

09-15-10 Preliminary Draft Comments from Clean Air Scientific Advisory Committee (CASAC) Ambient Air Monitoring and Methods Subcommittee (AAMMS). These preliminary pre-meeting comments are from individual members of the Subcommittee and do not represent CASAC consensus comments nor EPA policy. Do not cite or quote.

***Preliminary Comments from Dr. Peter McMurry on EPA's White Paper, Approach for the Development of a New Federal Reference Method (FRM) for Lead in Total Suspended Particulates (Pb-TSP)***

Charge Question 1: I am not an expert on methods used for extracting Lead (Pb), so I will not to comment on them.

Charge Question 2: Again, I have no particular expertise on analytical methods used to determine Lead (Pb) concentrations, so I will not comment on the choice of ICP-MS as the analysis method for the FRM. My only concern about this is that if state or local agencies use another method that produces equivalent results, then perhaps it should also be allowed.

Charge Question 3: Approach for Evaluating Performance.

My primary concern is that the standard involves the analysis of samples collected with a TSP sampler. There must be a reason that TSP samplers are used rather than, for example, PM10. Are TSP samplers also used for other types of sampling? It would seem that mandating TSP as well as PM10 sampling would impose unnecessary burdens on state and local agencies. Also, TSP samples are less well characterized than PM10 samples.

Other AAMM members have had more experience than I at method evaluation. I defer to their judgement on this topic.

Charge Question 4: Interlaboratory Testing.

It would appear that the interlaboratory testing plan is based on well-established paradigms.

What procedures will be employed to ensure that a given laboratory continues to analyze samples accurately over time, after the initial intercomparison is complete?