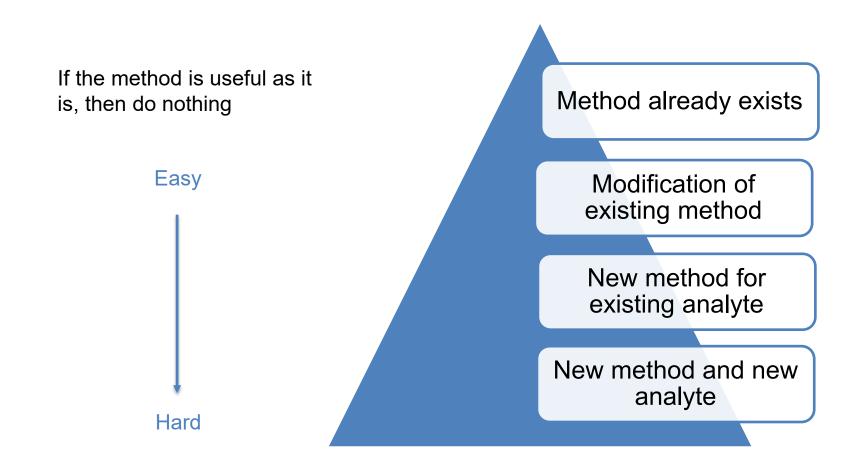


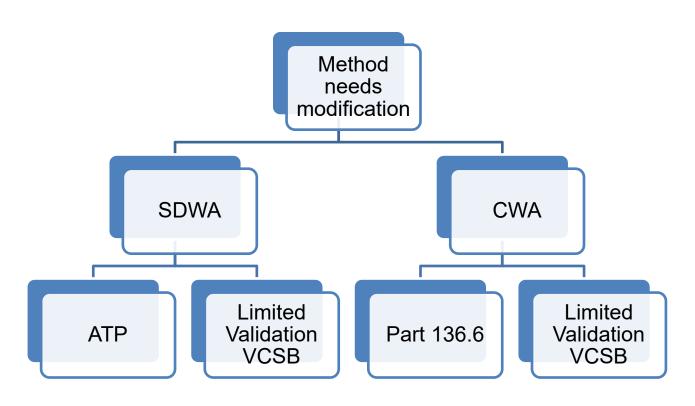


## Three scenarios that may require a new or improved method





# For existing methods, you can do an ATP, or modify it at a VCSB

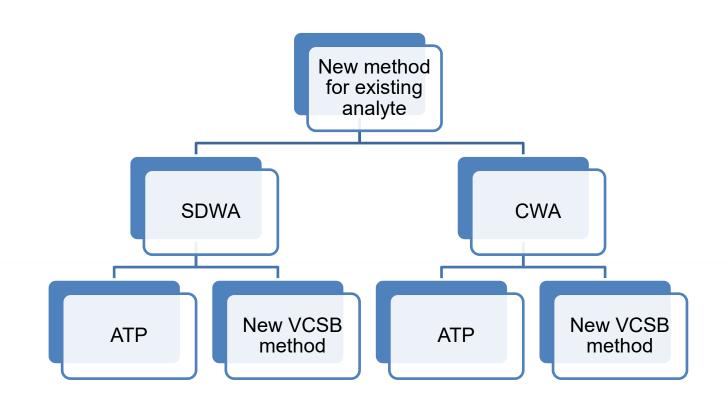


In the lab you can modify a CWA method and keep data on file, at VCSB a technical modification requires new data and balloting.

Red Line, reason for change, and possible two column comparison to EPA SDWA requires an ATP to modify a method

