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VIA ELECTRONIC SUBMISSION

TO: United States Environmental Protection Agency
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FROM: Steve Sliver, Executive Director
Michigan PFAS Action Response Team

DATE: July 19, 2019

SUBJECT: Docket ID No. EPA-HQ-OLEM-2018-0846

The Michigan PFAS Action Response Team's (MPART) Laboratory Standards Workgroup (Workgroup) reviewed the United States Environmental Protection Agency SW-846 Draft Method 8327 for the analysis of Per- and Polyfluoroalkyl Substances (PFAS) Using External Standard Calibration and Multiple Reaction Monitoring (MRM) Liquid Chromatography/Tandem Mass Spectrometry (LC/MS/MS). The Workgroup consists of staff from the Michigan Department of Health and Human Services, as well as staff from the Michigan Department of Environment, Great Lakes, and Energy.

Method 8327 describes procedures for the analysis of samples following a dilution preparation procedure included as Appendix B at the end of the method, intended to become future standalone Method 3512. Method 8327 indicates it covers analysis of various matrices (e.g., waters and solids) and has been tested in reagent water, surface water, groundwater, and wastewater. The sample preparation procedure in Appendix B appears to cover non-potable water only. Following are the Workgroup's comments regarding this new draft analytical testing method:

- Reporting limits for Method 8327 are listed between 10 and 50 parts per trillion for the included 24 compounds, which may or may not meet data quality objectives depending on the intended use of the data.
- During method and multi-laboratory validation, the performance of several compounds appeared to be an issue for a variety of reasons at low concentrations, from solubility to Quality Control (QC) failures, to background and response. Both 6:2 FTS and M2-6:2 FTS had frequent QC failures in general. It may be helpful to have these performance issues resolved before publishing this method.
- The method indicates that it can be used to test solids; however, the extraction and cleanup procedures are indicated as to be determined (TBD). It is recommended to have a solids preparation method in place and referenced before publishing this method.

Thank you for the opportunity to provide comments. If you have any questions, please contact me at 517-290-2943 or SliverS@Michigan.gov.