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TITLE: Extending the Tracking of Analytical Services
to Potentially Responsible Party-Lead Superfund
Sites

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OSWER OSWER OSWER
DIRECTIVE DIRECTIVE



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


JUL 6 1992

MEMORANDUM

OSWER Directive Number 9240.0-2B

SUBJECT: Extending the Tracking of Analytical Services to
Potentially Responsible Party-Lead Superfund Sites
(Supplemental Guidance on OSWER Directive 9240.0-2A)

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

Bruce M. Diamond, Director 
Office of Waste Programs Enforcement

TO: Waste Management Division Directors,
Regions I-X
Environmental Services Division Directors
Regions I-X

Purpose

The purpose of this memorandum is to provide procedures for tracking Potentially Responsible Party (PRP) analytical services on a national basis in accordance with OSWER Directive 9240.0-2A (Further Guidance on OSWER Directive 9240.02, Analytical Support for Superfund, November 20, 1990).

Since OSWER Directive 9240.0-2A was issued on November 20, 1990, EPA Regional Non-CLP Tracking System Coordinators have been appointed (see Attachment A). They have started to track non-CLP analytical services information at Fund-lead sites, and are entering this information into the National Non-CLP Tracking System. This Directive extends this tracking process to analytical services performed by PRPs in support of Superfund work at Federal and State enforcement-lead sites. All PRP analytical services fall under the non-CLP category, since they do not use an EPA contract to acquire analytical services from a CLP laboratory.

Benefits of Entering PRP Data into the Tracking System

In order to minimize potential adverse impacts from flawed sample analyses or non-compliance with QA procedures, it is in



EPA's interest to identify, as early as possible, laboratories that may be conducting unreliable analyses. For this reason, a national tracking capability has been established. When implemented, this effort will allow EPA to track all analytical services that support Superfund site work.

By maintaining a national system to track PRP analytical support services, the Agency will gather consistent information on laboratories and methods used by PRPs. This will provide EPA with information to plan and conduct evaluations and oversight audits, and to assure the public that EPA holds PRPs to comparable standards for sample analyses as used by EPA.

An additional benefit from tracking PRP analytical support services should be more consistent and improved oversight of PRP analytical support, because of the enhanced Agency awareness and knowledge of this process (and the ability to share information among Regions about firms which do business nationwide).

Implementation

This Directive applies to all PRP-lead site work (Removal, Remedial Investigation and Feasibility Study (RI/FS), Treatability Study, Remedial Design and Remedial Action (RD/RA), etc.) where oversight is funded by Superfund and where an EPA oversight assistant (including contractors, U.S. Army Corps of Engineers or similar service) is providing or participating in the oversight. At these sites, the oversight assistant should be assigned the tracking responsibility. Tracking should be phased in between the date of this Directive and September 30, 1992. After September 30, 1992, all PRP analytical services should be tracked by the process outlined in this Directive, regardless of what other tracking systems Regional Offices may have in place. Details on PRP, On-Scene Coordinator (OSC), Remedial Project Manager (RPM), and oversight assistant responsibilities in this tracking effort are provided below.

OSC and RPM Responsibility:

The OSC or RPM should clearly instruct the PRP that reports on analytical services must be submitted to the oversight assistant at least once a month. For new work, this language should be included in instructions dealing with sampling and analysis protocols provided the PRP prior to field activities. For Removals, this language should be provided with the Order. For RI/FS and RD/RA work, this language should be contained in the Quality Assurance Project Plan (QAPP) or in the Standard Operating Procedure (SOP), and in the scope of work provided the PRP prior to Work Plan development. For ongoing work, the OSC or RPM should instruct the PRP to report this information to the oversight assistant at least on a monthly basis.

The OSC or RPM should assign the tracking responsibility to the oversight assistant. The tracking responsibility should be included in all new oversight work assignments and added to all ongoing oversight work assignments through amendments.

Where flawed analytical procedures or non-compliance with QA procedures are detected through this tracking process or by other means, the OSC or RPM should take appropriate measures concerning ongoing site work that may be affected. In addition, the OSC or RPM should immediately contact the Regional Non-CLP Tracking System Coordinator so that corrective action can be initiated.

