

US EPA ARCHIVE DOCUMENT



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Jennifer Orme-Zavaleta  
EPA Science Advisor  
United States Environmental Protection Agency  
Ariel Rios Building (MD 4101M)  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

RE: Drinking Water Method Approvals

Dear Dr. Orme-Zavaleta:

The Environmental Laboratory Advisory Board (ELAB or Board), a standing Federal Advisory Committee Act board that advises the U.S. Environmental Protection Agency (EPA or Agency) requests that the USEPA use the same approach as the National Environmental Laboratory Accreditation Program (NELAP) and 40CFR Part 136.3 for wastewater testing which requires the use of the latest approved version of analytical methods. The NELAP requirements also allow for use of earlier approved versions of the method unless the testing laboratory has a valid reason for not doing so, such as client needs specific to a project or an existing contract that require the use of the older method versions.

On May 18, 2012, the USEPA published a Methods Update Rule (MUR) that established approval for a single method version and removed the approval for the older versions of all sources of methods (i.e. ASTM, USGS, etc.). On June 20, 2012, a letter was sent to Mr. Rodger Baird (Standard Methods (SM)) from the US EPA (ATP Case Number N12-0006) that further acknowledged additional acceptable versions of the methods from the 22<sup>nd</sup> edition of SM. Editorial changes had been made to the existing method versions identified in the Tables of Approved Methods in 40 CFR Part 136.3.

The June 20, 2012 letter encouraged laboratories to phase-in and adopt the QA/QC procedures specified in the most recent, approved editions for consistency and reliable results. With this letter, states that wanted to go ahead and approve the selected methods contained in the letter from the 22<sup>nd</sup> edition could do so. As an example, the New Jersey Department of Environmental Protection (NJDEP) adopted and certified wastewater/non-potable laboratories for the approved SM 2011 method versions (designated as -2011 or -11). Since this measure meant significant changes to the types and frequencies of the quality control samples that were required, NJDEP gave the laboratories almost a year to incorporate the changes. With the most recently approved MUR, those same 2011 editorial revisions, now represent the noted approved version of the method in the Tables at 40CFR Part 136.3. For NJDEP, this meant that generated data was associated with a higher level of confidence approximately five years ahead of the 40 CFR approval.

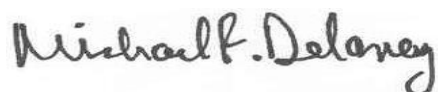
For drinking water testing where the approved methods and the need for laboratory certification are required by Federal regulation it has become increasingly difficult to encourage the laboratories to stop the use of the early versions even when the earlier versions were lacking in method driven quality control requirements. What this can mean for the certified laboratory market is that one laboratory from one state could be able to provide testing services for a lower price than another due to the differences in the quality control procedures required in a newer version. This effort also avails some laboratories the ability to potentially produce data of a lesser quality for the evaluation of compliance with the drinking water standards. Having all drinking water laboratories follow the most current and approved method for testing also allows the data users to more easily compare the results from different laboratories for a split sample tested with the same method version for consistency of data.

ELAB recognizes the USEPA has a defined process for the addition and removal of approved testing methods noted in 40 CFR which includes the six-year review process and gratefully acknowledges that the EPA has taken the expedited approval approach for additional approved drinking water methods. To further the effort for consistency with all laboratories performing drinking water testing, ELAB recommends that the USEPA provide a memorandum to the certifying agencies that could be used to encourage certified laboratories to use the latest approved version of methods.

ELAB appreciates the opportunity to provide its opinion to the Agency in support of a higher level of confidence in drinking water testing.

Please let us know if you would like ELAB to provide additional input regarding this topic.

Respectfully,



Michael F. Delaney, Ph.D.  
Chair, Environmental Laboratory Advisory Board

cc: ELAB Board  
Thomas O'Farrell, ELAB Designated Federal Official