

## WAC 173-50 Proposed Rulemaking Comments

Eurofins Seattle

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### **WAC 173-50-061 (2)(a), pg. 4**

Comment: Middle calibration points should be allowed for removal if there is documented and demonstrable error with the injection or standard preparation. E.g. incorrect concentration prepared, internal standard inadvertently omitted, or instrument autosampler malfunction.

Suggested verbiage: "A laboratory must not remove any midpoints from a calibration curve with the exception of consecutive points at either end of the curve, unless a significant error occurred with the standard preparation or sample introduction, and the error is documented and calibration point is excluded for all analytes."

### **WAC 173-50-061 (3), pg. 4**

Comment: Need clarification on the 50% of true value check on LOQ. "...laboratories must analyze a standard at their limit of quantitation at least annually. This standard must meet 50 percent of the true value." This could be interpreted as 50% of true value or greater with no upper limit. Should it be +/- 50% of true value?

### **WAC 173-50-069 (1)(d), pg. 6**

Comment: Allow for either automated or manual checks, as long compliant with method or WA rules. Automated, continuous monitoring should be allowed if not otherwise restricted by method or by WA, such as in WAC 173-50-069 (3) regarding incubators.

Suggested verbiage: "Document that all temperature-based equipment such as a refrigerator, oven, or incubator is both within control and checked **manually** as required by the relevant analytical method;"

### **WAC 173-50-190 Table 2&3, pg. 13**

Comment: Difficult to understand what "Per Parameter Add Fee to Existing Method" column means. Suggest adding a section or footnote to explain the changes from Table 1 to Table 2, namely in regard to the aforementioned column.

**WAC 173-50-190 (11), pg. 14**

Comment: Clarification requested. In the following statement, does “reinstate a parameter” include returning parameter from suspension or just revocation?

*“If a laboratory requests to add or reinstate a parameter to their scope of accreditation outside of their initial application or renewal process, the laboratory will be invoiced a fee based on the type and number of requested parameters, per Table 1, Table 2, Table 3, or as updated by Equation 1.”*

As such, if a parameter is suspended for 2 failing PTs, is a fee required to reinstate that parameter after a passing PT is achieved?

**WAC 173-50-061 (5), pg. 5**

Comment: Spiked control samples should account for exceptions for multi-component analytes, such as PCBs.

Suggested verbiage: “Laboratory control samples must include all analytes of interest in the respective analysis, unless method exceptions are specified.”

Thanks for your consideration!