



July 29, 2014

Ellen Treimel / Reggie Cheatham  
U.S. Environmental Protection Agency  
Office of Solid Waste and Emergency Response  
Federal Facilities Restoration and Reuse Office  
William Jefferson Clinton Federal Building (5106P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Ms. Treimel and Mr. Cheatham,

The Environmental Laboratory Advisory Board (ELAB or Board) is a standing Federal Advisory Committee Act board that advises the U.S. Environmental Protection Agency (EPA or Agency). The Board's Charter states that it is to provide consensus advice, information and recommendations on issues related to EPA measurement programs and facilitate operation and expansion of a national environmental accreditation program. Periodically, task groups are formed as needed, allowing ELAB members to focus on a specific issue that has been brought to the attention of the Board.

The Intergovernmental Data Quality Task Force (IDQTF) task group originally focused on the data quality objectives (DQO) process and its use within EPA. As an extension of this effort, many laboratories expressed concern that they were not brought into the DQO process during the initial planning stages, and only learn about specific project requirements when samples are received for analysis or when the laboratory is asked to bid on the testing portion of a project.

Ideally, the DQO process brings together key players in a project to begin planning the approach. It is apparent that laboratories are not considered key players but rather contractors to perform the testing identified in the project. This arrangement does not take advantage of the technical expertise that laboratories can contribute in the planning stages. In many instances, technically inappropriate or unachievable method quality objectives are developed during the DQO process (e.g., method detection and/or reporting limits, analysis in a complex matrix by methods that are not applicable, unachievable accuracy or precision goals). Because these issues are discovered in the implementation phase of a project, it often means costly delays while appropriate tests are found and/or developed or the DQO process goes through another iterative phase to "work around" and address analytical problems.

The IDQTF has been identified as a group that uses the DQO process as outlined in EPA quality documents. Further, the scope involves many governmental agencies that could benefit from laboratory expertise and engagement.

ELAB would like to open a dialog with you and the IDQTF to explore ways of using laboratory expertise in the early planning phases of the DQO process. The Board members hope that the outcome of this dialog will be to heighten the Agency's awareness of the importance of the practical expertise testing laboratories are willing to contribute.

Respectfully,

A handwritten signature in black ink, appearing to read "P Root".

Patsy Root  
Chair, Environmental Laboratory Advisory Board

cc: ELAB Board Members