

## SUMMARY

### TNI CHEMISTRY EXPERT COMMITTEE MEETING

The Chemistry Expert Committee (CEC) held a face-to-face meeting during the Forum on Environmental Accreditation on Wednesday, January 30, 2019 in Milwaukee, WI. Committee Chair Valerie Slaven led the meeting. The agenda for the meeting is presented as Attachment 1.

#### 1. Roll Call

|   |         |
|---|---------|
| Valerie Slaven, Consulting Services (Other) - Chair | Present |
| Jay Armstrong, VA DGS (AB)                          | Present |
| Paula Blaze, NJ DEP (AB)                            | Present |
| Eric Davis, Austin Water Utility (Lab)              | Present |
| Deb Gaynor, Independent Consultant (Other)          | Present |
| Shawn Kassner, Neptune (Other)                      | Present |
| Max Patterson, UT DOH (AB)                          | Present |
| Charles Neslund, Eurofins (Lab)                     | Absent  |
| Colin Wright, Florida DEP (Lab)                     | Present |
| Robert Wyeth, Program Administrator                 | Present |

No roll of associate members was recorded. A quorum was present and the meeting commenced.

#### 2. Introduction of New Members

Three new members of the CEC were introduced. New members were Chad Stoike (lab), Paul Junio (lab) and Calista Daigle (other). New members were approved by CSDEC Chair and committee balance is maintained. Since conclusion of this meeting Paul Junio has resigned from this committee as he assumes the role of chair of the CSDEC. Census of the committee is presently 4 lab, 3 AB and 4 other.

#### 3. Memorial for Ken Jackson

Valerie reiterated the news of Ken's passing and suggested a small memorial offering from the committee. She requested anyone interested in supporting this effort should see her after the meeting.

#### 4. Guidance Documents

##### a. Calibration

Valerie reported that the calibration guidance document had been approved and was deemed acceptable to the LASEC and AC for implementation.

##### b. LOD/LOQ

After various comments and questions regarding the LOD/LOQ guidance document had been addressed in the process of approval; final comments from the LASEC were received by the committee. Attachment 2 presents the specific comments submitted to the committee as well as the responses prepared by the committee to these inquiries.

The remainder of the meeting was spent discussing these concerns and the committee's response. Clarification was requested and developed as necessary during the meeting.

Attachment 3 includes the results of these conversations and debate as to the necessary language of the guidance document. The language changed and/or added to the document was approved by the committee however a formal motion and voting will occur following confirmation of the changes made meet the concerns of the LASEC.

#### **5. SIR's**

The following SIR's (282, 297, 339, and 340) were schedule to be addressed during this meeting but time expired and these matters will be discussed during a future meeting.

The CEC meeting adjourned at 4:00 PM CT. The next CEC meeting (conference call) is scheduled for March 6, 2019 at 2:00 PM ET.

# Attachment 1

## CEC Meeting Agenda

1/30/19

1. New Members
  - a. Chad Stoke
  - b. Paul Junio
  - c. Calista Daigle
  
2. Ken Jackson – Memorial/Flowers
  
3. Guidance Documents
  - a. Calibration
  - b. LOD/LOQ
    - i. LASEC final comments
  
4. SIRs
  - a. 282
  - b. 297
  - c. 339
  - d. 340

## Attachment 2

### LASEC comments/question regarding LOD/LOQ Guidance Document

#### **Section 3.1: What is expected when a lab fails to analyze a quarterly verification spike?**

CEC Response: The following language was added to the guidance document: "If a verification spike or blank is not analyzed each quarter in which samples are being analyzed and results are being reported below the LOQ this is considered a nonconformance and shall be evaluated per V1M2 section 4.9 and documented appropriately."

**Section 3.2: TNI Standard clause 1.5.2.1.2 specifies that if a quarterly verification fails, a new DL study must be performed within 30 calendar days. It should be noted that for some methods, especially those with long lists such as 8270 where iterative studies are required; a new DL study within 30 calendar days is not feasible unless the intent of the standard is that the DL study only be performed for the analyte that failed. Please clarify.**

CEC Response: The following language was added to the guidance document: "The requirement in section 1.5.2.1.2 is only applicable for the analyte/s that failed."

**Section 3.3: TNI Standard 1.5.2.2.2 b) If a continuing LOQ verification test does not meet this requirement, the laboratory shall take corrective action and document a technically valid reason for the corrective action. Corrective action shall be one of the following: (i) correcting method or instrument performance and repeating the verification test; (ii) evaluating the laboratory established control limits to ensure they reflect current performance; or (iii) raising the spiking level (and the quantitation limit if the spiking level is above it) and repeating the initial verification study within thirty (30) calendar days of the initial failure. Any samples analyzed in a batch associated with a failing LOQ verification shall be reanalyzed or reported with qualifiers.**

**Please clarify the expectation of the highlighted statement - do only the samples analyzed in the same batch analyzed with the LOQ verification require qualification? Or all batches until passing LOQ verification?**

CEC Response: The following language was added to the guidance document: "If a LOQ verification does not meet this requirement, it is considered a nonconformance and shall be evaluated per V1M2 section 4.9 and documented appropriately. If a repeat of the initial verification of the LOQ is required see section 1.5.2.2.1 for requirements. This will also meet the requirements of the initial determination of the detection limit found in section 1.5.2.1.1."