PRP Responsibility:

All data and information collected by PRPs at Superfund sites are available to EPA. PRPs normally provide detailed records of all laboratory analyses to the oversight assistant. These records should already contain the information needed for tracking non-CLP analytical services. PRPs should continue to submit this information to the oversight assistant as they normally report on their field activities, but must provide necessary information at least on a monthly basis, until all analyses from the site are completed and reported.

Oversight Assistant Responsibility:

When reports on PRP laboratory analyses have been received, the oversight assistant shall review and compile them. From these data the oversight assistant shall complete a separate report (either paper or electronic as the Regional Non-CLP Tracking System Coordinator prefers -- A copy of the tracking forms is provided in Attachment B) for each sample group. A sample group contains samples that came from one site, were collected consecutively during one phase of field sampling, and were processed by one lab. Reports shall be submitted to the Regional Non-CLP Tracking System Coordinator on a monthly schedule. Dates when sample information is received and when tracking information is submitted shall be included in the oversight report prepared for the OSC or RPM. If the information needed to answer question 9c of the tracking form, dealing with quality assurance (QA) of the analysis process, is readily available, the oversight assistant shall answer question 9c. Initially, answering question 9c is optional. However, in the long-term we believe that collecting information on how well non-CLP analyses comply with QA requirements is of utmost importance to the Agency, and this issue will be revisited. If QA non-compliance or flawed analysis is suspected, the oversight assistant shall notify the OSC or RPM and the Regional Non-CLP Tracking System Coordinator immediately, and shall also document suspected non-compliance or flawed analysis in the oversight report.

Support with Implementation

Regional Non-CLP Tracking System Coordinators should assist OSCs and RPMs who are managing PRP-lead sites in implementing the tracking requirement for PRP analytical services and should coordinate training of oversight assistants in the tracking process. If specific problems related to extending this tracking process to PRP analytical services cannot be resolved by the Regional Non-CLP Tracking System Coordinator, please contact David Eng (HQ HSED, FTS 260-4619) concerning the tracking process. Concerning PRP issues, please contact Hans Waetjen (HQ OWPE, FTS 260-4833).

A copy of OSWER Directive number 9240.02A is provided in Attachment C. Recommended language to use in the scope of work for the oversight assistant is provided in Attachment D. This language should be used in new oversight assignments and when adding the tracking responsibility to ongoing oversight assignments through amendments.

cc: Superfund Branch Chiefs, Regions I-X
ORC Superfund Branch Chiefs, Regions I-X
Superfund Section Chiefs, Regions I-X
Non-CLP Tracking System Coordinators, Regions I-X
Bill White, OE
Earl Salo, OGC

Attachments

Attachment A Regional Non-CLP Tracking System Coordinators

Region I	Heidi Horahan (HWMD) Scott Clifford (ESD)	(617) 573-5798 (617) 860-4831	FAX (617) 573-9662 FAX (617) 860-4397
Region II	Phil Guarraia	FTS 340-6697	FAX (908) 321-6616
Region III	Annette Lage (ESD) Dawn Ioven (HWMD)	(301) 266-9180 (215) 597-1309	FAX (410) 573-2698 FAX (215) 597-9890
Region IV	Pat Stamp (ESD) Nardina Turner (ESAT)	(404) 546-2445 (404) 347-7791	FAX (404) 546-3375 FAX (404) 347-1695
Region V	Jan Pels (ESD) Kaushal Khanna (WMD)	FTS 353-2720 FTS 353-2663	FAX (312) 886-2591 FAX (312) 353-9176
Region VI	Dave Stockton (ESD) Don Williams (WMD)	(713) 983-2100 (214) 655-2197	FAX (713) 983-2248 FAX (214) 655-6460
Region VII	Dale Bates (ESD)	(913) 551-5000	FAX (913) 551-5218
Region VIII	Steve Callio (ESD)	(303) 294-1056	FAX (303) 293-1424
Region IX	Jacob Silva (ESD) Gail Jones (ESAT)	(415) 744-1499 (415) 882-3067	FAX (415) 744-1476 FAX (415) 957-0270
Region X	Bruce Woods (ESD) Laura Castrilli (ESD) Joanne LaBaw (WMD)	(206) 553-1193 (206) 553-4323 (206) 553-2594	FAX (206) 553-0119 FAX (206) 553-0124

