

Date: 9 February 2006
To: Washington Closure Hanford (technical representative)
From: TechLaw, Inc.
Project: Remaining Sites Confirmation Sampling – Other Solid – Waste Site
128-D-2
Subject: Herbicide - Data Package No. K0072-LLI

INTRODUCTION

This memo presents the results of data validation on Data Package No. K0072 prepared by Lionville Laboratory Inc. (LLI). A list of samples validated along with the analyses reported and the method of analysis is provided in the following table.

Sample ID	Sample Date	Media	Validation	Date
J10D70	10/31/05	Solid	C	See note 1
J10D71	10/31/05	Solid	C	See note 1
J10D72	10/31/05	Solid	C	See note 1

1 – Herbicides by 8151A.

Data validation was conducted in accordance with the Washington Closure Hanford (WCH) validation statement of work and the 100 Area Remedial Action Sampling and Analysis Plan (DOE/RL-96-22, February 2005). Appendices 1 through 5 provide the following information as indicated below:

- Appendix 1. Glossary of Data Reporting Qualifiers
- Appendix 2. Summary of Data Qualification
- Appendix 3. Qualified Data Summary and Annotated Laboratory Reports
- Appendix 4. Laboratory Narrative and Chain-of-Custody Documentation
- Appendix 5. Data Validation Supporting Documentation

DATA QUALITY OBJECTIVES

• Holding Times

Sample data were assessed to ascertain whether the holding time requirements were met by the laboratory. The holding time requirements are as follows: Soil samples must be extracted within 14 days of the date of sample collection and analyzed within 40 days from the date of extraction.

If holding times are exceeded by less than two times the limit, all associated sample results are qualified as estimates and flagged "J" for detects and "UJ" for non-detects. If holding times are exceeded by greater than two times the limit, all

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associated detected sample results are qualified as estimates and flagged "J" and all non-detects are rejected and flagged "UR".

All holding times were acceptable.

• **Method Blank**

Method blank analyses are performed to determine the extent of laboratory contamination introduced through sampling, sample preparation or analysis. At least one method blank analysis must be conducted for every 20 samples. Method blanks should not contain target compounds at a concentration greater than required quantitation limit (RQL). If target compounds are present, sample results less than five times the blank concentration are qualified as undetected and flagged "U". If the sample result is less than five times the blank concentration and less than RQL, the result is qualified as undetected and elevated to the RQL.

All method blank results were acceptable.

Field Blanks

No field blanks were submitted for analysis.

• **Accuracy**

Matrix Spike & Laboratory Control Sample

Matrix spike (MS) and laboratory control sample (LCS) analyses are used to assess the analytical accuracy of the reported data. The matrix spike is used to assess the effect of the matrix on the ability to accurately quantify sample concentrations. Recoveries must fall within the range of 70% to 130%. If spike recoveries are outside control limits, detected sample results less than five times the spike concentration are qualified as estimates and flagged "J". Non-detected sample results with spike recoveries outside control limits are qualified as estimates and flagged "UJ". Sample results greater than five times the spike concentration require no qualification.

Due to matrix spike recoveries outside QC limits, all dalapon (23%), 2,4-D (28%) and pentachlorophenol (36%) results were qualified as estimates and flagged "J".

All other accuracy results were acceptable.

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Surrogate Recovery

The analysis of surrogate compounds provides a measure of performance for individual samples. Matrix-specific surrogate compound recovery control windows have been established by the laboratory. When a surrogate compound recovery is outside the control window, all positively identified target compounds associated with the unacceptable surrogate recoveries are qualified as estimates and flagged "J". Non-detected compounds with surrogate recoveries less than the lower control limit are qualified as having an estimated detection limit and flagged "UJ". Non-detected compounds with surrogate recoveries above the upper control limit require no qualification.

Due to surrogate recoveries outside QC limits, all herbicide results in samples J10D71 (21%) and J10D72 (30%) were qualified as estimates and flagged "J".

All other surrogate results were acceptable.

