Environmental Monitoring Coalition

Monday – September 27, 2021 at 3:00 pm ET

**1. The meeting was called to order at 3:01 pm**

**2. Roll call – Uttenweiler**

**3. August Minutes**

No actions were needed.

**4. EMC Action List**

Sarah Weight suggested color coding and the addition of a Status Code.

**5. Update on Current Activities**

Collision Reaction Cell Technology – Friedman/Burrows

**Problem Statement:** Collision/Reaction Cell (CRC) technology for ICP-MS analysis has been around for 15 years and has shown to reduce interferences and improve the accuracy of results. This technology is allowed in Method 200.8 for wastewater but not for drinking water. The objective of this effort is to get EPA to approve use of this technology for drinking water analysis.

There was a discussion about a response from EPA. Dan Hautman has shared the information that was shared by Jerry Parr. Dr. Jack Creed has started an interagency draft version of the Method 200.8. There is no indication that feedback has come to EPA from the regional laboratories.

Performance data to document the Method changes would be beneficial for the decision-making process. The changes are QC changes proposed to the Method. Will Adams was suggested as a person at EPA to assist with moving the process forward. Dan Hautman will facilitate a meeting between Adams and David Friedman. Feedback will assist future work with the group.

Jerry volunteered to look at the E”PA expedited method approval process and develop a conceptual plan for what data should be collected.

The future direction of this project was discussed. One direction would be to have ASTM submit changes to the Method or continue along the QC path. This will be defined once Adams and Friedman and members of the Task Force meet.

Acrolein/Acrylonitrile Holding Time Study – Friedman

**Problem Statement:** The sample preservation for acrolein and acrylonitrile in aqueous samples mandated in the Clean Water Act and RCRA programs is acidification to pH 4 – 5. This differs from the pH <2 specification for other VOA’s. The goal of this effort is to determine if (1) pH <2 preservation is appropriate for acrolein and acrylonitrile and (2) a 14-day holding time is valid, and then (3) to get EPA to change their preservation requirements.

**Update:** No progress since last meeting. Still waiting on meta data from labs. More effort is needed to address issues with the high bias and rounding errors with the surface and wastewater 2 samples.

Update on Initial Demonstration of Capability for Drinking Water Methods– Parr

**Problem Statement:** Most EPA drinking water methods require that laboratories conduct an Initial Demonstration of Capability which includes verifying that the Half Range Prediction Interval of Results (HRPI) for all analytes is within limits published in the method. This requirement has proven difficult to meet for methods which contain many analytes. The EPA drinking water program agrees and only requires that the HRPI be met for regulated drinking water analytes. The objective of this effort is to convince states and other assessors to adopt this posture.

**Update:** TNI’s NELAP Accreditation Council met with Jerry to discuss this issue in early September. The Council strongly believes that any analyte listed on a laboratory certificate must comply with method requirements, so the concept proposed by Dan does not appear to be viable. However, the Council also indicated that if a laboratory has a policy on how to handle such situations and takes corrective action when needed. That approach would be acceptable. Maybe EMC needs to develop guidance on this topic.

After discussion, it was agreed that developing guidance would be beneficial.

It was noted that corrective action by a laboratory could resolve issues.

QC Criteria Effort – 608.1, 624 and 625. - Parr

**Problem Statement:** When EPA published these revised methods as part of the 2017 Method Update Rule, the QC criteria in the methods was not updated because EPA did not have the data to support a change. The objective of this effort is to compile such data from member organization laboratories and provide it to EPA so they can update the method QC criteria.

**Update:** No progress since last meeting.

Collaboration with EPA letter – Parr

**Problem Statement:** EMC would like to collaboratively work with EPA on method, quality control, and accreditation issues.

**Update:** Robert edited the letter based on the August discussion. Changes included changing “contingency of laboratories” to “coalition of stakeholders” at the bottom of page 1 and editing the first sentence on the new paragraph on page 2. We need to finalize the CC list.

Jerry Parr made one minor suggested edit.

Carbons should be sent to a group listed on the letter. Jerry Parr edited the list of cc’s at the end of the letter along with other minor changes.

After the meeting: The letter was sent on September 29 and a response received from EPA on October 4.

Thank you for reaching out with your request to meet with Administrator Regan. By copy of this email, I am connecting you with Rosemary Enobakhare, Associate Administrator with the Office of Public Engagement and Environmental Education. Rosemary or her team will follow-up with you directly regarding your message.

Use of correlation coefficient to evaluate calibration curves - Parr

**Problem Statement:** Many environmental test methods allow for the use of correlation coefficient (r) and/or coefficient of determination (r2) even though this has been proven to be inappropriate.