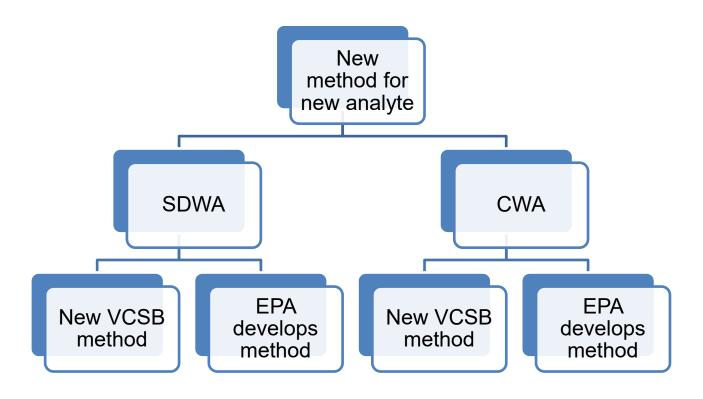


For a new method on an EXISTING analyte, with an existing approved method you can do an ATP or new method at a VCSB





# For a new method with new analytes, you can wait for EPA or do it yourself at a VCSB



VCSB require task group, single and multiple lab "validation", consensus balloting, Validation plan and full data package submitted to EPA



### SM and ASTM - voluntary consensus standard development organizations (SDO)

Reference = John K. Taylor,

Quality Assurance of Chemical

Measurements, Lewis

Publishers, 1987

Voluntary Consensus Standard Bodies that are Standard Development Organizations (SDOs) develop standard methods that can be approved by EPA for compliance testing.

Standard Method = A method of known and demonstrated precision issued by an SDO

Standard Reference Method = A Standard Method with demonstrated accuracy



### VCSB Methods are routinely used nationally and worldwide for compliance testing

TABLE IB - LIST OF APPROVED INORGANIC TEST PROCEDURES

| Parameter                        | Methodology <sup>33</sup>                                    | EPA 52                                      | Standard<br>methods           | ASTM         | USGS/AOAC/other          |
|----------------------------------|--|---|-------------------------------|--------------|--------------------------|
| 1. Acidity, as CaCO3,<br>mg/L    | Electrometric endpoint or phenolphthalein endpoint           |   | 2310 B-2011                   | D1067-<br>11 | I-1020-85. <sup>2</sup>  |
| 2. Alkalinity, as CaCO3,<br>mg/L | Electrometric or Colorimetric titration to pH 4.5,<br>Manual |   | 2320 B-2011                   | D1067-<br>11 | 973.43, 3 I-1030-85. 2   |
|                                  | Automatic  | 310.2 (Rev.<br>1974) 1                      |                               |              | I-2030-85. 2             |
| 3. Aluminum - Total, 4<br>mg/L   | Digestion, 4 followed by any of the following:               |   |                               |              |                          |
|                                  | AA direct aspiration <sup>36</sup>                           |   | 3111 D-2011 or<br>3111 E-2011 |              | I-3051-85. <sup>2</sup>  |
|                                  | AA furnace   |   | 3113 B-2010.                  |              |                          |
|                                  | STGFAA   | 200.9, Rev.<br>2.2 (1994)                   |                               |              |                          |
|                                  | ICP/AES <sup>38</sup>  | 200.5, Rev<br>4.2 (2003); 88<br>200.7, Rev. | 3120 B-2011                   | D1976-<br>12 | I-4471-97. <sup>50</sup> |

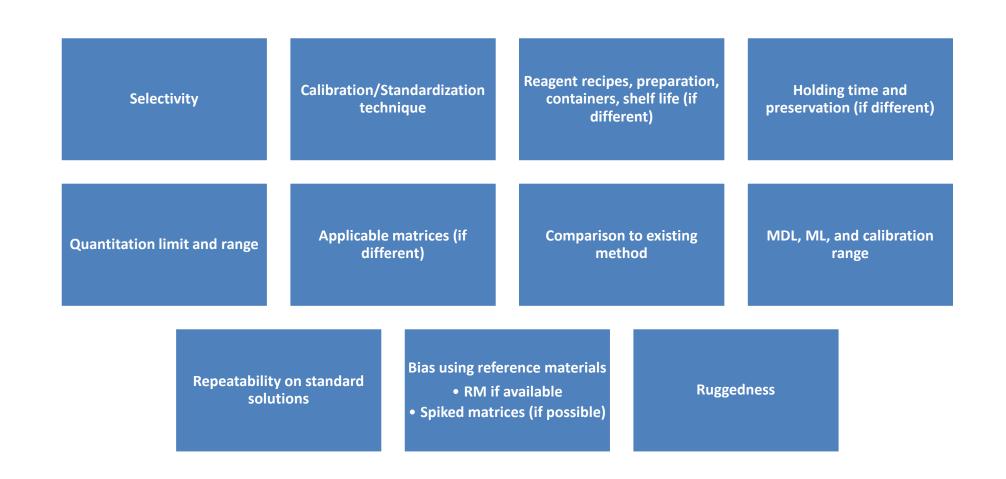
"In accordance with the National Technology Transfer and Advancement Act (NTTAA), EPA considers Voluntary Consensus Standards Bodies (VCSB), such as Standard Methods and ASTM in regulatory actions when periodically updating the list of approved methods."

