

DoD Environmental Data Quality Workgroup Memorandum

Subject: Identifying and Performing Modifications to Methods on Scopes of Accreditation

January 24, 2025



SW-846 methods are intended to be guidance methods with information on how to successfully perform an analytical procedure or technique and laboratories can use the guidance as a starting point for generating their own detailed procedure.¹ SW-846 methods modified in accordance with SW-846 policy and guidance, and the DoD/DOE Quality Systems Manual for Environmental Laboratories (QSM) do not need to be identified as “modified” on the laboratory’s scope of accreditation.

Similarly, modifications to other methods without identifying those methods as “modified” on the laboratory’s scope of accreditation are only allowed in accordance with program (e.g., CWA, SDWA) and reference method (e.g., ASTM and SM) requirements

Modifications to SW-846 and other methods are allowed if they meet the following requirements:

- The method is not identified in 40 CFR 260.11 as evaluating a method-defined parameter.
- The words "shall," "must," or "require" are used to indicate aspects of the method that are considered essential to its performance, and those aspects may not be modified.
- The modifications meet any applicable QSM Table B requirements, including the requirement to reanalyze or reprepare and analyze a sample because of a quality control check failure.
- The underlying chemistry and determinative technique of the modified method are essentially the same as the referenced method.² For example, modifying amounts or types of acids, or digestion times, for acid digestions is acceptable if the modifications are validated, because the “underlying chemistry” is acid digestion. Similarly, modifying chromatography conditions (e.g., temperature, eluent, column) is allowed because the “technique” of separation is maintained. Mass spectrometry is an acceptable modification from less selective detectors.
- The modified method is fully validated in accordance with EPA policy³ and QSM requirements.
- Elements of the method used to evaluate data quality are not eliminated.
- The method user's procedure clearly documents the modifications made.
- Customer approval of a modified method is obtained before use on the customer's samples.

CLEARED
For Open Publication

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¹ <https://www.epa.gov/hw-sw846/quality-assurance-and-hazardous-waste-test-methods> Department of Defense

² 40 CFR 136.6

³ Flexible Approaches to Environmental Measurement – The Evolution of the Performance Approach;

Reaffirmed: November 20, 2015

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Laboratory-modified methods that do not comply with these requirements may still receive accreditation, but the scope of accreditation may not contain the reference method number in the method title (e.g., titles like “537 Mod” and “1633 Screen” are not allowed). See December 2024 *Instructions for DENIX Methods* for titling the method in DENIX and on laboratory scopes of accreditation.

Changes to scopes of accreditation may begin immediately upon release of this memorandum. After January 24th, 2025, no new scopes of accreditation containing laboratory-modified methods that do not comply with these requirements and contain the reference method number in the method title will be allowed.