9 Quality Assurance

Quality Assurance is an integral part of every activity at Brookhaven National Laboratory (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. Most analyses are performed by contract laboratories that are state certified and routinely participate in independent performance testing. Quality control at the analytical laboratories is maintained through daily instrument calibration, efficiency, 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. The multilayered components of QA monitored at BNL ensure that all analytical data reported for the 2020 Site Environmental Report are reliable and of acceptable quality.

9.1 QUALITY PROGRAM ELEMENTS

As required by Department of Energy (DOE) Order 458.1, Radiation Protection of the Public and Environment, and DOE Order 436.1, Departmental Sustainability, 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 Title 10 of the Code of Federal Regulations, Part 830 10 CFR 830, Subpart A, Quality Assurance Requirements, and DOE Order 414.1D, Quality Assurance. The responsibility for quality at BNL starts with the Laboratory Director, who approves the policies and standards of performance governing work that extends throughout the entire organization. The purpose of the BNL QA Program is to implement QA methodology throughout the various Laboratory management systems and associated processes to do the following:

- Plan and perform operations in a reliable and effective manner to minimize any impact on the environment, safety, security, and health of the staff and public.
- Standardize processes and support continual improvement.
- Enable the delivery of products and services that meet customers' requirements and expectations.
- Support an environment that facilitates scientific and operational excellence.

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 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 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.

Laboratory environmental personnel determine sampling requirements using the Environmental Protection Agency (EPA) Data Quality Objective (DQO) process (EPA 2006) 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

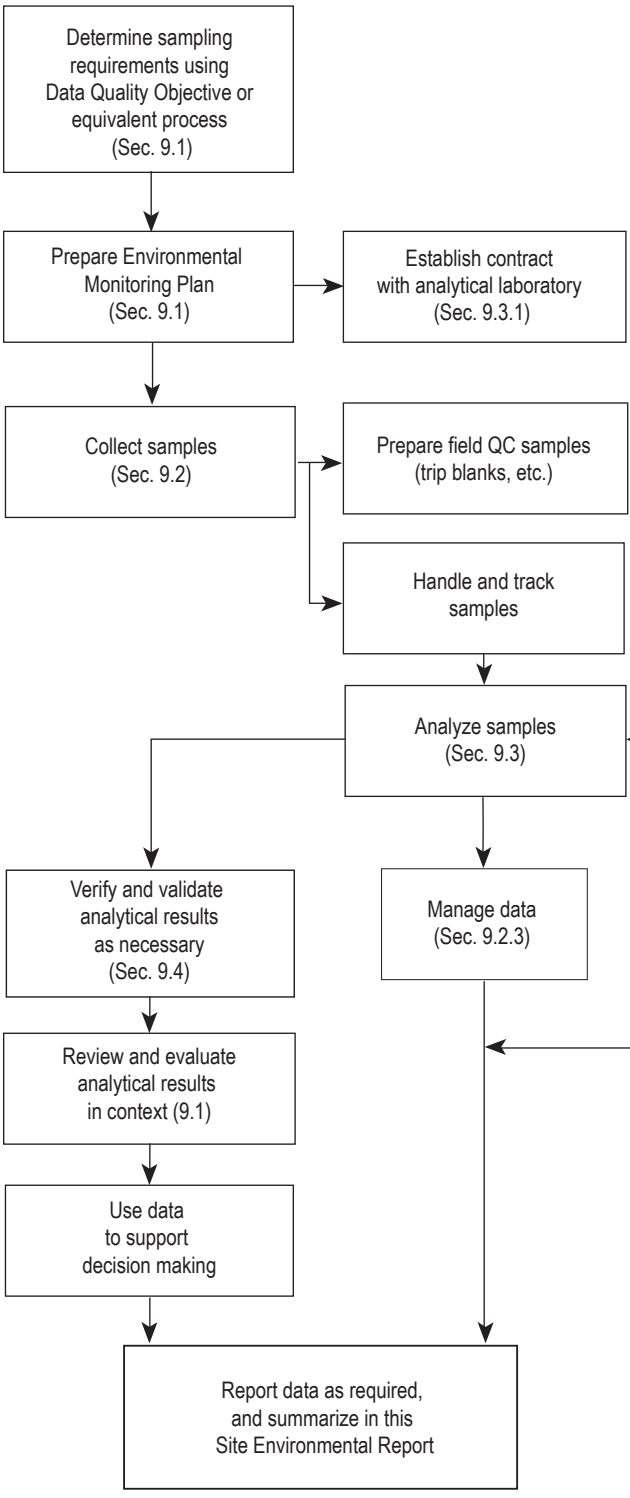


Figure 9-1. Flow of Environmental Monitoring QA/QC Program Elements.

