

Libby Environmental, Inc.

I do have a specific comment for #7

Inserted a new section (7): When Quality Control samples such as a Laboratory Control Sample or Matrix Spike are above their acceptance criteria for a parameter(s), the data for that parameter(s) can only be reported if the laboratory can demonstrate:

- (a) no source of low bias of that parameter(s) is also present in the sample(s) and/or other related quality control samples and,
- (b) the reported samples do not have a detection for the high biased parameter(s)

What do you mean by above? Do you mean outside of the control chart limits? You speak of high bias and low bias, so I think you mean outside of, but it is unclear. MS/MSD are not meant to exclude parameters. This would be a new paradigm for this QC and would wrongly affect an entire batch of samples. This could be useful for clean, chemically neutral samples, but the second the sample is contaminated, it would no longer be possible to report any of the parameters that were in the sample. For example, toluene would be unreportable if a contaminated sample was chosen for MS/MSD. The purpose of an MS/MSD is informational, and should not determine if a parameter could be reported. Adding a qualifier is commonly done to acknowledge the exceedence of QC criteria. Terrible suggestion for all GC and Metals methods.