Comments on PFAS National Primary Drinking Water Rulemaking (03/29/2023)
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Prepared by: The NELAC Institute
PO Box 2439
Weatherford, TX 76086
817-598-1624
https://nelac-institute.org

The NELAC Institute (TNI) is a 501(c)(3) non-profit organization whose mission is to foster the generation of environmental data of known and documented quality through an open, inclusive, and transparent process that is responsive to the needs of the community. Among other matters, TNI manages a national proficiency testing (PT) program for environmental laboratories that covers drinking water, non-potable water, and hazardous wastes.

TNI appreciates the opportunity to comment on the proposed PFAS National Primary Drinking Water Rulemaking (03/29/2023). This comment requests changing the proposed Performance Evaluation sample acceptance limits outlined in Table 2 Paragraph (b)(2)(iii)(B).

141.901 Sub part Z. Section B states, "… the laboratory must achieve quantitative results on the PE sample analyses that are within the following acceptance limits:"

Table 2 to Paragraph (b)(2)(iii)(B) shows these acceptance limits as 70-130 percent recovery of true values. TNI requests these acceptance limits be adjusted to 60-140 percent recovery of true values to be consistent with UCMR 5 Performance Evaluation Sample acceptance criteria. Making this change would ensure data quality objectives for analysis completed in support of this rule would be consistent with UCMR 5 regarding Performance Evaluation data evaluation. Performance Evaluation sample data has not been gathered outside of UCMR and can thus not be evaluated to determine if limits of 70-130% would be supported. Furthermore, performance evaluation samples are not at a set true value. The true value of the compounds of interest can vary within the range specified in PT Provider instructions or Fields of Proficiency Testing (FoPT) Tables. These concentrations are randomly assigned according to the TNI PT standards. In reviewing Laboratory Fortified Blank (LFB) criteria in PFAS analytical methods, there is a percent recovery range specified at the Method Reporting Limit (MRL) level as well as the mid/high level. As PE (PT) samples could

potentially incorporate multiple compounds spiked into one sample, recovery acceptance limits of 60-140% would be more inclusive to account for this range.

As specified in EPA Method 533 regarding LFB criteria:

9.2.3.2 Results for analytes fortified at concentrations near or at the MRL (within a factor of two times the MRL concentration) must be within 50–150% of the true value. Results for analytes fortified at all other concentrations must be within 70–130% of the true value. If the LFB results do not meet these criteria, then all data for the problem analytes must be considered invalid for all samples in the Extraction Batch.

As specified in EPA Method 537.1 regarding Laboratory Fortified Blank criteria:

9.3.3. Results of the low-level LFB analyses must be 50-150% of the true value. Results of the medium and high-level LFB analyses must be 70-130% of the true value. If the LFB results do not meet these criteria for method analytes, then all data for the problem analyte(s) must be considered invalid for all samples in the extraction batch.

Thank you for your consideration,

The TNI Proficiency Testing Program Executive Committee
Stacie Crandall, Chair
SCrandall@hrsd.com