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**RESULTS OF U. S. EPA REVIEW OF THE U.S. DOE LABORATORY
AUDIT PROGRAM**

12/20/94

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RESULTS

DOE-FN



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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FILE:
SEARCHED:

REPLY TO THE ATTENTION OF:

DEC 20 1994

Mr. Jack R. Craig
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

HRE-8J

RE: Results of U.S. EPA Review
of the U.S. DOE Laboratory
Audit Program

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) internal quality assurance laboratory audit program conducted for the Fernald Environmental Management Project (FEMP). U.S. EPA also conducted an on-site audit of the FERMCO laboratory on October 27, 1994.

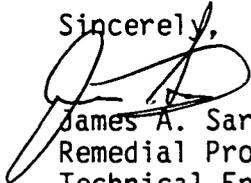
The internal quality Assurance auditing program is working very well and adequately evaluates laboratory performance. However, additional steps must be taken to track audit recommendations and assure laboratory compliance with the recommendations. Timeframes should be established for laboratories to implement necessary quality controls.

The FERMCO on-site laboratory is operating acceptably with only minor changes required to maintain the high-evidentiary requirements of the Fernald cleanup. U.S. EPA noted deficiencies in the October 1994 audit, that were also indicated in the January 1994 FERMCO internal audit. Thus confirming the need to assure internal audit recommendations are implemented.

U.S. EPA has enclosed comments on both the internal quality assurance audit program and the FERMCO on-site laboratory audit. U.S. DOE must incorporate these recommendations/changes and submit documentation of such implementation within thirty (30) days receipt of this letter.

Please contact me at (312) 886-0992, or Patrick Churilla at (312) 353-5210 if you have any questions.

Sincerely,



James A. Saric
Remedial Project Manager
Technical Enforcement Section #1
RCRA Enforcement Branch

Enclosure

cc: Tom Schneider, OEPA-SWDO
Jack Baublitz, U.S. DOE-HDQ
Don Ofte, FERMCO
Jim Thiesing, FERMCO
Paul Clay, FERMCO



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DEC 05 1994

MEMORANDUM

500-14J

SUBJECT: Review of FERMCO Laboratories

FROM: Patrick J. Churilla, Chemist,
Contract Analytical Services Section *Patrick J. Churilla*

Brian Freeman, Chemist, *Brian Freeman*
Contract Analytical Services Section

TO: James Saric, Remedial Project Manager,
Waste Management Division

As requested, An on-site audit of the FERMCO laboratory was conducted on Oct. 27, 1994 to evaluate the lab's analytical and custodial procedures, determine the adequacy of the current auditing program and determine if past recommendations had been implemented.

1. Several findings of our audit were the same as those from the FERMCO audit conducted on January 25-28, 1994. This indicates that the audit resolution process needs to be improved. These repeat findings are as follows:

a) Several SOPs previously noted as being out of date have not been updated. In particular, 9031 - Data Management and Reporting, 9103 - Mercury by Cold Vapor AA and 9012 - TCLP have not been updated.

b) Blank spaces are still abundant on printed forms and laboratory logbooks. For evidentiary purposes all unused spaces should be Z'd out, initialed and dated or marked N/A.

2. Two previous findings which were corrected were:

a) Previously unavailable instrument detection limits were present.

b) ICP logbooks which lacked method information now have the particular method being used recorded.

3. In addition to the above findings we observed the following practices which should be addressed:

a) Weights used to check balances were not recently calibrated. The balance in the sample receiving area did not have a check weight present.

b) Labels on sample containers in the sample receiving area were observed to have information scratched out. It is unknown whether this occurred in the field or in the laboratory. No information should be obliterated. Changes should be made with a single line through the old information and initialed and dated.

c) The Graphite Furnace Maintenance Logbook numbered 94-035 contained entries with dates earlier than the beginning date on the cover of the logbook. For evidentiary purposes this inconsistency needs to be avoided.

d) There is no evidence of supervisory or quality assurance inspection of logbooks. We recommend that logbooks be periodically examined by management for consistency and completeness.

In summary, our opinion is that the laboratory is currently operating acceptably with only minor changes required to maintain the high evidentiary requirements of the Fernald clean-up project. The only analytical finding that we have is to more frequently check the weights used in measuring the samples.

If you have any questions please call Brian Freeman at (312)-353-2720, or Patrick Churilla at (312)-353-6175.

ATTENDANCE ROSTER

EPA AUDIT KICK-OFF MEETING

10/27/94

<u>NAME</u>	<u>COMPANY/AFFILIATION</u>
Howard Etkind	DOE 648-1151 FX 2073
REINHARD FRISKE	ENV. QA IQC LAB
Amy MEYER	FERMCO/ALS
Hickie Hina	FERMCO/ALS - # 9166 FX-9287
David Madsen	FERMCO/QA
William Kelley	FERMCO/ALS
PATRICK CHURILLA	USEPA - REGION 5
BRIAN P. FREEMAN	USEPA - REGION 5
ALEX R. DUARTE	FERMCO/ALS/SMO
CHRIS SUTTON	FERMCO/ALS
RAY DANAHY	FERMCO/ALS/RTA
Chris SUTTER	Fermco/ALS/QA

ATTENDANCE ROSTER

EPA AUDIT CLOSE-OUT MEETING

10/27/94 2:00 pm

<u>NAME</u>	<u>COMPANY/AFFILIATION</u>
Chris Sotta	FERMCO/ALS Dept.
Ray Danahy	FERMCO / ALS DEPT.
<i>[Signature]</i>	FERMCO/ALS - # 9166
David Madsen	FERMCO/QA
Amy Meyer	FERMCO/ALS
BRIAN P. FREEMAN	US EPA RIJ
PATRICK CHURILLA	USEPA - REGION VI
William D. Kelley	FERMCO/ALS
Howard Etkind	<u>USDOE Fermid</u>



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REGION 5
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CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DEC 9 5 1994

MEMORANDUM

SQC-14J

SUBJECT: Review of FEMP QA Audit Program

FROM: Patrick J. Churilla, Chemist,
Contract Analytical Services Section

TO: James Saric, Remedial Project Manager,
Waste Management Division

In response to your request for a review of FEMP's QA audit program, I examined previous FEMP Laboratory Audit Checklists and audit SOPs and visited the FERMCO laboratory to evaluate the effectiveness of the auditing process. In general, the FEMP QA Audit Program is working very well. Below are my specific findings:

1. The audit checklist used by FEMP is very thorough, covering the analytical processes, quality assurance, project management and documentation.

2. The FEMP Audit Program SOPs are clearly written and internally consistent. However, two areas could have better documentation:

a) The process for developing audit checklists should be more clearly described. It is not clear how particular questions are added to the checklist.

b) A mechanism for setting time limits for laboratory compliance should be added to the audit SOP. Several findings of our audit were the same as those from the FERMCO audit conducted on January 25-28, 1994 and concerned the updating of lab SOPs. These are documented in our audit report.

3. The on-site laboratory audit revealed an efficiently running laboratory with only a few evidentiary issues that need to be addressed. Technical performance was very good.

In conclusion, my opinion is that the auditing process developed by FEMP is adequately evaluating the performance of the laboratories being used in the Fernald clean-up project. However, it does not sufficiently track the implementation of its audit recommendations. We recommend that future audits include timeframes for laboratory

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compliance. These timeframes provide the lab with a helpful reminder to implement necessary quality controls.

If you have any questions please call Brian Freeman at (312)-353-2720 or Patrick Churilla at (312)-353-5210.