• Precision

Matrix Spike/Matrix Spike Duplicate Samples

Matrix spike/matrix spike duplicate results provide matrix-specific information on the precision of the method for specific target compound classes. Precision is expressed as the relative percent difference (RPD) between the recoveries of duplicate matrix spike analyses performed on a sample. For soil samples, results must be within RPD limits of plus/minus 30%. If RPD values are out of specification and the sample concentration is less than five times the spike concentration, all associated detected sample results are qualified as estimates and flagged "J". If RPD values are out of specification and the sample concentration is greater than five times the spike concentration, no qualification is required.

Due to an RPD outside QC limits (38%), all dalapon results were qualified as estimates and flagged "J".

All other precision results were acceptable.

Field Duplicate Samples

One set of field duplicates (J10D70/J10D71) were submitted for analysis. Field duplicates are assessed using the same criteria as for laboratory duplicates. All field duplicate results were acceptable.

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• **Analytical Detection Levels**

Reported analytical detection levels are compared against the 100 Area RQLs to ensure that laboratory detection levels meet the required criteria. Nine analytes exceeded the RQL. Under the WCH statement of work, no qualification is required.

• **Completeness**

Data Package No. K0072 was submitted for validation and verified for completeness. Completeness is based on the percentage of data determined to be valid (i.e., not rejected). The completion percentage was 100%.

MAJOR DEFICIENCIES

None found.

MINOR DEFICIENCIES

The following minor deficiencies were noted:

- Due to matrix spike recoveries outside QC limits, all dalapon (23%), 2,4-D (28%) and pentachlorophenol (36%) results were qualified as estimates and flagged "J".
- Due to surrogate recoveries outside QC limits, all herbicide results in samples J10D71 (21%) and J10D72 (30%) were qualified as estimates and flagged "J".
- Due to an RPD outside QC limits (38%), all dalapon results were qualified as estimates and flagged "J".

Data flagged "J" indicates that the associated concentration is an estimate, but under the BHI statement of work, the data may be usable for decision-making purposes. All other validated results are considered accurate within the standard error associated with the methods.

Nine analytes exceeded the RQL. Under the WCH statement of work, no qualification is required.

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REFERENCES

WCH, Contract #20266, *Validation Statement of Work*, Washington Closure Hanford Incorporated, July 7, 2003.

DOE/RL-96-22, Rev. 4, *100 Area Remedial Action Sampling and Analysis Plan*, U.S. Department of Energy, February 2005.

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Appendix 1

Glossary of Data Reporting Qualifiers

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Qualifiers which may be applied by data validators in compliance with the procedures herein are as follows:

- U - Indicates the compound or analyte was analyzed for and not detected in the sample. The value reported is the sample quantitation limit corrected for sample dilution and moisture content by the laboratory.
- UJ - Indicates the compound or analyte was analyzed for and not detected in the sample. Due to a minor QC deficiency identified during the data validation, the associated quantitation limit is an estimate.
- J - Indicates the compound or analyte was analyzed for and detected. Due to a minor QC deficiency identified during the data validation, the associated quantitation limit is an estimate.
- R - Indicates the compound or analyte was analyzed for, detected, and due to an identified major QC deficiency, the data are unusable.
- UR - Indicates the compound or analyte was analyzed for and not detected in the sample. Additionally, the data is unusable due to an identified major QC deficiency.
- NJ - Indicates presumptive evidence of a compound at an estimated value. The data may not be valid for some specific applications (i.e., usable for decision-making purposes).
- N - Indicates presumptive evidence of a compound. The data may not be valid for some specific applications (i.e., usable for decision-making purposes).

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Appendix 2
Summary of Data Qualification

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HERBICIDE DATA QUALIFICATION SUMMARY*

SDG: K0072		REVIEWER	Project: 128-D-2	PAGE: 1 OF 1
COMMENTS:				
COMPOUND	QUALIFIER	SAMPLES AFFECTED	REASON	
Dalapon 2,4-D Pentachlorophenol	J	All	MS recovery	
All	J	J10D71, J10D72	Surrogate recovery	
Dalapon	J	All	RPD	

* - The Qualified Data Summary Table includes laboratory applied "U" qualifiers not specifically identified here. The laboratory applied "U" qualifiers are included to minimize misinterpretation of results contained in the table.

