

NJDEP Technical Guidance Document Review Form

**Documents: *FSPM Chapter 2 - Quality Assurance (updated)*
FSPM Chapter 3- Gaining Entry to Inspect Sites
*For Actual or Suspected Pollution (deleted)***

Comment Period August 10, 2021 to August 31, 2021

NJDEP Committee Chairpersons: Crystal Pirozek and Biff Lowry

Comment #	Page	Section	Subsection	COMMENTS	RESPONSE
1				Comments for Chapter 3 have been previously submitted through participation in the FSPM subcommittee for Chapters 5 and 6	Noted
2				<p>General:</p> <p>-The header contains the document name. They should consider adding the version number or finalized date to the header name (for Records Mgmt). This helps readers ensure they are reading the current version.</p> <p>-For brevity, use of acronyms is recommended once the acronym has been spelled out already. For example, SOPs, QC, QAPPs, QA, CFR...</p> <p>-General observation of descriptive words, i.e., adjectives/adverbs, which are better described using a hyphen. Examples include: decision-making (2.2.1); on-site (2.4.7)(2.6.5.1); cross-contamination (2.6)(2.6.2.2.1)(2.6.2.2.1 p.14)(2.6.5.1); method-dependent (2.6.1.1.1); analyte-free (2.6.1.1.1)(2.6.2.2.1)(2.6.4 - 4 times); laboratory-demonstrated (2.6.2.2.1); site-specific (2.6.2.2.2); New Jersey defined methods (2.6.6); location-specific (2.6.6); program-specific (2.6.7.3); case-by-case (2.6.7.3); OQA-certified laboratory (Appx 2.2); wide-mouth (p. 27) 3 times; PTFE-lined (p.27) last two rows (Container); solvent-free (Appx 2.3 p.29)</p>	<p>Agreed to add date</p> <p>Dashes added where appropriate.</p>
3				Draft Chapter 2 references additional elements required in a QAPP, such as sample containers, decontamination procedures, quality control samples, preservation, and holding time requirements. Including additional QAPP requirements in the updated FSPM that are not incorporated concurrently in the QAPP Guidance can lead to missing elements in QAPPs as investigators will reasonably conclude that the QAPP requirements can be comprehensively found in the QAPP Guidance. Potentially critical components of QAPPs may be missed as "additional elements" are being placed in the updated FSPM as opposed to in an updated QAPP Guidance document. This may hinder the final remediation of contaminated sites.	Agreed to put note into the intro stating that the two documents are meant to work together as resources to create a project specific QAPP.
4	3	2.1		Draft Chapter 2 refers to a "Field Sampling Plan-Quality Assurance Project Plan" or "FSP-QAPP". The current April 2014 NJDEP Quality Assurance Project Plan Technical Guidance ("QAPP Guidance") does not reference a "Field Sampling Plan-Quality Assurance Project Plan" or "FSP-QAPP", meaning that differing language is utilized for the same technical document across at least two NJDEP guidance documents (i.e., the updated FSPM and the QAPP Guidance). Note that the 2005 FSPM does reference "Field Sampling Plan-Quality Assurance Project Plan" or "FSP-QAPP". The NJDEP should use this opportunity to eliminate differing and potentially confusing vocabulary in the FSPM. If a "Field Sampling Plan-Quality Assurance Project Plan" or "FSP-QAPP" is in fact distinct from that referenced in the QAPP Guidance, the NJDEP should clearly state what those differences are and when each is applicable and required.	Changed all references to FSP-QAPP to QAPP.