**INSTRUCTIONS FOR COMPLETING THE NON-CLP
SUPERFUND ANALYTICAL SERVICES TRACKING SYSTEM FORM (1/91)**

These instructions are intended to provide additional explanation and assist individuals in completing the data collection form for the non-Contract Laboratory Program (non-CLP) tracking system, a system for monitoring the use, magnitude, and quality of non-CLP analytical services within the Regions. Non-CLP analytical services refer to any Superfund services that are not acquired or generated through CLP Routine Analytical Services or Special Analytical Services (i.e., services not scheduled through the CLP Sample Management Office). For purposes of this tracking system, Superfund activities are those which are funded by Superfund or involve work at a Superfund site. Non-CLP may include services generated by Environmental Services Division (ESD) laboratories, field contractors and their subcontractors, states, other federal facilities, and Potentially Responsible Parties (PRP).

A separate form should be completed for each sample group analyzed using non-CLP analytical services. A sample group is defined as a group of samples that are associated with a unique site, field team, sampling period, and laboratory (if applicable). The number of samples contained in each sample group is determined by the EPA site manager. After completion of the form, the information is entered into a Regional database and also compiled into a national database at EPA Headquarters. In the instructions, the number in parentheses following a data element indicates the length of the corresponding field in the database. The form, along with a complete glossary, is attached.

- The Reference No. (10) is used by the Regions for identifying individual tracking forms/records. Please ensure that all record numbers used within the Region (including numbers used by the Region's contractors) are unique.
 - Enter the Region in which the Superfund site is located.
 - Enter the official CERCLIS No. (12).
 - Enter the period during which sampling was conducted. If the sampling was completed in one day, enter that date for both the beginning and end date of sampling.
1. Enter the Site name (40), city (35), and state (2) as they appear on all official documentation.
 2. Please indicate the type(s) of activity (25) for which these environmental data will be used. The first three choices generally refer to pre-remedial activities, the next five to remedial, and the following four to removal activities. When PRP Oversight is checked, one of the other activities must also be checked to specify the actual site decision that is being made.

- 3a. Please indicate the type(s) of facility or equipment used (30) to perform the analyses. A facility code is defined in brackets after each response. This code is to be used in answering question 5b. to specify the type of facility or equipment used to perform each type of analysis.
- 3b. The laboratory name (35) and the city (35) and state (2) in which the laboratory is located must be entered for all fixed laboratory analyses. This category may or may not be applicable for mobile laboratory and temporary on-site laboratory analyses.

Subcontractor laboratory (35) refers only to those instances when some or all of the analyses are performed by a laboratory under subcontract to the laboratory designated above.

- 4a. Indicate the organization that has the funding lead (45) and is financially responsible for the analytical services.
- 4b. The field contracts (10) listed are only applicable for Superfund-lead analyses.

For Contractor company (30), specify the contractor or subcontractor responsible for procuring the analytical services. If more than one company is represented, enter the prime contractor company name.

- 5a. Specify the total number of samples analyzed (3) using all facilities/equipment specified above. This is calculated by:

$$\#Samples = \#Sampling\ Points + \#Field\ QC\ Samples$$

For example, soil collected from a particular sampling point will be regarded as one sample, regardless of whether it is analyzed for inorganic, organic, or both types of parameters. This is different from the CLP's definition in which this soil would be counted as two separate samples (organic and inorganic).

- 5b. For analysis type (40), enter the fraction, compound group, compound, analyte, or determination. To avoid confusion and prevent misspelled entries, choose from the following list of common analysis types. (This list is also provided in the database software.)

Ammonia	Furans
Aromatics	Halocarbons
Biological Toxicity	Herbicides
Biological Oxygen Demand (BOD)	Inorganics
Chlorinated Hydrocarbons	Metals
Chloride	Methane
Chlorine	Oil & Grease
Carbon Dioxide (CO ₂)	Organics
Chemical Oxygen Demand (COD)	PAHs
Coliform	PCBs
Cyanide	Pesticides & PCBs
Dioxins and Furans	Pesticides
Dioxins	Petroleum Hydrocarbons

**NON-CLP SUPERFUND ANALYTICAL
SERVICES TRACKING FORM**

Reference No. _____
(Assigned by Region)

Region _____ CERCLIS No. _____

Sampling Period _____ to _____

A separate form should be completed for each sample group, which is defined as a group of samples that are associated with a unique site, field team, sampling period, and laboratory (if applicable). The number of samples contained in each sample group is determined by the EPA site manager.