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Appendix 3

Qualified Data Summary and Annotated Laboratory Reports

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Project: WASHINGTON CLOSURE HANFORD							
Laboratory: LLI		SDG: K0072					
Sample Number		J10D70		J10D71		J10D72	
Remarks		Duplicate					
Sample Date		10/31/05		10/31/05		10/31/05	
Extraction Date		11/7/05		11/7/05		11/7/05	
Analysis Date		11/10/05		11/10/05		11/10/05	
Chlorinated Herbicides	RQL	Result	Q	Result	Q	Result	Q
Dalapon	150	210	UJ	210	UJ	180	UJ
Dicamba	150	83	U	83	UJ	72	UJ
Dichloroprop	150	210	U	210	UJ	180	UJ
2,4-D	150	41	UJ	42	UJ	36	UJ
2,4,5-TP (Silvex)	150	21	U	21	UJ	18	UJ
2,4,5-T	150	21	U	21	UJ	18	UJ
2,4-DB	150	210	U	210	UJ	180	UJ
Dinoseb	150	21	U	21	UJ	18	UJ
Pentachlorophenol	150	17	UJ	17	UJ	14	UJ

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Appendix 4

Laboratory Narrative and Chain-of-Custody Documentation

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Case Narrative

Client: TNU-HANFORD RC-030
LVL #: 0511L604
SDG/SAF # K0072/RC-030

W.O. #: 11343-606-001-9999-00
Date Received: 11-02-2005

HERBICIDE

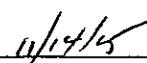
Three (3) solid samples were collected on 10-31-2005.

The samples and their associated QC samples were extracted on 11-07-2005 and analyzed according to Lionville Laboratory SOPs based on SW846, 3rd Edition procedures on 11-10,11-2005. The extraction and analysis procedures were based on method 8151A.

The following is a summary of the QC results accompanying the sample results and a description of any problems encountered during their analyses:

1. All results presented in this report are derived from samples that met LvLI's sample acceptance policy, with the exception of some discrepancies, which have been recorded on the Sample Receipt Checklist.
2. Samples were extracted and analyzed within required holding time.
3. The method blank was below the reporting limits for all target compounds.
4. Four (4) of eight (8) surrogate recoveries was outside acceptance criteria. A copy of the Sample Discrepancy Report (SDR# 05GC506) has been enclosed.
5. All blank spike recoveries were within acceptance criteria.
6. Three (3) of eighteen (18) matrix spike recoveries were outside acceptance criteria. A copy of the Sample Discrepancy Report (SDR# 05GC506) has been enclosed
7. The initial calibrations associated with this data set were within acceptance criteria.
8. The continuing calibration standards analyzed prior to sample extracts were within acceptance criteria.
9. I certify that this sample data package is in compliance with SOW requirements, both technically and for completeness, other than the conditions detailed above. Release of the data contained in this hard-copy data package has been authorized by the laboratory Manager or a designee, as verified by the following signature.


Iain Daniels
Laboratory Manager
Lionville Laboratory Incorporated


Date

kim\vr\group\data\herb\lml\0511-604.doc

The results presented in this report relate only to the analytical testing and conditions of the samples at receipt and during storage. All pages of this report are integral parts of the analytical data. Therefore, this report should only be reproduced in its entirety of 8 pages.