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5	3	2.1		<p>EPA's revised Environmental Information Quality Policy (CIO 2105.1) and Quality Procedure (CIO 2105-P-01.1) have replaced the term "quality system" with "quality program". For consistency, NJDEP may wish to revise the term in the 1st sentence of the 2nd paragraph to "The foundation of an organization's quality program is typically documented in a Quality Management Plan (QMP)."</p> <p>FYI - Term is also used at: pg 5, 2.3 option #2: "The National Environmental Laboratory Accreditation Program (NELAP) which offers certification based upon nationwide criteria that use a quality systems approach to insure the integrity of analytical data". Revising the term in this sentence to "...quality program approach..." is depended on the source of the statement, i.e. EPA or NELAP.</p>	<p>Agreed to change. Note: In the FSPM hyperlinks are not given names. The actual link addresses are listed in the text.</p>
6	3	2.1		<p>Please revise the statement at the end of the 2nd paragraph that reads "The USEPA issues documents to provide further information on satisfying the quality requirements, known as USEPA Requirements for Quality Management Plans (QA/R-2)-March 2000 available at: https://www.epa.gov/quality/epa-qar-2-epa-requirements-quality-management-plans".</p> <p>This document is currently under revision. The revised document is anticipated to be titled "Environmental Information Quality Management Plan Standard". The revised document will be linked to the same location as the current document, however the name of the link will probably be revised.</p> <p>For the NJDEP Field Sampling Procedures Manual, I recommend that the name of the current hyperlink be edited to be more generic, such as: USEPA Environmental Information Quality Management Plan (QMP) Standard, and then revise the last sentence to read something like:</p> <p>"The USEPA issues documents to provide further information on satisfying the quality program requirements. The current version of the QMP requirements are available at: USEPA Environmental Information Quality Management Plan (QMP) Standard."</p>	<p>Agreed to change. Note: In the FSPM hyperlinks are not given names. The actual link addresses are listed in the text.</p>
7	3	2.1		<p>Please revise the statement at the end of the 4th paragraph that reads "Plans are prepared by using a variety of standard references including, but not limited to, EPA Requirements for QA Project Plans (QA/R-5) and Guidance on Quality Assurance Project Plans (G-5). These documents can be found on the USEPA website at: https://www.epa.gov/quality/epa-qar-5-epa-requirements-quality-assurance-project-plans".</p> <p>These documents are currently under revision. The revised documents are anticipated to be titled "Environmental Information Quality Assurance Project Plan Standard" and "Environmental Information Quality Assurance Project Plan Guidance". The revised documents will be linked to the same locations as the current documents, however the names of the links will probably be revised.</p> <p>For the NJDEP Field Sampling Procedures Manual, I recommend that the name of the current hyperlink be edited to be more generic, such as: USEPA Environmental Information Quality Assurance Project Plan (QAPP) Standard, that the hyperlink to the guidance document: https://www.epa.gov/quality/guidance-quality-assurance-project-plans-epa-qag-5 be added with a more generic name, such as USEPA Environmental Information Quality Assurance Project Plan (QAPP) Guidance, and then the sentences be revised to read something like:</p> <p>"Plans are prepared by using a variety of standard and guidance references including, but not limited to, USEPA's Quality Assurance Project Plan Standard and its related Guidance document. The most current version of these documents are available at: USEPA Environmental Information Quality Assurance Project Plan (QAPP) Standard and USEPA Environmental Information Quality Assurance Project Plan (QAPP) Guidance, respectively". Additional guidance documents may be found at the USEPA website: www.epa.gov/quality under https://www.epa.gov/quality/agency-wide-quality-program-documents.</p>	<p>Agreed to change. Note: In the FSPM hyperlinks are not given names. The actual link addresses are listed in the text.</p>
8	3	2.1		<p>Fourth paragraph, Last sentence-Add are implemented during analysis and</p>	<p>Agreed to add</p>
9	3	2.1		<p>Last sentence of page reads "Permits may require the permittee to achieve detection of pollutants that are present at certain minimum concentrations." This language is a bit cumbersome and should be reworded. Possibly: "Permits may require a permittee to achieve specific reporting limits when monitoring for pollutants." The permittee is not required to achieve detection of a pollutant but instead is required to ensure monitoring is achieved down to a certain RL level.</p>	<p>Agreed to change / USEPA amendments to CWA for use of sufficiently sensitive test methods. Refer to FR notice (August 2014): https://www.govinfo.gov/content/pkg/FR-2014-08-19/pdf/2014-19265.pdf</p>

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10	3	2.1		replace is with are after protocols on line 3	The recommended change is not necessary..
11	3	2.1		After CERCLA, please "research conducted by the NJDEP Division of Science and Research,"	Made changes to be more clean
12	3	2.1		After the QMP text. The following should be inserted for the LSRP and field sampling team; "The QMP provides the current list of the current NJDEP QA management structure and contact information by relevant program for questions related to QA."	Agreed to add, changed wording
13	3	2.1		USEPA Requirements for Quality Management Plans (QA/R-2)-March 2000 is scheduled to be updated - ensure latest version is cited correctly and link goes to latest version	Updated per USEPA comments 3 and 4
14	3	2.1		EPA Requirements for QA Project Plans (QA/R-5) and Guidance on Quality Assurance Project Plans (G-5) are scheduled to be updated - ensure latest version is cited correctly and link goes to latest version	Updated per USEPA comments 3 and 4
15	3	2.1		The USEPA issues documents to provide further information on satisfying the quality requirements, known as <i>USEPA Requirements for Quality Management Plans (QA/R-2)-March 2000 (QA/R-2) (EPA 2001)</i> available at: https://www.epa.gov/quality/epa-qar-2-epa-requirements-quality-management-plans .	Updated per USEPA comments 3 and 4
16	3	2.1		Consider adding a link directly to DEP's current QMP or instead to the Quality Assurance Program's webpage (https://www.nj.gov/dep/enforcement/oqa/qap.html) which contains a link to the current QMP.	Agreed to add
17	3	2.1		The Guidance on Quality Assurance Project Plans (G-5) document is not available at the given link only the EPA Requirements for QA Project Plans (QA/R-5) is. Either provide additional link or edit the sentence accordingly.	Updated per USEPA comments 3 and 4
18	3	2.1		Quality Requirements for non-.... (R should be small r)	Agreed to change
19	3	2.1		"In addition" is starting a new paragraph. Consider removing these two words.	Agreed to change
20	3	2.1		SDWA is plural, yet all other pgms are singular. Was this intentional?	Agreed to change
21	3	2.1		Not grammatically correct; not a sentence. Consider merging w/prior sentence ... "approach, i.e., the level ..."	Considered, no change
22	3	2.1		It is important to include the analytical laboratory staff...in (best to use "staff" after laboratory)	Agreed to change
23	3	2.1		Paragraph 2, sentence 2. " The QMP is viewed as the over-arching, 'umbrella' document which describes the quality policies, procedures, and applicable areas within the organization..." The word "quality" before policies seems unnecessary or redundant.	Considered, no change. QA is a term.
24	3	2.1		Paragraph 2, no period at the end (after the link).	Agreed to change
25	4	2.1		last section with bullets: Analytical Lab Data... Usability Technical (Usability needs capitalization)	Agreed to change
26	4	2.1		Standard Operating Procedures (SOPs) for sample collection, handling, and analysis are examples of elements that must be included in the QAPP	Agreed to change
27	4	2.1		The link in the first section is only to SRP's guidance library, not all of DEP's as the sentence states.	Changed to "NJDEP Site Remediation and Waste Management Program"
28	4	2.1		List of links: Soil- Investigation SI/RI/RA Technical Guidance : https://www.nj.gov/dep/srp/guidance/#si_ri_ra_soils Ground Water SI/RI/RA Technical Guidance: https://www.nj.gov/dep/srp/guidance/#pa_si_ri_gw Also the font size is inconsistent for the the sublist of analytical method tech guidance docs. While "usability" isn't actually capitalized on the analytical method webpage, consider correcting it both in this document and on the webpage.	Agreed to change
29	4	2.1		Paragraph 2, no period at the end (after the link).	Agreed to change
30	4	2.2		2nd sentence: Permits... add "or use specific analytical methods".	Agreed to change

