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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

OFFICE OF SUPERFUND
ASSOCIATE
DIVISION DIRECTOR

Directive No. 9355.9-02

MEMORANDUM

SUBJECT: Superfund Data Quality Objectives: Fact Sheet, Interim Final Guidance, and Workbook

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

Bruce M. Diamond, Director
Office of Waste Programs Enforcement

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

Purpose

The purpose of this directive is to transmit to you pre-publication copies of the following materials relating to Superfund Data Quality Objectives (DQOs):

- Data Quality Objectives Process for Superfund: Fact Sheet (Publication No. 9355.9-01FS)
- Data Quality Objectives Process for Superfund: Interim Final Guidance (Publication No. 9355.9-01)
- Data Quality Objectives Process for Superfund: Workbook (Publication No. 9355.01A)

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Effective immediately, the Interim Final Guidance on Data Quality Objectives Process for Superfund is to be used to implement new Superfund data collection activities, including integrated site assessments under the Superfund Accelerated Cleanup Model (SACM). As appropriate, the DQO process should be integrated into on-going data collection activities.

Background

In 1987, the Office of Solid Waste and Emergency Response (OSWER) published guidance on Data Quality Objectives for Remedial Response Activities. Five years of Regional experiences with implementing the data quality objectives (DQOs) process indicated the need to update the guidance.

The updated DQO materials (attached) are a product of the Superfund Data Quality Objectives Workgroup which was established in 1992 and chaired by Esperanza Renard of the ORD Risk Reduction Engineering Laboratory in Edison NJ. The DQO workgroup had members from all Regions including remedial project managers (RPMs), on-scene coordinators (OSCs), site assessment managers, quality assurance managers, and toxicologists, as well as representatives from OERR, OWPE, and the Office of Research and Development. A list of the workgroup members, including your Regional representatives, is attached.

Objective

The objective of this guidance is to provide integration of Superfund quality assurance efforts in the planning and collection of environmental data.

Implementation

Regional implementation of the Interim Final Guidance on Data Quality Objectives Process for Superfund requires involvement of the Regional Quality Assurance staff from the early stages of scoping site work through data review and validation. The Superfund Quality Assurance Standing Committee, which is comprised of representatives from the OERR Divisions and OWPE and which is chaired by Duane Geuder, the OERR Quality Assurance Manager, is responsible for overseeing the implementation of the DQO guidance. Duane Geuder and members of the Standing Committee are available to consult with Regional staff on DQO issues. In addition, the ORD Quality Assurance Management Staff (QAMS) is available for assistance in implementing DQOs, particularly for your demonstration sites. Some contract support is immediately available through QAMS and we anticipate identifying additional support in FY94 for training, statistical expertise, and sampling.

The Interim Final Guidance on Data Quality Objectives Process for Superfund replaces the 1987 DQO Guidance for Remedial Response Activities. The main elements of the Interim Final Guidance are chapters on applying the Agency's 7-step DQO process to Superfund decisions, a technical appendix with more detailed guidance for Superfund sites, and three case studies of DQO use at Superfund sites.

The major changes from the 1987 DQO guidance are (1) that the qualitative approach has been supplemented with quantitative aspects, (2) that the guidance is directed toward the entire Superfund process, not just the remedial program, (3) that the five analytical levels in the 1987 guidance (as well as the three quality assurance objectives in the QA/QC removal guidance and the three data useability categories (DUCs) in the site inspection guidance) have been replaced by two data categories. The major documents impacted by the change to the two data categories are:

- Data Quality Objectives Guidance for Remedial Response Activities: Development Process and Case Studies: EPA/540/G-87/003 and 004, OSWER Directive 9355.0-7B, March 1987.
- Quality Assurance/Quality Control Guidance for Removal Activities: Sampling QA/QC Plan and Data Validation Procedures, EPA /540/G-90/004, OSWER Directive 9360.4-01 April 1990.
- Guidance for Performing Site Inspections under CERCLA, OSWER Directive 9345.1-05, August 1992

The Interim Final Guidance on Data Quality Objectives Process for Superfund supersedes the 1987 guidance in total, including the five analytical levels. The Interim Final Guidance also replaces the sections of QA/QC removal guidance which relate to the three quality assurance objectives and the sections in the site inspection guidance which relate to the three data useability categories.

An integral part of the Superfund DQO Interim Final Guidance is the initiation of demonstration sites in the Fall of 1993. The attached DQO Workbook is designed to be used by site managers and, in particular, with the demonstration sites to record DQO decisions. A member of the Superfund Quality Assurance Standing Committee will be contacting each Region about the initiation of DQO demonstration sites. The initial results of the demonstrations will be evaluated over the next six months and used to revise the Interim Final Guidance. Issuance of DQO Final Guidance will be based upon the results of the demonstration sites and Regional experience.

The ORD Quality Assurance Management Staff is developing additional implementation tools for DQOs, such as interactive software for evaluating the required number of samples and Data Quality Assessment guidance. As these tools become available, we anticipate integrating them into the Superfund DQO process through subsequent communication with you.

I appreciate your participation in this effort, including the efforts of your Regional workgroup representatives and your

recent comments on the review draft, which are reflected in the Interim Final Guidance. Please refer any questions on implementation of this guidance to Duane Geuder, chair of the Superfund Quality Assurance Standing Committee, at 703/603-8991 (voice) or 703/603-8710 (facsimile).

Attachments

cc: Regional Environmental Services Branch Chiefs
Regional Waste Management Branch Chiefs
Regional Removal Managers
Regional Quality Assurance Managers

Superfund Data Quality Objectives Guidance Workgroup

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