stakeholder expectations. 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 and the EM-SOPs also specify data acceptance criteria.

Contracts with off-site analytical laboratories are established for sampling analysis. The EM-SOPs direct sampling technicians on proper sample collection, preservation, and handling requirements. Field QC samples are prepared as necessary and analyzed in the field or at a certified contract analytical laboratory. The results are then validated or verified in accordance with published procedures. Finally, the 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.). The data are used to support decision making, reported as required, and summarized in this annual report.

9.2 SAMPLE COLLECTION AND HANDLING

In 2020, environmental monitoring samples were collected, as specified, by EM-SOPs, the BNL Environmental Monitoring Plan Update (BNL 2020), and project-specific work plans. BNL uses SOPs that are consistent with industry and regulatory standards for the collection of environmental samples, including groundwater, surface water, soil, sediment, air, flora, and fauna. These procedures contain detailed information on the sample collection process, including what types of equipment to use, equipment calibration; how to properly collect, handle, and preserve samples; sample handling and shipment; and how to manage any wastes generated during sampling. QC checks of sampling processes include the collection of field duplicates, matrix spike samples, field blanks, trip blanks, and equipment blanks.

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 2020. A sample is considered to be in the custody of a person if any or all 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 after being in 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, Storage, Packaging, and Shipment of Samples" (BNL 2020).

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 contract analytical laboratory. Samples requiring refrigeration are placed immediately into a refrigerator or a cooler with cooling media and are kept under custody rules. The technician signs the COC form when relinquishing custody and contract analytical laboratory personnel sign the COC form when accepting custody.

As required by EM-SOP-201, "Documentation of Field Activities" (BNL 2019), field sampling technicians are also required to maintain bound, weatherproof field logbooks, which are used to record sample ID numbers, collection times, descriptions, collection methods, and COC numbers. Daily weather conditions, field measurements, and other appropriate site-specific observations also are recorded in the logbooks.

9.2.1.2 Preservation and Shipment

Before sample collection, field sampling technicians prepare all bottle labels and affix them to the appropriate containers, as defined in the applicable EM-SOPs. Appropriate chemical preservatives are added to the containers before or immediately after collection, and samples are refrigerated as necessary. Sample preservation is maintained, as required, throughout the shipping of the samples to the analytical laboratory. If samples are sent via commercial carrier, a bill-of-lading is used. COC seals are placed on the shipping containers and their intact status upon receipt indicates that custody was maintained during shipment.

Upon receipt of the samples, the contract laboratory verifies that proper preservation requirements have been met. BNL is notified as soon as practical if a sample arrives unpreserved, improperly preserved, or at the wrong temperature.

Sample preservations, including incorrect preservation, are noted on the sign-in documentation and included with every data package. If the BNL Project Manager, with the help of a QC chemist and/or radiochemist, determines that an incorrect preservation issue would result in data that does not meet the data quality objectives of the project, the analysis would be cancelled.

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 the BNL EM-SOP 200 series, "Quality Assurance." Equipment blanks and trip blanks were collected for all appropriate media in 2020.

An equipment blank is a volume of solution (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 (VOC). The use of trip blanks provides a way to determine whether contamination of a sample container occurred during shipment from the manufacturer, while the container was in storage, during shipment to a contract analytical laboratory, or during analysis of a sample at a contract analytical laboratory. Trip blanks consist of an aliquot of laboratory-grade water sealed in a sample bottle, usually prepared by the contract analytical laboratory prior to shipping the sample bottles to BNL. If trip blanks are

not provided by the contract analytical laboratory, then field sampling technicians prepare trip blanks before they collect the samples. Trip blanks were included with all shipments of aqueous samples for VOC analysis in 2020.

