip blanks show whether a sample bottle was contaminated during shipment from the manufacturer, while in bottle storage, in shipment to the laboratory, or during analysis at a lab. Trip blanks consist of an aliquot of laboratory-grade water sealed in a sample bottle, usually prepared by the analytical laboratory prior to shipping the sample bottles to BNL. If trip blanks were not provided by the contract laboratories, then field sampling technicians prepare trip blanks before they collect the samples. Trip blanks were

included with all shipments of aqueous samples for VOCs analyses in 2004.

Field blanks are collected to check for cross-contamination that might occur during sample collection. For the groundwater monitoring program, one field blank is collected for every 20 samples, or one per sampling round, whichever is more frequent. Field blanks are analyzed for the same parameters as the groundwater samples. For other programs, the frequency of field blank collection is based on their specific DQOs.

In 2004 (as in other years), the most common contaminants detected in the trip, field, and equipment blanks were methylene chloride, acetone, and chloroform. These compounds are commonly detected in blanks and do not pose significant problems with the reliability of the analytical results. Several other compounds were also detected, such as toluene and strontium-90 (Sr-90), at low levels. When these contaminants are detected, validation or verification procedures are used, where applicable, to qualify the associated data as "nondetects," as described in the 200 Series of BNL EM-SOPs (see Section 9.4). The results from blank samples collected during 2004 did not indicate any significant impact on the quality of the results.

Field duplicate samples are analyzed to check the reproducibility of sampling and analytical results, based on EPA Region II guidelines (EPA 2001). For example, in the groundwater monitoring program, duplicates are collected for 5 percent of the total number of samples collected for a project per sampling round. During 2004, 83 duplicate samples were collected for nonradiological analyses, and 75 duplicate samples were collected for radiological analyses. All duplicate samples were acceptable for input into BNL's Environmental Information Management System (EIMS) database, which is used to manage the Laboratory's environmental data. Duplicates were analyzed only for the parameters relevant to the program they monitored. Of the 5,439 nonradiological parameters analyzed in 2004, 99.98 percent of the analyses met QA criteria. Of the 365 radiological parameters monitored, 98 percent met QA criteria. These results indicate consistency between the laboratory and field sampling technicians.

Matrix spike and matrix spike duplicates are performed to determine whether the sample matrix (e.g., water, soil, air, vegetation, bone) adversely affected the sample analysis. A *spike* is a known amount of analyte added to a sample. Matrix spikes are performed at a rate specified by each environmental program's DQOs. The rate is typically one per 20 samples collected per project. No significant matrix effects were observed in 2004 for routine matrices such as water and soil. Nonroutine matrices, such as oil, exhibited expected matrix issues.

9.2.3 Tracking and Data Management

Most environmental monitoring samples and analytical results were tracked in the EIMS. The small number of environmental samples that were not tracked in the EIMS were from Chemtex Environmental Laboratory, which cannot produce the electronic data deliverables needed to enter the data into the EIMS. Tracking was initiated when a sample was recorded on a chain-of-custody form. Copies of the COC form and supplemental forms were provided to the project manager or the sample coordinator and forwarded to the data coordinator to be entered into the EIMS. Each analytical laboratory also maintained its own internal sample tracking system.

Following sample analysis, the contract laboratory provided the results to the project manager or designee and, when applicable, to the validation subcontractor, in accordance with their contract. Once results of the analyses were entered into the EIMS, reports could be generated by project personnel and DOE Brookhaven Area Office staff using a web-based data query tool.

9.3 SAMPLE ANALYSIS

In 2004, environmental samples were analyzed either by the on-site analytical laboratory or by one of five contract laboratories, whose selection is discussed in Section 9.3.1. All samples were analyzed according to EPA-approved methods, where such methods exist, and by standard industry methods where there are no EPA methods. In addition, field sampling technicians performed field monitoring

for parameters such as conductivity, dissolved oxygen, pH, temperature, and turbidity.

9.3.1 Qualifications

BNL used the following laboratories for analysis of environmental samples in 2004:

- BNL Analytical Services Laboratory for radiological analytes (January only)
- General Engineering Laboratories, LLC (GEL) in Charleston, South Carolina, for radiological and nonradiological analytes
- H2M Labs, Inc. (H2M) in Melville, New York, for nonradiological analytes
- Severn-Trent Laboratories, Inc. (STL) based in St. Louis, Missouri, for radiological and nonradiological analytes
- Chemtex Environmental Laboratory, Inc. in Port Arthur, Texas, for select nonradiological analytes
- Brooks Rand, LLC in Seattle, Washington, for mercury and methylmercury analyses

The process of selecting off-site contract laboratories involves a number of factors: 1) their record on performance evaluation (PE) tests, 2) their contract with the DOE Integrated Contract Procurement Team, 3) pre-selection bidding, and 4) their adherence to their own QA/QC programs, which must be documented and provided to BNL. Routine QC procedures that laboratories must follow, as discussed in Section 9.5, include daily instrument calibrations, efficiency and background checks, and standard tests for precision and accuracy. All the analytical laboratories that BNL used in 2004 were certified by the New York State Department of Health (NYSDOH) for the relevant analytes, where such certification existed. The laboratories also were subject to PE testing (see Section 9.7) and DOE-sponsored audits.