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31	4	2.2		last sentence of 1st paragraph - is unclear. What are you trying to say? "Discharges eliminated...??"	Sentence rewritten
32	4	2.2		The first paragraph/second sentence of this section references the same sentence as above. Should update this language as requested in comment 3.	Agreed to change
33	4	2.2		Last sentence of first paragraph reads "Discharges may need to be eliminated if they exceed concentrations which may not be detectable unless proper quality control methods are implemented." This sentence should start with "Pollutants" instead of discharges - they need to eliminate the pollutant that was detected not the discharge itself. Also, consider including reference to the requirement for use of sufficiently sensitive test methods; maybe include " The use of sufficiently sensitive test methods (SSTM) is required to comply with permit limits in accordance with the National Pollutant Discharge Elimination System (NPDES). "	Agreed to change
34	4	2.2		Discharges may need to be eliminated if they exceed concentrations which may not be detectable unless proper quality control methods are implemented. Comment: This sentence is unclear and needs to be clarified. I'm not sure if you are saying 1) discharges might be overlooked/not identified unless proper QC methods are implemented, 2) if proper QC isn't followed, some identified discharges might have to be discarded if the reported concentrations are greater than the MDL, or 3) something else.	agreed to change (same comment as above)
35	4	2.2		"Discharges may need to be eliminated if they exceed concentrations which may not be detectable unless proper quality control methods are implemented ." - Unclear what you're trying to say here - please revise	agreed to change (same comment as above)
36	4	2.2		Laboratories submitting analytical data to the State of New Jersey must hold current certification where applicable under the Laboratory Certification Rule at N.J.A.C. 7:18. Comment: This sentence is awkward, consider rewording along the lines of: Pursuant to the Laboratory Certification Rule, N.J.A.C. 7:18, certain laboratories submitting analytical data to the State of New Jersey be certified.	Considered, no change / consistent with NJDEP OQA webpage
37	4	2.2		Consider adding to the last paragraph the following link to OQA website listing the certification status of laboratories: https://www.nj.gov/dep/enforcement/oqa/certlabs.htm - FYI, this address may change after the reorganization of C&E occurs in sept, confirm current address upon finalization of doc.	Agreed to add
38	4	2.2		"Analytical" vs. Analytic accuracy is preferred	Agreed to change
39	4	2.2		Link to OQA regs implies the most recent version of the rule, will it be complete by FSPM publication?	If a new regulation is promulgated, the link will be updated.
40	4	2.2		Permits will require the permittee to achieve detection of pollutants that are present at certain minimum concentrations.	Agreed to leave "may" and not change to "will" because not all NJDEP permits require analytical concentration limits. / EPA amendments to CWA (August 2014) to require use of sufficiently sensitive test methods
41	4	2.2		Environmental laboratory is defined as any laboratory, facility, consulting firm, local government or private agency, business entity or other person that the NJDEP has authorized to generate analytical data.	Agreed to change / NJDEP Low Flow Purging and Sampling Guidance for exact language used by NJDEP.
42	5	2.2		Option 2 should include "pending OQA approval as certain regional certifications, (CA), are not acceptable"	Regional certification is not offered. NJ-cert is offered for the ACPL contained in Part III of the NJ-cert application. NJ-cert is offered under the state program (ELCP, aka Blue Book) or the national program (NELAP). No 'regional' certification is offered.

