Validation of Total Petroleum Hydrocarbons Gasoline Range Organic/Diesel Range Organics Analytical Data (Method 8015)

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Hazard Class: ☒ Low ☐ Moderate ☐ High/Complex
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The Responsible Manager has determined that the following organizations' review is required for initial procedure release as well as subsequent major revisions. Review documentation is contained in the Document History File.

Technical Leads Quality Assurance

Classification Review: ☒ Unclassified ☐ UCNI ☐ Classified

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Responsible Manager, Division and Title

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REVISION HISTORY

Document No./Revision No.	Issue Date	Action	Description
OIO-TP-5171, Rev. 0	8/5/2016	Minor Revision	Changed Document type and Organization. Replacing SOP-5171 to OIO-TP-5171
ER-AP-20319, R0	4/25/2017	Major Revision	Revised to remove NNSA Model Validation.

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1. PURPOSE

This procedure represents the minimum standards for evaluating routine total petroleum hydrocarbon (TPH) gasoline range organics (GRO) and diesel range organics (DRO) analytical data.

2. SCOPE

This document is intended to assist in the technical review of analytical data generated by environmental laboratories. Qualification of data is the product of data validation, analytical laboratory analysis, and focused validation that describe validation anomalies and their consequences

3. BACKGROUND

Data qualifiers and reason codes are assigned to analytical results from TPH-DRO and TPH-GRO analyses according to the specifications in this method-specific procedure. These guidelines are developed using the EPA method-specific data quality criteria.

4. PRECAUTIONS

Nothing in this procedure precludes the data validator from going beyond the minimum requirements specified within this procedure. If additional directions are required, the data validator shall reference the EPA method-specific guidelines. Implementation of this procedure may be followed by a more focused and data-use-specific evaluation of the data by the project chemist, especially if the implementation of this procedure indicates the data may contain technical deficiencies.

5. PREREQUISITE ACTIONS

Data Validators must:

- Possess a minimum of a Bachelor's degree in chemistry or one of the physical sciences and either two (2) years of experience in generating analytical data in an environmental analytical laboratory or two (2) years of experience in data validation.
- Complete Attachment 1, Data Validation Cover Sheet, and Attachment 2, TPH GRO and DRO Analytical Data Validation Checklist, during data validation.

6. PERFORMANCE

6.1 Validation Process

EIM applies a subset of qualifiers described in this procedure to analytical data using auto-validation subroutines. EIM auto-validation applies qualification to analytical records using tests listed in Attachment 2 that have a Valid Reason Description containing "(AV)". When the project leader requests a focused validation the assigned data validator completes the following steps to assess all potential analytical data qualification:

[1] **REVIEW** the qualifiers assigned during EIM auto-validation to verify that qualifiers were assigned consistently with this procedure. If auto-validation qualification is found to be inconsistent with this procedure then the validator initiates a change request using ER-AP-20304, Change Control for Data in the Environmental Information Management (EIM) Database.

[2] **PRINT** Attachment 1 and **REVIEW** the data package for potential qualification using Attachment 2.

[3] **NOTE** conditions causing recommendation for qualification and options for qualification.

[4] **COMPLETE** Attachment 1 and **FORWARD** to the project leader with conditions and options.

The project leader is the responsible party for making the decision of record if validation qualifiers should be assigned and EIM validation records updated. This record of decision is added to comments section of Attachment 1.

Once the decision of record has been made, Attachment 1 is sent to the Sample Management Office (SMO) staff. The SMO staff re-print the data validation record from EIM and add Attachment 1 that includes the record of decision to the final records package.

6.2 Analyte Quantitation

The assignment of the detection status to analytical measurements is the first step of analytical data validation. Most validation qualifiers and validation reason codes are applied based on the measurement's initial detection status. Results that are less than the report method detection limit (RMDL) are qualified as nondetect with the U validation qualifier and U_LAB validation reason code. Results greater than or equal to the RMDL and less than the report detection limit (RDL) are qualified as detected and estimated with the J validation qualifier and J_LAB validation reason code. Results greater than or equal to the RDL are qualified as detected with the NQ validation qualifier.

Criteria	Validation Qualifier	Validation Reason Code
Target analyte result is < RMDL; a nondetect	U	U_LAB
Target analyte result is ≥ RMDL and < RDL; a detect	J	J_LAB
Target analyte result is ≥ RDL; a detect	NQ	NQ

Since a result can have only one validation qualifier and one validation reason code the sequencing of validation steps is important. Analyte quantitation occurs first, then analyte identification, because most other validation functions depend on the correct identification and quantitation of the analytical parameter. When two or more qualifiers can be applied to a record, the qualifier representing the more severe consequence to data usability supersedes the qualifier with less severe consequence. The R validation qualifier has the greatest impact on data usability and supersedes other validation qualifiers.

