



STATE OF NEW YORK DEPARTMENT OF HEALTH

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Dear Interested Party,

Included below the line you will find guidance that was sent by email on October 15, 2012, directly to laboratories that hold New York State (NYS) Environmental Laboratory Approval Program (ELAP) accreditation for EPA 5035 and 5035A.

EPA SW846 Methods 5035 and 5035A offer laboratories some unique challenges due to specific sample collection requirements. Since there are currently several variations in sample collection procedures, ELAP has developed the following guidance regarding compliance in New York State.

Sample Collection:

Although ELAP's regulatory authority does not extend to sample collection conducted by non-laboratory commercial entities (i.e., environmental consultants), we strongly encourage all field samplers to acquire proper training through their corporate means. For laboratories that have no role in the sample collection, ELAP recommends that labs place a disclaimer on their reports stating they are responsible only for the certified testing and are not directly responsible for the integrity of the sample before laboratory receipt.

However, if sample collection is performed by employees of a NYS ELAP certified laboratory, then the lab must accept the legal responsibility for the manner in which the samples are collected. In this circumstance, ELAP will require the lab to retain the responsibility for the sampler's training (including DOCs), proper sample collection SOPs, chains-of-custody, etc. These must be available for review during the NYS ELAP on-site assessment.

Laboratory Analyses for Soil and Sediment Samples:

1. Low-Level Collections: Sample collection information (e.g., lab prepared VOA vial, EnCore, Terra Core, etc.) must be indicated on the laboratory report, associated sample chain of custody, or field data sheets. If samples are submitted with a request for low-level volatile analysis (less than 200 ug/kg), but have not been collected according to 5035 low-level specifications, the lab must notify the client that the sample does not meet their sample acceptance criteria and provide the client an opportunity to re-collect the sample. If the client chooses not to re-collect and requests the samples to still be analyzed, the lab must qualify any reported sample concentrations that are below 200 ug/kg indicating they may be biased low due to the sample not being collected according to 5035-L/5035A-L low-level specifications. (See 5035A, sec. 8.2.1.) Laboratories must have a purge and trap device that meets the equipment specifications of 5035A, sec. 6.2.1 to hold 5035-L or 5035A-L certification.

2. High-Level Collections using chemical preservatives: All samples submitted following the high-level collection protocol must be identified on the laboratory report or associated chain of custody as collected in a water miscible solvent (such as methanol). The reporting limit for a field-preserved sample may vary depending on the dilution factors, percent moisture, and the range of the initial calibration curve. (See 5035A, sec. 8.2.2.)

3. High-Level Collections without chemical preservation: Any reported concentrations less than 200 ug/kg for samples collected without chemical preservation must be qualified indicating they may be biased low due to the sample not being collected according to 5035/5035A low-level specifications. The 200 ug/kg concentration may not be reduced (even if supported by the low end of the initial calibration curve) as this concentration is the limit for high level sample collection - not the analytical procedure. The collection of samples without use of a chemical preservative is appropriate for those samples or wastes suspected of percent level contamination. (See 5035A, sec. 8.2.3.)

Reporting levels must be supported by a limit of quantitation (LOQ) study that includes all sample processing steps.

Please review EPA SW846 5035A, including the appendix, for additional information.

If you have any additional questions, please do not hesitate to contact ELAP at (518) 485-5570 or elap@health.state.ny.us.