**Section 3.4: Please clarify the requirement to use 24 months of data for the recalculation of the blank DL. Some interpretations of the EPA procedure have been up to 24 months of data (as**

**needed to get a sufficient data set population). For some methods, 24 months of blank data can include thousands of data points.**

CEC Response: The following language was added to the guidance document: “Ongoing verification data must be collected following the analysis of an initial study. All data used to establish the initial study must be used in the ongoing documentation if it is within the last 24 months”

## Attachment 3



### **TNI V1M4 2016 Standard Update Guidance on Detection and Quantitation** GUID-3-110-Rev0

This material represents the opinion of its authors. It is intended solely as guidance and does not include any mandatory requirements except where such requirements are referenced. This guidance does not establish expectations of being implemented universally, exclusively, in whole, or in part.

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Individuals that have questions about the applicability, scope, and use of this guidance may contact TNI at [www.nelac-institute.org](http://www.nelac-institute.org)

June 29, 2018

This document was prepared to provide guidance on the detection and quantitation section (1.5.2) of Module 4 of the 2016 TNI Standard Volume 1, i.e., V1M4. This document does not discuss all sections of V1M4, only those which have changed substantially with the 2016 TNI Standard. This document is not intended to be an official interpretation of the Standard, nor is it to be used in place of the Standard. This document is only intended to help users of the Standard understand the changes and implement them in their laboratory. If there are questions regarding the use and implementation of the Standard, contact the appropriate accreditation body. Standard Interpretation Requests may be made through the TNI website.

This section of the guidance document covers determination and verification of the LOQ (Limit of Quantitation) and Limit of Detection, hereafter called DL (Detection Limit). Note: Volume 1, Module 2 defines Limit of Detection as “The minimum result, which can be reliably discriminated from a blank with a predetermined confidence level. Also used is Detection Limit.” This is comparable, but less specific than EPA’s definition of the Method Detection Limit (MDL), “the minimum measured concentration of a substance that can be reported with 99% confidence that the measured concentration is distinguishable from method blank results.” TNI uses DL to ensure there is no confusion with the Limit of Detection published in the Department of Defense Quality Systems Manual for Environmental Laboratories (DOD QSM).

This section is written as a set of procedural recommendations that will allow the requirements of the Standard to be met in a relatively productive and efficient manner. One key assumption is that the laboratory will be following EPA’s revised procedure for determining an MDL according to the procedure in Appendix B of 40 CFR Part 136. It is not a requirement of the Standard to follow the EPA MDL procedure. However, as pointed out in a NOTE to section 1.5.2.1.1, following the EPA MDL procedure is an acceptable way to meet the TNI requirements regarding detection limits and is likely the easiest way to be in compliance with the TNI requirements. While the EPA procedure is only required for wastewater analyses conducted under Part 136, the procedure can be applied to other matrices such as air, drinking water, or soils. As stated in Section 1.5.2.1.1 f) of the TNI standard, the TNI procedure applies to all quality system matrices, as defined in Module 2. Some laboratories believe that certain methods (e.g., Methods 300.1 and 351.2) have different requirements, but a careful reading of these methods indicate the methods use the word “should,” so the EPA and TNI requirements would override what is in the methods. Also note that section 1.5.1 (a) requires an initial DL and LOQ determination as part of the initial method validation.

Note: Language quoted from the standard is shown in grey text boxes.

## **1.0 Overview of Section 1.5.2**

In the course of laboratory environmental testing, the test results for many chemical contaminants will be below concentrations that are detectable or quantifiable. Therefore, it is critical that the procedures the laboratory uses to establish detection and quantitation limits for each sample matrix, test method, and analyte be critically evaluated and defensibly verified.

Section 1.5.2 includes subsections 1.5.2.1, Detection Limit and 1.5.2.2, Limit of Quantitation, making it appear that these are two separate requirements. However, the two requirements are meant to be used together, with one set of activities that achieve the requirements of both subsections. The flow charts below show how this is done. Note that there are two distinct processes: the determination of the DL and initial verification of the LOQ, and the periodic verification and annual recalculation of the DL and LOQ.

Please refer to the text following the process flow charts for details of each step.

