



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

Directive # 9240.0-2C

November 14, 2002

MEMORANDUM

SUBJECT: Tracking Superfund Non-CLP Analytical Data

FROM: Michael B. Cook //ss// Michael B. Cook  
Director, Office of Emergency and Remedial Response

TO: Superfund National Program Policy Managers  
Regional Science and Technology Division Directors

40278417



Superfund

Purpose

This directive reinforces the requirement for nationally tracking non-Contract Laboratory Program (CLP) analytical services and supersedes OSWER Directives 9240.0-2A and 2B. The prior directives established the *Analytical Services Tracking System (ANSETS)* as a tracking system for non-CLP data, since the CLP already had extensive tracking procedures in place. It is still a requirement to submit data to ANSETS. However, the focus is primarily on tracking analytical data generated via EPA field contractors and their subcontractors at federal fund lead sites and at sites where EPA is the lead agency overseeing a federal facility cleanup under an Interagency Agreement. To aid in ANSETS data submission, the system has been updated, the reporting elements have been reduced, and various options (including FORMS II Lite™) are available to submit the required data. (See the FORMS II Lite™ Companion Directive # 9420.0-38 for additional details). Since ANSETS is not considered a self-reporting quality assurance tool, the EPA Regions need to provide this function. The Office of Emergency and Remedial Response (OERR) is also developing electronic tools to facilitate data review for non-CLP data.

The Importance of ANSETS

The Superfund program requires analytical data for critical decision making. Analytical data is used to demonstrate the nature and extent of contamination at hazardous waste sites, to assess response priorities based on risks to human health and the environment, to establish appropriate cleanup actions, and to determine the completion of remedial actions. The generation of technically sound and legally defensible data is of primary importance to

Superfund for site decisions as well as to support enforcement actions and cost recovery. It is equally essential that the Regions ensure the appropriate quality assurance for analytical data and select the most cost effective contract vehicle.

The Field and Analytical Services Teaming Advisory Committee (FASTAC), which is comprised of managers from OERR, the Regional Science and Technology (RS&T) Divisions, and the Regional Superfund Divisions, established a decision tree for selecting analytical services. In general, the RS&T Division laboratories (i.e., Tier 1) are the preferred option for special analytical services while the CLP (i.e., Tier 2) is the preferred option for routine analytical services. Region-specific analytical services contracts comprise Tier 3. The least preferred option (i.e., Tier 4) for obtaining analytical services is using subcontractors via field contracts such as Response Action Contracts (RACS), Superfund Technical Assessment and Response Team (START), Emergency and Rapid Response Services (ERRS), and other headquarters or regional contracts. EPA's concerns with Tier 4 include lack of direct oversight of these contractors, quality assurance potentially not meeting EPA standards, and often higher costs. By requiring contractors to use the ANSETS tracking system, the Superfund program can determine whether the FASTAC strategy is being implemented, analyze trends in new services needed, track national laboratory analyses acquired for the Superfund program, and plan for quality assurance oversight.

### **Scope of ANSETS Requirements**

Although the majority of the Regions are submitting ANSETS data, there appears to be under-reporting, and not all contractors are complying with the requirement. This new Directive is aimed at reinvigorating analytical services information collection from all EPA field contractors (e.g., RACS, START, ERRS) and their subcontractors at federal fund lead sites and at sites where EPA is the lead agency overseeing federal facility cleanups under an Interagency Agreement (i.e., Tier 4).

RS&T Division laboratories (i.e., Tier 1) do not need to comply with the ANSETS requirements. The Regions have the option of reporting data generated from their Region-specific analytical services contracts (i.e., Tier 3).

State-funded sites and Potentially Responsible Parties (PRPs) do not need to comply with ANSETS data submission, although regional management should establish (or continue) regional systems to track and oversee PRP analytical services. Tracking PRP data is an important step to take, especially in light of past problems with potentially fraudulent data and difficulty in tracking down affected sites.

