

US EPA ARCHIVE DOCUMENT



June 20, 2014

Ms. Lara Phelps
U.S. Environmental Protection Agency (E243-05)
109 TW Alexander Drive
Research Triangle Park, NC 27709

Dear Ms. Phelps,

The Environmental Laboratory Advisory Board (ELAB or Board) is a standing Federal Advisory Committee Act board that advises the U.S. Environmental Protection Agency (EPA or Agency). The Board's Charter states that it is to provide consensus advice, information and recommendations on issues related to EPA measurement programs and facilitate operation and expansion of a national environmental laboratory accreditation program.

Since the discussion between ELAB members and EPA staff (copied on this letter) in January 2014, the Board has deliberated on various options EPA might consider to enhance method harmonization within the Agency. ELAB appreciates EPA's efforts to establish collaborative method development workgroups among Agency offices as a means to improve method harmonization. Below are some additional ideas the Board hopes may also be beneficial.

Harmonization of Quality Control (QC) Requirements

ELAB recognizes that certain QC requirements can vary among methods as a result of matrix-specific issues or regulatory constraints. There are, however, QC protocols that adhere to fairly standard concepts and practices, such as construction of calibration curves, that may be amenable to harmonization.

For example, the Board has become aware that EPA is revising liquid chromatography-tandem mass spectrometry (LC/MS/MS) Method 1694 (pharmaceuticals in water, soil, sediment and biosolids). This revision may be an excellent opportunity to assess whether certain QC criteria could be harmonized with other EPA LC/MS/MS methods (e.g., Methods 537 and 6850). For instance, Method 1694 currently uses five standards to construct a calibration curve, whereas Method 6850 recommends six standards. It is the general consensus of the ELAB Board that these two approaches could be made the same and still meet the calibration curve requirement.

For Methods 1694, 537 and 6850 there are different approaches to establish the chromatographic retention time window; ELAB would be interested in working with the Agency on a single preferred approach.

Adoption of New or Revised EPA Methods by Other EPA Offices

In the most recent Methods Update Rule of 2012, the Office of Water adopted a cyanide method developed and validated by ASTM International (Method D7511). This method, which utilizes in-line ultraviolet digestion followed by gas diffusion and amperometry, is more resistant to interferences than traditional colorimetric methods. If the D7511 method was included in SW-846, it would alleviate method adoption challenges for the average environmental laboratory. In general, having new or revised methods available for compliance use across various EPA programs and offices generally makes method adoption much more efficient and timely for environmental laboratories.

Hopefully, the Board's suggestions are helpful as you continue to enhance your efforts in method harmonization. ELAB welcomes any opportunity to assist you as appropriate.

The Forum on Laboratory Accreditation meeting will be held in Washington, D.C. on August 4–8, 2014, and could provide an opportunity for members of the Board and EPA to meet and discuss how method harmonization efforts can proceed in a meaningful manner. The Board is open to making members available to meet with you during this time.

We look forward to your thoughts on ELAB's suggestions and the potential meeting in August.

Thank you.

Respectfully,



Patsy Root
Chair, Environmental Laboratory Advisory Board

cc: ELAB Board Members

Mr. Adrian Hanley (EPA/OW)
Mr. Dan Hautman (EPA/OW)
Ms. Jan Matuszko (EPA/OW)
Dr. Robin Oshiro (EPA/OW)
Dr. Michael Shapiro (EPA/OW)
Dr. Glynda Smith (EPA/OW)
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