1. Site name, city, state: _____

2. Type of activity (check all that apply):
 Preliminary Assessment SSI LSI
 RI/FS Remedial Design Remedial Action Operation/Maintenance NPL Delisting
 Removal Site Eval. Removal Action Oil Response UST Response
 PRP Oversight Other, specify _____

3a. Analytical facility/equipment used (check all that apply): () = Facility Code included for use in question 5b.
 Fixed laboratory (L) Fieldable equipment (F) Temporary on-site laboratory (T)
 Mobile laboratory (M) Portable equipment (P) Other (O), specify _____

3b. Laboratory name (if applicable) _____ City, state _____
 Subcontractor laboratory (if applicable) _____

4a. Funding lead: Superfund Other Federal Agency, specify _____
 PRP State, specify _____ Other, specify affiliation _____

4b. Field Contract (Superfund lead only): TAT ERCS FIT ARCS TES
 ESAT Other, specify _____

Contractor Company _____

5a. Total number of samples analyzed _____

5b. Specific Analysis Information (use additional pages if necessary to identify all analyses):

Analysis Type (e.g., VOAs, Metals, PCBs)	Facility Code (see 3a)	Matrix	#Samples*	Sample Preparation Source & Method # (if none, answer 5c.)	Analysis Source & Method # (if none, answer 5c.)

*#Samples = #Sampling Points + #Field QC Samples

5c. If non-standard methods were used, list below and specify if performance data are available for the matrices, analytes, and detection limits used. (Y = yes, N = No, D = Don't Know)

Non-standard sample preparation/cleanup techniques:	<u>Matrices</u>	<u>Analytes</u>	<u>Detection Limits</u>
_____	_____	_____	_____
_____	_____	_____	_____
Non-standard analytical methods:			
_____	_____	_____	_____
_____	_____	_____	_____

NON-CLP SUPERFUND ANALYTICAL SERVICES TRACKING FORM

6. Reasons for selecting non-CLP analytical services for these samples (check all that apply):
 Proximity to site Direct interaction with lab Unique parameter analysis Cost savings
 Product control Ease of acquiring services Less paperwork Method flexibility
 Quick turnaround Select locations for further analysis
 Other, specify _____
7. Are the environmental data from this sampling event stored electronically and available to EPA personnel?
 No Don't Know Yes, contained on: PC Mainframe (including minicomputers)
8. For laboratory analyses, what was the turnaround time? _____ days Was it met? Yes No Don't Know
- 9a. Document(s) where sampling, analytical, and QC requirements are defined (check all that apply):
 QAPjP SAP FOP/TDD/TID Other, specify _____
- 9b. Document(s) approved by: ESD WMD Other, specify affiliation _____
- 9c. For each analytical facility/equipment used, please indicate whether the QA/QC requirements were defined in the above documents (Def) and whether compliance was adequate to meet the intended purpose (Met).

	Fixed lab		Mobile lab		On-Site lab		Fieldable		Portable		Other	
	Def	Met	Def	Met	Def	Met	Def	Met	Def	Met	Def	Met
Analytical Method(s)												
Sample preservation & handling												
Sample chain-of-custody												
Sample holding times							XX	XX	XX	XX		
Detection/quantification limits												
Equipment maintenance/calibration												
Documentation												
Frequency & type of QC samples												

Y = yes N = no R = data not reviewed for this criterion (only applicable for Met column)

10. Was the laboratory audited as part of the Superfund program by:
 EPA or EPA Contractor PRP Not Audited Don't Know
 Comments: _____
- 11a. Were data reviewed for technical limitations? Yes No (go to 12.)
- 11b. Reviewed by: ESD/ESAT User Other, specify affiliation _____
- 11c. Extent of data review: Full review of _____ % of the data
 Partial review of _____ % of the data
- 11d. Review criteria used: CLP National Functional Guidelines
 QA/QC Guidance for Removal Activities (ERT Guidance)
 Other, specify _____
12. Were the quality and quantity of data sufficient to meet the intended purpose?
 Yes No (explain below) Don't Know (explain below)
 Reason: _____

Completed by: _____
Name and Affiliation

_____ Date

pH	Sulfide
Phthalate Esters	Sulfite
Phenolics	TCLP Extraction
Phenols	Total Organic Carbon (TOC)
SemiVOAs	Total Organic Halide (TOX)
Sulfate	VOAs

If the analysis type is not contained in this list, please enter it. Note that it is important to keep the terminology consistent (e.g., VOAs, not volatiles or volatile organics). Individual metals should be spelled out, not listed by chemical symbol.