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Lionville Laboratory Sample Discrepancy Report (SDR)

SDR #: 0566506

Initiator: [Signature]
 Date: 11/10/05
 Client: TNU

Batch: 0511604
 Samples: _____
 Method: SW846/MCAWW/CLP/

Parameter: OH36X
 Matrix: SOLIDS
 Prep Batch: 0510874

1. Reason for SDR

a. COC Discrepancy Tech Profile Error Client Request Sampler Error on C-O-C
 Transcription Error Wrong Test Code Other _____

b. General Discrepancy

Missing Sample/Extract* Container Broken Wrong Sample Pulled Label ID's Illegible
 Hold Time Exceeded Insufficient Sample Preservation Wrong Received Past Hold
 Improper Bottle Type Not Amenable to Analysis

Note*: Verified by [Log-In] or [Prep Group] (circle)...signature/date: _____

c. Problem (Include all relevant specific results; attach data if necessary). Several of samples exhibited low surrogate recoveries, as well as several MS/MSD recoveries being low. Blank, BS/BSD recoveries all acceptable and the rest of the batch had reasonable surrogate recoveries. Believe this to be due to sample matrix.
 Please Advise See Attached

2. Known or Probable Causes(s)

MATRIX - X - other solid

3. Discussion and Proposed Action

Other Description:

- Re-log
- Entire Batch
- Following Samples: _____
- Re-leach
- Re-extract
- Re-digest
- Revise EDD
- Change Test Code to _____
- Place On/Take Off Hold (circle)

[Signature] 11/10/05

4. Project Manager Instructions...signature/date: _____

- Concur with Proposed Action
- Disagree with Proposed Action; See Instruction
- Include in Case Narrative
- Client Contacted:
- Date/Person _____
- Add
- Cancel

5. Final Action...signature/date: _____

Other Explanation:

- Verified re-[log][leach][extract][digest][analysis] (circle)
- Included in Case Narrative
- Hard Copy COC Revised
- Electronic COC Revised
- EDD Corrections Completed

When Final Action has been recorded, forward original to QA Specialist for distribution and filing.

Route Distribution of Completed SDR

Route Distribution of Completed SDR

- Initiator
- Lab General Manager: M. Taylor
- Project Mgr: Stone/Johnson
- Data Management: Stilwell
- Sample Prep: Beegle/Kiger

- Metals: Beegle
- Inorganic: Perrone
- GC/LC: Kiger
- MS: Rychlak/Daley
- Log-in: Perry
- Admin: _____
- Other: _____

0511604

Washington Closure Hanford		CHAIN OF CUSTODY/SAMPLE ANALYSIS REQUEST			RC-030-005	Page 1 of 2
Collector STANKOVICH/HUDSON	Company Contact Mike Stankovich	Telephone No. 531-7620	Project Coordinator KESSNER, JH		Price Code 9C	Data Turnaround
Project Designation Remaining Sites Confirmation Sampling - Other Solid	Sampling Location 128-D-2:1	SAF No. RC-030	Air Quality		15 Days	
Ice Chest No. ERC-02-002	Field Logbook No. EL-1578-7	COA R10DR16700	Method of Shipment FedEx		Bill of Lading/Air Bill No. See O5PC	
Shipped To EBERLINE SERVICES / LIONVILLE		Offsite Property No. A06006D				

POSSIBLE SAMPLE HAZARDS/REMARKS Non Rad Special Handling and/or Storage Cool 40C	Preservation	None	None	Cool 4C	Cool 4C	Cool 4C	Cool 4C				
	Type of Container	G/P	G/P	aG	G	aG	G				
	No. of Container(s)	1	1	1	1	1	1				
	Volume	500ml	40ml 120	60ml	60ml	60ml	250ml				

SAMPLE ANALYSIS				See item (1) in Special Instructions	See item (2) in Special Instructions	PCBs - 808; Pesticides - 808; Chloro-Herbicides - EPA8151	VOA - 8260A (TCL)	Semi-VOA - 8270A (TCL)	TPH (Total) - 418.1
Sample No.	Matrix *	Sample Date	Sample Time						
J10D68	OTHER SOLID	10/31/05	1000	X	- 1000ml only				
J10D69	OTHER SOLID	10/31/05	1200	X	X	X	X	X	
J10D70	OTHER SOLID	10/31/05	1245	X	X	X	X	X	
J10D71	OTHER SOLID	10/31/05	1245	X	X	X	X	X	
J10D72	OTHER SOLID	10/31/05	1515	X	X	X	X	X	