Field blanks are collected to check for cross-contamination that may occur during sample collection. A field blank consists of an aliquot of laboratory-grade water that is poured into a sample container in the field. 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 groundwater samples. For other programs, the frequency of field blank collection is based on their specific DQOs.

In 2020, the most common contaminant detected in the trip, field, and equipment blanks was trace to low levels of chloroform (Table 9-1). This compound is commonly detected in blanks and does not pose significant problems with the reliability of the analytical results. Several other compounds were also detected, such as bromoform and styrene at low levels. When these contaminants are detected, validation or verification procedures are used, where applicable, to qualify the associated data as "nondetects" (see Section 9.4). The results from blank samples collected during 2020 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 2012, 2013). For example, in the Groundwater Monitoring Program, duplicates are collected for five percent of the total number of samples collected for a project per sampling round.

During 2020, a total of 123 duplicate samples were collected for non-radiological analyses and 84 duplicates were collected for radiologic analyses. Not all parameters were analyzed in every duplicate. The parameters in each duplicate were consistent with those required for the specific program the duplicate was monitoring. Of the 3,233 non-radiologic parameters analyzed, 65 parameters (two percent) were above 50 percent Relative Percent Difference. For the radiologic parameters, 27 of the 333 parameters (8.1 percent) failed to meet criteria. These results are indicative of analytical method consistency within the laboratory, and that consistency within the sample collection process results in valid, reproducible data.

Matrix spike and matrix spike duplicates are used to determine whether the sample matrix (e.g., water, soil, air, vegetation, bone, or oil) 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 2020 for routine matrices such as water and soil. Non-routine matrices, such as oil, exhibited the expected matrix issues.

9.2.3 Tracking and Data Management

Most environmental monitoring samples and analytical results were tracked in BNL's Environmental Information Management System (EIMS), a database system used to store, manage, verify, protect, retrieve, and archive BNL's environmental data. A small number of environmental samples that were not tracked in the EIMS were analyzed at a contract analytical laboratory (Chemtex Lab) that cannot produce the electronic data deliverable package needed to enter the data into the EIMS. Tracking is initiated when a sample is recorded on a COC form. Copies of the COC forms and supplemental forms are provided to the project manager or the sample coordinator and forwarded to the data coordinator to be entered into the EIMS. Each contract analytical laboratory also maintains its own internal sample tracking system (also known as a Laboratory Information Management System).

Following sample analysis, the contract analytical laboratory sends the results to the BNL chemist and project manager for initial review. When required by project-specific DQOs, the analytical data may also be sent to a BNL contract chemist for full data validation. Once results of the analyses are determined to be complete and of acceptable quality, the data are entered into the EIMS. Once entered into EIMS, reports can be generated using a web-based data query tool.

9.3 SAMPLE ANALYSIS

In 2020, environmental samples were analyzed by five contract analytical laboratories, whose

selection is discussed in Section 9.3.1. All samples were analyzed according to EPA-approved methods or by standard industry methods where no EPA methods are available. 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 five contract analytical laboratories for analysis of environmental samples in 2020:

1. American Radiation Services (ARS) in Port Allen, Louisiana, for radiological analytes.
2. Chemtex Lab in Port Arthur, Texas, for select nonradiological analytes.
3. General Engineering Lab (GEL) in Charleston, South Carolina, for radiological and nonradiological analytes.
4. PACE Lab in Melville, New York, for nonradiological analytes; and
5. Test America (TA), based in St. Louis, Missouri, for radiological and nonradiological analytes.

The process of selecting contract analytical laboratories involves the following factors:

1. Maintaining required NYSDOH certifications for the specific analyses to be performed, as applicable.
2. Their record on performance evaluation (PE) tests.
3. Their contract with the DOE Integrated Contract Procurement Team.
4. Pre-selection bidding; and
5. 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. Four of the five laboratories contracted by BNL in 2020 were certified by the New York State Department of Health (NYSDOH) for the relevant analytes, where such certification existed. NYSDOH does not currently certify for the specific analytes tested by Chemtex Lab (e.g., tolyltriazole), which has Texas National Environmental Laboratory Accreditation Program (NELAP) accreditation. The laboratories also were subject to PE testing and DOE-sponsored audits (see Section 9.7).