The facility code (1) is obtained from the response to question 3a. above.

Common matrices (10) include the following. Please ensure that consistent terminology is used for other matrices.

Air	Dust	Oil	Tar
Ash	Liquid (non- aqueous)	Sludge	Water
Biota		Soil/Sed	Wipes

Enter the number of samples (3) analyzed for each analysis type using the equation in 5a.

The source (10) of the sample preparation and analysis methods include, but are not limited to the following. "If none" indicates that the methods are non-standard (see 5c. for an explanation).

- CLP SOW - Contract laboratory Program Statement of Work
- FASP SOG - Field Analytical Support Project Standard Operating Guidance
- STD METH - ASTM "Standard Methods for the Examination of Water and Wastewater"
- FSMC - Field Screening Methods Catalog
- Federal Register methods
- MCAWW - "Methods for Chemical Analysis of Water and Wastes"
- SW-846 - "Test Methods for Evaluating Solid Waste Physical/Chemical Methods"

Specify the method number (15) used in this analysis. If CLP methods were used, enter the code description for the SOW used. Choose from the following:

MC	Multi-Concentration
LC	Low Concentration
HC	High Concentration
DF	Dioxins/Furans

- 5c. A non-standard method is one that is not found in a compendium, catalog, or published document. This may include methods that have been modified in-house or obtained from a source that is not easily referenced or recognized. The analysis type, fraction code, matrix, and # of samples for non-standard methods must also be entered in 5b.

Include a brief description (40) for each non-standard method and indicate whether performance data are available to verify the method's performance with the matrices, analytes, and detection limits used in this analysis.

6. Please check all of the reasons for using non-CLP analytical services (30) for this particular sample group.
7. If an electronic file of the environmental data is available to EPA, indicate how the data are stored.
8. Enter the turnaround time (3) to the nearest half day. Therefore, 36 hrs. will be 1.5 days, etc.
- 9a. Please indicate all documents (40) specifying the sampling, analytical, and QC requirements for this sample group.
- 9b. Indicate the Regional EPA Division or other organization responsible for approving the document(s) (20) specified in 9a.
- 9c. Enter a "Y" or "N" to indicate whether the requirements were defined in the document(s) indicated above, and whether compliance with the requirements was adequate to meet the intended purpose. If the data review did not address a given criterion, compliance with the requirements for that criterion can not be determined and an "R" should be entered in the Requirements Met column.

Please note that even though a data review was performed, all included QA/QC criteria may not have been reviewed.

10. Only audits performed under the Superfund program are applicable. Please do not include audits such as those performed for drinking water or state certifications. Please provide any relevant comments (40) concerning the audit(s) in the space provided.
- 11a. If no technical data review was performed, skip to question 12.
- 11b. Please designate whether the data were reviewed by (20) the Regional ESD/ESAT, the user, or other organization.
- 11c. Specify the percentage of the entire sample group that received a full data review (3), and the percentage that received a partial review (3).
- 11d. Specify the guidance containing the review criteria (50) used to evaluate the analytical data.
12. Please indicate whether the quality and quantity of the data generated in this sampling event were sufficient to support the intended purpose for generating the analytical data.
- Include the name and affiliation of the person who completed the hardcopy form and the date the form was completed.