9.4 VERIFICATION AND VALIDATION OF ANALYTICAL RESULTS

Environmental monitoring data are subject to data verification and, in certain cases, data validation, when the data quality objectives of the project require this step. For example, as per the *BNL Groundwater Monitoring Program Quality Assurance Project Plan* (BNL 1999b), a significant portion of the groundwater sam-

ples analyzed for environmental restoration projects underwent data validation in addition to verification.

The data verification process involves checking for common errors associated with analytical data. The following criteria can cause data to be rejected during the data verification process:

- *Holding time missed* – The analysis is not initiated or the sample is not extracted within the time frame required by EPA or by the contract.
- *Incorrect test method* – The analysis is not performed according to a method required by the contract.
- *Poor recovery* – The compounds or radioisotopes added to the sample (spiked) before laboratory processing are not recovered at the recovery ratio required by the contract.
- *Insufficient QA/QC data* – Supporting data received from the analytical laboratory are insufficient to allow validation of results.
- *Incorrect minimum detection limit (MDL)* . The laboratory reports extremely low levels of analytes as “less than minimum detectable,” but the contractually required limit is not used.
- *Invalid chain-of-custody* – There is a failure to maintain proper custody of samples, as documented on COC forms.
- *Instrument failure* – The instrument does not perform correctly.
- *Preservation requirements not met* – The requirements identified by the specific analytical method are not met or properly documented.
- *Contamination of samples from outside sources* – These possible sources include sampling equipment, personnel, and the analytical laboratory itself.
- *Matrix interference* – Analysis is affected by dissolved inorganic/organic materials in the matrix.

Data validation is a more extensive process than data verification. Validation includes all the verification checks as well as checks for less common errors, including instrument calibration that was not conducted as required,

internal analyte standard errors, transcription errors, and calculation errors. The amount of data checked varies, depending on the environmental media and on the data quality objectives for each project. Data for some projects, such as long-term groundwater monitoring, may require only verification. Data from initial investigations receive the more rigorous validation testing, performed on 20 to 100 percent of the analytical results. The results of the verification or validation process are entered into the EIMS.

9.4.1 Verifying and Validating ASL Results

For samples analyzed by BNL’s Analytical Services Laboratory in 2004, the QA officer or group leader verified that all analytical batches fulfilled internal QA/QC acceptance criteria. These criteria included precision, accuracy, recovery, instrument background checks, and stable instrument efficiency performance. All QA/QC data were reviewed before ASL results were reported.

9.4.2 Checking Off-Site Results

Nonradiological data analyzed off site in 2004 were verified and validated using BNL EM-SOPs in the 200 Series and EPA contract laboratory program guidelines (EPA 1992, 2001). Radiological packages were verified and validated using BNL and DOE guidance documents (BNL 2002, DOE 1994). During 2004, the verifications were conducted using a combination of manually checking the hard copy data packages and the use of a computer program developed at BNL to verify the information reported electronically and stored in the EIMS.

9.5 ANALYTICAL LAB QA/QC

In 2004, sample results for environmental restoration, compliance, and surveillance were analyzed by ASL or by one of the off-site contract laboratories. Procedures for calibrating instruments, analyzing samples, and assessing QC were consistent with EPA methodology. QC checks that were performed included analyzing blanks and instrument background; using Amersham Radiopharmaceutical Company or National Institute for Standards and Technology (NIST) traceable standards; and analyzing

reference standards, spiked samples, and duplicate samples. BNL's contracts with the off-site laboratories specify analytes, required methods, detection limits, and data deliverables—which include standard batch QA/QC performance checks. As part of the contract laboratory selection process, candidate laboratories are required to provide BNL with copies of their QA/QC manuals, as well as their QA program plans.

When discrepancies were found in field sampling designs, documented procedures, COC forms, data analyses, data processing systems, QA software, or when failures in PE testing occurred, nonconformance reports were generated. Following investigation into the root causes, corrective actions were taken by the analytical laboratory and tracked to closure.