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, groundwater samples undergo data verification, whereas analytical results for specific waste streams undergo a full validation.

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 was not initiated, or the sample was not extracted, within the time frame required by EPA or by the contract.
- *Incorrect test method* – The analysis was not performed according to a method required by the contract.
- *Poor recovery* – The compounds or radioisotopes added to the sample before laboratory processing were not recovered at the recovery ratio required by the applicable analytical method/performance criteria.
- *Insufficient QA/QC data* – Supporting data received from the contract analytical laboratory were insufficient to allow for the verification or validation of results.
- *Incorrect minimum detection limit (MDL)* – The contract analytical laboratory reported extremely low levels of analytes as "less than minimum detectable," but the contractually required limit is not used.
- *Invalid chain-of-custody* – There was a failure to maintain proper custody of samples as documented on COC forms.
- *Instrument failure* – The instrument did not perform correctly.
- *Preservation requirements not met* – The requirements identified by the specific analytical method were not met or properly documented.
- *Contamination of samples from outside sources* – Possible sources include sampling equipment, personnel, and the contract analytical laboratory.

Table 9-1. Summary of Detections in Trip and Field Blank Samples.

Constituent	Number of Analyses	Number of Detects	Minimum	Maximum	Typical Reporting Limit	Units
Trip Blank Results						
Bromoform	91	1	0.14	0.14	0.5	µg/L
Chloroform	91	3	0.17	0.28	0.5	µg/L
Tetrachloroethylene	91	1	8.9	8.9	0.5	µg/L
Trichloroethylene	91	1	0.19	0.19	0.5	µg/L
Trichlorofluoromethane	91	1	3.9	3.9	0.5	µg/L
Methyl chloride	91	1	0.19	0.19	0.5	µg/L
Styrene	89	2	0.35	0.61	0.5	µg/L
1,1,1-Trichloroethane	91	1	0.29	0.29	0.5	µg/L
Field Blank Results						
Organic Compounds						
1,2,3-Trichlorobenzene	27	1	0.61	0.61	0.5	µg/L
Trichloroethylene	29	1	0.48	0.48	0.5	µg/L
Chloroform	29	2	0.25	0.34	0.5	µg/L
Metals						
Mercury	5	1	0.124	0.124	1	µg/L
Sodium	5	1	105	105	100	µg/L
Zinc	5	1	7.08	7.08	3.3	µg/L
General Chemistry Parameters						
Chloride	2	1	0.134	0.134	0.067	mg/L
Alkalinity (as CaCO3)	2	2	1.99	2.15	1.45	mg/L
Nitrogen	5	5	0.0382	0.065	0.033	mg/L
TDS	5	2	4.29	48.6	3.4	mg/L
Total Kjeldahl Nitrogen	5	5	0.0382	0.065	0.033	mg/L
Ammonia (as N)	5	5	0.0192	0.0219	0.017	mg/L

µg/L Micrograms per liter.
mg/L Milligrams per liter.

- *Matrix interference* – Analysis was affected by dissolved inorganic/organic materials in the matrix.

Data validation involves 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 standard errors, transcription errors, and calculation errors. The amount of data checked varies, depending on the environmental media and on the DQOs for each project. Data for some projects, such as long-term groundwater monitoring, may require only verification.

During the 2020 characterization of the per- and polyfluoroalkyl substances (PFAS) plumes associated with BNL's current and former firehouse facilities, approximately 25 percent of the data packages were validated by a contract chemist. Furthermore, verification was performed on 20 to 100 percent of the analytical results for some waste streams to satisfy QA requirements.

The results of the verification or validation process are entered into the EIMS. When analyses are determined to be outside of QC parameters, a qualifier is applied to the result stored in the

EIMS. Results that have been rejected are qualified with an "R." Rejected results are not used in the preparation of this report.