CHAIN OF POSSESSION		Sign/Print Names		SPECIAL INSTRUCTIONS		Matrix *
Relinquished By/Removed From	Date/Time	Received By/Stored In	Date/Time	(1) Gamma Spectroscopy (TCL List) (Cesium-137, Cobalt-60, Europium-152, Europium-154, Europium-155); Gamma Spec - Add on (Americium-241), Americium-241, Gross Alpha & Gross Beta; Nickel-63, Isotopic Plutonium-238, 240, Total alpha, Technetium-99; Isotopic Uranium (Uranium-235/238, Uranium-235, Uranium-238); Total Uranium (2) ICP Metals - 6010A (SW-846) (Aluminum, Antimony, Arsenic, Barium, Beryllium, Boron, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Molybdenum, Nickel, Potassium, Selenium, Silicon, Silver, Sodium, Vanadium, Zinc); Mercury - 7471 -(CV)		S=Soil SS=Soil/Sediment SO=Solid SL=Sludge W=Water O=Oil A=Air DS=Drum Solids DL=Drum Liquid T=Trace W=Wipe L=Liquid V=Vegetation X=Other
Relinquished By/Removed From	Date/Time	Received By/Stored In	Date/Time			
Relinquished By/Removed From	Date/Time	Received By/Stored In	Date/Time			
Relinquished By/Removed From	Date/Time	Received By/Stored In	Date/Time			
Relinquished By/Removed From	Date/Time	Received By/Stored In	Date/Time			

LABORATORY SECTION	Received By	Title	Date/Time
FINAL SAMPLE DISPOSITION	Disposal Method	Disposed By	Date/Time

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Lionville Laboratory Incorporated
SAMPLE RECEIPT CHECKLIST (SRC)

CLIENT: *TNUL HANFORD*

Date: *11/2/05*

Purchase Order / Project# /

SAF# / SOW# / Release #: *RC-030*

LvLI Batch #:

0511L604

Sample Custodian:

[Signature]

NOTE: EXPLAIN ALL DISCREPANCIES

- | | | | |
|---|---|---|----------|
| 1. Samples Hand Delivered <u>or Shipped</u> | Carrier <i>Fed Ex</i> | Airbill# <i>79177145 3732</i> | |
| 2. Custody seals on coolers or shipping container intact, signed and dated? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> No Seals | Comments |
| 3. Outside of coolers or shipping containers are free from damage? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 4. All expected paperwork received (coc and other client specific information) sealed in plastic bag and easily accessible? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 5. Samples received cooled or ambient? | Temp <i>211</i> °C | Cooler # <i>ERC-02-007</i> | |
| 6. Custody seals on sample containers intact, signed and dated? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> No Seals | |
| 7. coc signed and dated? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 8. Sample containers are intact? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 9. All samples on coc received? All samples received on coc? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No <i>#001 not rec'd</i> | |
| 10. All sample label information matches coc? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 11. Samples properly preserved? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 12. Samples received within hold times? Short holds taken to wet lab? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 13. VOA, TOC, TOX free of headspace? | <input type="checkbox"/> Yes <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A | |
| 14. QC stickers placed on bottles designated by client? | <input type="checkbox"/> Yes <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A | |
| 15. Shipment meets LvLI Sample Acceptance Policy? (Identify all bottles not within policy. See reverse side for policy) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | |
| 16. Project Manager contacted concerning discrepancies? name/date (or samples outside criteria) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> No Discrepancies | |

SR-002-B



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Appendix 5

Data Validation Supporting Documentation

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GENERAL ORGANIC DATA VALIDATION CHECKLIST

VALIDATION LEVEL:	A	B	C	D	E
PROJECT:	128-D-2		DATA PACKAGE: K0072		
VALIDATOR:	TLI	LAB:	LLI	DATE: 2/4/02	
			SDG:	K0072	
ANALYSES PERFORMED					
8015	8021	8141	8151	8315	
		WTPH-HCID	WTPH-G	WTPH-D	
SAMPLES/MATRIX:					
J10D70 J10D71 J10D72					
Solid					

