

# GSI REGULATORY UPDATE BULLETIN

ISSUED: 4/16/03

GROUNDWATER SERVICES, INC.

## TRRP-13: REVIEW AND REPORTING OF COC CONCENTRATION DATA



### Overview

Effective February 1, 2003, new TCEQ requirements will mean more attention, more paperwork, and more money for laboratory work conducted subject to the Texas Risk Reduction Program (TRRP). Under "TRRP-13: Review and Reporting of COC Concentration Data," issued by TCEQ in December 2002, persons conducting environmental site investigations and response actions must:

1. Use a laboratory with an appropriate Quality Assurance (QA) program;
2. Produce more detailed laboratory QA/QC reports for all lab analyses; and
3. Submit a "Data Usability Summary" in conjunction with TRRP reports.

If you fail to meet these requirements, your data report could be deemed unacceptable by TCEQ.

### Key Provisions of TRRP-13

- **Applicability:** TRRP-13 specifically applies to the analysis and review of **critical samples**, i.e., data collected to demonstrate compliance with TRRP. Critical samples include samples that are used to:
  - Determine if a protective concentration limit (PCL) must be established for a Chemical of Concern (COC);
  - Define the extent of affected media;
  - Demonstrate that a response action is complete or that no further action is required; or
  - Determine if notification of off-site property owner is required.
- **Process Overview:** New requirements for reporting COC concentrations under TRRP involve a three-step process, as follows:
  1. The laboratory analyzes the samples, taking into account TRRP requirements for analysis, data review, and report format and content.
  2. The responsible person or their contractor reviews the lab data with respect to project-specific Data Quality Objectives (DQOs) and prepares a Data Usability Summary for inclusion in a TRRP report (e.g., an Affected Property Assessment Report).

### TRRP-13



3. TCEQ personnel verify that the laboratory reports and the Data Usability Summary are complete and sufficient to justify the use of the data.

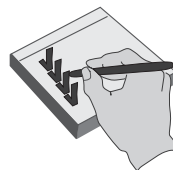


### Changes to Requirements for Laboratories

- **Laboratory Qualifications:** The laboratory must have a QA program consistent with a national accreditation program (i.e., ISO 25 or the National Environmental Laboratory Accreditation Program) and be capable of achieving required Method Quantitation Limits (MQLs), as well as project DQOs for accuracy, precision, and bias.
- **Laboratory Data Package:** The laboratory must issue a data package conforming to TRRP form and content requirements. The data package must reflect new requirements for the analysis of QA/QC samples, including verification of method detection limits on a quarterly basis and laboratory control samples (LCSs) spiked with project COCs. Matrix spikes (MS) and matrix spike duplicates (MSD) spiked with all COCs must be analyzed if called for in project DQOs.
- **Sample Data:** Results for all media must be reported as either as i) less than the sample quantitation limit (SQL), ii) estimated up to the method quantitation limit (MQL), or iii) a quantified value above the MQL. All soil and sediment results must be reported on a dry-weight basis.
- **Recordkeeping:** All Reportable and Supporting Data must be available for review by the TCEQ for up to three years after report submittal.

### Changes to Requirements for Data Users

- **Data Usability Review:** The lab data package must be compared to project-specific DQOs to document that data are suitable for the intended purpose (e.g., delineation of affected groundwater). As needed, data must be qualified to indicate possible data problems or cautions for using the data.
- **Data Usability Summary:** The Data Usability Review must be documented in a Data Usability Summary and included as an appendix of the TRRP report (e.g., Affected Property Assessment Report).



### To Find Out More

Copies of the TRRP guidance documents issued to date are available on the TCEQ website:

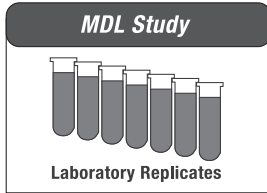
<http://www.tceq.state.tx.us/permitting/remed/techsupp/guidance.htm>

# TRRP LAB TESTING: Key Definitions

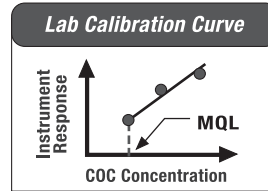


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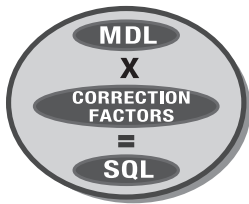
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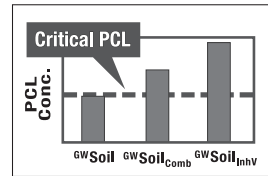
**Method Detection Limit (MDL):**  
The minimum concentration at which a chemical can be measured with a statistical confidence of 99% that the COC is present and the concentration is greater than zero. As long as the MDL meets this statistical requirement, TRRP-13 offers flexibility in determining the MDL.



**Method Quantitation Limit (MQL):**  
The lowest detectable and quantifiable concentration on the laboratory instrument calibration curve.



**Sample Quantitation Limit (SQL):**  
For each COC in each sample, the SQL is equal to the MDL adjusted for sample characteristics (e.g., dilution, sample size, and/or moisture content). Note that this is actually equivalent to the "sample detection limit."



**Critical Protective Concentration Limit (PCL):**  
The lowest PCL for the applicable exposure pathways at the site. The critical PCL corresponds to the level of required performance for the laboratory.



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■ *GSI WILL CONTINUE TO PROVIDE periodic updates regarding important regulatory developments in Texas. Should you have any questions regarding these or other upcoming issues, please feel free to contact us at 713-522-6300.*

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## About GSI

Groundwater Services, Inc., (GSI), is an environmental engineering consulting company located in Houston, Texas, which specializes in the management of environmental risk. Since 1986, GSI, has been providing industry with innovative solutions to soil, groundwater surface water, and air pollution problems.

G S I R e g u l a t o r y U p d a t e B u l l e t i n

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