**Figure 1: Process Flow Chart for the Initial Determination of the LOQ and DL**

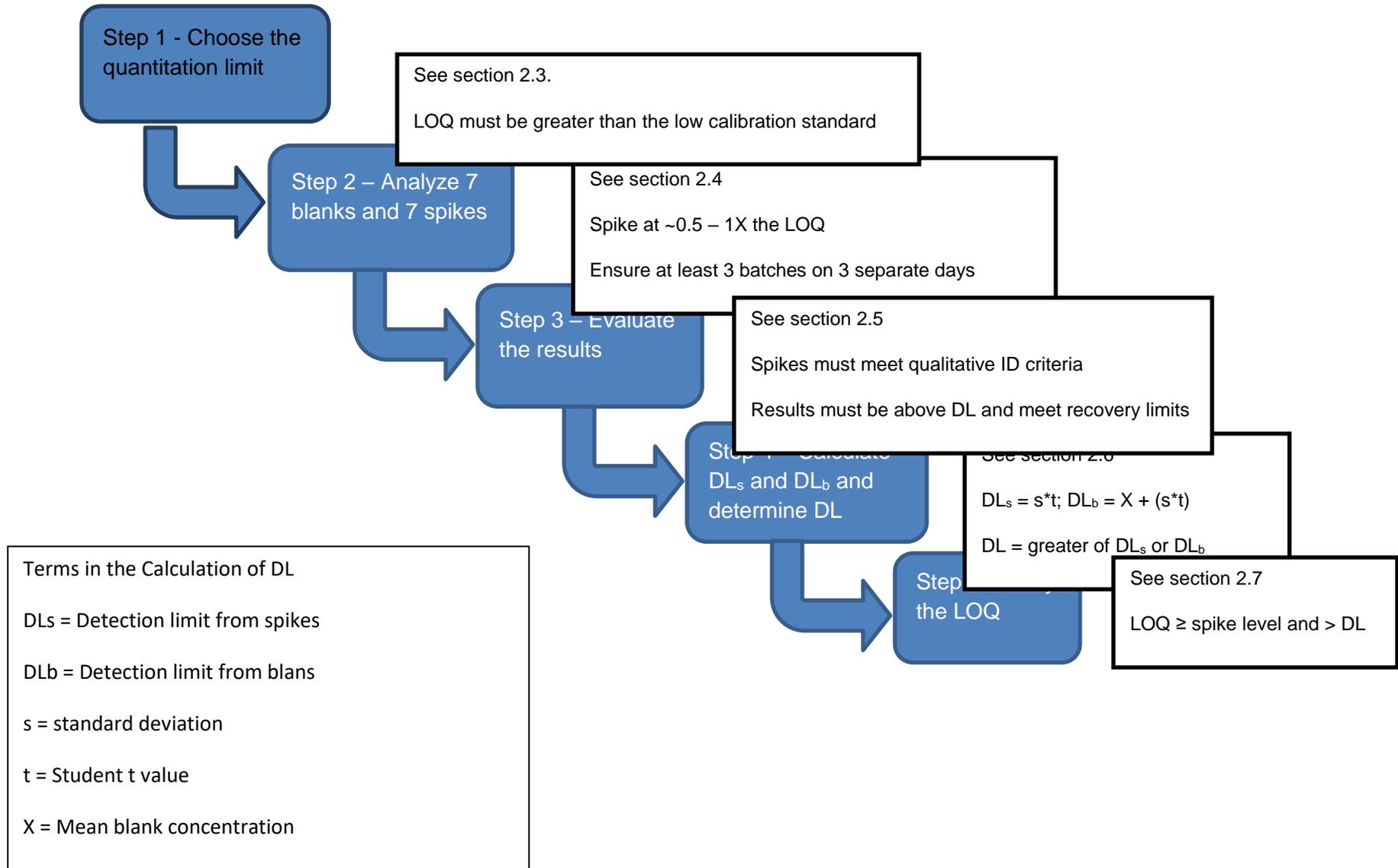
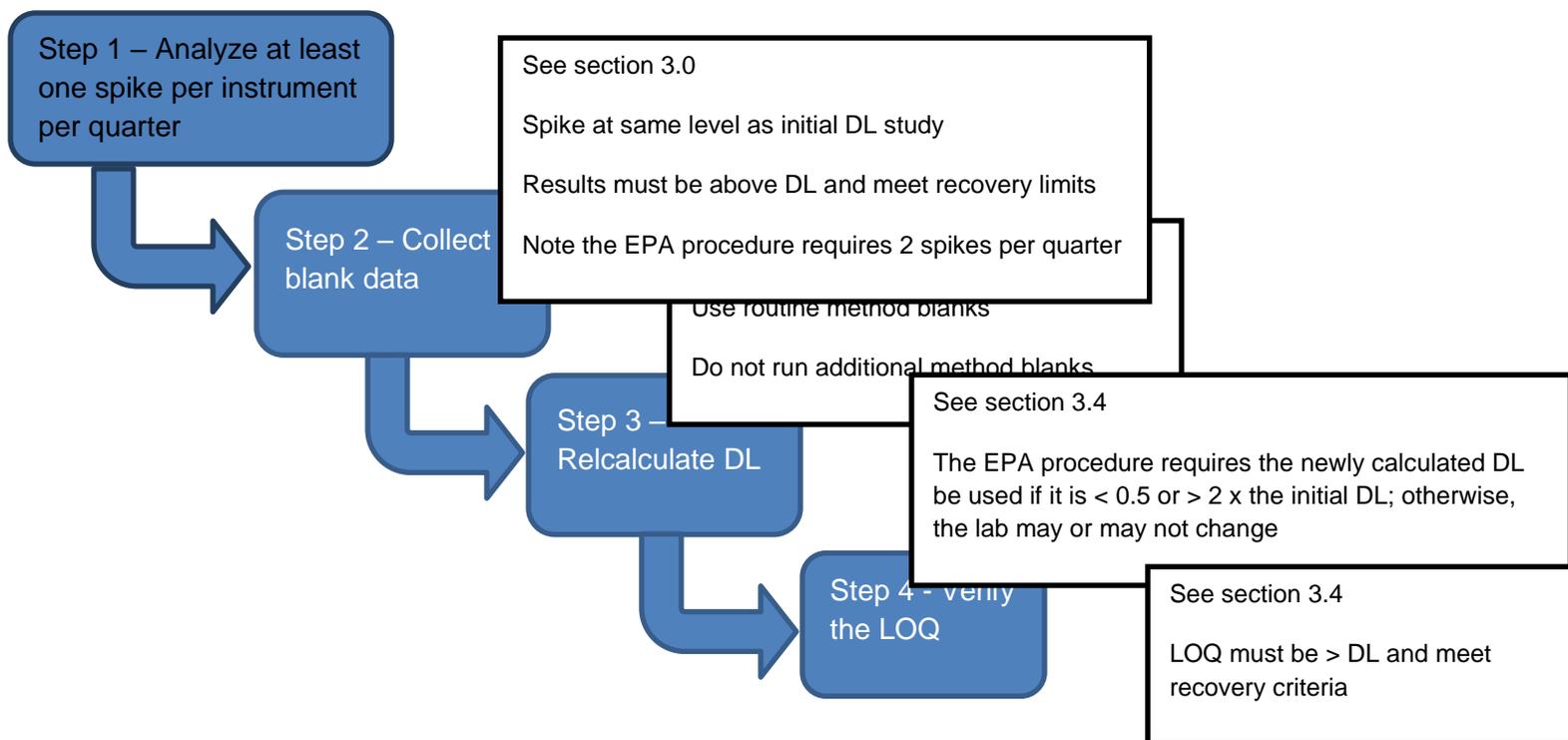