6.2 Analyte Quantitation (continued)

Order Of Severity	Validation Qualifier	Description
1	R	The reported sample result is classified as rejected due to serious non-compliances regarding quality control acceptance criteria. The presence or absence of the analyte cannot be verified.
2	UJ	The analyte is classified as not detected, with an expectation that the reported result is more uncertain than usual.
3	U	The analyte is classified as not detected.
4	J	The analyte is classified as detected but the reported concentration value is expected to be more uncertain than usual.
5	NQ	No validation qualifier flag is associated with this result, and the analyte is classified as detected.

LANL project chemists may identify quality deficiencies in analytical results affecting analyte quanitation. These deficiencies can include analytical results with detection limits elevated above project data-quality objectives, concentrations above the calibration range of the instrument or method, results exhibiting carryover or detector contamination, large relative percent difference between dual-column detects, chromatographic interference from another analyte, and other quality deficiencies. The reason code of DR19 or GR19 is applied to affected records by the project chemist to identify these quality deficiencies when they are identified.

6.3 Analyte Identification

The identification of an analytical parameter is the second step of analytical data validation. Identification of TPH compounds depends upon the relative retention time of the compound of interest to the known retention time of the compound in the calibration standard, and the relative intensity of the mass spectrum of the compound of interest in a sample to the known intensity of the compound in a calibration standard. When mass spectral analyte identification criteria are not met the DR8 or GR8 series of reason codes are applied to affected parameters. When relative retention time criteria are not met the DR0 or GR0 series of reason codes are applied to affected parameters.

6.4 Holding Times and Sample Preservation

Sample handling requirements are specified to ensure integrity and defensibility of analytical measurements. Samples are to be prepared and analyzed within specified time limits. Samples are also preserved chemically and physically by controlling temperature. When sample handling requirements are not met the DR9 or GR9 series of reason codes are applied to affected samples.

6.5 Initial and Continuing Calibration

Calibration is performed to set the operating range of the instrument and to ensure that the instrument is performing within specifications. The initial calibration and verification is performed prior to the start of analyses. Continuing calibration checks and instrument performance samples are performed periodically during analysis to ensure the instrument is providing accurate results. When initial calibration criteria are not met the DR7 or GR7 series of reason codes are applied to affected analytes in all samples analyzed after the unacceptable initial calibration to the next acceptable initial calibration for that instrument. When continuing calibration criteria or are not met the DR7 or GR7 series of reason codes are applied to affected analytes in all samples analyzed after the unacceptable continuing calibration to the next acceptable continuing calibration for that instrument. When instrument performance checks do not meet criteria the DR16 or GR16 series of qualifiers are applied to affected analytes in all samples analyzed after the unacceptable instrument performance check to the next acceptable instrument performance check for that instrument.

6.6 Surrogates

Surrogates are compounds not normally found in the environment, but which have quantitation limits and retention times similar to the analytes of interest in a sample. Surrogates are added to samples, standards, and QC samples to determine the effectiveness of analyte quantitation. Sample results are not adjusted based on surrogate recoveries. When surrogate recovery criteria are not met the DR3 or GR3 series of reason codes are applied to affected samples.

6.7 Blanks

The Method Blank is an analyte-free matrix that is prepared and analyzed in the laboratory with the samples. The method blank determines contamination from the analytical processes. Method blanks are prepared with every preparation batch. If more than one method blank is associated with a given sample, qualification is based upon a comparison with the associated blank having the highest concentration of the parameter. When method blank criteria are not met the DR4 or GR4 series of reason codes are applied affected samples.

The Trip Blank is an analyte-free matrix that is inserted into each sample cooler for volatile organic analyses to determine if contamination of samples occurred before laboratory receipt. Samples traveling in the same cooler with a trip blank that does not meet blank criteria are qualified with the DR4 or GR4 series of reason codes.

The Field Blank is an analyte-free matrix opened to the atmosphere at the time of sample collection. Field blanks are used to determine if atmospheric conditions resulted in contamination of samples during sample collection. Samples collected the same day as the field blank that does not meet blank criteria are qualified with the DR4 or GR4 series of reason codes.

The Equipment Blank is an analyte-free matrix poured over or through sample collection equipment. Equipment blanks are used to determine the cleaning effectiveness of sampling equipment between samples. Samples collected using the same tools as the equipment blank that does not meet blank criteria are qualified with the DR4 or GR4 series of reason codes.