Validation Procedures provide guidelines to method developers to ensure the provide the information EPA needs

ASTM and/or Standard Methods often submit new, and updated methods for use in wastewater, drinking water, and RCRA compliance



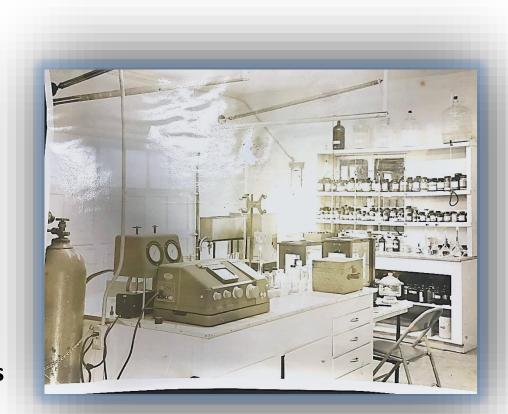
### The validation guidelines for EPA ATP's, new EPA methods, and VCSB's are very similar





### A VCSB validation differs from a lab validating a method, because usually no method exists

- This "validation" is what a lab does
  - > MDL
  - > IDAC
  - > Spikes
  - > **Duplicates**
- <u>Lab compares performance to criteria in existing method</u>
- This type of method validation is NOT what ASTM or SM does





### **Examples of modifying an existing consensus** standard or EPA method

#### MDL incorrect, or newer MDL needed

- Create task group
- Collect data, verify at several locations over several days
- "Break" method, re-verify
- Modify text, ballot at task group and main committee

#### Incorrect reagent recipe

- Historical data search
- Editorial → SM can make change, ASTM must re-ballot
- Not editorial → create a task group, collect data, and re-ballot

#### Convert manual method to automated method

- This is a new method for VCSB
- Allowed modification, for a lab, at Part 136.6
- Requires an ATP for SDWA



### **Examples of a new method for an existing parameter**

There is already a SDWA, CWA, or "RCRA" parameter/method → new method is required when:

- Different extraction / digestion
- Different determination step

#### This requires:

- Task group at a VSCB or an ATP
- Rationale
- Validation Plan
- Extensive Single lab study
  - Single operator precision and accuracy
- Comparison with existing method(s)
- Ruggedness
- Multiple laboratory study
- Data package



### Rationale $\rightarrow$ why do we need a new method for an existing parameter?







### Examples of a new method for a new parameter



### There is not a SDWA, CWA, or RCRA parameter or method:

Maybe reported in literature

May be a technique used, but not formalized



#### This requires:

Task group or EPA Work Group

Rationale

Validation Plan

Extensive Single lab study

Single to several lab operator precision and accuracy

Extensive evaluation of interferences

Lots of "optimization" of instrument operation, extractions, digestions

Ruggedness

Multiple laboratory study

Data package



### Rationale --> why do we need a new method?

Is there a demand or need to analyze compound X?

How will we test for it? Is this the best way?

How low, or at what concentrations?

What matrices?

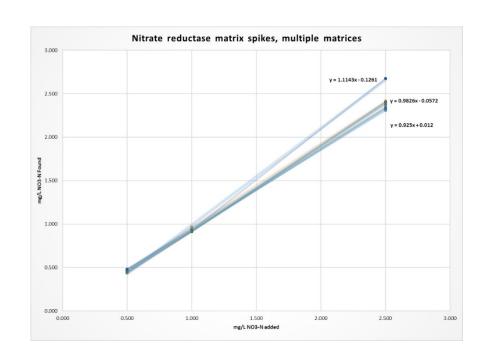
Who are the stakeholders?