Figure 2: Process Flow Chart for the Ongoing Verification of the LOQ and DL



## 2.0 Initial Determination of the DL and Verification of the LOQ

1.5.2.1 If a mandated test method or applicable regulation includes protocols for determining detection limits, they shall be followed. The laboratory shall document the procedure used for determining the DL. If the method or regulation does not contain specific directions for determination of the detection limit, the following requirements shall apply.

1.5.2.2 If a mandated test method or applicable regulation includes protocols for determining quantitation limits, they shall be followed. The procedure used for determining the LOQ shall be documented by the laboratory. The laboratory shall select an LOQ for each analyte, consistent with the needs of its clients, and greater than the DL.

### 2.1 Which Comes First, the LOQ or the DL?

Although the two sections above could be seen as two separate activities, in fact they are intertwined. The LOQ is established first, since the LOQ must be at or above the spiking level. If a DL has already been determined, then the LOQ must be set at a concentration that is a) no less than the spiking level, b) greater than the DL, and c) at or above the lowest calibration standard. An LOQ is required for each *quality system matrix of interest, technology, method, and analyte*. For example, as specified in 1.5.2.2. b) if a laboratory performs the analytical method 8270 and uses preparation methods 3510 (separatory funnel) and 3520 (CLLE) for aqueous samples, and preparation method 3540 (Soxhlet) for soils, then 3 separate LOQ verifications will be required. The LOQ for preparation method 3510 may well be determined to be the same as that for 3520, but separate initial determinations are required. However, there is no firm relationship of the MDL to the LOQ other than a statement in 1.5.2.2.1 c) that the LOQ must be greater than the DL.

1.5.2.1 DL determinations are not required for methods/analytes for which a detection limit is not applicable such as pH, color, odor, temperature, or dissolved oxygen. DL determinations based on low level spikes are not required for analytes for which no spiking solutions are available.

1.5.2.2 An LOQ is required for each quality system matrix of interest, technology, method, and analyte, except for any component or property for which spiking solutions are not available or a quantitation limit is not appropriate, such as pH, color, odor, temperature, dissolved oxygen, or turbidity.

## 2.2 Exceptions

Module 4 of the TNI Standard is for chemical testing and thus does not apply to asbestos, microbiology, radiochemistry or toxicity testing. The EPA MDL procedure states:

The MDL procedure also is *not* applicable to measurements such as, but not limited to, biochemical oxygen demand, color, pH, specific conductance, many titration methods, and any method where low-level spiked samples cannot be prepared. MDL determinations using spiked samples may not be appropriate for all gravimetric methods (e.g., residue or total suspended solids), but an MDL based on method blanks can be determined in such instances.