The most common QC issue during 2020 was the detection of low-level contamination of trip, field, and method blanks used in VOC analyses. Results for the trip and field blanks are summarized in Table 9-1. This issue resulted in minor qualification of sample results. Minor violations of laboratory control sample results are also common. In most cases, the violations do not result in qualified sample results. Furthermore, during 2020, 19 samples sent for VOC analysis were analyzed outside technical holding times due to the laboratory transferring the samples between their testing facilities. As a result, the analytical data were rejected due to the holding time exceedances, and BNL had to provide new samples for analysis. The contract laboratory has since fixed its courier issues.

9.4.1 Checking Results

Nonradiological data analyzed in 2020 were verified and/or validated when required by project DQOs, BNL EM-SOPs, and/or EPA contract laboratory program guidelines (EPA 2012, EPA 2013). Radiological packages were verified and validated using BNL and DOE guidance documents (BNL 2017). During 2020, the verifications were conducted using a combination of manually checking hard copy data packages and by the use of a computer program developed by BNL to verify the completeness of the electronic data deliverable (EDD) before the data are entered into BNL's EIMS.

9.5 CONTRACT ANALYTICAL LABORATORY QA/QC

In 2020, procedures for calibrating instruments, analyzing samples, and assessing QC were consistent with EPA methodology. QC checks 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. Analytical laboratory contracts specify analytes, methods, required detection limits, and deliverables, which include standard batch QA/QC performance checks. As part of the laboratory selection process, candidate laboratories are required to provide BNL with copies of their QA/QC manuals and QA program plans.

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

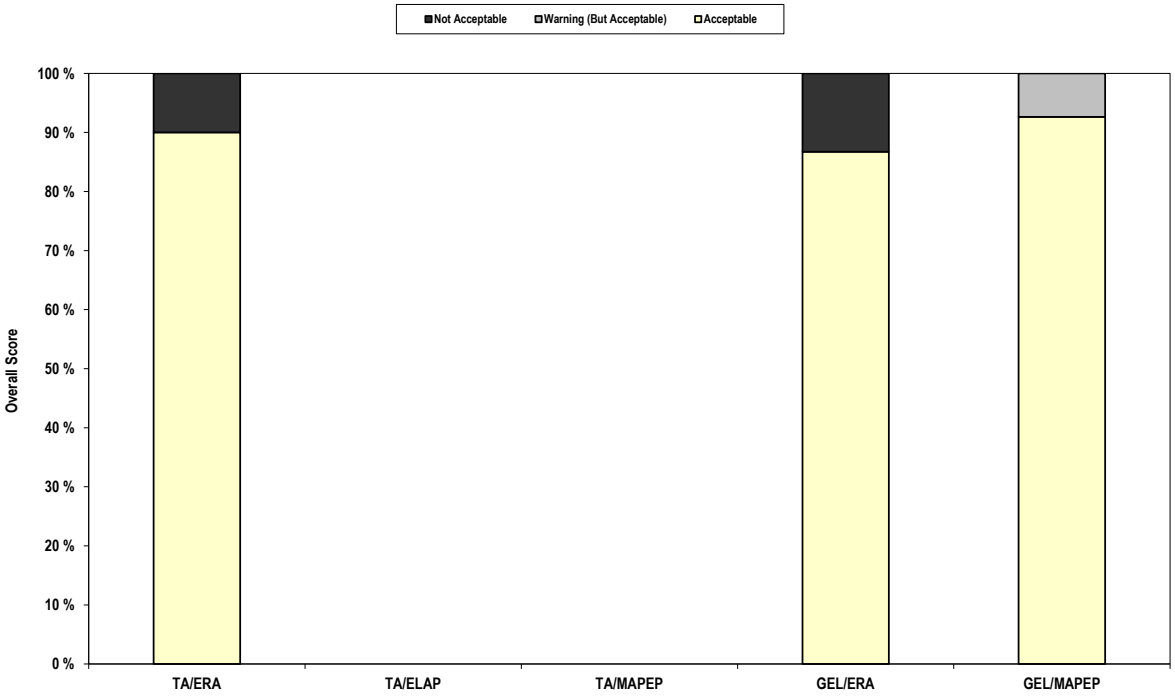
9.6 PERFORMANCE OR PROFICIENCY EVALUATIONS