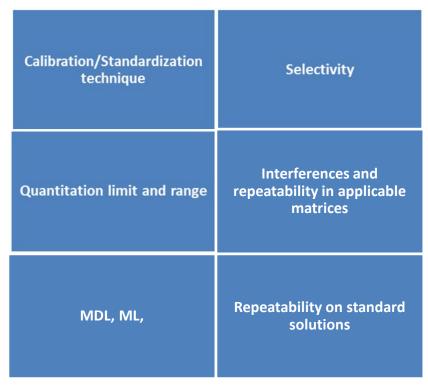
Do any other countries do this test?





### Single lab study of precision and bias spiking multiple matrices at three concentrations





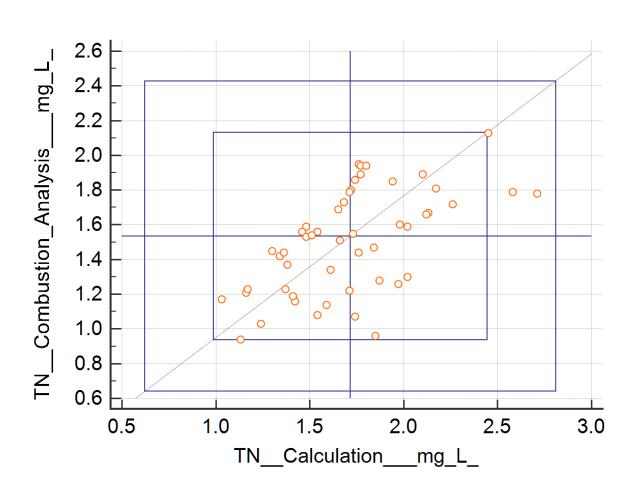


### Single lab study comparing two methods

| Analysis by Cd Reduction (mg NO <sub>3</sub> +NO <sub>2</sub> -N/L) | Analysis by Reductase (mg NO <sub>3</sub> +NO <sub>2</sub> -N/L) |
|---|--|
| 0.96  | 0.94   |
| 0.04  | 0.05   |
| 0.32  | 0.24   |
| 0.68  | 0.68   |
| 10.1  | 11.6   |
| 0.75  | 0.79   |
| 2.5   | 3.11   |



## Single lab study comparing two methods using Youden plot





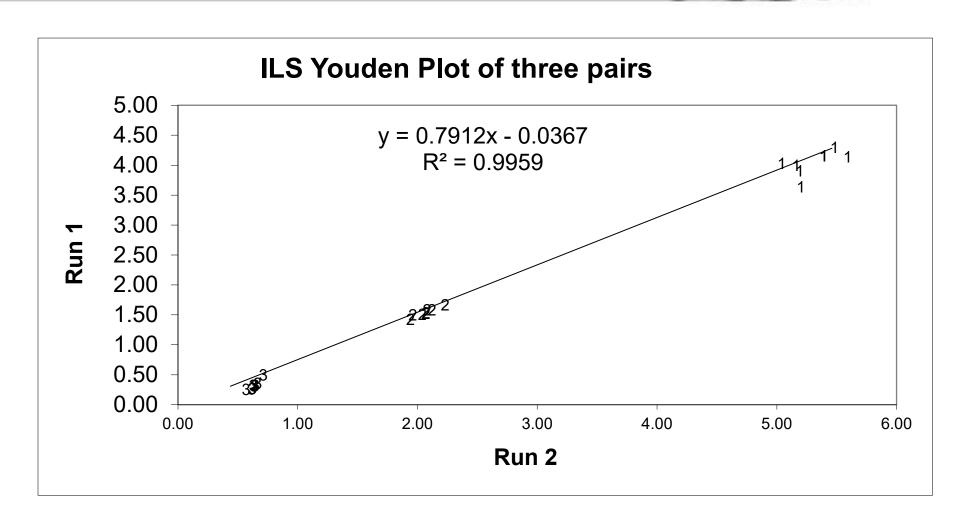
### **Example of a Ruggedness study for TKN**

| Factor                  | Nominal    | Variation  |
|-------------------------|------------|------------|
| Portion size            | 10 ml      | 25 ml      |
| Evaporation temperature | 160 °C     | 220 °C     |
| Evaporation time        | 1 hour     | 30 minutes |
| Digestion temperature   | 370 °C     | 380 °C     |
| Digestion time          | 15 minutes | 1 hour     |

What steps are so critical that changing them changes the result?