1. DATA PACKAGE COMPLETENESS AND CASE NARRATIVE

Technical verification documentation present? Yes No N/A

Comments: _____

2. INSTRUMENT TUNING AND CALIBRATION (Levels D and E)

Initial calibrations acceptable? Yes No N/A

Continuing calibrations acceptable? Yes No N/A

Standards traceable? Yes No N/A

Standards expired? Yes No N/A

Calculation check acceptable? Yes No N/A

Comments: _____

GENERAL ORGANIC DATA VALIDATION CHECKLIST

3. BLANKS (Levels B, C, D, and E)

Calibration blanks analyzed? (Levels D, E)..... Yes No N/A
 Calibration blank results acceptable? (Levels D, E)..... Yes No N/A
 Laboratory blanks analyzed?..... Yes No N/A
 Laboratory blank results acceptable?..... Yes No N/A
 Field/trip blanks analyzed? (Levels C, D, E)..... Yes No N/A
 Field/trip blank results acceptable? (Levels C, D, E)..... Yes No N/A
 Transcription/calculation errors? (Levels D, E)..... Yes No N/A
 Comments: no FB

4. ACCURACY (Levels C, D, and E)

Surrogates/system monitoring compounds analyzed?..... Yes No N/A
 Surrogate/system monitoring compound recoveries acceptable?..... Yes No N/A
 Surrogates traceable? (Levels D, E)..... Yes No N/A
 Surrogates expired? (Levels D, E)..... Yes No N/A
 MS/MSD samples analyzed?..... Yes No N/A
 MS/MSD results acceptable?..... Yes No N/A
 MS/MSD standards NIST traceable? (Levels D, E)..... Yes No N/A
 MS/MSD standards expired? (Levels D, E)..... Yes No N/A
 LCS/BSS samples analyzed?..... Yes No N/A
 LCS/BSS results acceptable?..... Yes No N/A
 Standards traceable? (Levels D, E)..... Yes No N/A
 Standards expired? (Levels D, E)..... Yes No N/A
 Transcription/calculation errors? (Levels D, E)..... Yes No N/A
 Performance audit sample(s) analyzed?..... Yes No N/A
 Performance audit sample results acceptable?..... Yes No N/A

Comments: 71 + 72 Surrogates low - J all
MS discrepancy, 2,4-D + pentachlorophenol - low MS J all
no BAS

GENERAL ORGANIC DATA VALIDATION CHECKLIST

5. PRECISION (Levels C, D, and E)

- Duplicate RPD values acceptable?..... Yes No N/A
- Duplicate results acceptable? Yes No N/A
- MS/MSD standards NIST traceable? (Levels D, E)..... Yes No N/A
- MS/MSD standards expired? (Levels D, E)..... Yes No N/A
- Field duplicate RPD values acceptable?..... Yes No N/A
- Field split RPD values acceptable? Yes No N/A
- Transcription/calculation errors? (Levels D, E) Yes No N/A

Comments: dalepan - 3870 J all

6. HOLDING TIMES (all levels)

- Samples properly preserved?..... Yes No N/A
- Sample holding times acceptable? Yes No N/A

Comments: _____

GENERAL ORGANIC DATA VALIDATION CHECKLIST

8. COMPOUND IDENTIFICATION, QUANTITATION, AND DETECTION LIMITS (all levels)

Results reported for all requested analyses?..... Yes No N/A
Results supported in the raw data? (Levels D, E)..... Yes No N/A
Samples properly prepared? (Levels D, E)..... Yes No N/A
Detection limits meet RDL?..... Yes No N/A
Transcription/calculation errors? (Levels D, E)..... Yes No N/A
Comments: Q over

9. SAMPLE CLEANUP (Levels D and E)

Fluoricil ® (or other aborbant) cleanup performed? Yes No N/A
Lot check performed?..... Yes No N/A
Check recoveries acceptable? Yes No N/A
Check materials traceable?..... Yes No N/A
Check materials Expired?..... Yes No N/A
Analytical batch QC given similar cleanup? Yes No N/A
Transcription/Calculation Errors? Yes No N/A
Comments: _____