6.8 Matrix Spike and Laboratory Control Samples

The laboratory control sample is created by adding known amounts of parameters of interest to an aliquot of a blank matrix. The laboratory control sample is used to evaluate the effect of the analytical process of the recovery of analytes. When laboratory control sample criteria are not met the DR12 or GR12 series of reason codes are applied to all associated samples.

7. RECORDS

Records generated by this procedure will be submitted to the Environmental Protection Records Management Office for document management in accordance with P1020-1, Laboratory Records Management and EP-AP-10003, Records Management.

- Completed Data Validation Cover Sheets
- Completed TPH GRO and DRO Analytical Data Validation Checklists

8. REFERENCES

EP-AP-10003, Records Management

ER-AP-20304, Change Control for Data in the Environmental Information Management (EIM) Database

P1020-1, Laboratory Records Management

9. ATTACHMENTS

Attachment 1: Data Validation Cover Sheet
Attachment 2: TPH GRO and DRO Analytical Data Validation Checklist

ATTACHMENT 1

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Data Validation Cover Sheet

Section I.

Request Number: _____ Validation Date: _____ Lab Code: _____

Contract Laboratory Name: _____

Validator: _____ Organization: _____

Analytical Suite (Check All That Apply):

☐ **TPH-GRO**	☐ **High Explosives**	☐ **Dioxin Furans**	☐ **LCMSMS Perchlorates**
☐ **TPH-DRO**	☐ **Metals & Cyanide**	☐ **PCB Congeners**	☐ **Organochlorine Pesticides/Polychlorinated Biphenyls**
☐ **General Chemistry**	☐ **Radiochemistry**	☐ **LCMSMS High Explosives**	

☐ **Other (Describe):** _____

_____

Section II. Completeness Check

YES	NO	N/A	(check one)	YES	NO	N/A	(check one)
☐	☐	☐	1. Chain-Of-Custody Form(S)	☐	☐	☐	6. Raw/BSS Data
☐	☐	☐	2. Case Narrative	☐	☐	☐	7. Quality Control Forms
☐	☐	☐	3. Sample Result Forms	☐	☐	☐	8. Quantitation Reports
☐	☐	☐	4. Sample Chromatograms	☐	☐	☐	9. TICS Forms
☐	☐	☐	5. Standard Chromatograms	☐	☐	☐	10. TICS Mass Spectra

Comments/problems noted (include information about requests for further information submitted to the contract laboratory and agreed-upon date of resolution and contract laboratory point of contact):

Validator's Signature: _____ Date: _____

ER-AP-20319, R0	Los Alamos Environmental Safety & Health
	(Attach additional comment sheets as necessary)

ATTACHMENT 2

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TPH GRO and DRO Analytical Data Validation Checklist

Yes	No	N/A		Assign Qualifier Listed Below If Criterion = Yes	
(Check One)				Non-detected Analyte	Detected Analyte
Holding Times and Sample Preservation					
☐	☐	☐	1. The preserved sample was extracted > 7-day holding time and ≤ 14-days. (AV)	UJ, DR9 or GR9	J-, DR9 or GR9
☐	☐	☐	2. The sample extract was analyzed > 40-day holding time and ≤ 80-days. (AV)	UJ, DR9 or GR9	J-, DR9 or GR9
☐	☐	☐	3. The sample was extracted or the extract was analyzed > 2x holding time. (AV)	R, DR9a or GR9a	J-, DR9a or GR9a
☐	☐	☐	4. Sample temperature > 10°C upon receipt at the laboratory.	UJ, DR9c or GR9c	J, DR9c or GR9c
Initial and Continuing Calibration					
☐	☐	☐	5. The affected results were not analyzed with a valid 5-point calibration curve and/or a standard at the reporting limit.	UJ or R, DR7 or GR7	J, DR7 or GR7
☐	☐	☐	6. The affected analytes were analyzed with an initial calibration curve that exceeded the %RSD criteria and/or the associated multipoint calibration correlation coefficient is less than 0.995.	UJ, DR7a or GR7a	J, DR7a or GR7a
☐	☐	☐	7. The ICV and/or CCV were recovered outside the method specific limits.	UJ, DR7c or GR7c	J, DR7c or GR7c
☐	☐	☐	8. The ICV and/or CCV were not analyzed at the appropriate method frequency.	UJ, DR7d or GR7d	J, DR7d or GR7d
☐	☐	☐	9. Required calibration information is missing or samples were analyzed on an expired calibration. Contact the SMO or external laboratory for information.	R, DR7f or GR7f	R, DR7f or GR7f