### Once all other tests are completed you conduct a multiple laboratory study:





## ILS Precision and bias report with Youden pairs:

| Number of useable pairs               | 6    | 6    | 6    | 6    | 7    | 7    |
|---------------------------------------|------|------|------|------|------|------|
| True Concentration (mg/L)             |      |      |      |      | 50.1 | 40.1 |
| Mean Concentration (mg/L)             | 3.88 | 3.31 | 8.29 | 9.63 | 49.8 | 40.2 |
| % Recovery                            |      |      |      |      | 99.4 | 100  |
| Overall Standard Deviation            | 0.34 | 0.56 | 1.19 | 1.36 | 4.28 | 3.18 |
| Overall % RSD                         | 8.78 | 16.2 | 14.2 | 14.0 | 8.60 | 7.90 |
| Number of Useable<br>Pairs            | 6    |      | 6    |      | 7    |      |
| Single Operator<br>Standard Deviation | 0.37 |      | 0.59 |      | 1.32 |      |
| Single Operator % RSD                 | 10.2 |      | 6.58 |      | 2.94 |      |



## Precision and bias report with blind duplicates:

| MATRIX  | 5     | 6     | 7     | 8     | 9     | 12    |
|---|-------|-------|-------|-------|-------|-------|
| Number of useable values                              | 14    | 12    | 12    | 14    | 12    | 12    |
| True concentration (mg/L)                             | 5.39  | N/A   | N/A   | 21.0  | N/A   | 0.501 |
| Mean Recovery (mg/L)                                  | 5.67  | 1.61  | 1.68  | 21.9  | 3.63  | 0.808 |
| % Recovery  | 105   | N/A   | N/A   | 104   | N/A   | 161   |
| Overall Standard<br>Deviation, St                     | 0.777 | 0.265 | 0.350 | 2.53  | 0.374 | 0.162 |
| Overall Relative<br>Standard Deviation<br>(%)         | 13.71 | 16.48 | 20.99 | 11.54 | 10.28 | 20.02 |
| Single Operator<br>Standard Deviation<br>So           | 0.549 | 0.243 | 0.329 | 1.156 | 0.317 | 0.150 |
| Single Operator<br>Relative Standard<br>Deviation (%) | 9.68  | 15.47 | 19.75 | 5.27  | 8.71  | 18.59 |



