BROOKSRAND
TRACE METALS ANALYSIS & PRODUCTS

CORRECTIVE ACTION PLAN

Concerning Consistently Low Recoveries of Field Spikes Using Iodated Carbon Traps Prepared by Brooks Rand Labs (BRL Client ID AIR001)

prepared by

BROOKS RAND LABS (BRL)
3958 6th Ave. N.W.
Seattle, WA 98107
(206) 632-6206

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VP of Analytical Services — 6/13/07 Date

Project Manager — 6/13/07 Date

Quality Assurance Manager — 6/13/07 Date

Routing

Name	Initials/Date

Name	Initials/Date

Name	Initials/Date

3958 6th Avenue NW • Seattle, WA 98107 • Phone (206) 632-6206 • Fax (206) 632-6017 • www.brooksrand.com • brl@brooksrand.com

Introduction

Brooks Rand Labs (BRL) prepares all spiked iodated carbon traps used as field spikes for the project AIR001. The field spikes prepared for the project on 4/23/07 have yielded lower than typical recoveries ranging from 68% to 80%, with the recovery of 68% failing to meet the acceptance criterion for the method of 80-120%. Prior to shipping the spiked trap set to the client, one trap was tested and yielded an acceptable, albeit low recovery of 82%.

Spike recoveries for traps prepared from the same iodated carbon material yielded recoveries ranging from 87-103% during the initial method detection limit studies indicating that the trap material is acceptable for use. Previously spiked trap sets prepared using traps from the same lot (1003A) yielded recoveries ranging from 84-88% and 84-95% when returned from the field, indicating that the trap lot is also acceptable for use. It is apparent that the field spike trap set prepared on 4/23/07 is not suitable for use and that the acceptance criterion of 80-120% for trap testing is not strict enough to ensure that traps will not fail when returned from the field.

The following Corrective Action Plan has been written to address this issue and ensure that it does not occur in the future at Brooks Rand Labs.

Corrective Action Plan

The following procedure must take place before any set of spiked iodated carbon traps are shipped to a client.

1. A minimum of one spiked trap must be tested and the recovery must fall within the stricter control limits of 85-115%. If the recovery fails to meet the acceptance criterion, then the entire set of spiked iodated carbon traps must be discarded a new set must be prepared and tested.

2. All results must be fully reviewed and approved by the Quality Assurance Group. Approval will consist of the issuance of a signed and dated certificate of analysis that, at a minimum, includes the trap lot number, date of spiking, and the recovery of the tested trap.