UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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MEMORANDUM

DATE: October 17, 2018

SUBJECT: FASTAC and Procedures for Selecting Superfund Analytical Services (Updated)

FROM: Bryan Olson, Director /s/ *Bryan Olson*
Office of Site Remediation and Restoration

TO: Office of Site Remediation and Restoration (OSRR) Remedial Project Managers (RPM), Site Assessment Managers (SAMs), On Scene Coordinators (OSCs), Contracts Management Section
OSRR Section Chiefs
OSRR Branch Chiefs
Office of Environmental Measurement and Evaluation (OEME) Laboratory and QA Analytical Services Contacts
Field Sampling Contractors (FSCs)

This memorandum outlines the procedures for obtaining analytical services in Region 1's Superfund program. FASTAC process and procedures does not obviate the need for an approved QAPP prior to sampling. This update includes minor changes including changes in FASTAC Contacts (Attachment A), guidance updates, updated intranet/internet links and includes reference to new remedial contracts, RAF.

The national Field and Analytical Services Teaming and Advisory Committee (FASTAC) developed a hierarchical tiering system for selecting analytical services in the Superfund program. The tiering system provides the government with the most cost-effective service.

I. FASTAC Analytical Tiers

Region 1 endorses the analytical tiers developed by the national FASTAC and is committed to ensure that samples are processed through the tier that is most appropriate and beneficial to the Region. The FASTAC tiered approach, in priority preference, is specified below with Tiers 1 and 2 being the preferred options. There is a Regional requirement to document each decision that results in utilizing Tier 4 services (Attachment B).

EPA FASTAC Tier System for the Analysis of Environmental Samples:

- **Tier 1** OEME laboratory (includes ESAT support)
- **Tier 2** Contract Laboratory Program (CLP) Routine Analytical Services (RAS), CLP Modified Analysis[1], or National Non-RAS contracts
- **Tier 3** Regional OEME analytical contract mechanisms
- **Tier 4** Regional Field Sampling Contractor (FSC, i.e., START, RAF, RACs, etc.) subcontracted laboratory services

II. Project Scoping

As with all projects requiring analytical services, case team scoping meetings are beneficial to ensure sampling/analytical procedures are efficient and meet project data quality objectives (DQOs). The case team typically consists of the RPM/OSC, hydrogeologists, human health and ecosystem risk assessor(s), contract project officer, contractor staff, various specialists as needed for the project and QA

[1] CLP Modified Analysis allows the user to modify existing CLP analyses (lower detection limits, additional analytes, etc.).

representative(s) as appropriate (Note: Contact the OSRR Liaison for OEME if a QA representative has not been identified prior to a scoping meeting). Scoping meetings are necessary to properly identify the project objectives. Defining the DQOs and analytical service needs are aspects of the scoping process. The analytical specifications are defined by the number of samples, sample matrices, analytical methods, sample quantitation limits, data quality objectives, etc. The appropriate FASTAC tier should be discussed at the scoping meeting. The project may include analyses at one tier or multiple tiers, in accordance with the objectives.

III. FASTAC Tier Selection, Lead Time and Documentation Process

Requesting FASTAC Services – To provide the best possible customer service, a lead time of two to four weeks prior to sampling is optimal. In cases where Tier 2 services including CLP Modified Analyses, Non-RAS analyses, or a large number of field samples are needed, a four to six week lead time is preferred. However, expedited requests should always be submitted for consideration. Emergency situations will be dealt with on an as needed basis.

Samples Potentially Containing Dioxins and Furans
OSRR, in collaboration with OEME, has developed procedures for Tier 1 analytical services to comply with OEME's *Policy and Implementation for Samples Containing Dioxins and Furans* (Revision 2.0 dated March 10, 2011). The intent of OEME's policy is to avoid receipt of samples from known or suspected dioxin sites that could pose health risks to OEME employees and/or that OEME would be unable to dispose. The policy outlines the approval process for samples before they can be accepted at OEME for analysis. The full text of OEME's policy can be found here:
https://r1-gis-web.r1.epa.gov/oeme/data/OEMEPOLICY-DIOXIN1.pdf

Tier 1 - To request OEME analytical services, the requestor (RPM, OSC, SAM, FSC, etc.) should contact the OEME laboratory Senior Chemist (Attachment A). If there is any indication from site knowledge or previous analytical data that the samples may generate dioxin containing waste, Attachment C must be submitted to the EIA (for Chemistry Laboratory samples) or ECA (for Biology Laboratory samples) Branch Manager for final approval **before** samples can be shipped to OEME for analysis. The EIA or ECA Branch Manager will contact the requestor with a decision to either accept or deny the samples for analysis at the OEME laboratory. If the EIA or ECA Branch Manager rejects the samples, the EIA or ECA Manger will contact the requestor and OEME laboratory Senior Chemist to jointly determine the most appropriate FASTAC Tier for analytical services.