Four of the contract analytical laboratories (ARS, GEL, PACE, and TA) participated in several national and state PE testing programs in 2020. Chemtex Lab did not participate in PE testing because there is no testing program for the specific analytes Chemtex analyzed for BNL (specifically for 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 DOE required Mixed Analyte Performance Evaluation Program (MAPEP), Resource Technology Corporation, Phenova, and the NYS- DOH Environmental Laboratory Accreditation Program (ELAP). The results from these tests are summarized in Section 9.6.1.

9.6.1 Summary of Test Results

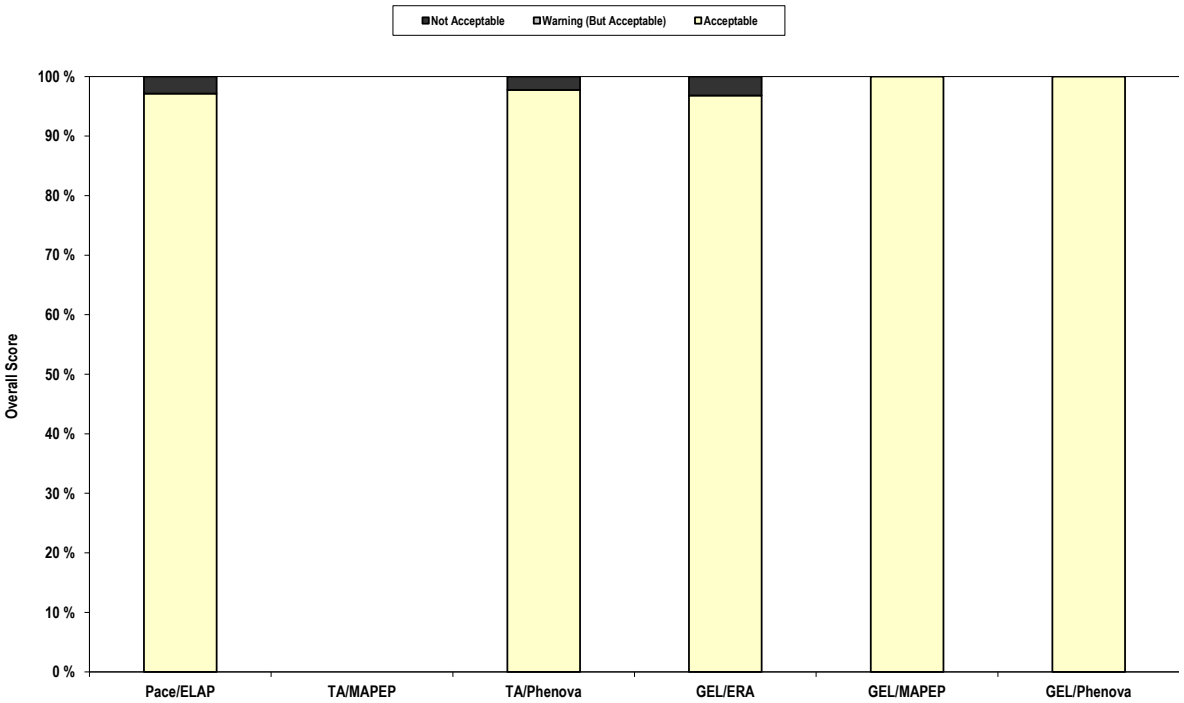
As shown by Figures 9-2 and 9-3, test results are plotted as percentage scores that were "Acceptable," "Warning (But Acceptable)," or "Not Acceptable." A Warning (But Acceptable) is considered by the testing organization to be "satisfactory." An "average overall satisfactory" score is the sum of results 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.

Table 9-2 provides a summary of the DOECAP audit results. TA had 3 Priority II findings, ARS has



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.