9.6 PERFORMANCE OR PROFICIENCY EVALUATIONS

Four of the contract laboratories (GEL, STL, H2M, and Brooks Rand, LLC) participated in several national and state PE testing programs in 2004. The fifth contractor, Chemtex Environmental Laboratory, Inc. did not participate in PE testing because there is no testing program for the specific analytes analyzed: tolyltriazole, polypropylene glycol monobutyl ether, and 1,1-hydroxyethylidene diphosphonic acid. Each of the participating laboratories took part in at least one testing program, and several laboratories participated in multiple programs. Results of the tests provide information on the quality of a laboratory's analytical capabilities. The testing was conducted by Environmental Resource Associates (ERA), the National Voluntary Laboratory Accreditation Program, the DOE Environmental Measurements Laboratory (EML) Quality Assessment Program, the voluntary Mixed Analyte Performance Evaluation Program (MAPEP), NYSDOH Environmental Laboratory Accreditation Program (ELAP), and the Analytical Products Group (APG). The results from these tests are summarized in Section 9.6.1. Because Brooks Rand, LLC only analyzed samples for mercury and methylmercury, their PE results are not summarized. Also, because ASL was closed as of February 2004,

their PE results are unavailable. Brooks Rand, LLC and ASL maintained the required certification during the periods in 2004 when they performed analyses for BNL.

9.6.1 Summary of Test Results

In Figures 9-2 and 9-3, results are plotted as percentage scores that were “Acceptable,” “Warning (But Acceptable),” or “Not Acceptable.” A Warning (But Acceptable) is considered by the testing organization to be “satisfactory.” An “average overall satisfactory” score is the sum of results rated as Acceptable and those rated as Warning (But Acceptable), divided by the total number of results reported. A Not Acceptable rating reflects a result that is greater than three standard deviations from the known value—a criterion set by the independent testing organizations, rather than BNL.

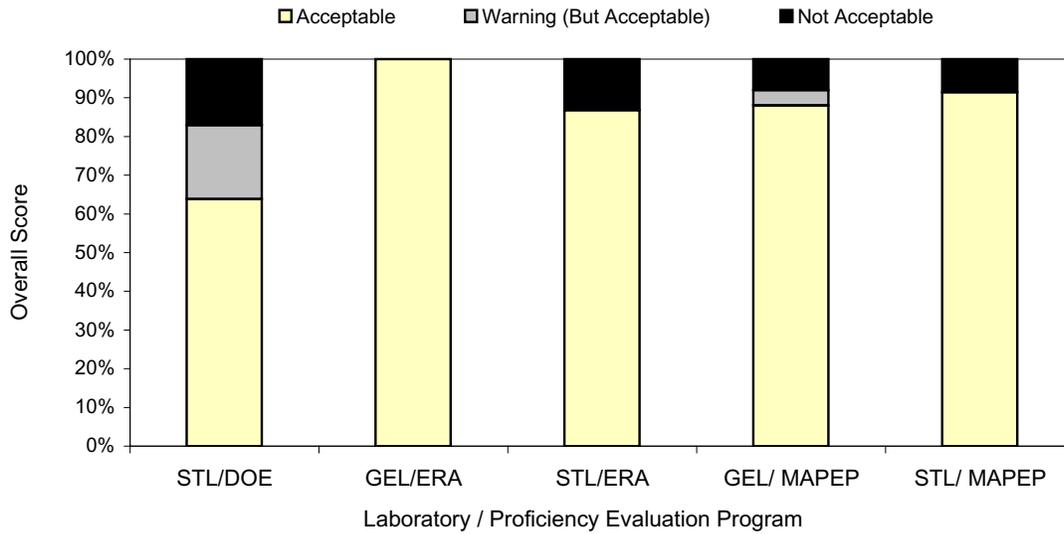
Figure 9-2 summarizes radiological performance scores in the DOE (EML), ERA, and MAPEP programs. During 2004, the NYS ELAP did not provide radiological samples for PE testing, so there were no ELAP scores as there have been in past years. GEL and STL had average overall satisfactory scores of 96 and 87 percent, respectively. More details about the radiological assessments are in Section 9.6.2.1.

Figure 9-3 summarizes the three participating laboratories' (GEL, H2M, and STL) non-radiological performance results in the ERA, MAPEP, and ELAP tests. For nonradiological tests, the average overall satisfactory results ranged from 94.2 to 97.9 percent. Additional details on nonradiological evaluations are in Section 9.6.2.2.

The contract laboratories received an acceptable rating for a combined average overall satisfactory score of 93.9 percent on the radiological and nonradiological PE tests performed in 2004.