If the OEME laboratory cannot provide the services requested, the OEME laboratory Senior Chemist will coordinate with the requestor and internally within OEME to select another tier. Since Tier 1 is capacity limited, CLP RAS, Modified Analyses, and Non-RAS analyses are generally performed under Tier 2 to reserve OEME laboratory capacity for specialized services and high priority, sensitive activities.

Tier 2 - If CLP RAS, Modified Analyses, or Non-RAS services are needed, contact the CLP Representative See attachment A for the contact name for Tier 2 services. Information on Tier 2 services can be found at http://www.epa.gov/clp.

Tier 3 – Currently (Fall 2018), there are no available regional OEME analytical contract mechanisms. For further information, the OEME laboratory Senior Chemist can provide advice regarding the procurement of analytical services which are not provided by OEME. (Note – Use of this mechanism generally requires funding from the requestor).

Tier 4 - When project scoping indicates that the analytical services in Tier 1 through Tier 3 will not meet the project objectives, and a subcontracted laboratory is needed, the requestor must complete the EPA New England *Tier 4 Projected/Actual Sampling Event Form* (Attachment B). This is a two part form: Part 1 of the form, Tier 4 Projected Sample Event, is for projected sample analyses and summarizes the analytical

needs and the rationale/justification for using a subcontracted laboratory; Part 2 of the form, Tier 4 Actual Sampling Event, is for actual sample analyses.

The Tier 4 Projected Sampling Event Form must be submitted to the Superfund Program contact (Attachment A) **four to six weeks** prior to sampling. Procedures for submitting the Tier 4 Projected Sampling Event Form are as follows:

- Submit the form electronically to the Superfund Program contact. The Superfund Program contact will submit all forms to the Senior Chemist and OSRR Liaison.
- The form(s) will be reviewed within 24 hrs of receipt by the appropriate OEME contacts. The time frame for review of the form will vary depending on the requested services; however, communication between the contacts will be maintained to ensure that the project timeline will be maintained.
- After reviewing the form, either the Senior Chemist or OSRR Liaison will respond either accepting the request or provide recommendations for submitting the samples to an alternate Tier.
- The Superfund Program contact will provide the final decision to the requestor and provide a copy of the signed form to the requestor and OSRR Liaison.
- The form documents that the Region approves the use of Tier 4 services, and that no other Tier supports the project objectives.

The Tier 4 Actual Sampling Event Form (Part 2) must be provided to the CLP Contact by the requestor or FSC when the data package is received or data validation is complete.

The quality of the Tier 4 analytical services is ensured by the implementation of project scoping and an approved QAPP. The regional and national guidance which are referenced in project development to ensure quality include EPA QA/R-2 (https://www.epa.gov/quality/epa-qar-2-epa-requirements-quality-management-plans), EPA QA/R-5 (https://www.epa.gov/quality/epa-qar-5-epa-requirements-quality-assurance-project-plans) and for the **Remedial Acquisition Framework** suite of contracts the UFP QAPP procedures will be used instead of EPA QA/R-5 (https://www.epa.gov/fedfac/uniform-federal-policy-quality-assurance-project-plans-training-materials), EPA QAPP Guidance (Revision 2, January 9, 2010 or most recent version http://www.epa.gov/quality/epa-new-england-quality-assurance-project-plan-program-guidance-january-9-2010), and Region 1, EPA New England Data Review Program Guidance, June 2018 (https://www.epa.gov/quality/epa-new-england-environmental-data-review-program-guidance) and EPA New England Data Review Supplement for Regional Data Review Elements, June 2018 (https://www.epa.gov/quality/epa-new-england-environmental-data-review-supplement)and Superfund Guidance/Procedures, April 22, 2013. Other guidance as applicable may be used (http://www.epa.gov/quality/epa-quality-management-tools-projects and https://www.epa.gov/quality).

NOTE: Emergency analytical services, health and safety samples, and waste product analysis are excluded from this process and requirements.

If you have any questions, please contact anyone in Attachment A to ensure your understanding of the procedures.