NON-CLP SUPERFUND ANALYTICAL SERVICES TRACKING SYSTEM
GLOSSARY (1/91)

- ARCS - Alternative Remedial Contracts Strategy.
- CERCLIS No. - The official 12-digit site identification code designated by the CERCLA Information System (CERCLIS).
- CLP - Contract Laboratory Program.
- Data Review - The technical review of the raw data usually done by a chemist to determine the analytical limitations of the data. This review does not necessarily determine whether the data are valid for their intended use.
- ERCS - Emergency Response Clean-up Services.
- ERT - Environmental Response Team.
- ESAT - Environmental Services Assistance Team.
- ESD - Environmental Services Division.
- Field Contract - Contract under which the field team that acquires or provides the analytical services is working.
- Fieldable Equipment - Particularly rugged analytical equipment with limited external power required. Easily transported in a van, pick-up truck, or four wheel drive vehicle (e.g., some spectrophotometers).
- FIT - Field Investigation Team.
- Fixed Laboratory - Any off-site laboratory in which analytical services are performed.
- FOP - Field Operations Plan.
- Full Review - Data review in which every criterion listed in the review guidelines is used to evaluate the data.
- Funding Lead - The organization that is financially responsible for the analytical services.
- LSI - Listing Site Inspection--The collection of quantitative information to determine the extent of site contamination and rank the site on the NPL.
- Mainframe - For this question, any computer larger than a PC, including minicomputers.
- Mobile Laboratory - A trailer or van containing ruggedized laboratory or field equipment.
- Non-CLP - Any Superfund analytical services that are not acquired or generated through CLP RAS or SAS (i.e., services not scheduled through the CLP Sample Management Office). Non-CLP may include services generated by ESD laboratories, ESAT, field contractors and their subcontractors, states, other Federal facilities, and PRPs.
- Non-standard Method - A method that is not found in a compendium, catalog, or published document. This may include methods that have been modified in-house or obtained from a source that is not easily referenced or recognized.
- NPL - National Priorities List.
- NPL Delisting - Removing a site from the NPL after determination that the site no longer poses a significant threat to public health or the environment.
- Operation/Maintenance - Activities conducted after a site action is completed to ensure that the action is effective and operating properly.
- Partial Review - Data review in which only some of the criteria addressed in the review guidelines are used to evaluate the quality of the data.
- PC - Personal Computer; any computer small enough to be contained on desk top.
- Performance Data - Analytical data generated to verify the applicability of the method to a given criterion (e.g., matrix, analyte, detection limit).

Portable Equipment - Hand held analytical equipment that can be easily carried by one person (e.g., Dissolved Oxygen meters/probes, portable GC).

Preliminary Assessment - The process of collecting and reviewing available information about a known or suspected waste site or release to determine if it warrants further investigation under Superfund.

PRP - Potentially Responsible Party.

QA - Quality Assurance.

QAPJP - Quality Assurance Project Plan.

QC - Quality Control.

Quick Turnaround - (see Turnaround) A turnaround shorter than that required for the corresponding CLP RAS analysis.

RAS - Routine Analytical Services.

Reference No. - An identification, assigned by the Region, to be used for tracking forms/records.

Region - Region in which the Superfund site is located.

Remedial Action - The actual construction or implementation phase of a site cleanup.

Remedial Design - A phase of remedial operations that includes development of engineering drawings and specifications for a site cleanup.

Removal Action - Short-term immediate actions taken to address releases of hazardous substances that require expedited response.

Removal Site Evaluation - The collection of site information to determine the extent and severity of hazards posed by the site and to determine if removal action is necessary.

RI/FS - Remedial Investigation/Feasibility Study--An in-depth study designed to identify preliminary alternatives for remedial actions, support the technical and cost analyses of the alternatives, and recommend the selection of a cost-effective alternative.

Sampling Period - Period of time from beginning to end of sampling for a particular sample group (e.g., 1/24/90 - 2/3/90).

SAP - Sampling and Analysis Plan.

SAS - Special Analytical Services.

Source - For question 5b., the publication/manual/catalog containing the method reported (e.g., SW-846, CLP SOW, FASP SOG).

SOW - Statement of Work.

SSI - Screening Site Inspection--The collection of qualitative information to determine the major contaminants present at a site.

Superfund - For purposes of this tracking system, Superfund activities are those which are funded by Superfund or involve work at a Superfund site.

TAT - Technical Assistance Team.

TCL - Target Compound List (contained in the CLP SOW).

TDD - Technical Direction Document.

Temporary On-site Laboratory - Temporary laboratory that is set up on the site for a specific amount of time (contains laboratory and field equipment).

TES - Technical Enforcement Support.

TID - Technical Instruction Document.

Turnaround - Period of time from sample receipt by the laboratory to data reporting date.

User - The person responsible for using the numerical data.

UST - Underground Storage Tank.

WMD - Waste Management Division (or equivalent).