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43	5	2.2		<p>EPA's revised Environmental Information Quality Policy (CIO 2105.1) and Quality Procedure (CIO 2105-P-01.1) have replaced the term "quality system" with "quality program". Comment 1 above suggests that for consistency, NJDEP may wish to revise the term in the 1st sentence of the 2nd paragraph on page 3 to "The foundation of an organization's quality program is typically documented in a Quality Management Plan (QMP)."</p> <p>The term is also used at option #2: "The National Environmental Laboratory Accreditation Program (NELAP) which offers certification based upon nationwide criteria that use a quality systems approach to insure the integrity of analytical data". Revising the term in this sentence to "...quality program approach..." is depended on the source of the statement, i.e. EPA or NELAP.</p>	Agreed to change
44	5	2.2	2.2.1	<p>Other field parameters through the Laboratory Certification Rule (N.J.A.C. 7:18),</p> <p>Comment: A consistent format should be used for citations throughout the chapter and the whole FSPM. I recommend: Laboratory Certification Rule, N.J.A.C. 7:18, but some other Tech Guidance Docs use Laboratory Certification Rule (N.J.A.C. 7:18). The key is that the same format is consistent throughout the document.</p> <p>Also the title for each Rule/Reg/Statute should be consistent throughout the document. In the paragraph it's called the "Laboratory Certification Rule" but, for example, in Section 2.4 it's called "NJ Laboratory Certification Regulations" and the "Regulations Governing the Certification of Laboratories and Environmental Measurements". Review and update this document so the title and cite are consistent throughout..</p>	Reviewed chapter and made the format consistent. It is referred to by either it's full name "Regulations Governing the Certification of Laboratories and Environmental Measurements" or it's abbreviated name "Laboratory Certification Rule" as cited in the first use of the term in the second paragraph of Section 2.2.
45	5	2.2	2.2.1	<p>Regardless of whether a company or organization is a laboratory, certification is strongly recommended.</p> <p>Comment: Why would a company that is not a lab need to be certified? Are words missing from the sentence?</p>	The wording has been changed from recommended to required. Pursuant to the Regulations Governing the Certification of Laboratories and Environmental Measurements, N.J.A.C. 7:18, the OQA requires that field environmental measurements and environmental laboratories submitting analytical data to the NJDEP, regardless of quality level, must be certified. Environmental laboratory is defined as any laboratory, facility, consulting firm, local government or private agency, business entity or other person that the NJDEP has authorized to generate analytical data.
46	5	2.2	2.2.1	<p>"For measurements collected in the field and submitted to the NJDEP to support regulatory compliance decision making, the OQA requires certification for "Analyze Immediately" and other field parameters through the Laboratory Certification Rule (N.J.A.C. 7:18), unless allowed by federal regulation to be measured by a non-certified entity." The bold section must be changed to "unless a specific NJDEP regulation allows for measurement by a non-certified entity". The feds do not require certification for anything other than drinking water but the DEP has more stringent requirements that do require cert so the exclusion should point to DEP programs not the feds.</p>	Agreed to change
47	5	2.2	2.2.1	<p>"Additionally, immunoassay field methods require certification pursuant to N.J.A.C. 7:18 under the Solid and Hazardous Waste Program category. Regardless of whether a company or organization is a laboratory, certification is strongly recommended. This includes but is not limited to responsible parties, contractors, and facilities. For additional information regarding the above laboratory, immunoassay, and field instrument certification requirements see the OQA website at: https://www.nj.gov/dep/enforcement/oqa.html." Change the bolded language to "Regardless of whether a company or organization is considered a true laboratory, certification is required when reporting data for compliance purposes." as the program rules require certification. Also delete "the above" in the next sentence.</p>	Agreed to change
48	5	2.2	2.2.1	Should include link to the Analyze Immediately parameters for the reader	Made changes to address comment
49	5	2.2	2.2.1	Regardless of whether a company or organization is a laboratory, certification is required .	Agreed to change

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50	5	2.3		In the 1st paragraph of Section 2.3, please replace the name of the hyperlink: https://www.epa.gov/quality/agency-wide-quality-system-documents with: https://www.epa.gov/quality/agency-wide-quality-program-documents . The link takes you to the same place, but the name has changed due to the change in the term "quality system" to "quality program" as noted in prior comments.	Agreed to change
51	5	2.3		Replace contractor with LSRP	This document applies all entities conducting work in New Jersey, not just LSRPs working for the Site Remediation and Waste Management Program.
52	5	2.3		Selection and application of site-appropriate Data Quality Objectives (DQO) must be discussed in the FSP-QAPP.	Considered, no change
53	5	2.3		Doesn't the consultant/contractor also have to develop the FSP-QAPP in addition to implementing it?	agreed to not change. Refer to section 2.3 second paragraph, which clearly states 'development and implementation' of a QAPP.
54	5	2.3		References to the NJDEP Technical Guidance Documents should be added. Also, the development of project DQOs (not just analytical DQOs) should be discussed in this section.	Considered, no change
55	6	2.3		For permit compliance sampling, a quality assurance program is necessary and required to assure analytical accuracy sufficient to demonstrate compliance	Considered, no change
56	6	2.3		" <i>Sample analytical data that undergo data validation by the NJDEP must be generated . . .</i> " - just for NJDEP validation? What about other entities? Data to be validated must be a standardized full deliverable	This paragraph is not saying that data generated for entities other than the NJDEP does not need to be validated. It is saying that if you are submitting data to NJDEP that will undergo validation, the deliverable must be a "laboratory full data deliverable", pursuant to N.J.A.C. 7:26E-2.
57	6	2.3		" <i>Other programs may also have specific data deliverable requirements and subsequent validation of these data.</i> " - awkward and unclear - please revise	Made changes to address comment
58	6	2.3	2.3.1	Second paragraph on page specifics the 40 CFR locations for drinking water and clean water act parameter requirements; this section should also list 40 CFR 143 for drinking water secondary contaminants.	Agreed to add
59	6	2.3	2.3.1	2nd paragraph, last sentence: change Appendix 2.4 and 2.5 to "Appendices..."	Agreed to change
60	6	2.3	2.3.1	5th paragraph, last sentence: These documents may be found - change to "are found"	Agreed to change
61	6	2.3	2.3.1	Methods for marine and freshwater biological monitoring that are not in 40 CFR are listed in Appendix 2.4 and 2.5 of this chapter . Comment: Shouldn't there be a chapters # after 40 CFR, e.g. 40 CFR 136? Also please clarify that you are referring to the Appendices of this document/chapter/FSPM. Review and update the rest of this document, to be sure that all references to the Appendices, as well as Chapters, Sections, etc of the FSPM are clear that they are to Appendices this document/chapter/FSPM.	Reviewed and updated chapter to ensure all references to appendices are clearly referring to this document. The CFR parts are listed in document. Changed to make more clear.
62	6	2.3	2.3.1	"Current requirements for samples to be analyzed in accordance with the USEPA SW846 Methods are published in the latest final update of the USEPA SW846 Test Methods for Evaluating Solid Waste – Physical and Chemical Methods 3rd Edition issued 1996 and amended. They may be found on USEPA's website at https://www.epa.gov/hw-sw846 ". Reference to 3rd Edition may be outdated as SW846 provides "updates" online but may not refer these updates to 3rd edition? This should be referred to as the SW-846 Method Compendium, or The Test Methods for Evaluating Solid Waste: Physical/Chemical Methods Compendium, as amended and supplemented.	Changed to not specifically mention the 3rd edition.