Attachment A
FASTAC Contacts

OSRR Superfund Program contacts:

Main Contact: Margaret Leshen, Chief, Technical & Support Branch
Telephone: 617-918-1421; E-mail: Leshen.Margaret@epa.gov

Backup: Meghan Cassidy, Chief, Technical & Enforcement Support Section
Telephone: 617-918-1387; E-mail: Cassidy.Meghan@epa.gov

OEME Laboratory contacts:

Main contact: Dan Boudreau, Senior Chemist
Telephone: 617-918-8340; E-mail: boudreau.dan@epa.gov

Backup: Ernest Waterman, EIA Branch Chief
Telephone: 617-918-8632; E-mail: waterman.ernest@epa.gov

OEME Dioxin/Furan Sample Submission Form Contacts:

Ernest Waterman, EIA Branch Chief
Telephone: 617-918-8632; E-mail: waterman.ernest@epa.gov

Katrina Kipp, ECA Branch Chief
Telephone: 617-918-8309; E-mail: kipp.katrina@epa.gov

OEME Quality Assurance Contact:

Vicki Maynard, OSRR Liaison and CLP Contact
Telephone: 617-918-8614; E-mail: maynard.vicki@epa.gov

Attachment B
Tier 4 PROJECTED Sampling Event – Part 1

Date:	Program: Remedial or Removal	Field Sampling Contractor:	Contact Name & Phone No.:
Site Name:		Site Location:	
Lab Name:		Lab Location:	
Estimated Sampling Date(s):		Data Turnaround Time:	

Parameter	Matrix	Estimated No. of Samples	Attach a list of compounds-of-interest and the required quantitation limits for each parameter.

Subcontracted Services Rationale:

Projected Tier 4 Analyses Accepted: Yes ____ No ____ Comments:

_____

Program Approval Signature and Date Comments:

Tier 4 ACTUAL Sampling Event – Part 2

Field Sampling Contractor/Contract:			Ship to Lab Date:	Data Package Receipt Date:	
DAS Case No.:			SDG:	Data Turnaround Time:	
Site Name:			Site Location:	CERCLIS #:	
Site ID:	Action Code:	Operable Unit:		Purpose Code:	
Lab Name:			Lab Location:	Lab Code:	
No. of Samples: (Total-Including PES & Blanks)			Sample IDs:	Case Complete: Yes or No	Total Cost:

Parameter	Cost per Parameter, Matrix & Sample	Matrix	No. of Samples	Associated PE Sample Numbers	Associated Field Duplicates	Associated Spike/ Duplicates	Associated MS/MSD Samples	Associated Blanks & Type

Note: The Chain of Custody and Data Validation Memo must be attached.
List the Parameter and Matrix from the NEST Look-Up Table. If the parameter does not exist in the look-up table, send a copy of the Method or a definition along with this form to the RSCC for entry into NESTS.

Attachment C

Dioxin/Furan Sample Submission Form

Site Name:_____

EPA Project Manager Signature and Date:

_____ _____

Sampling Information
Sampling Date(s):

Parameters Requested:

Matrix:

Background Information
Site history/Source of potential contamination: samples from sources or sites where the processes listed below occurred should be considered as potentially containing dioxin and furan contamination that may generate a dioxin-containing waste (check if applicable):

____Burning treated wood
____Companies generating dioxin waste
____Herbicide (Silvex) manufacturers
____Chlorinated Pesticides manufacturers
____Chlorinated Phenol manufacturers
____PVC production
____Bleaching process in pulp and paper companies
____Incineration in municipal solid waste
____Copper smelters
____Cement kiln and coal burning power plants
____Fires where chlorophenols are present
____Creosote wood treatment facilities

Data from previous analyses with sample locations, compounds, and concentrations (please describe and attach files):

Advisory Limits:

Waste Water

PCDDs or PCDFs (other than Hp isomer)	63 ppt
PeCDD	63 ppt
PeCDF	35 ppt
HpCDDs or HpCDFs	63 ppt
HxCDDs or HxCDFs	63 ppt
OCDDs or OCDFs	63 ppt
TCDDs or TCDFs	63 ppt
DCP	44 ppb
TrCP	35 ppb
TeCP	30 ppb
PCP	89 ppb
2,4,5 TP	720 ppb

Solid Samples

PCDDs or PCDFs	1 ppb
PeCDDs or PeCDFs	1 ppb
HpCDDs or HpCFs	2.5 ppb
HxCDDs or HxCDFs	1 ppb
OCDDs or OCDFs	1 ppb
TCDDs or TCDFs	1 ppb
DCPs	14 ppm
TrCPs	7.4 ppm
TeCPs	7.4 ppm
PCP	7.4 ppm
2,4,5-TP	7.9 ppm

Based on the above, for samples from sites that may fit categories described in Sections 3.2 and/or 4.3 of OEME Chlorinated Dioxin and Furan Sample Policy submit this form for approval by EIA and/or ECA Branch Manager.

EIA and/or ECA Branch Manager Approval Signature and Date:

_____ _____

_____ _____