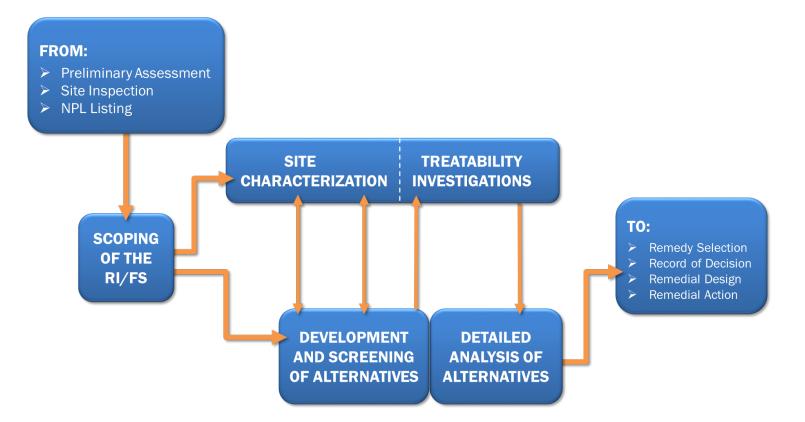


# Data Validity and Usability in the RI/FS Process

CHRISTINA MOTT FRANS, JOSH HOPP, CHRISTINE RANSOM

# **RI/FS Process**

Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA (EPA 1988).



# Data Quality Process for RI/FS

- Plan the investigation
- Collect samples
- Analyze samples
- Verify and validate data
- Evaluate and use the data

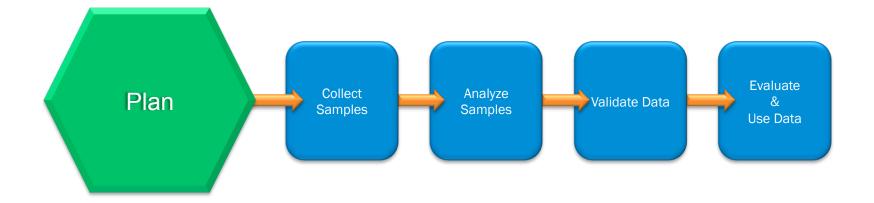




Gather these resources:

- Site map and history
- Guidance documents

- Screening/action levels
- SOPs (lab and field)
- Data quality professionals





#### **Involve Data Quality Professionals**

These include:

- Laboratory project managers
- Laboratory chemists
- Data validators
- Database managers
- Statisticians

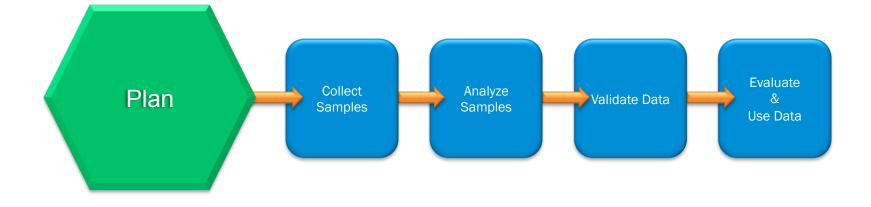
- AutoCAD users
- GIS users
- Risk assessors
- Regulatory compliance specialists



Develop these plans:

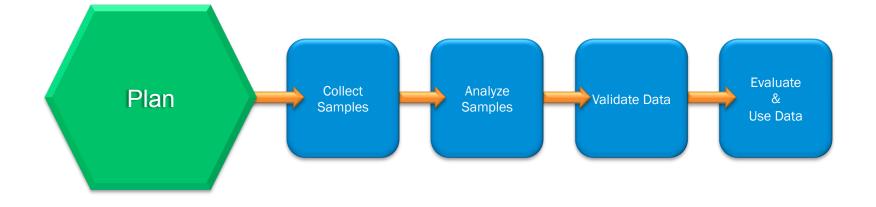
- Budget
- Project timeline
- Data quality objectives