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63	6	2.3	2.3.1	"Current requirements for samples to be analyzed in accordance with the USEPA Contract Laboratory Program are published in the latest version of the USEPA CLP Statements of Work (SOWs). These documents may be found on the USEPA Website at http://www.epa.gov/superfund/programs/clp/index.htm ." This link is no longer current. Need to insert the following: https://www.epa.gov/clp/epa-contract-laboratory-program-statement-work-superfund-analytical-methods-multi-media-multi-0	Agreed to change
64	6	2.3	2.3.1	The URL in the 5th paragraph under Section 2.3.1: http://www.epa.gov/superfund/programs/clp/index.htm does not work. Please replace the link.	Agreed to change (same comment as above)
65	6	2.3	2.3.1	These documents may be found on the USEPA Website at http://www.epa.gov/superfund/programs/clp/index.htm . - This link does not go to the CLP - https://www.epa.gov/clp is the correct link	Agreed to change (same comment as above)
66	6	2.3	2.3.1	The link to the Superfund CLP page doesn't work. Also, Website should not be capitalized.	Agreed to change (same comment as above)
67	6	2.3	2.3.1	Replace requirements with guidance as these are guidance	Changed the text to be accurate.
68	6	2.3	2.3.1	The following link for the USEPA CLP Statements of Work (SOWs) is not unctioning. Brings you to a page that that says "Sorry, this page does not exist". http://www.epa.gov/superfund/programs/clp/index.htm	links fixed
69	6	2.3	2.3.2	Enzyme kits are available for a variety of parameters. Modify following sentence for example PCBs and explosives	Agreed to change
70	7	2.3	2.3.2	Bullet 4 states "Methodology to compare field and laboratory data, such as duplicates, performance evaluation samples, and calibration measurements"... Change the bolded text to " proficiency testing " as performance evaluation is outdated and no longer the term used.	Agreed to change
71	7	2.3	2.3.2	"If applicable, the field technician performing the analyses shall have proof of training by the manufacturer/vendor of the test method pursuant to N.J.A.C. 7:18 " 7:18 does not contain language as specified here and certification through the OQA is certification of labs and NOT individual analysts. OQA does not certify individuals so reference should be removed.	Made changes to address comment and certification requirements. NJ-certification for generation of analytical data by laboratories, companies, remediation professionals, field samplers, and other entities (such as a municipal authority operating a wastewater treatment plant) is a multi-step process. This process is detailed in NJAC 7:18. For basic slements of this NJ-cert process, refer to section 2.2.1 Field Paramaters. The business entity is certified, but the NJ-cert requirements include: Environmental Laboratory Personnel Requirements and Duties (training, education, years of experience, etc), Demonstration of Competance (DOCs) for each person performing each analytical method on each sample matrix, Proficiency Testing (PT) for each method for each sample matrix to report and pass for each analyte to be certified, Onsite Audits, Notification of Changes in Status, etc. The NJ-cert is granted to the company or organization, based on satisfactory completion of the process. Renewal cert must be applied for annually. Onsite audits are conducted bi-annually. PT samples are analyzes on a schedule defined by NJDEP OQA.
72	7	2.4		Prior to the collection of a sample, consideration should be given to the type and material of construction of the container(s) that will be used to store and transport the sample	Type is a general term which includes material of construction. Matrial of construction is specifically addressed in the next section (2.4.1).
73	7	2.4		The entity requesting the analysis is responsible for requesting the proper sample containers; or providing the laboratory with an accurate description of the matrix being sampled to enable the laboratory to provide the correct quantity and type of sample container.	Agreed to delete

