

United States
Environmental Protection
Agency

Office of
Solid Waste and
Emergency Response

Agency

emergency response



DIRECTIVE NUMBER: ⁹²⁴⁰ 9242.0-02A

TITLE: Further Guidance on OSWER Directive ⁹²⁴⁰ 9242.0-02
Analytical Support for Superfund

APPROVAL DATE: 11/20/90

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ORIGINATING OFFICE: HSED

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REFERENCE (other documents):

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United States Environmental Protection Agency
Washington, DC 20460

OSWER Directive Initiation Request

1. Directive Number
9240.0-02A

2. Originator Information

Name of Contact Person Dave Bennett	Mail Code OS-230	Office HSED	Telephone Code
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3. Title

Further Guidance on OSWER Directive 9240.0-02, Analytical Support for Superfund

4. Summary of Directive (include brief statement of purpose)

Supplements 9240.0-02, by establishing a system for tracking analytical services performed by ESD laboratories, contractors, and subcontractors

5. Keywords

Superfund; analysis; contract labs; QA/QC

6a. Does This Directive Supersede Previous Directive(s)?

No Yes What directive (number, title)

b. Does It Supplement Previous Directive(s)?

No Yes What directive (number, title)
9240.0-02 - Same Title

7. Draft Level

A - Signed by AA/DAA B - Signed by Office Director C - For Review & Comment D - In Development

8. Document to be distributed to States by Headquarters? Yes No

This Request Meets OSWER Directives System Format Standards.

9. Signature of Lead Office Directives Coordinator Betti C. VanEpps, OERR Directives Coordinator	Date 11/20/90
10. Name and Title of Approving Official Henry L. Longest II, Director, OERR	Date 11/20/90

EPA Form 1315-17 (Rev. 5-87) Previous editions are obsolete.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

OSWER Directive #9240.0-02A

SUBJECT: Further Guidance on OSWER Directive 9240.0-2, Analytical Support for Superfund

FROM: Henry L. Longest II, Director *H.L.L.*
Office of Emergency and Remedial Response

B.M.D. Bruce M. Diamond, Director *Glanis Stanley*
Office of Waste Programs Enforcement

TO: Addressees

Purpose: The purpose of this memorandum is to provide guidance and instructions for implementing OSWER Directive 9240.0-2, Analytical Support for Superfund, March 20, 1986, by establishing a system for tracking Superfund analytical services performed by Environmental Services Division (ESD) laboratories, the Environmental Services Assistance Teams (ESAT), other field contractors (e.g., ARCS, TAT, TES) and their subcontractors, States, other federal facilities, and Potentially Responsible Parties (PRPs). Another purpose of this memorandum is to request that you designate a contact in your Region who will work with Headquarters to implement this Superfund wide analytical services tracking system. As you know, the Contract Laboratory Program (CLP) already has extensive tracking procedures. This system establishes similar procedures for tracking critical information associated with non-CLP services.

Background: In 1986, the above directive was issued to require the oversight and monitoring of all Superfund analytical activities, not just those analyses provided by ESD and CLP laboratories. Compliance with the directive has been difficult to determine, originally because: (1) analytical services provided outside of ESD/CLP laboratories comprised a relatively small percentage of Superfund's analysis activities; (2) there were limited resources to undertake additional monitoring activities; and (3) guidance was needed on exactly how to track and monitor non-CLP analytical support. We now know that non-CLP services play a significant role in supporting Superfund and we now have contractor resources in place to assist in the oversight of these services.

The tracking system described in this memorandum has been discussed with Analytical Services Advisory Committee (ASAC) members, and has been pilot tested in Regions II, IV, and VII. This system addresses the need for guidance on tracking and monitoring all analysis activities. The system's paper and automated procedures have been reviewed by ASAC members, subjected to a study and thorough workgroup review, and revised based on the results of the pilot study and workgroup comments.

Objective: The objective of the tracking system is to capture information needed to determine the use, magnitude, and quality of analytical services and thereby provide a means for Regions to oversee and monitor these resources in accordance with Directive 9420.0-2. It also is intended to provide Regional quality assurance (QA) officials with information they need to implement and manage QA programs that encompass all analytical activities within the Regions. In addition to facilitating Regional QA oversight activities, the tracking system is intended to monitor PRP enforcement laboratory and field data generation activities to provide Headquarters with national information on analytical services that support Superfund. This information will enable Headquarters to plan and implement a comprehensive Superfund QA program and provide the Regions with QA support, such as providing sufficient quantities and types of performance evaluation (PE) materials to assist in evaluating the quality of data generated from all Superfund analyses.

