

US EPA ARCHIVE DOCUMENT



April 18, 2017

Dr. Michael Shapiro  
Office of Water  
U.S. Environmental Protection Agency  
Ariel Rios Building (MD 4101M)  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

RE: Ambiguity in EPA Method 6010D

Dear Dr. Shapiro,

On behalf of the members of the Environmental Laboratory Advisory Board (ELAB or Board), I would like to call your attention to an ambiguity in EPA Method 6010D. Paragraph 11.3 reads:

*For all analytes and determinations, the laboratory must analyze an ICV (Secs 7.11.3 and 10.8.1) and a CCV (Secs. 7.11.4 and 10.8.5) and CCB (Secs. 7.11.2.1 and 10.8.5) after every ten samples and at the end of the analysis batch run.*

It appears that at least some accreditation bodies are reading this section as requiring three separate quality control (QC) samples (an ICV, CCV and CCB) for each group of ten samples. In other words, a run of 21 samples would require nine QCs after initial verification. ELAB contends that this interpretation is in error and that the requirement for an ICV only applies to the start of the run. This would be consistent with the language in paragraph 10.8.5 of the same method, which reads:

*Verify the ongoing validity of the calibration curve after every 10 samples, and at the end of each analysis batch run, through the analysis of a CCV standard (Sec.7.11.4) and a CCB (Sec. 7.11.2.1).*

This paragraph does not mention a repeated ICV; indeed, the very language of an “**Initial** Calibration Verification” implies verification performed solely at the first part of the analysis. Provided that the Board’s interpretation is consistent with the intention of the method requirements, ELAB respectfully requests that EPA modify paragraph 11.3 to remove the ambiguity in the next revision of the method. The following minor modification would suitably clarify the requirement as ELAB has described:

*For all analytes and determinations, the laboratory must analyze an ICV (Secs 7.11.3 and 10.8.1) and ICB (Secs. 7.11.21 and 10.8.4) prior to analysis of any samples. Additionally, a CCV (Secs. 7.11.4 and 10.8.5) and CCB (Secs. 7.11.2.1 and 10.8.5) must be analyzed after every ten samples and at the end of the analysis batch run.*

The Board understands that method revisions often take significant time to be issued; therefore, ELAB also requests that EPA issue a letter of clarification in the interim, so that laboratories and accreditation bodies can be explicitly made aware of this requirement.

Please do not hesitate to contact the Board if you have any further questions or concerns.

Regards,

A handwritten signature in blue ink, appearing to read "Henry Leibovitz". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Henry Leibovitz, Ph.D.  
Chair, Environmental Laboratory Advisory Board

cc: ELAB members  
Lara Phelps, ELAB Designated Federal Official