### **Procedures for Submitting ANSETS Data**

The Regions should use their discretion to determine the most appropriate steps needed to fulfill the ANSETS data submission requirement. There are four major mechanisms to submit ANSETS data to OERR:

- ◆ FORMS II Lite™ (preferred) - FORMS II Lite™ automates sampling field documentation and exports the data electronically. The export file from FORMS II Lite™ captures the essential ANSETS data and is the most direct and effective method to meet the ANSETS requirements. Samplers can use FORMS II Lite™ for sampling events and to

submit the export file electronically via the Internet.

- ◆ Web-Based Submission Form - Contractors can submit the ANSETS data by completing the web-based form and submitting the data via the Internet.
- ◆ ANSETS Standalone Desktop Application- Contractors submit data to the Regions. The Regions use the desktop application to manage and submit the ANSETS data to OERR.
- ◆ Batch submissions - Contractors submit data to Regional tracking systems. The Regions then batch the data and provide it bi-monthly to OERR.

Detailed instructions and procedures for submitting ANSETS data can be found at: <http://www.epa.gov/superfund/programs/clp/ansets.htm>.

### **Suggested Contract Language for EPA Contracts, Cooperative Agreements, and Interagency Agreements**

Attachment 1 provides additional details and suggested language to modify EPA contracts, Cooperative Agreements, and Interagency Agreements. Attachment 2 lists the required data for ANSETS submission. Amendments to State cooperative agreements and federal facility interagency agreements for EPA-lead cleanups may also be required. Each Region should amend its major assessment and response contracts (e.g., RACS, START, ERRS) that provide analytical services to ensure the ANSETS requirements can be met. Regional modifications may be needed to accommodate Region-specific needs. In instances where FORMS II Lite™ will be used to meet the ANSETS requirement, contractors shall provide the equipment necessary to operate FORMS II Lite™. Contract language for the FORMS II Lite™ requirement and information on the software and training can be found in Directive # 9420.0-38. OERR recommends the contract amendments for the FORMS II Lite™ and ANSETS requirements be made at the same time. The ANSETS requirements should be in place by January 1, 2003.

### **Next Steps**

Regional Contracting Officers and Project Officers will need to amend their assessment and response contracts to reinforce the ANSETS analytical services tracking requirements. Regions need to designate a person to serve at the ANSETS liaison with Headquarters to ensure compliance. The Regional ANSETS liaison needs to work closely with site managers to ensure the analytical contractors are reporting data to ANSETS. Please send the name of the ANSETS liaison to Dana Tulis by December 10, 2002. OERR will continue to provide summary ANSETS reports to the Regions every two months.

Thank you for your cooperation in improving compliance with the ANSETS requirement. Please call Dana Tulis at 703-603-8993 for general policy issues and Willie Wong at 703-603-8846 for technical questions.

Attachments

CC:  
Field and Analytical Services Teaming Advisory Committee

Superfund Senior Regional Management and Acquisition Council  
Regional Lab Directors  
Regional Quality Assurance Managers  
CLP Project Officers  
Regional Sample Control Center Coordinators  
RACs, START, ERRS Contract Officers/Project Officers  
OERR Senior Management Team



**Please see ANSETS Website for Current List of Required Data  
Attachment 2 - ANSETS Data Requirement  
(List of Required Data )**

Date: \_\_\_\_\_ Sampling Start Date: \_\_\_\_\_  
 Sampling End Date: \_\_\_\_\_

<b>Project Numbers</b>			
<b>Project Number:</b>	<b>Regional Account Number:</b>	<b>DAS Number:</b>	<b>Assoc. CLP Case No:</b>
<b>Site Information</b>			
<b>Site Name:</b>		<b>City:</b>	<b>State:</b>
<b>CERCLIS ID:</b>	<b>Operable Unit:</b>	<b>Action:</b>	<b>Funding Lead:</b>
<b>Responsible EPA Project Individual:</b>		<b>Sampling Organization:</b>	

<b>Analytical Services Information</b>	
<p>If field analytical services are used during this project write "field analysis" in the Laboratory Name Column. If fixed laboratory is used write the name of the laboratory in the Laboratory Name Column. Please specify in this box all field analytical techniques used.</p>	<b>COST:</b>

Laboratory Name (include location if multiple lab locations)	No. Samples	Matrix	Analysis	Requested Turnaround (Days)
<b>Completed by:</b>	<b>Organization:</b>		<b>Date:</b>	