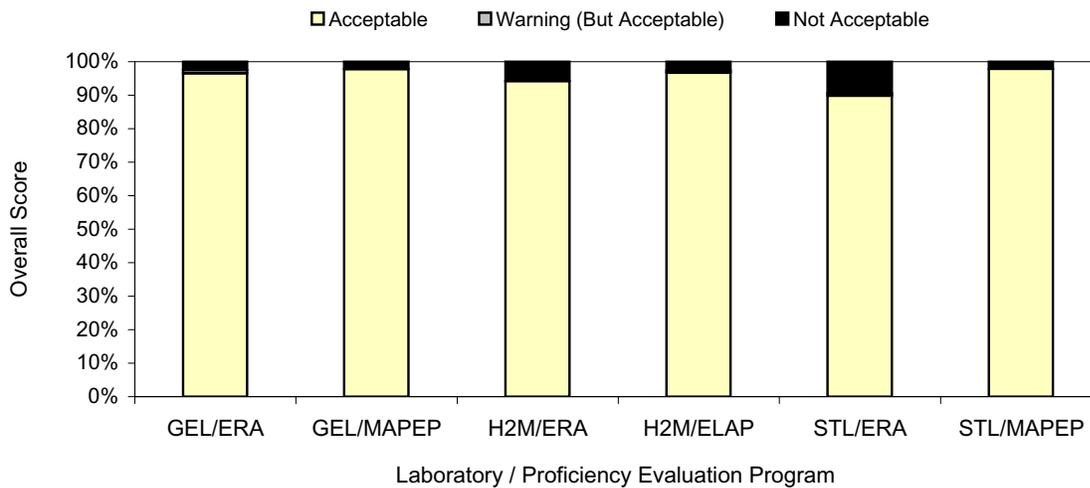
9.6.1.1 Radiological Assessments

In 2004, STL participated in the DOE EML Quality Assessment Program, the ERA radiological program, and the MAPEP evaluations of mixed analytes. GEL participated in the ERA and MAPEP programs. The NYSDOH ELAP provided no samples for radiological testing in 2004.



Note that the Acceptable scores and the Warning (But Acceptable) scores combined constitute the “overall satisfactory” category referred to in the text of this chapter.

Figure 9-2. Summary of Scores in the Radiological Proficiency Evaluation Programs.



Note that the Acceptable scores and the Warning (But Acceptable) scores combined constitute the “overall satisfactory” category referred to in the text of this chapter.

Figure 9-3. Summary of Scores in the Nonradiological Proficiency Evaluation Programs.

Of STL's radiological tests on samples of air, vegetation, water, and soil, 82.9 percent were within the testing organization's acceptable range. Both GEL and STL participated in the ERA radiological PE studies: 100 percent of GEL's tests on radiological samples were in the acceptable range; 86.9 percent of STL's tests were acceptable. Both GEL and STL participated in the MAPEP evaluations: 92 percent of GEL's tests on radiological samples were in the acceptable range, as were 91.4 percent of STL's tests.

9.6.1.2 Nonradiological Assessments

During 2004, H2M participated in the NYSDOH ELAP evaluations of performance on tests of nonpotable water, potable water, and solid wastes. NYSDOH found 97.3 percent of H2M's nonradiological tests to be in the acceptable range. GEL and STL, which are certified through the National Environmental Laboratory Accreditation Conference (NELAC), were not required to participate in ELAP evaluations.

STL and GEL voluntarily participated in the ERA water supply and water pollution studies, although this evaluation is not required for New York State certification. ERA found that 97.5 percent of GEL's tests were in the acceptable range, as were 95.1 percent of STL's tests.

GEL and STL also voluntarily participated in MAPEP evaluations. These evaluations showed that 97.5 percent of GEL's nonradiological tests were in the acceptable range, as were 97.9 percent of STL's tests.

9.7 AUDITS

As part of DOE's Integrated Contract Procurement Team Program, STL and GEL were audited during 2004 (DOE 2004a, b). During the audits, errors are categorized into Priority I findings and Priority II findings. Priority I status indicates a problem that can result in unusable data or a finding that the laboratory is unfit to perform services for DOE. Priority II status indicates problems that do not result in unusable data and do not indicate that the laboratory is unfit to perform services for DOE (DOE, 2002). There were no Priority I findings for STL and GEL.

The results of the STL audit included 13 Priority II findings: five radiological findings, four inorganic findings, one information management system finding, one waste management finding, and two general findings. The results of the GEL audit included 10 Priority II findings: one radiological finding, two inorganic findings, one information management system finding, and four general findings. Corrective action plans were submitted to DOE by both laboratories to document that procedures were put in place to correct these findings. Based on the audits, the analytical data met DOE's criteria for acceptable status.

9.8 CONCLUSIONS

Based on the data validations, data verifications, and results of the independent Performance Evaluation assessments, the chemical and radiological results reported in the *2004 Site Environmental Report* and SER Volume II, *Groundwater Status Report* are of acceptable quality.

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