- QAPP (Define the COPCs)
- SAP (the "work plan")
- Conceptual Site Model





- Define the purpose of the RI/FS
- Understand the problem and prioritize the problem
- Set clear and achievable goals (DQOs)
- Follow the regulatory requirements and/or guidance





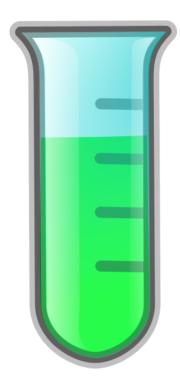
Data quality professionals help by:

- Reviewing the budget and project timeline
- Reviewing the DQOs in the SAP/QAPP
- Selecting site-specific screening/cleanup levels
- Selecting a laboratory and analytical methods
- Evaluating field QC frequency (duplicates, rinse blanks)
- Determining number of samples needed
- Communicating with the database manager/user(s)



Criteria for selecting a laboratory:

- Capacity and turn-around time
- Technical ability (meets the necessary RLs/MDLs)
- Good communication
- Applicable certifications
- Ability to produce the required project deliverables
- Experience on the project site





If data validation is required:

- Select the level of validation
- Determine which guidance applies for validation
- Select a desired format for the data validation report
- Determine the EDD format for qualified data

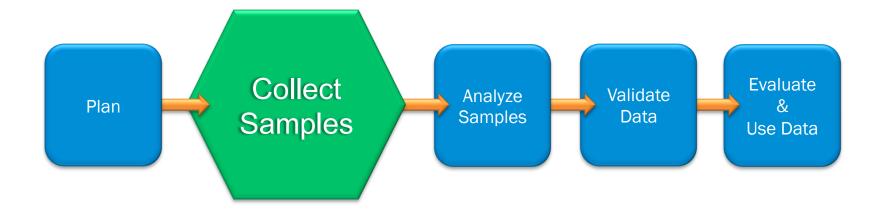


### **Step 2: Collect Samples**

Use these resources:

- Health and Safety Plan
- Site map and History
- SAP and/or QAPP

- Field SOPs
- Field documentation
- Chains of custody

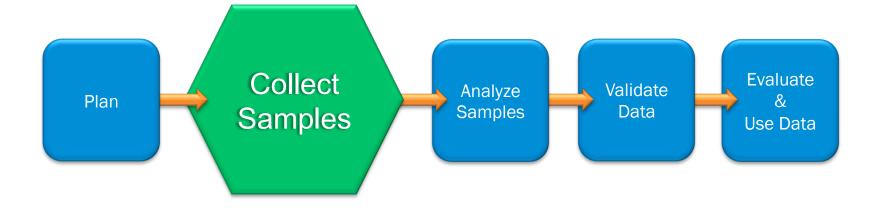




# **Step 2: Collect Samples**

- Sample containers, preservation, and holding time requirements
- GPS or survey data

- Sampling equipment and tools
- Cooler packing
- Shipping vs. courier services

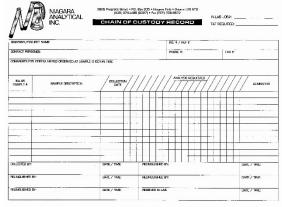




# **Step 2: Collect Samples**

Data quality professionals help by:

- Reviewing COCs to
- -Spot documentation problems and potential analytical problems
- -Anticipate laboratory batching to make validation more cost effective
- Providing technical support for problems encountered in the field that may affect data quality





### **Step 3: Analyze Samples**

According to:

- Chains of custody
- Published methods or laboratory SOPs

- SAP/QAPP for DQOs
- Laboratory Quality Management Plan
- MDLs/RLs and screening or cleanup levels





### **Step 3: Analyze Samples**

- Build a rapport with the laboratory to facilitate effective communication.
- Ask the lab to relay problems or issues in a timely manner.
- The project team must be able to advise the laboratory on how to proceed.
- Get the sample to the lab as quickly as possible!
- Request sample login confirmation and review it in a timely manner.
- Don't ask the laboratory to meet low RLs for non-priority analytes.
- Don't be a victim of "units confusion."



