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April 2, 2007

Laboratory Manager or Quality Assurance Officer Name  
Laboratory Name  
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City, State Zip Code

**Notice: New Low Level Air Analysis Method Required by the  
NJDEP's Site Remediation and Waste Management  
Program (SRWM)**

The NJDEP Site Remediation Waste Management (SRWM) Program has developed criteria for a Low Level Volatile Organics Method for air sampling and analysis that will be used in place of USEPA Method TO-15. The new method is designated as NJDEP-SRWM Low Level USEPA Method TO-15, March 2007 (NJDEP-LLTO-15-3/2007). The specific details of the new method requirements are given in the following three documents:

- 1) NJDEP Modified Low Level TO-15 Method ([NJDEP-LLTO-15-3/2007](#))
- 2) NJDEP Ambient Air Regulatory Data Report Format ([Appendix 1](#))
- 3) Method NJDEP-LLTO-15-3/2007 [Data Reporting Spreadsheet](#)

These documents can be obtained directly from the NJDEP's Office of Quality Assurance (OQA) website at:

<http://www.nj.gov/dep/oqa/bboard.html#new>.

or on the NJDEP Site Remediation & Waste Management (SRWM) Program's Vapor Intrusion website at:

<http://www.state.nj.us/dep/srp/guidance/vaporintrusion/>

Included in the method is the specific list of compounds that meets the requirements of the

SRWM Program. This list is contained in Table 2 of the method. To submit data to the Department, laboratories must be certified for all compounds in Table 2 of Method NJDEP-LLTO-15-3/2007. Laboratories cannot add additional compounds to this method.

Among other requirements, Method NJDEP-LLTO-15-3/2007 will formally lower the reporting limit for volatile organics in indoor air to 0.2 ppbv for a majority of the compounds. However, a select group of compounds listed in the method will have higher reporting limits. These compounds and their associated reporting limits can be found in Table 2 of the method.

The Department expects that as of July 1, 2007 USEPA Method TO-15 will no longer be accepted for any indoor air or soil gas analysis by the SRWM Program. Please review the above named websites on a regular basis for notifications and updates on certification and vapor intrusion status and issues.

### **Laboratory Certification Process**

Effective immediately, the Department's Office of Quality Assurance will begin offering certification for Method NJDEP-LLTO-15-3/2007 under the New Jersey Environmental Laboratory Certification Program (NJ-ELCP) and the National Environmental Laboratory Accreditation Program (NJ-NELAP). The requirements for applying for certification are as follows:

#### For Laboratories New to the Certification Program or For Certified Laboratories Not Having USEPA Method TO-15 Certification:

The laboratory shall submit the following to the OQA.

1. An application and appropriate fees for new parameter codes CAP03.06850 – CAP03.06972.
2. A standard operating procedure (SOP). The SOP shall contain all operational details including calibration and QC procedures with associated acceptance/rejection criteria. Hard copy submittal is required.
3. Submittal of all method performance data to include:
  - a. Limit of Detection (LOD) Study.
  - b. Laboratory's procedure for determining LOQ (can be referenced in SOP).
  - c. Precision and Accuracy (P&A) Study.
  - d. Initial Calibration Summary Reports and Associated Chromatograms.
  - e. Method Blank Summary Report and Associated Chromatogram.
4. Analytical data report of a real environmental sample. The sample must be collected in a 6 Liter canister for a 24 hour period from an indoor air location. Submittal of data from a Proficiency Test Sample or a sample generated and/or collected on the laboratory property is not acceptable. (Original and one copy are required).
5. Submittal of all the electronic deliverables as specified in Appendix 1 of the Ambient Air NJDEP Regulatory Data Report Format. (1 set of electronic data deliverables is required).

An onsite laboratory assessment is a requirement for certification. An acceptable onsite laboratory assessment must be concluded prior to granting certification for the new method.

For Laboratories Currently Certified for USEPA Method TO-15:

All of the submittals listed in Items 1 through 5 above are required. An onsite laboratory assessment may not be required if the laboratory's data and documentation are acceptable and if the laboratory has had an acceptable onsite assessment by the NJDEP's OQA within the last two years.

Overall, certification will be granted after a laboratory has successfully completed the following OQA assessment criteria:

Application for Certification and Submittal of Fees  
Standard Operating Procedures Review  
Method Performance Data Review  
Method Data Report Review  
Method Electronic Data Review  
Onsite Laboratory Assessment (if required)

Any method performance and/or data reporting deficiencies determined during data review and during the on-site assessment will be brought to the attention of the laboratory in writing. The laboratory will have the opportunity to provide corrective actions based on the findings. Certification will only be granted after any and all corrective actions from method review and onsite assessments have been acceptably completed.

**Analytical Data Package Compliance**

Please note that if after certification has been granted and if the laboratory is found to be routinely unable to properly submit a compliant data package, the laboratory may be fined, subject to a loss of certification and/or found "ineligible to report data to the NJDEP". Data package requirements are found in Appendix 1 of Method NJDEP-LLTO-15-3/2007.

If this office can be of any further assistance, please call Mr. Michael DiBalsi or Dr. Z. Bernie Wilk of the Office of Quality Assurance at (609) 292-3950.

Sincerely,

Joseph F. Aiello, Chief