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74	7	2.4	2.4.1	Insert the following statement into this last paragraph: "Only plastic containers should be used when the determinations of boron and silica are critical."	Agreed to add
75	7	2.4		1st sentence: change "consideration should be given..." to must or shall be given to type of container...	Cannot use "shall" unless specifically required in regulation.
76	7	2.4	2.4.1	1st paragraph,last sentence awkward reword "plasticizers may leach into the sample and solvents may degrade the plastic"	Agreed to change
77	7 & 8	2.4	2.4.1	Should add a paragraph discussing specific container requirements for PFAS	Decided to keep section general and not list specific requirements for individual compounds. As noted in the text, specific requirements are identified in the analytical method.
78	8	2.4	2.4.1	last sentence is missing a period. (after with the laboratory)	Agreed to change
79	8	2.4	2.4.1	Last sentence of last paragraph of this subsection is missing a period.	Agreed to add
80	8	2.4	2.4.2	Replace with sample matrix rather than just matrix	Agreed to add
81	8	2.4	2.4.3	Containers used for metals analysis can be opaque or colorless.Consider adding the following language "unless the sample will be analyzed for Silver or any other element which may be affected by light."	agreed to add
82	8	2.4	2.4.3	While color does exclude wavelenths of light it is the opaqueness that shields the sample from photodegradation	Considered, no change
83	8	2.4	2.4.4	No amendments should be added to ground glass stoppers to facilitate opening. Comment: Is amendments to best word? It doesn't sound right to me. Alternatively, consider rewording the sentence.	Changed to make more clear
84	8	2.4	2.4.5	Insert "Lot" certified containers	Agreed to not change. The last sentence addresses this issue when referring to "batch certified"
85	8	2.4	2.4.5	Sample Container Quality - starts off with "single-use containers". This should be further down, and opening sentence should be similar to 3rd sentence (The cleaning procedure is dictated by the specific analysis to be performed.) A general statement that cleaning QC is relative to the sensitivity of analysis. This may improve reuse and washing of some containers (like TSS in wastewater or other conventionals). Low-level analysis requires use of specialized cleaning procedures or in-house cleaning using strict QC methods.	Agreed to change, rewrote section
86	8	2.4	2.4.6	To first sentence, add "transport and/or" after "To prepare for..."	Agreed to change
87	8	2.4	2.4.6	To prepare for shipment, the sample bottles must be accompanied by a hard copy of the chain of custody. In addition, the cooler or shuttle containing the samples must be custody sealed unless the cooler or shuttle is within sight of the sampler or sample custodian.	Added to text to address change
88	9	2.0	2.4.6	When receiving the sample set from the laboratory, field personnel should record the seal number associated with each sample shipment container or cooler and record whether the seal was intact upon arrival in the field.	Agreed to change / not all coolers are custody sealed, as they are opened and re-iced for transport to the lab while in the 'custody' of the remediation professional or the laboratory personnel (including lab couriers who are trained 'sample custodians' following an SOP in maintaining custody). Coolers shipped via third party carriers are iced and sealed to maintain custody.
89	9	2.4	2.4.6	The chain of custody will identify final disposal of the sample container. This statement is not accurate unless the laboratory is using an "internal chain of custody" . This is also not a requirement within NJAC 7:18 and not enforced upon labs.	Made changes to address comment
90	9	2.4	2.4.6	Last sentence add "or contact the commercial laboratory if you have questions about the documentation"	Made changes to address comment