# Some examples of method ATPs with no VCSB equivalent

|                                     |   | The second secon | I .                                 | 1                | T. Control of the Con |
|-------------------------------------|---|--|-------------------------------------|------------------|--|
| 4. Ammonia (as N), mg/L             | Manual distillation <sup>6</sup> or gas diffusion (pH > 11), followed by any of the following:  | 350.1, Rev. 2.0<br>(1993)  | 4500-NH3 B-2011                     |                  | 973.49. <sup>3</sup>   |
|                                     | Nesslerization  |  |                                     | D1426-<br>08 (A) | 973.49, <sup>3</sup> I-3520-85. <sup>2</sup>   |
|                                     | Titration   |  | 4500-NH3 C-2011                     |                  |  |
|                                     | Electrode   |  | 4500-NH3 D-2011<br>or E-2011        | D1426-<br>08 (B) |  |
|                                     | Manual phenate, salicylate, or other substituted phenols in Berthelot reaction based methods    |  | 4500-NH3 F-2011                     |                  | See footnote. 60   |
|                                     | Automated phenate, salicylate, or other substituted phenols in Berthelot reaction based methods | 350.1, <sup>30</sup> Rev. 2.0 (1993)   | 4500-NH3 G-2011,<br>4500-NH3 H-2011 |                  | I-4523-85. <sup>2</sup>  |
|                                     | Automated electrode   |  |                                     |                  | See footnote. 7  |
|                                     | Ion Chromatography  |  |                                     | D6919-           |  |
|                                     | Automated gas diffusion, followed by conductivity cell analysis                                 |  |                                     |                  | Timberline Ammonia-<br>001. <sup>74</sup>  |
| 88. Nitrate (as N), mg/L            | Ion Chromatography  | (1993) and 300.1,<br>Rev. 1.0 (1997)   | 4110 B-2011 or C-<br>2011           | D4327-<br>03     | 993.30. 3  |
|                                     | CIE/UV  |  | 4140 B-2011                         | D6508-<br>10     | D6508, Rev. 2. <sup>54</sup>   |
|                                     | Ion Selective Electrode   |  | 4500-NO3- D-<br>2011                |                  |  |
|                                     | Colorimetric (Brucine sulfate)  | 352.1 (Issued<br>1971) <sup>1</sup>  |                                     |                  | 973,50, <sup>3</sup> 419D <sup>17</sup> p.   |
|                                     | Spectrophotometric (2,6-dimethylphenol)   |  |                                     |                  | Hach 10206. 75   |
|                                     | Nitrate-nitrite N minus Nitrite N (See parameters 39 and 40)                                    |  |                                     |                  |  |
| 89. Nitrate-nitrite (as N),<br>ng/L | Cadmium reduction, Manual   |  | 4500-NO3- E-2011                    | D3867-<br>04 (B) |  |
|                                     | Cadmium reduction, Automated  | 353.2, Rev. 2.0<br>(1993)  | 4500-NO3- F-2011                    | D3867-<br>04 (A) | I-2545-90. <sup>51</sup>   |
|                                     | Automated hydrazine   |  | 4500-NO3- H-<br>2011                |                  |  |
|                                     | Reduction/Colorimetric  |  |                                     |                  | See footnote. 62   |
|                                     | Ion Chromatography  | 300.0, Rev. 2.1<br>(1993) and 300.1,<br>Rev. 1.0 (1997)  | 4110 B-2011 or C-<br>2011           | D4327-<br>03     | 993.30. <sup>3</sup>   |
|                                     | CIE/UV  |  | 4140 B-2011                         | D6508-<br>10     | D6508, Rev. 2. <sup>54</sup>   |
|                                     | Enzymatic reduction, followed by automated colorimetric determination                           |  |                                     |                  | L-2547-11, <sup>72</sup> L-2548-<br>11, <sup>72</sup> N07-0003. <sup>73</sup>  |
|                                     | Spectrophotometric (2,6-dimethylphenol)   |  |                                     |                  | Hach 10206. 75   |