Table 9-2. Summary Results of 2020 DOE CAP Audits*

Laboratory	Finding Priority	Area of Concentration	Number of Findings
Test America, Earth City, Missouri			
	I	Radiochemistry	NA
	II	Quality Assurance	3
	I	Organic Analyses	NA
	I	Inorganic Analyses and Wet Chemistry	NA
	I	Radiochemistry	NA
	I	Materials Management	NA
GEL Laboratories			
	II	Quality Assurance	NA
	II	Radiochemistry	NA
ARS International			
	I	Radiochemistry	NA
	II	Quality Assurance	10
	II	Organic Analyses	2
	II	Inorganic Analyses and Wet Chemistry	4
	II	Laboratory Information Management Systems	NA
	II	Materials Management	1

* There were no DOE CAP audits on these laboratories during 2020.

17 Priority II findings and GEL had no findings. Priority II findings are deviations from a requirement.

9.6.1.1 Radiological Assessments

GEL and TA participated in the ERA radiological PE studies. TA and GEL did not participate in the ELAP evaluations for 2020. Figure 9-2 summarizes radiological performance scores in the ERA and MAPEP programs. GEL had an average overall satisfactory score of 90 percent. TA also had an overall satisfactory score of 90 percent. For 2020, TA did not participate in the ELAP and MAPEP radiological Performance Tests.

9.6.1.2 Nonradiological Assessments

During 2020, PACE participated in the NYSDOH ELAP evaluations of performance on tests of nonpotable water, potable water, and solid wastes. NYSDOH found 97 percent of PACE's nonradiological tests to be in the Acceptable range. GEL participated in the ERA water supply and water pollution studies where 97 percent of GEL's tests were in the Acceptable range. GEL also participated in the MAPEP water supply and water pollution studies and received 100 in the Acceptable range.

TA and GEL participated in the Phenova Soil/Hazardous Waste and Water Pollution proficiency testing programs. Ninety-eight percent of TA's results were in the Acceptable range and 100 percent of GEL's results were in the Acceptable range.

Figure 9-3 summarizes the non-radiological performance results of three of the four participating laboratories (GEL, Pace, and TA) in the ERA, MAPEP, Phenova, and ELAP tests. For nonradiological tests, the laboratories received overall satisfactory result of 98 percent. TA did not participate in the MAPEP non-radiological PTs for 2020.

9.7 AUDITS

As part of DOE's Consolidated Audit Program (DOECAP), TA was audited in 2020 (ANAB 2020a) by ANSIASQ National Accreditation Board (ANAB). During the audits, three nonconformities were cited. In all instances concerning parameters required by BNL, these findings did not affect BNL data.

ARS was assessed by ANAB and approval was given in March 2020 (ANAB 2020a). GEL was not assessed during 2020; they are scheduled for an ANAB audit during 2021. Although Pace was not assessed during 2020, a NYSDOH audit is scheduled for 2021.

Based on the audit and assessments, the analytical laboratories met the criteria of the audit programs for Acceptable status.

9.8 CONCLUSION

The data validations, data verifications, and DQO checks conducted on analytical results at BNL are designed to eliminate any data that fails to meet the DQO of each project. The results of the independent PE assessments and assessments of contractor laboratories summarized in this report are also used to assess the quality of the results. Therefore, the data used in this Site Environmental Report are of acceptable quality.

REFERENCES AND BIBLIOGRAPHY

10CFR 830 Subpart A. U.S. Department of Energy. Quality Assurance Requirements. U.S. Code of Federal Regulations. 2000.

BNL. 2017. EM-SOP 209. Radiochemical Data Validation. Brookhaven National Laboratory, Upton, NY.

BNL 2019. EMSOP-201 Documentation of Field Activities. Brookhaven National Laboratory, Upton, NY.

BNL. 2020. EM-SOP 109. Chain-of-Custody, Storage, Packaging, and Shipment of Samples. Brookhaven National Laboratory. Upton, NY.

BNL. 2020. Brookhaven National Laboratory Environmental Monitoring Plan Update. Brookhaven National Laboratory, Upton, NY. January 2020.

DOE Order 414.1D. Quality Assurance. U.S. Department of Energy. Washington, DC. August 16, 2011.

DOE Order 436.1. Departmental Sustainability. U.S. Department of Energy, Washington, DC. May 2, 2011.