Comment #	Page	Section	Subsection	COMMENTS	RESPONSE
91	9	2.4	2.4.6	exclusive referencnes to NJAC 7:26E SRP regs for chain of custodies should also include other Regs such as NJAC 7:14A, and other applicable regs, if this a departmental document .	considered, no change. 7:14A makes no references to chain of custody.
92	9	2.4	2.4.7	Use of a temperature blank sounds like a good idea, but is not always indicative of the sample temp if, for example, the samples were very warm and/or the location of sampling site is close to the laboratory (it won't get as cold as a small bottle which has been kept on ice)	Reference to temperature blank removed.
93	9	2.4	2.4.7	Sample bottles and clean sampling equipment must never be stored near running vehicular exhaust pipes , solvents, gasoline, or other materials that are potential sources of contamination.	Agreed to add
94	9	2.4	2.4.7	Strike the last sentence in the 1st paragraph "stored on site 4 days." It depends on the method and should not be used.	agreed to remove the reference to '4 days' as sample hold times depend on analytical paramater and method defined preservatives.
95	9	2.4	2.4.7	The Site Remediation and Waste Management Program recommends that sample bottles not be held on site in excess of 4 days - recommends or requires? I thought this was a requirement	The timeframe is not specifically cited in regulation.
96	9	2.4	2.4.7	Regarding the sentence "The Site Remediation and Waste Management Program recommends that sample bottles not be held on site in excess of 4 days." we suggest clarifying whether this is in reference to filled or empty sample bottles. If filled sample bottles are being referenced, then suggest adding reference to laboratory hold times, as these would also affect the amount of time the filled bottles can be kept onsite (short hold times would require retrieval by the laboratory in less then 4 days in some cases).	Agreed to remove
97	9	2.4	2.4.7	The Site Remediation and Waste Management Program recommends that sample bottles not be held on site in excess of 4 four days.	Agreed to change
98	9	2.4	2.4.7	The laboratory may opt to provide a temperature blank to document the sample temperatures upon receipt of the samples. Use of temperature blanks is highly recommended.	Agreed to remove
99	9	2.4	2.4.8	Add language," perservatives added by the lab prior to sampling preclude the bottle rinsing with sample prior to collection." as an added conlsideration.	Bottle rinsing not mentioned in this section
100	9	2.4	2.4.8	1st sentence: at end add "and may include field filtration" (after maintain sample integrity.)	Changed section to adress
101	9	2.4	2.4.8	2nd bullet: can add "i.e., within 15 minutes." at the end, after "... are collected"	Agreed to change
102	10	2.4	2.4.8	3rd bullet: modify to add after "...to conduct" "sample processing/preservation activities." and consider adding after "activities" "away from vehicle or other machinery exhaust".	Agreed to change
103	10	2.4	2.4.8	2nd to last bullet: Metals... "should take place ..." add "at least 24-hours" prior to analysis of the sample (for NJPDES program). (This reco may be too specific - so understand if it's rejected)	Considered, decided not to change
104	10	2.4	2.4.8	Fourth bullet down. For pH verification procedure detailing sample aliquot placed into clean beaker or container lid and checked with pH paper; add that the portion of stopper exposed to pH paper should be rinsed with reagent water. Also, it must be clear that for certain parameters there are specific directions for checking pH such that nothing is placed into the container or on the cap so this section needs to direct the sampler to ensure they're familiar with preservation check requirements in the method; for example, for oil and grease nothing can go into the bottle or touch the cap as it O&G may adhere to that and reduce the measured amount, also VOA vials cannot be checked in this manner either. so you should include a statement that refers them to the method for exemptions.	Agreed to change to make more clear
105	10	2.4	2.4.8	Fifth bullet down. List of label items to include on preservative containers should include expiration date.	agreed to add
106	10	2.4	2.4.8	No discussion of field blank containing the preservative to certify that it is of sufficient purity not to interfere with the analysis	Considered, no change, further discussed in chapter 6

Comment #	Page	Section	Subsection	COMMENTS	RESPONSE
107	10	2.4	2.4.8	All preservative containers must be labeled with respect to contents, concentration, laboratory grade, expiration date , and the date of purchase or preparation.	Agreed to add text to address
108	11	2.4	2.4.8	1st paragraph: "rinsed with the sample source".... Add "three times,..." and an ...	Text not present
109	11	2.4	2.4.8	Note: Certain methods..... (I reco change wording from "so long as" to "provided" "they are received....")	Agreed to change
110	11	2.4	2.4.8	Second bullet down. Could add that samples shall never be frozen unless specifically allowed by the analytical method.	Agreed to add
111	11	2.4	2.4.8	"Information on required <u>holding times</u> can be found at the following USEPA websites." This subsection addresses preservation requirements, should "holding times" be changed to "preservation requirements" here, 2.6.5.2 already lists resources to find holding time requirements.	Considered, no change
112	11	2.4	2.4.8	Comment on same sentence as above. 2.6.5.2 for holding times states that holding times are dictated by the specific analytical method used, but 2.4.8 pertaining to preservation does not mention preservation requirements found within the method although the note above does list a specific example for mercury. Perhaps the sentence in 2.4.8 should say something like "Information on required holding times (or preservation requirements if changed based on previous comment) can be found within the specific analytical method being used and at the following USEPA websites. Not all methods dictate a holding time so more than just reference to the method is needed.	Concidered, no change, method defined
113	11	2.4	2.4.8	The last bullet of this section contains an incorrect link: https://www.epa.gov/clp/ . It should provide the following link: https://www.epa.gov/clp/epa-contract-laboratory-program-statement-work-superfund-analytical-methods-multi-media-multi-0	Agreed to change
114	11	2.4	2.4.8	In the first paragraph of the page, when it states "the interior of the sample container rinsed with the sample source"; this section should state " rinse at least two times with the sample water before the actual sample is collected. Double rinsing is needed to ensure thorough rinse is completed.	Agreed to change
115	11	2.5		2nd paragraph: Remove "itself" from 2nd to last sentence.	agreed to remove
116	11	2.4	2.4.8	SW846 methods are guidance documents not requirements replace with recommendations if you agree	Changed text to address comment
117	12	2.6		Add preservative purity to the section second sentence	Agreed to add
118	13	2.6	2.6.2.1.1	"A <i>description of field blanks for the aqueous and non-aqueous (2.6.1.1.1 above)</i> ." - is not a sentence - please correct Field blanks must be analyzed for all of the same parameters that the samples collected will be analyzed for .	Fixed descriptions for both field blanks to address
119	13	2.6	2.6.2.1.1	However, F field B lanks may be required to detect cross contamination from ambient air during potable ...	Agreed to change
120	13	2.6	2.6.2.2.1	Trip blanks are required only for aqueous sampling events, pursuant to the specific analytic method.	Agreed to add
121	13	2.6	2.6.2.1.1	last paragraph: Either remove "However" or remove capital F and B.	Agreed to change
122	14	2.6	2.6.2.2.1	1st paragraph: seems overly repetitive. Same info has been presented several times on trip blank (aqueous).	Because this document is used as a reference manual (not intended to be read in its entirety), the same information may be in different locations.
123	14	2.6	2.6.2.2.1	2nd paragraph: For brevity, reco removing the words "in the laboratory" after "method blank water used.... during analysis.	Considered decided not to change
124	14	2.6	2.6.2.2.1	After "specific method" at the top of the page dangling sentence, add "or SOP that specifies the laboratory background contamination by specific volatile solvents."	Changed text to address comment
125	14	2.6	2.6.2.2.2	USEPA has issued analytical methods that require additional trip blanks for each batch of twenty samples submitted to the CLP laboratory	Agreed to add