The laboratory should note that spiking solutions are available for several analytes that are determined gravimetrically (e.g., TDS) and titrimetrically (e.g., Residual Chlorine). Thus, DLs and LOQs will need to be established since non-detects may be expected in some samples.

1.5.2.2 ...The laboratory shall select an LOQ for each analyte, consistent with the needs of its clients, and greater than the DL...

## 2.3 Step 1: Selection of the LOQ

Since the DL has not yet been determined, the laboratory may select any LOQ consistent with the needs of its clients. However, keep in mind the requirement in 1.5.2.2 c):

1.5.2.2 c) The LOQ must be at or above the lowest corresponding calibration standard concentration with the exception of methods using a single point calibration

Typically, laboratories will choose to verify the LOQ at or above the lowest calibration standard since attempting to verify an LOQ below the lowest calibration standard may not be practical. The LOQ verification does not have to be as low as can possibly be analyzed by the method and instrument. For example, in a sufficiently clean environment, an ICPMS could have an LOQ in the low part per trillion range for iron. This would be of no value for environmental analysis, and most labs will select an LOQ for iron in the part per million range. Just like it would be impractical to calculate a DL for sodium in saltwater, there are some analytes where an DL just makes no sense, since detection is not an issue. In these cases, the Addendum to the EPA MDL procedure can be used as guidance:

The MDL may be determined in a specific sample matrix as well as in reagent water.

- 1) Analyze the sample matrix to determine the native (background) concentration of the analyte(s) of interest.
- 2) If the response for the native concentration is at a signal-to-noise ratio of approximately 5-20, determine the matrix-specific MDL according to Section 2 but without spiking additional analyte.
- 3) Calculate  $MDL_b$  using the method blanks, not the sample matrix.
- 4) If the signal-to-noise ratio is less than 5, then the analyte(s) should be spiked into the sample matrix to obtain a concentration that will give results with a signal-to-noise ratio of approximately 10-20.
- 5) If the analytes(s) of interest have signal-to-noise ratio(s) greater than approximately 20, then the resulting MDL is likely to be biased high.

1.5.2.2 a) Each selected LOQ shall be verified through analysis of initial verification samples. An initial verification sample consists of a spiked matrix blank at or below the selected LOQ.

## 2.4 Step 2 - Initial Verification of the LOQ

In some instances, assuming that the performance of the method is adequate, it is recommended to spike at a concentration half that of the LOQ. The reason for this is that the LOQ verification samples may also be used to calculate the DL. Spiking at a concentration below the LOQ makes it more likely that a DL will be 2-3 times below the LOQ. If the laboratory is seeking the lowest possible LOQ or the LOQ is less than 2-3X the DL, spiking at half the LOQ concentration is not recommended.

Essentially, the LOQ verification spikes must be treated in the same way and go through the same steps that are performed for sample processing and analysis. If the blanks and

1.5.2.2 b) All sample processing and analysis steps performed for routine sample analysis shall be included in the LOQ verification testing.

1.5.2.2 c) The LOQ must be at or above the lowest corresponding calibration standard concentration with the exception of methods using a single point calibration.

Laboratory Control Samples (LCS) are preserved then it is recommended, but not required, that the preservation be applied to the LOQ verification spikes.

As noted above, the LOQ must be at or above the lowest calibration standard. (If the LOQ verification is performed using spikes at half the LOQ, then the spiking level may be below the lowest calibration standard, but in that case it is recommended to include an additional calibration standard at least as low as the spiking level).

These accuracy criteria may come from a method or a Quality Assurance Plan. If these documents do not include acceptance criteria then the laboratory determines its own criteria.

1.5.2.2 d) The laboratory shall establish acceptance criteria for accuracy for the LOQ verification spikes

The acceptance criteria should be reasonable; in other words, choosing acceptance criteria of 0-200% for everything may meet the letter of the Standard, but not the intent. Most methods will have performance criteria for the mid-level LCS. A reasonable first approximation for the LOQ verification would be 10-20% wider. For example, if the LCS recovery criterion is 70-130%, then 60 -140% or 50-150% is reasonable for the LOQ verification acceptance limits.

The laboratory may analyze the LOQ verification spikes first, and then develop the recovery acceptance criteria based on comparative methods or laboratory statistical process control (e.g. control charting) of the results obtained. LOQ verification data must be provided to clients upon request. If the acceptance limits are too wide, a client may decide that the laboratory performance is inadequate to meet their needs.

Note there is no quantitative criterion for recovery at the calculated DL, nor is there one in the EPA

1.5.2.2.1 a) A minimum of seven (7) low level spikes at or below the LOQ concentration shall be processed through all steps of the method. Both preparation and analysis of these low-level spikes shall include at least three (3) batches on three (3) separate days.

procedure, although some labs incorrectly applied one.

The seven (minimum) low level spikes are processed through the entire method, and the preparation and analysis must both be spread over at least three separate days, although the

- i. If there are multiple instruments that will be assigned the same LOQ, then these low-level spikes shall be distributed across all of the instruments.
- ii. A minimum of two (2) low level spikes prepared and analyzed on different days shall be tested on each instrument.

preparation and analysis of an individual spiked blank may be performed on the same day.

