

# Field Sampling Concerns for Superfund

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# What is the Issue

- Between July 1, 2007 and December 31, 2008, approximately 75% of cases received by the CLP program for analysis involved at least one field sampling issue
- CLP experience may be indicative of a larger problem (e.g., other contracts)

# Why is it important

- Field sampling issues cause:
  - Negative schedule and cost impacts
  - Affect the Agency's ability to meet deadlines for action
  - Can impact the scientific credibility of Agency efforts

# Why is this being discussed today

- Promote awareness and to provide information on our planned next steps
- To identify opportunities to improve the feedback loop related to field sampling issues
- Discuss next steps

	Issues Submitted Between 7/1/2007 and 12/31/2008	7/1/2007 – 12/31/2007	1/1/2008 – 6/30/2008	7/1/2008 – 12/31/2008
CLP Activities	Sites Scheduled	272	249	284
	Cases Scheduled	415	469	525
	Shipments Made	1,256	1,497	1,713
	% of Samples Scheduled that Shipped	76%	80%	81%
	Total Number of ROCs Reported by Laboratories	1,577	1,180	1,380

#### Summary of Issues

Issues	7/1/2007 – 12/31/2007	1/1/2008 – 6/30/2008	7/1/2008 – 12/31/2008
Air bubbles, headspace and/or sediment in VOA vials	7	7	8
Broken samples	100	70	100
Discrepancies with tags, jars, and/or TR/COC	550	432	427
Incorrect/duplicated sample numbers	32	30	53
Incorrect/missing copies of TR/COC	18	6	13
Incorrect/missing PE instructions	7	3	8
Insufficient/inappropriate designation of laboratory QC	395	300	360
Insufficient volume	123	118	139
Missing/broken custody seals	14	10	2
Missing signature on TR/COC	24	21	15
Missing temperature blank	95	32	20
Missing weight tables	0	2	0
Non-standard matrix	48	32	34
pH outside allowable limits	45	22	34
Return airbill information missing/incomplete	42	29	36
Samples listed on TR/COC but not received at laboratory	45	26	35
Samples received at an elevated temperature	26	19	25
Samples received at laboratory but not listed on TR/COC	39	31	24
Samples shipped in incorrect containers	0	0	8
Samples shipped to the incorrect laboratory	25	23	21
<b>Total</b>	<b>1635</b>	<b>1213</b>	<b>1362</b>



	Issues Submitted Between 7/1/2008 and 12/31/2008	Regions										
		1	2	3	4	5	6	7	8	9	10	Total
CLP Activities	Sites Scheduled	11	38	70	41	29	11	39	13	15	17	284
	Cases Scheduled	30	52	160	55	52	11	89	21	23	32	525
	Shipments Made	95	272	410	187	175	30	143	38	194	169	1,713
	% of Samples Scheduled that Shipped	84%	84%	81%	73%	77%	80%	78%	88%	69%	93%	81%
	Total Number of ROCs Reported by Laboratories	82	210	314	164	171	8	77	50	169	135	1,380

Summary of Issues by Region	Number of Occurrences by Region										
Issues	1	2	3	4	5	6	7	8	9	10	Total
Air bubbles, headspace and/or sediment in VOA vials	1	2	1	0	0	0	0	0	4	0	8
Broken samples	4	17	35	13	11	2	5	3	9	1	100
Discrepancies with tags, jars, and/or TR/COC	26	47	108	44	62	4	14	16	72	34	427
Incorrect/duplicated sample numbers	6	10	16	5	10	0	0	1	1	4	53
Incorrect/missing copies of TR/COC	3	7	2	0	0	0	0	0	0	1	13
Incorrect/missing PE instructions	5	0	0	1	0	0	2	0	0	0	8
Insufficient/inappropriate designation of laboratory QC	14	60	110	38	28	1	9	14	42	44	360
Insufficient volume	6	22	21	7	15	0	3	6	52	7	139
Missing/broken custody seals	0	0	1	0	1	0	0	0	0	0	2
Missing signature on TR/COC	2	0	2	3	3	0	1	0	3	1	15
Missing temperature blank	0	0	6	0	7	0	0	3	2	2	20
Missing weight tables	0	0	0	0	0	0	0	0	0	0	0
Non-standard matrix	1	8	10	2	2	0	1	0	3	7	34
pH outside allowable limits	3	1	16	3	4	0	2	2	1	2	34
Return airbill information missing/incomplete	1	3	5	4	11	0	0	2	5	5	36
Samples listed on TR/COC but not received at laboratory	2	2	7	11	3	0	0	0	10	0	35
Samples received at an elevated temperature	1	5	8	5	3	0	1	0	1	1	25
Samples received at laboratory but not listed on TR/COC	2	2	4	7	6	0	0	1	2	0	24
Samples shipped in incorrect containers	0	4	4	0	0	0	0	0	0	0	8
Samples shipped to the incorrect laboratory	5	4	4	4	3	0	1	0	0	0	21

# Possible Reasons

- Lack of feedback loop
- Inexperience and high turn-over of field sampling staff
- Lack of clarity in contract requirements
- Lack of oversight of QA/QC requirements
- Other contributing reasons

# Planned Future Steps

- Provide 6 month error reports to the regional RSCCs and other individuals at the regional level
- Recommend coordination between the QA Officer the RSCC, as well as the Contracting Officer and Contracting Officer Representative (if sampling activity is an agency contractor)
- Examine whether contract terms are sufficient and/or are being properly followed by the contractor
- Identify acceptable quality levels (AQL) and impose incentives or disincentives (monetary or equivalent), where appropriate, on existing contracts
- Consider changing contract language and identifying standards, AQLs and disincentives or incentives for future contracts as part of the Contracts 2000 strategy relook



# Regional Feedback

- Actions Taken?

R3- Problems have been reported to CO for action

R10- Field sampling “cheat sheets” provided, and unannounced inspections conducted by QA Officer

- Input on recipient list for information?

# Contact Information

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