



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20004

OFFICE OF  
WATER

September 15, 2014

Patsy Root, Chair  
Environmental Laboratory Advisory Board  
IDEXX Laboratories  
1 IDEXX Drive  
Westbrook, ME 04092

Dear Ms. Root:

On behalf of the Forum on Environmental Measurements (FEM), I would like to thank the Environmental Laboratory Advisory Board (ELAB) for your letter on improving method harmonization across the US Environmental Protection Agency (EPA or the Agency).

The FEM reviewed ELAB's June 20, 2014 letter during our quarterly meeting on August 11, 2014 in addition to hearing from some of the program office representatives who participated in the face-to-face meeting with ELAB representatives during the National Environmental Monitoring Conference (NEMC) on August 4, 2014. We appreciate the recognition by ELAB that the Agency offices establish method development workgroups to help ensure collaborative engagement, but also the challenge offered by ELAB to do more, for example, in regards to quality control (QC) requirements.

As discussed during the NEMC meeting, different EPA offices have different data quality objectives that correspond to different decisions that data are used to support. As a result, it is not possible to completely harmonize all similar EPA methods from different EPA offices. Certain methods' QC requirements vary, such as retention time windows and number of calibration standards. These would be dependent on the types of decisions supported as well as the sample matrix, analytical instrument used, class of analytes, needed sensitivity, and other criteria to meet a programs method needs. It can be fairly difficult to set QC requirements for Solid Waste (SW)-846 methods developed by the Office of Solid Waste and Emergency Response's Office of Resource Conservation and Recovery (ORCR) matrices to be the same as those developed by the Office of Water's Office of Ground Water and Drinking Water (OGWDW) or Office of Science and Technology (OST) in typically cleaner matrices. EPA recognizes, however, that when methods are being updated some sections could be revised to improve consistency across programs; for instance, by using common definitions and QC terms, when applicable. Recent actions illustrate that EPA is working toward this objective. Within the last year, OST and ORCR revised methods and sought input from other EPA offices, ELAB, and The NELAC Institute (TNI) to make those methods more harmonized across the EPA offices.

EPA does not have the resources to revise the hundreds of active methods currently being used. The most practical strategy is to address method harmonization on a case-by-case basis as each method is revised in the future. EPA agrees, where the decision objectives allow, method harmonization is a worthwhile effort for newly drafted methods and methods being revised, but only when it does not compromise the data quality objectives of the method for the office authoring that method nor the decision that data will be supporting. The FEM has initiated a workgroup effort to see how method harmonization can be better instituted across the Agency, as well.

We want to again thank you and the other members of ELAB for all the work you do to assist the Agency in improving programs for organizations involved in using EPA methods. Please continue to send us your comments and suggestions, since ELAB serves as an important mechanism for the FEM to keep abreast of important issues facing the monitoring community and to receive the community's input on our activities.

If you have any questions, please feel free to contact me at 202-564-5700 or [shapiro.mike@epa.gov](mailto:shapiro.mike@epa.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Shapiro".

Michael Shapiro  
Chair, FEM

Attachment

Cc: Lara Phelps, OSA  
FEM Membership (individual names can be provided)