As an example, assume a laboratory has four instruments. The following set of analyses would meet the requirements:

|           |                             |  |
|-----------|-----------------------------|--|
| Monday    | Prepare extracts 1 and 2    | Analyze extract 1 on instruments a and b   |
| Tuesday   | Prepare extracts 3 and 4    | Analyze extract 2 on instruments a and b<br>Analyze extract 3 on instruments c and d |
| Wednesday | Prepare extracts 5, 6 and 7 | Analyze extract 4 on instruments c and d   |

1.5.2.2.1 b) Existing data may be used if compliant with the requirements for at least three (3) batches, generated within the last two (2) years and representative of current operations.

Analyze extracts 5, 6 and 7 on any instruments

This is a very important point – samples that laboratories are currently analyzing in order to meet existing requirements such as the current TNI LOQ and DL verifications, Department of Defense LOD requirements, Drinking Water requirements, or SW-846 requirements, may well meet the requirements of the new LOQ standard. This is especially the case since there is a period of time available before the TNI Standard is implemented. If the low-level spikes analyzed for these or other programs are i) spiked with an analyte concentration at or below the desired LOQ, ii) give results above the DL that meet the qualitative identification criteria in the method, iii) are within the laboratory established recovery criteria, and iv) are analyzed across at least 3 separate batches and days, then they will be suitable as LOQ verification spikes. It is highly recommended to plan ahead and design your current low-level spike analyses such that they meet the requirements for the LOQ verification.

1.5.2.2.1 c) The LOQ is verified if the following criteria are met

i) All results are quantitative (above zero and meet the qualitative identification criteria of the method; e.g., recognizable spectra, signal to noise requirements, and presence of qualifier ions).

## 2.5 Step 3 - Evaluation of the Results of the LOQ Verification Samples

The qualitative identification criteria required differ from method to method, but should be those used to determine if an analyte is present. For example, a GC/MS method might require that the quantitation and two qualifier ions maximize within a 2-scan range and that the mass

ii) The mean recovery of each analyte is within the laboratory established accuracy acceptance criteria

iii) The LOQ is greater than the established DL and at or above the spiking concentration.

spectrum obtained be fully recognizable, while an ICP method may have very little in the way of qualitative identification criteria.

The results are evaluated against the laboratory established recovery criteria.

If the DL has not been determined yet, this part iii does not apply immediately. If there is an established DL, then the comparison is made and the LOQ adjusted if necessary. The LOQ must be greater than the DL. Note that this adjustment DOES NOT require reanalyzing spiked samples at a higher concentration.

## 2.6 Step 4 - Determination of the DL

1.5.2.1.1 c) the DL determination shall include data from low level spikes and routine method blanks prepared and analyzed over multiple days; at least one low level spike and routine method blank must be analyzed on each applicable instrument; a minimum of seven (7) replicates is required for both low level spikes and routine method blanks;

### 2.6.1 Calculation of a $DL_b$ and $DL_s$

Determination of the DL requires results for a set of method blanks ( $DL_b$ ) as well as the spiked samples ( $DL_s$ ) using the spikes from the LOQ determination. For an existing method, just use the routine method blanks; there is no need to run additional method blanks. If validating a new method (or a new analyte in an existing method) the same requirement for at least three batches analyzed over three separate days applies, and a minimum of seven method blanks is required.

First, calculate the  $DL_s$  based on the results for the spiked samples from the LOQ study. This calculation is the same as the EPA MDL procedure.

$$DL_s = ts;$$

where  $t$  is Student's  $t$  value and  $s$  is the standard deviation of the results for the spiked samples.

Note: With this procedure, many laboratories are likely to have more than 7 spike or blank results. Appendix 1 contains an expanded Student  $t$  Table to help with this calculation.

Then, calculate the  $DL_b$  based on at least seven method blank results.

If all the method blanks give numerical results calculate the  $DL_b$  as follows:

$$DL_b = X + ts;$$

where  $X$  is the mean of the blank results,  $t$  is Student's  $t$  value, and  $s$  is the standard deviation of the blank results. Numerical results include both positive and negative values. The EPA MDL procedure requires the laboratory to use 0 as the mean if the  $MDL_b$  is calculated as a negative number. If all of the blank results are "ND" then the  $DL_b$  is zero and the DL will be based on the spike results.

If some of the results are "ND" and some are numerical results, as stated in the EPA MDL procedure, two options are available:

- 1) Set the  $DL_b$  equal to the highest method blank result.
- 2) If more than 100 method blanks are available, it is recommended to set  $DL_b$  to the level that is no less than the 99<sup>th</sup> percentile of the blank results. When using this approach to set the  $DL_b$ , all results including the "ND" results, are included. The 99<sup>th</sup> percentile is the more robust statistic and ensures a 99% confidence interval, consistent with the EPA definition of the MDL. The 99th percentile equation in Excel is "`=PERCENTILE(A1:Axxx,99)`", where xxx is the number of blanks.

