

**ELAB**  
**Environmental Laboratory Advisory Board**  
Federal Advisory Committee to EPA

# **SW-846 Methods Update Implementation Issues**

**“Identifying & Implementing  
Solutions to Eliminate Regulatory  
Status Uncertainty”**

# Issue Background

- \* The Availability Of Update IV Of SW-846 Announced On January 3, 2008, In The Federal Register Included 47 New/Revised Methods, and Deleted 44 Obsolete Methods.
- \* Stakeholder Community Expresses Concerns on Use Status. Clear Language on Status is Not Provided by OSW.
  - Stakeholder Assumption: Updates Improve Performance, Data Quality & Cost Effectiveness Rendering Previous Versions Obsolete.
- \* Other Regulatory Authorities are Confused about the Use Status of Revised SW-846 Methods and Associated QC Requirements.
  - Piecemeal Recognition for Monitoring & Remediation Uses,
  - NELAP Accreditation Bodies Differ On Accreditation Policy Causing Interstate Accreditation Recognition Difficulties.
- \* QC Requirements of Revised SW-846 Methods Conflict With Previous Versions Causing Laboratory and Regulatory Community Confusion Determining Which to Apply.

# Issue Impact

- \* Maintaining Accreditation for Multiple Versions of Methods That Contain New, Different and Often Conflicting Requirements is Costly and Wasteful.
- \* Attempting to Manage Different Versions of a Method in a Laboratory Environment Increases the Logistical Challenges Associated With Batching and Analysis.
  - Results in Execution Confusion,
  - Leads to the Misreporting of Analytical Data,
  - Causes an Unnecessary Increase in Analytical Costs.
- \* USEPA OSW Plays a Key Role in Determining the Resolution of This Issue, But are not the Only Party.

# Activity: Aug 2008 - Current

- \* 1/3/08 - Availability of SW-846 UD IV Announced By USEPA Containing 47 New/Revised Methods, Deleting 44 Obsolete Methods.
- \* NEMC 2008: Stakeholders Vocalize Method Status Concerns & Quality Control Criteria Conflicts Between Revised and Previous Method Versions, Impacting Accreditation & Use to ELAB.
- \* 9/15/2008 - ACIL Letter Expresses SW-846 Concerns to ELAB & Suggests Recommendations to USEPA Clarifying Method Status & QC Criteria.
- \* 10/15/2008 - ELAB Develops Strategy & Engages OSW In SW-846 Issues Discussions.
- \* 1/12/09 - OSW Participates in ELAB Open Forum to Clarify SW-846 Status, Discuss Issues and Recommendations and Propose Remedial Solutions.

# Questions Previously Presented to OSW - 1

- \* Please Outline OSW's Policy on Publishing New or Revised Methods Including the Policy on Their Intended Use:
  - When A New Or Revised Method Is Published, What is Its Relationship To Previous Versions?
  - Do Newly Published Methods Supersede Previously Existing Versions (What Does This Mean)?
  - If a New Method Version Is Available, When does the Previously Published Version become Obsolete?
  
- \* How Can OSW Clarify the Issues surrounding Multiple Versions of the Same or Similar Methods (Same Technologies) to Provide Relief to the Regulated Community to Promote Consistency and Clear Instructions?
  
- \* What Is OSW's Process And Timeline for Addressing and Resolving the Issues Discussed With ELAB?

# **Questions Previously Presented to OSW - 2**

- \* When Does The Agency Issue Revised or New Methods and What is the Criteria for Revising or Issuing New Methods?
- \* How Can the Stakeholder Community Assist the Agency in Developing and Implementing a Solution?
- \* How Can OSW Issue a Clarifying Position Statement on all Existing and Future Revised SW-846 Methods That Explains Their Status and Eliminates the Difficulties that are Occurring Without Such a Statement?
- \* What Would Make It Possible For OSW to Make a Strong Statement That the QC Specifications and Evaluations in the Revised/Updated Method are Superior to Previous Versions when any New Method/Revision is Published, to Include a Date when the New Specifications Should Replace the QC Specifications of the Old Method?

# Objectives & Ground Rules

- \* Positive, Solution Oriented Exchange,
- \* Move Forward not Backwards,
- \* ELAB's Plays Role of Facilitator, Providing Input and Recommendations to the Agency That Enables Them To Develop Solutions,
- \* ELAB Input is Provided By the Stakeholder Community. Our Objective is to Continue Working With The Agency Until the Issues are Resolved and Clear Solutions are Developed.