

<b><u>ARCHIVE:</u></b>	<b>Archived due to the 2012 rule revision</b>
<b><u>TITLE:</u></b>	<b>Use of Mobile Lab Data for Screening at a VAP Property</b>
<b><u>DATE EFFECTIVE:</u></b>	March 2009
<b><u>HISTORY:</u></b>	New to the Technical Guidance Compendium
<b><u>KEYWORDS:</u></b>	Mobile labs; screening data; fixed based lab; real time data; non-CL data; standard operating procedure; quality assurance program, sample population, data set, chemicals of concern.
<b><u>RULES:</u></b>	OAC 3745-300-01; 3745-300-04; 3745-300-07
<b><u>QUESTION:</u></b>	<b>When can mobile lab data be used for screening at a VAP property?</b>
<b><u>ANSWER:</u></b>	<p>Because there are many possible interpretations for the term “mobile laboratory,” the VAP developed its’ own definition. OAC Rule 3745-300-01 defines a mobile laboratory as a non-fixed laboratory that is at a location on or near the property that provides real-time analysis of environmental media for the purposes of generating screening or non-certified laboratory data; this includes, but not limited to a vehicular or trailer laboratory.</p> <p>A CP may use data from a previous or current property investigation that have been collected by a mobile laboratory for screening so long as the requirements of OAC 3745-300-07(E)(1)(e) are met. These requirements are discussed in more detail below. Additionally, the volunteer may use the data generated from a mobile laboratory as data used to show that the property meets applicable standards provided the data are confirmed with certified laboratory data.</p> <p>Rule OAC 3745-300-07(E)(1)(d) allows a volunteer to use data generated from a mobile laboratory as non-certified lab data provided that the information and methods are consistent with the Phase II Rule, and the data meets the quality and consistency requirements of the VAP Phase II rule. The certified professional’s review of the data should be consistent with the Ohio EPA DERR Guidance (DERR-DI-00-034) for Laboratory and Field Screening Data Review</p>

and the certified professional's Data Quality Objectives for the project.

If the volunteer wishes to include the mobile laboratory generated data into the larger dataset used to demonstrate that a property meets applicable standards, then according to the requirements of OAC 3745-300-07(E)(1)(d)(iii) the data must be confirmed by a CL. A minimum of ten per cent of each data set for ground water, surface water or air samples from the same sampling points must be collected.

For soil or sediment samples, or when the original sampling points cannot be used, the representative concentrations of chemicals of concern within each identified area must be verified. Verification must show that the two datasets are not significantly different. Any method that is accepted as an academic or industry standard may be used. A volunteer must collect a minimum of 10 per cent of the original sample population or eight samples (whichever is greater) to make the confirmation demonstration.

OAC 3745-300-07(E)(1)(e) also requires the mobile lab data to be generated using methods and instrumentation recognized, endorsed, or published by the United States Environmental Protection Agency (US EPA) or Ohio EPA for the quantitative analysis of environmental media. These methods and instrumentation specifications must be similar to those used by a fixed-based laboratory that provides quantitative analysis of environmental media. The mobile laboratory must ensure that all analytical procedures are documented in standard operating procedures and a quality assurance program plan to ensure that data of known quality will be generated.

**SUMMARY:**

As mobile labs have come into use in environmental investigations, questions have been raised whether the quality of their data is appropriate for VAP projects. The Ohio VAP will accept mobile lab data for screening purposes when the CP can present documentation that the mobile lab data was generated with the same procedures and quality assurance used by a fixed based lab. If the mobile lab data meets the criteria to be accepted as screening data and the volunteer would like to include it with an applicable standards demonstration dataset, then it must be confirmed with CL data.

**OHIO EPA**  
**CONTACT:**

For questions concerning this issue, please contact the VAP central office at: (614) 644-2924.

ARCHIVE