**Update:** Jerry updated the letter to specifically mention Part 136, SW-846 Method 8000 and a possible memo from EPA’s Environmental Methods Forum and developed three attachments with proposed language for all three options.

There was a general discussion regarding edits to the letter and the attachments to it. William Lipps and Richard Burrows assisted with drafting the letter and the attachments. More data relation to Attachment 1 was suggested to assist with approval. Richard Burrow will generate the data as suggested.

**6. Potential New Business**

Method 1633

EPA’s Office of Water, in partnership with the Department of Defense’s (DoD) Strategic Environmental Research and Development Program, has published draft Method 1633, a single-laboratory validated method to test for 40 PFAS compounds in wastewater, surface water, groundwater, soil, biosolids, sediment, landfill leachate, and fish tissue. This draft method can be used in various applications, including NPDES permits. While the method is not nationally required for CWA compliance monitoring until EPA has promulgated it through rulemaking, it is recommended now for use in individual permits. DoD expects to begin a multi-laboratory validation study of the procedure in 2021 and complete it in 2022. <https://www.epa.gov/cwa-methods/cwa-analytical-methods-and-polyfluorinated-alkyl-substances-pfas>

There was a discussion about EMC’s involvement or actions. Jordan Adelson discussed how Method 1633 will be pushed forward. Adelson stated that comments would be welcome by the end of October. It was decided that EMC as a group might not have time to provide feedback. Individual members may choose to comment. Any comments at this time should be sent to Adrian Hanley.

Mary Johnson of Four Rivers Sanitation Authority provided two new items.

Guidance on drying TSS samples to constant weight - Mike Delaney is drafting document explaining what individual labs must do to verify that they achieve a constant weight if they dry a set time. Goal would be to add that language to Standard Methods 2540.

BOD vs. TOC - A Task group member drafted language on using regression analysis to establish a relationship or correlation between BOD and TOC. Language is currently under review by full task group. Goal is to add language to Standard Methods 5310.

The DoD Environmental Data Quality Workgroup is requesting your feedback on the Draft Appendix B Table B-24: Per- and Polyfluoroalkyl Substances (PFAS) by LC/MS/MS (EPA 1633). Table B-24 provides a list of requirements that must be met in addition to those specified in EPA Draft Method 1633 in order to be DoD ELAP accredited for EPA Method 1633.

<https://drive.google.com/file/d/1RJBtLPGOtj4NTzVy8iPhd2oHcdoVL9fQ/view?usp=sharing>

**7. Any other business**

There being no further business, the meeting was adjourned at 3:48 pm.

Respectfully submitted,

Robert Uttenweiler
ACIL Section Executive Officer

**Attachment 1. Roll Call**

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| **Members** | **Organization** | P / A |
| Jordan Adelson | US Navy (DOD EDQW) | P |
| Kristin Brown | Utah DOH | A |
| Richard Burrows | Eurofins | P |
| Michael Delaney | MRWA (retired) | P |
| David Friedman - Vice Chair | ACIL | P |
| Jay Gandhi | Metrohm | P |
| Mary Johnson | Rock River Reclamation District (WEF) | A |
| Kitty Kong | Chevron | P |
| William Lipps | Shimadzu | P |
| Sharon Mertens | Milwaukee MSD (TNI) | P |
| Judy Morgan | Pace Analytical (ACIL) | PP |
| Jerry Parr - Chair | TNI | P |
| Steven Rhode | MWRA (APHL) | P |
| David Thal | Environmental Standards | A |
| Sarah Wright / Erin Morin | APHL | P / P |
| **Staff / Invited Guests** |  |  |
| Tarun Anumol | Agilent Technologies | P |
| Richard Bright | ACIL | A |
| Jack Farrell | AEX | P |
| Michael Flournoy | Independent Consultant | A |
| Zach Mandera | Oregon DEQ | P |
| Brad Meadows | Babcock Laboratories | A |
| Lori Pillsbury | Oregon DEQ | A |
| Robert Uttenweiler | ACIL | P |
| Kathleen Young | PerkinElmer | P |
| **EPA** |  |  |
| Dan Hautman | EPA OW OGWDW | P |
| Adrian Hanley | EPA OW OST | P |
| Kim Kirkland | EPA  | A |
| Troy Strock | EPA | P |
| Sarah Burket | EPA OW OST | A |
| Lemuel Walker | EPA OW OST | P |
| Brian D’Amico | EPA | A |
| Sandip Chattopadhyay | EPA | P |
| Jesse Pritt | EPA OW OST | A |