# **Examples of ATPs with consensus method** and **EPA equivalents**

|                               |   | 1                    | I.              | 1               | I.                              |
|-------------------------------|---|----------------------|-----------------|-----------------|---------------------------------|
| 23. Cyanide - Total, mg/L     | Automated UV digestion/distillation and Colorimetry                                     |                      |                 |                 | Kelada-01. <sup>55</sup>        |
|                               | Segmented Flow Injection, In-Line Ultraviolet Digestion, followed by gas diffusion      |                      |                 | D7511-          |                                 |
|                               | amperometry   |                      |                 | 12              |                                 |
|                               |   |                      |                 | D2036-          |                                 |
|                               | Manual distillation with MgCl2, followed by any of the following:                       | 335.4, Rev. 1.0      |                 | 09(A),          | 10-204-00-1-X. <sup>56</sup>    |
|                               |   | (1993) <sup>57</sup> | and C-2011      | D7284-          |                                 |
|                               |   |                      |                 | 13              |                                 |
|                               |   |                      |                 | D2036-          |                                 |
|                               | Flow Injection, gas diffusion amperometry   |                      |                 | 09(A)<br>D7284- |                                 |
|                               |   |                      |                 | 13              |                                 |
|                               |   |                      |                 | D2036-          | _                               |
|                               | Titrimetric   |                      | 4500-CN- D-2011 | 09(A)           | p. 22. <sup>9</sup>             |
|                               |   |                      |                 | D2036-          |                                 |
|                               | Spectrophotometric, manual  |                      | 4500-CN- E-2011 | 09(A)           | I-3300-85. <sup>2</sup>         |
|                               |   | 335.4, Rev. 1.0      |                 |                 | 10-204-00-1-X, <sup>56</sup> I- |
|                               |   | (1993) <sup>57</sup> |                 |                 | 4302-85. <sup>2</sup>           |
|                               | on Chromatography   |                      |                 | D2036-          |                                 |
|                               |   |                      |                 | 09(A)           |                                 |
|                               | on Selective Electrode  |                      | 4500-CN- F-2011 | D2036-          |                                 |
|                               |   |                      | 1000 011 1 2011 | 09(A)           |                                 |
| 24. Cyanide - Available, mg/L | Cyanide Amenable to Chlorination (CATC); Manual distillation with MgCl2, followed by    | У                    | 4500-CN- G-2011 | D2036-          |                                 |
|                               | Titrimetric or Spectrophotometric   |                      |                 | 09(B)           |                                 |
|                               | Flow injection and ligand exchange, followed by gas diffusion amperometry <sup>59</sup> |                      |                 | D6888-          | OIA-1677-09. 44                 |
|                               |   |                      |                 | 09              | 16-1-4-04-55                    |
|                               | Automated Distillation and Colorimetry (no UV digestion)                                |                      |                 |                 | Kelada-01. 55                   |
| 24.A Cyanide - Free, mg/L     | Flow Injection, followed by gas diffusion amperometry                                   |                      |                 | D7237-<br>10    | OIA-1677-09. <sup>44</sup>      |
|                               | Manual micro-diffusion and colorimetry  |                      |                 | D4282-          |                                 |



### **Examples of new modified VCSB methods in process**

- ASTM WK59699 Revision of D5673 16 Standard Test Method for Elements in Water by Inductively Coupled Plasma— Mass Spectrometry
- ASTM WK66230 Revision of D3454 18 Standard Test Method for Radium-226 in Water
- ASTM WK75659 Revision of D5174 07(2013) Standard Test Method for Trace Uranium In Water by Pulsed-Laser Phosphorimetry
- Standard Methods 4500 pH
- Standard Methods 4500 Cl



### **Examples of new VCSB methods in process**

- WK57556 Total Hardness of Water, Wastewater with Color Using Titration and Optical Spectroscopy as End Point Determination
- WK74312 Bioavailable Aluminum in Water with Suspended Solids
- WK77585 Available Sulfide in Water by Gas Extraction
- WK67788 Identification of Polymer Type and Quantity (Mass) Measurement of Microplastic Particles and Fibers in Waters with High-to-Low Suspended Solids Using Pyrolysis-Gas Chromatography/Mass Spectrometry: Py-GC/MS
- WK57480 Measuring Volatile Organic Compounds (VOCs) in Water utilizing Headspace Analysis with Gas Chromatography and Mass Spectrometry (Headspace GC/MS)
- WK54549 Determination of Pesticides, PCBs, and Polychlorinated Biphenyl Congeners in Aqueous Solution by Tandem GCMSMS
- WK67565 Spectroscopic Identification and Quantification of Microplastic Particles and Fibers in all High and Low Turbidity Water Matrices including Municipal Wastewater Using IR and Raman Spectroscopy.
- WK68866 Determination of Adsorbable Organic Fluorine in Waters and Waste Waters by Adsorption on Activated Carbon followed by Combustion Ion Chromatography
- WK73235 Determination of Polyfluoroalkyl Substances (PFAS) in Aqueous Matrices by Cosolvation followed by Liquid Chromatography Tandem Mass Spectrometry (LC/MS/MS)
- WK74011 Determination of Nitrosamines in Non-potable Water by Tandem Liquid Chromatography Mass Spectrometry (LCMSMS)



#### **Conclusion:**

- > Brief overview of ATP and VCSB approach
- > Both VCSB and EPA validation approach similar
- > VCSB's work with EPA to standardize new or modified methods
- > VCSB a way to get new methods with new parameters published



### **Any Questions?**

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