1.5.2.1.1 d) results from low level spikes used in the DL determination shall meet qualitative identification criteria in the method, and shall be above zero

Finally, compare  $DL_s$  and  $DL_b$  – the higher of the two becomes the DL.

The section above requires the laboratory to include qualitative identification criteria. In other words, it is not sufficient to calculate a DL based on just a measured value. The results must meet criteria such as a signal to noise ratio, having a peak, or meeting mass spectra criteria.

1.5.2.2.1 c) The LOQ is verified if the following criteria are met

iii) The LOQ is greater than the established DL and at or above the spiking concentration.

If the LOQ is less than or equal to the DL, the LOQ shall be raised to greater than the DL.

## **2.7 Step 5 - Verification of the LOQ Based on the Determined DL**

The main determinant of the LOQ is the spiking concentration; the LOQ must be at or above the spiking concentration. There is a secondary requirement, that the LOQ must be greater than the DL.

#### 1.5.2.1.2 Ongoing verification of the DL

A minimum of one (1) verification spike and one (1) blank shall be analyzed on each instrument during each quarter in which samples are being analyzed....

#### 1.5.2.2.2 Ongoing Verification of the LOQ

The laboratory shall prepare and analyze a minimum of one (1) verification sample spiked at the same concentration as the initial LOQ verification on each instrument during each quarter in which samples are being analyzed

### **3.0 Ongoing Verification and Annual Recalculation of the LOQ and DL**

Assuming that the same low-level spikes or samples spiked at the same concentration were used for the determination of the DL and the initial verification of the LOQ, then the ongoing verifications may be carried out using one set of low level spikes

Note that if different spike concentrations were used for the initial DL determination and initial LOQ verification, then different spike concentrations would be required for the ongoing verifications of the DL and LOQ as well.

The TNI standard requires one spike sample be analyzed per instrument per quarter. However, the EPA procedure requires at least two spikes in separate batches per quarter on any instrument that is used to analyze samples. Thus for those laboratories who analyze various sample types using one method, then two spikes would be required. It is important to note that the spiking concentration of the ongoing verification samples must be the same as for the initial verification of the LOQ. If for some reason it is necessary to use a different concentration, then a new initial study is required.

Note: A single extract may be analyzed on one or more instruments.

#### 1.5.2.1.2 Ongoing Verification of the DL

...A minimum of one verification spike and one blank shall be analyzed on each instrument during each quarter in which samples are being analyzed and results are being reported below the LOQ....

### 3.1 Ongoing Verification of the DL

Note: A single extract may be analyzed on one or more instruments.

The TNI Standard does not require quarterly DL verification if data is not being reported below the LOQ, but keep in mind that the EPA MDL procedure does require quarterly verification in any quarter in which samples are analyzed

If a verification spike or blank is not analyzed each quarter in which samples are being analyzed and results are being reported below the LOQ this is considered a nonconformance and shall be evaluated per V1M2 section 4.9 and documented appropriately.

1.5.2.1.1 d) results from low level spikes used in the DL determination shall meet qualitative identification criteria in the method, and shall be above zero;

1.5.2.1.2 In the event that verification fails, the laboratory shall perform a new DL study within

### 3.2 Acceptance Criteria for the Quarterly Verification Spikes

For a spike analysis to be acceptable as a DL verification sample, the result must be above zero, and any qualitative identification criteria in the method must be met. (Note: The laboratory may need to modify the way they record sample data since the results may be below the laboratory's LOQ) If DL verification samples are to be used for LOQ verification they must also meet the criteria listed in 1.5.2.2.2 a). If these criteria are not met, then the laboratory must perform one of the corrective actions as listed in 1.5.2.2.2 b) (See section 3.3 below) and document a technically valid reason for the corrective action. The technically valid reason shall be appropriate for the corrective action selected. Examples of a technically valid reason are: incorrect preparation, instrument failure, calibration error, instrument performance indications show a change in sensitivity, etc. If the spiking level must be raised and a new initial study

performed within 30 days, the existing DL and LOQ are used for reporting during this 30 day (or less) period.

The requirement in section 1.5.2.1.2 is only applicable for the analyte/s that failed.

1.5.2.2.2 b) If a continuing LOQ verification test does not meet this requirement, the laboratory shall take corrective action and document a technically valid reason for the corrective action. Corrective action shall be one of the following:

- (i) correcting method or instrument performance and repeating the verification test;
- (ii) evaluating the laboratory established control limits to ensure they reflect current performance; or
- (iii) raising the spiking level (and the quantitation limit if the spiking level is above it) and repeating the initial verification study within thirty (30) calendar days of the initial failure.

Any samples analyzed in a batch associated with a failing LOQ verification shall be reanalyzed or reported with qualifiers.