ATTACHMENT 2

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Yes	No	N/A		Assign Qualifier Listed Below If Criterion = Yes	
(Check One)				Non-detected Analyte	Detected Analyte
Method Blanks					
☐	☐	☐	10. The sample result is less than or equal to 5 times the concentration of the related analyte in the method blank. (AV)	N/A	U, DR4 or GR4
☐	☐	☐	11. The affected analytes are considered estimated and biased high because this analyte was identified in the method blank, but was greater than 5x. (AV)	N/A	J+, DR4a or GR4a
☐	☐	☐	12. The sample result is less than or equal to 5 times the concentration of the related analyte in the trip blank, rinsate blank or equipment blank.	N/A	U, DR4d or GR4d
☐	☐	☐	13. Required method blank information is missing. Data may not be acceptable for use. Contact the SMO or external laboratory for information.	R, DR4e or GR4e	R, DR4e or GR4e
Relative Retention Time					
☐	☐	☐	14. The retention time criteria were not met.	R, DR0 or GR0	R, DR0 or GR0
☐	☐	☐	15. Required retention time documentation is missing. Data may not be acceptable for use. Contact the SMO or external laboratory for information.	R, DR0b or GR0b	R, DR0b or GR0b

ATTACHMENT 2

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Yes	No	N/A		Assign Qualifier Listed Below If Criterion = Yes	
(Check One)				Non-detected Analyte	Detected Analyte
Surrogates					
☐	☐	☐	16. The surrogate is less than 10%R. Follow external laboratory limits.	R, DR3 or GR3	J-, DR3 or GR3
☐	☐	☐	17. The surrogate is less than the Lower Acceptance Limit, but greater than or equal to 10%R. Follow external laboratory limits.	UJ, DR3a or GR3a	J-, DR3a or GR3a
☐	☐	☐	18. The surrogate %R value is greater than the Upper Acceptance Limit. Follow external laboratory limits.	N/A	J+, DR3b or GR3b
☐	☐	☐	19. Required surrogate information is missing. Data may not be acceptable for use. Contact the SMO or external laboratory for information.	R, DR3d or GR3d	R, DR3d or GR3d
Matrix Spike and Laboratory Control Samples					
☐	☐	☐	20. The LCS percent recovery was less than 10%. Follow the external laboratory limits. (AV)	R, DR12 or GR12	J-, DR12 or GR12
☐	☐	☐	21. The LCS percent recovery was less than the Lower Acceptance Limit, but greater than or equal to 10%. Follow the external laboratory limits. (AV)	UJ, DR12a or GR12a	J-, DR12a or GR12a
☐	☐	☐	22. The LCS percent recovery was greater than the Upper Acceptance Limit. Follow the external laboratory limits. (AV)	N/A	J+, DR12b or GR12b

ATTACHMENT 2

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Yes	No	N/A		Assign Qualifier Listed Below If Criterion = Yes	
(Check One)				**Non-detected Analyte**	**Detected Analyte**
☐	☐	☐	23. The LCS documentation is missing. Data may not be acceptable for use. Contact the SMO or the external laboratory for information.	R, DR12c or GR12c	R, DR12c or GR12c
☐	☐	☐	24. The MS/MSD percent recovery was less than 10%. (AV)	R, DR12d or GR12d	R, DR12d or Gr12d
☐	☐	☐	25. The MS/MSD percent recovery was greater than or equal to 10%, but less than 70%. (AV)	UJ, DR12e or GR12e	J, DR12e or GR12e
☐	☐	☐	26. The MS/MSD percent recovery was greater than 130%. (AV)	N/A	J+, DR12f or GR12f
☐	☐	☐	27. The MS/MSD relative percent difference was greater than 30%. (AV)	UJ, DR12g or GR12g	J, DR12g or GR12g

ATTACHMENT 2

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Yes	No	N/A		Assign Qualifier Listed Below If Criterion = Yes	
(Check One)				Non-detected Analyte	Detected Analyte
Analyte Quantitation					
☐	☐	☐	28. The non-detected analytes have elevated detection limits and may not meet project data-quality objectives because the sample was diluted without any target analytes identified as a result of matrix interference. Reject non-detected results if the analytical laboratory cannot provide proof for matrix interference.	UJ, R, DR15 or GR15	NA
☐	☐	☐	29. The LANL project chemist identified quality deficiencies in the reported data that requires further qualification. This code can only be used under advisement by the LANL project chemist.	UJ, R, DR19 or GR19	J, R, DR19 or GR19
☐	☐	☐	30. Qualification of data via data validation did occur, however no data quality control requirements in this procedure were applicable. Adhere to the external laboratory qualifiers found within the Form 1 analytical data summary sheets generated by the external laboratory. (AV)	U, U_LAB	J, J_LAB NQ, NQ (No qualification)