Implementation: The Hazardous Site Evaluation Division's (HSED) Analytical Operations Branch (AOB) has been directed to work with each Regional and Headquarters contact, as well as OWPE, to ensure that the tracking system assists Regional efforts to manage non-CLP analytical services and that the system is implemented smoothly. Regions will ensure that current contracts are changed to provide directions, as needed, to comply with and implement this directive. The non-CLP tracking system will apply to all Superfund activities including those related to enforcement oversight conducted by all Superfund contracts. OWPE will provide separate guidance in the near future on utilization of the tracking system for PRP generated data.

In addition OWPE is evaluating the benefits of this tracking system for RCRA purposes. It is reasonable to assume that some of the laboratories inspected under the RCRA program will also be used for Superfund analysis even if not in the CLP. The laboratory audit inspection that RCRA enforcement staff conducts is designed to determine whether laboratories are analyzing groundwater samples and performing the proper analysis with the appropriate sample, analytical methods and QC requirements. Therefore, potentially valuable information (historical or current) on the lab may already exist in your regional or State RCRA files. We will be providing further guidance on this issue.

The Regional Hazardous Waste Management Divisions will have the responsibility for directing the collection of information and the Environmental Services Division will be responsible for compiling the information, carrying out appropriate QA oversight, and reporting to Headquarters. Each Region will decide how best to operate the system in accordance with its requirements, resources (contracts), and existing operations. Moreover, each Region will decide who (e.g., Regional staff or contractors) is responsible for collecting and entering tracking information and the appropriate media for tracking that information (e.g., paper or automated formats). Headquarters will provide both paper documentation and software for automating the process.

We fully expect that the tracking system will provide you with valuable information on a continuing basis, and only require that you provide automated updates periodically to Headquarters. Examples of the types of information the tracking system will provide include:

- Magnitude of non-CLP support, by laboratory and on an aggregated basis;
- List of "Non-CLP" labs used by the Regions that are candidates for on-site audits;
- Quality of data generated and the extent to which data meet intended uses;
- Number of "Non-CLP" samples analyzed by a laboratory under investigation by the IG;
- Extent of review performed on these data;
- Types of analyses and methodologies performed; and
- Extent of services used by Regions, their contractors, states, and PRPs.

The information transmitted to Headquarters on analytical activities will form a national database to which the Regions will have access and from which Headquarters will generate a variety of national and Regional reports on trends, quality, and utilization of services. Approximate costs for various types of analyses will be collected by other mechanisms. Headquarters will provide user support to the designated Regional contact and will encourage the participation of these contacts in user groups to enhance tracking system operations.

The tracking system's manual and PC-based data collection instruments, together with procedures for implementing and operating the system, will be provided by the AOB to your Regional contact prior to national implementation in March, 1991. The system will be introduced and discussed in detail at the National Non-CLP Tracking System Meeting, planned for December 11-13, 1990 at the Holiday Inn Golden Gateway in San Francisco, California. Region specific implementation and operational details will be worked out between Regional contacts and the AOB.

To begin the process of implementing the tracking system, please designate your Region's contact and have the contact notify David Eng at the AOB (FTS 382-4619, FAX (202) 252-0524, E-mail EPA5512, Mailcode OS-230) by December 3, 1990.

Attachments

Addressees:

- Director, Waste Management Division
Regions I, IV, V, VII, VIII
- Director, Emergency and Remedial Response Division
Region II
- Director, Hazardous Waste Management Division
Regions III, VI
- Director, Toxic and Waste Management Division
Region IX
- Director, Hazardous Waste Division
Region X
- Director, Environmental Services Division
Regions I-X

- cc: HSCD Paul Nadeau, Acting Director
ERD Stephen Luftig, Director
OWPE Frank Biros, Chief, Technical Support Branch
OE David Van Slyke, Deputy AEC - HWED
Non-CLP Tracking System Workgroup members