Corrective action: An action to determine and eliminate the root cause(s) of a nonconformity to prevent further recurrence of the issue. (TNI Glossary of terms)

### **3.3 Corrective Action**

#### 1.5.2.4 Documentation

At least once per year, the laboratory shall tabulate all results of the ongoing verification sample testing. All data representative of the current operations shall be used, if generated within the last two (2) years. A minimum of seven (7) samples is required.

- a) The laboratory shall record the analytical and preparation methods used, dates of preparation and testing, the batch identifiers, the testing instrument, quality system matrix, technology, analyte, concentration in the spiked sample with units, and the test result (if any) for each LOQ and/or DL verification test.
- b) For each analyte, the laboratory shall record the percent recovery, the number of results (n), the mean and standard deviation of the percent recovery, and the spiking concentration of the spiked samples with units. These data shall be provided to clients upon request.

If a LOQ verification does not meet this requirement, it is considered a nonconformance and shall be evaluated per V1M2 section 4.9 and documented appropriately. If a repeat of the initial verification of the LOQ is required see section 1.5.2.2.1 for requirements. This will also meet the requirements of the initial determination of the detection limit found in section 1.5.2.1.1.3.4

#### **Annual Assessment of the Quarterly Spike and Blank Results**

The DL is recalculated annually (at least once every thirteen months) as the greater of the  $DL_s$  (calculated from the quarterly spike samples) and the  $DL_b$  (calculated from the method blanks) using the last 24 months' worth of data. Include the initial DL data if it is within the last 24 months. If the recalculated DL is within 0.5-2 times the current DL and fewer than 3% of the method blank results (for the individual analyte) have numerical results above the existing DL, then the DL may be left unchanged. Otherwise the recalculated DL replaces the current DL.

Ongoing verification data must be collected following the analysis of an initial study. All data used to establish the initial study must be used in the ongoing documentation if it is within the last 24 months.

The results from the quarterly spikes are collected and tabulated. This documentation is intended to be adequate to unequivocally identify the samples used in the quarterly verifications including appropriate preservation if utilized. Once collected, the number of samples, and the

mean and standard deviation of the results are calculated summarized for laboratory customers and/or assessors to review as needed. T.

#### Example 1: Comparing Existing and New DL

The existing DL is 6.53

There are 16 spike results. The standard deviation of these 16 spikes is 2.34

There are 61 method blank results. The mean of the method blanks is 1.03 and the standard deviation is 1.89

$DL_s = 2.34 \times 2.602 = 6.09$  (Student's t for 16 replicates is 2.602)

$DL_b = 1.03 + 1.89 \times 2.390 = 5.55$  (Student's t for 61 replicates is 2.390)

In this case the  $DL_s$  is greater, so the calculated DL is 6.09

The previously existing DL was 6.53, so the laboratory has the option of adopting the new

1.5.2.2.2 a) ... the quantitated result shall be greater than the DL and meet the laboratory established accuracy criteria as established by Section 1.5.2.2 d)

### **3.5 Updating the LOQ**

If the DL has been changed, then the LOQ may also need to be changed, based on the requirement that the LOQ shall be above the DL.

The EPA MDL procedure states:

If the verified MDL is within 0.5 to 2.0 times the existing MDL, and fewer than 3% of the method blank results (for the individual analyte) have numerical results above the existing MDL, then the existing MDL may optionally be left unchanged. Otherwise, adjust the MDL to the new verification MDL.

While this is not a TNI requirement, it seems prudent to include this action when appropriate. Usually the LOQ will remain unchanged. However, if the DL has increased it may also be

Example 2: DL Greater than LOQ

Existing DL is 0.9, existing LOQ is 1.0

Newly calculated DL is 1.9 The LOQ must be raised to greater than 1.9.

This example is most likely to occur when first implementing this procedure because it introduces the potential for an increased amount or variability. The potential for increased variability may come from analyzing and preparing the low-level spike samples on multiple days and in multiple batches.

necessary to raise the LOQ, since the LOQ must be greater than the DL.

**Appendix 1: Student's t Table for 99% Confidence**

| Degrees of Freedom =<br>Number of Spikes or Blanks - 1 | Student's t |
|--|-------------|
| 6  | 3.143       |
| 7  | 2.998       |
| 8  | 2.896       |
| 9  | 2.821       |
| 10   | 2.764       |
| 11   | 2.718       |
| 12   | 2.681       |
| 13   | 2.650       |
| 14   | 2.624       |
| 15   | 2.602       |
| 16   | 2.583       |
| 17   | 2.567       |
| 18   | 2.552       |
| 19   | 2.539       |
| 20   | 2.528       |
| 21   | 2.518       |
| 22   | 2.508       |
| 23   | 2.500       |
| 24   | 2.492       |
| 25   | 2.485       |
| 26   | 2.479       |
| 27   | 2.473       |
| 28   | 2.467       |
| 29   | 2.462       |
| 30   | 2.457       |
| 40   | 2.423       |
| 60   | 2.390       |
| 80   | 2.374       |
| 100  | 2.364       |
| 1000   | 2.330       |