# **Step 3: Analyze Samples**

#### Data quality professionals help by:

- Reviewing an early data package to
- Determine if the laboratory deliverables are complete and as expected
- -Provide feedback in regard to analytical issues or irregularities
- -Compare results to the DQOs from the SAP/QAPP
- Providing technical support for analytical issues that may affect data quality



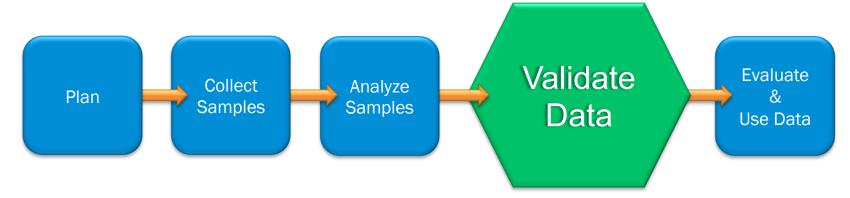


#### Step 4: Verify/Validate Data

Using these tools:

- SAP/QAPP for DQOs
- Field chains of custody
- MDLs/RLs and screening or cleanup levels

- Published methods or laboratory SOPs
- Data validation guidance
- Lab reports & EDDs





# Step 4: Verify/Validate Data

Data quality professionals help by:

- Completing verification and/or validation
- Communicating data quality issues



- Providing technical support for analytical issues that may affect data quality
- Working with the laboratory to minimize the affects of extreme data quality issues and help salvage as much data as possible when this situation occurs



# Step 4: Verify/Validate Data

#### Have your data quality professionals help by:

- Determining data usability
  - Selecting the most appropriate result from multiple analyses (dilutions, re-extractions, if the same analyte is reported from multiple methods)
  - Determine high or low bias for qualified data
  - Explain rejected data
- Providing a complete report detailing the results of validation with associated qualified laboratory results

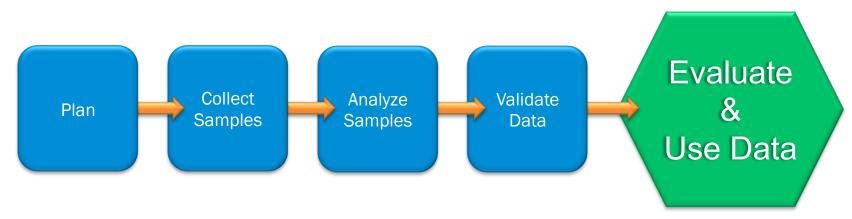


#### Step 5: Evaluate & Use Data

Using these tools:

- Historical Project Data
- SAP/QAPP for DQOs
- Field data and logbooks

- Data validation reports
- MDLs/RLs and screening or cleanup levels
- Guidance documents
- Site maps





#### Step 5: Evaluate & Use Data

- Throw out rejected data! Do not use any rejected results for decision making.
- Use qualitative information such as bias and comparability in your evaluation.
- Include data validation qualifiers in data tables, especially if "U" flags were added during DV.
- Re-calculate totals and TEQs based on qualified data.
- Make sure units are correct and check for reasonableness (e.g. Any results >1,000,000 ppm?)



# Key Takeaways

- Data quality issues can cause expanded investigations, budget overruns, incomplete risk evaluations, and many other problems at complex sites.
- Planning and communication are essential.
- Review each stage of the RI/FS project from planning to execution with the help of data quality professionals to maximize success.
- Choose a good lab that communicates issues in a timely manner.
- Prioritize tackle the big problems first, be practical and efficient by setting realistic DQOs.



### And, Finally, Use the Data

**Congratulations!** 

Engineers, geologists, responsible parties, regulators, etc. have confidence that the results can be used for decision making!





#### **Questions?**



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