



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MEMORANDUM

SUBJECT: **Recommended Approved Modifications to EPA Method 625**

OFFICE OF
WATER

FROM: Richard Reding, Chief
Engineering & Analytical Support Branch, EAD, OST

TO: Quality Assurance Managers
ATP Coordinators
NPDES Coordinators

DATE: November 1, 2006

The 304(h) methods branch recommends allowing several modifications to EPA Method 625 for environmental permitting and compliance monitoring under the EPA's Clean Water Act (CWA) programs. This memorandum does not address laboratory certification requirements that states have mandated.

The text in "Protocol for EPA Approval of Alternate Test Procedures for Organic and Inorganic Analytes in Wastewater and Drinking Water" Section 1.3.2 allows flexibility in the modification of "front end techniques" of the test method provided all criteria in this section and **all QC in the method are met and documented**. This protocol can be downloaded at <http://www.epa.gov/waterscience/methods>.

Recommendations on Method Modifications to EPA Method 625 when Capillary Columns are used:

1. Combining sample extracts before analysis

If the analytes can be reliably identified and quantified in the combined extracts, the extracts may be combined. If, however, the identification and quantitation of any analyte is adversely affected by another analyte, a surrogate, or an interferant, the extracts must be analyzed separately. If there is ambiguity, the extracts must be analyzed separately.

2. Reverse order of pH extraction

The pH extraction sequence may be reversed to better separate acid and neutral components. Neutral components may be extracted with either acid or base components.

Previously, neither of these modifications has been used with Method 625 primarily because of limitations of the resolving power of the packed columns used. In 1985, EPA Region 3 Central Regional Lab requested a modification to method 625 as an alternate test procedure (ATP). Although the approval was for limit use by EPA's Region 3, Central Regional Laboratory only, this modification has come to be used throughout the laboratory community (see attached memo).

Why allow these modifications? Following the base-neutral than acid extraction sequence of method 625 in some cases demonstrated the decomposition of some analytes under basic conditions. Organochlorine pesticides may dechlorinate; phthalate esters may exchange; phenols may react to form tannates. These reactions increase with increasing pH. Reversing the extraction pH sequence may better separate acid and neutral waste components.

Other Recommended Modifications to Method 625

A smaller sample volume may be used to minimize matrix interferences provided matrix interferences are demonstrated and documented.

Alternate surrogate and internal standard concentrations other than those specified in the method are acceptable provided that method performance is not degraded;

An alternate calibration curve and a calibration check other than those specified in the method;

A different solvent for the calibration standards to match the solvent of the final extract.

Other Method Flexibility News

We are revising the "Guidance on Evaluation, Resolution, and Documentation of Analytical Problems Associated with Compliance Monitoring" often referred to as the "Pumpkin Book". Many of the recommendations in the revised "Pumpkin Book" cover ways to mitigate matrix effects.

More explicit flexibility to make changes in approved methods without prior EPA approval is now described at 40 CFR Part 136.6. Such changes are only allowed if the modified method produces equivalent performance for the analyte(s) of interest, and the equivalent performance is documented. It is essential to consult the full text at 40 CFR 136.6 before undertaking method modifications.

Please feel free to forward this information. If you have any questions regarding this memorandum, please contact Lemuel Walker of EASB/EAD/OST by email at walker.lemuel@epa.gov.

cc Lemuel Walker
 ATP Coordinator