



July 23, 2013

Mr. Lemuel Walker
Clean Water Act ATP Coordinator
U.S. Environmental Protection Agency
Office of Science and Technology
Engineering and Analysis Division
1200 Pennsylvania Avenue, NW (4303T)
Washington, DC 20460

RE: Requested Comments on Draft Revised EPA Method 608A

Dear Mr. Walker:

Thank you for providing the Environmental Laboratory Advisory Board (ELAB or Board) with the opportunity to comment on Method 608A. The Board has provided its recommendations and suggestions embedded as comments within the Method document you previously sent. Please see the attached document.

ELAB has not attempted to write specific language into the Method, but could do so in a future round of comments if this would be useful to you.

There are some general themes to the Board's comments, as follows:

1. Several vendors mentioned in Section 5 are no longer in business; the Board suggests removing all vendor references.
2. Although the method includes multipeak analytes, such as Aroclors and Toxaphene, there is minimal discussion of how these analytes should be calibrated, identified and quantitated. More discussion is needed on these topics, and ELAB suggests reviewing the directions found in method 8082A.
3. The tables contain very outdated data. If new data are not readily available, the Board suggests removing most of the information in the tables. Calibration and quality control (QC) criteria could be replaced with set limits (for example 75–125% for continuing calibration verifications [CCVs]) or laboratory-derived historical limits (for example for the laboratory control sample). In particular, Table 4, with the different calibration groups of compounds, should be removed.
4. There is some confusion in terminology that needs to be standardized. For example, the continuing calibration is sometimes a "CCV" and sometimes a "combined QC standard."
5. An initial calibration verification section needs to be added.

6. The retention time calibration for retention times that vary with concentration should be removed. This is not an issue with modern instrumentation unless excessive concentration levels are used.
7. Sections 8.1 (describing types of QC samples) and 8.5 (describing criteria for those QC samples) should be combined.
8. In many cases, the language in the Method could be more consistent with the language in the current drafts of Method 624B and (especially) 625B. The language between these methods should be as consistent as possible.
9. There is some confusion in the method between the use of solid phase cartridges for extraction versus for cleanup.
10. Many of the references listed in the method are outdated; they should be checked for relevance and availability.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Root'.

Patsy Root
Chair, Environmental Laboratory Advisory Board

Attachment

CC: Lara Phelps
ELAB Members