Comment #	Page	Section	Subsection	COMMENTS	RESPONSE
126	14	2.6	2.6.3	Stack Emissions & Bureau of Stationary Sources - The given links are to the section's/unit's main page and not to the a sampling or QA/QC page. The user would have to do a lot of digging to get to the information they are looking for. Consider replacing with a better link.	Agreed to leave link to main pages so users can see "big picture"
127	15	2.6	2.6.4	second full paragraph references 7:18 and specific sections and definition. 7:18 is going through a rule revision and this information will change when final.	We will update when rule is final.
128	15	2.6	2.6.4	Recommend adding EPA descriptions of deionized and organic free blank water.	Considered, no change
129	15	2.6	2.6.5.1	after cross contamination add "or degradation."	Agreed to add
130	15	2.6	2.6.5.1	"The Site Remediation and Waste Management Program <i>recommends</i> that quality control samples not be held on site in excess of 4 days." - I thought this was required by NJDEP - not recommended	The timeframe is not specifically cited in regulation.
131	15	2.6	2.6.5.1	The Site Remediation and Waste Management Program recommends that sample bottles not be held on site in excess of 4 four days.	Agreed to change
132	15	2.6	2.6.5.1	1st sentence: change 'should' to 'shall' to read, "Blanks and other QC samples shall be maintained in a similar...."	Cannot use "shall" unless specifically required in regulation.
133	15	2.6	2.6.5.2	1st sentence: add to the end, "or under the regulated program".	Agreed to change
134	15	2.6	2.6.5.2	For sentence "Holding times for individual parameters are dictated by the specific analytical method being used." May want to add that holding times in Federal Regulation may control over those in the analytical method. OQA enforces the stricter holding time of the two. Also could mention that holding times for NJ regulated parameters that are not found in CFR are found in N.J.A.C. 7:18.	Reviewed and made changes
135	15	2.6	2.6.5.2	Again SW846 is guidance not requirements	Reviewed and made changes
136	15	2.6	2.6.5.2	Paragraph starting with "Current requirements for samples to be analyzed in accordance...". After the paragraph and link, there needs to be a period.	Agreed to change
137	16	2.6	2.6.5.2	"The holding time clock for all other certified methods and parameters begins at the time of sample collection in the field." Is clarification of the start of holding time for composite samples needed? This information is noted in 40 CFR 136 regarding composites.	Agreed that no change is needed
138	16	2.6	2.6.5.2	First paragraph, second sentence incorrectly references the link: It should be " https://www.epa.gov/clp/epa-contract-laboratory-program-statement-work-superfund-analytical-methods-multi-media-multi-0 "	Agreed to change
139	16	2.6	2.6.5.2	The URL in the 1st paragraph on page 16 (under Section 2.6.5.2): http://www.epa.gov/superfund/programs/clp/index.htm does not work. Please replace the link.	Agreed to change
140	16	2.6	2.6.5.2	These documents may be found on the USEPA website at: http://www.epa.gov/superfund/programs/clp/index.htm . - the link is not valid - https://www.epa.gov/clp is the correct link	Agreed to change (same comment as above)
141	16	2.6	2.6.5.2	EPA CLP link is incorrect	Agreed to change (same comment as above)
142	16	2.6	2.6.5.2	Same as comment 4. The first link on page for the USEPA CLP SOWs is not functioning.	Agreed to change
143	16	2.6	2.6.6	For brevity, recommend removing "It is important to note that" and just start the sentence "Many methods have additional QC..."	Agreed to change
144	16	2.6	2.6.6	2.6.6 Specialty m Methods - Both words in the heading should be capitalized, consistent with the rest of the document. Also be sure that this is updated in the Table of Contents as well.	Agreed to change
145	16	2.6	2.6.7.1	We used "batch" to specify the 20 samples run in one day.	Considered, no change

Comment #	Page	Section	Subsection	COMMENTS	RESPONSE
146	16	2.6	2.6.7.1	Consider changing 'should' to 'shall' in 2nd paragraph / 2nd sentence.	Cannot use "shall" unless specifically required in regulation.
147	17	2.6	2.6.7.1.1	And in 2.6.7.1.2: For proper English, consider adding 'of' after "in order to fill all ____ the necessary". Either "all necessary containers" or "all of the necessary". And for brevity, consider removing the word 'sample' after 'necessary' (in both sections).	Agreed to change
148	17	2.6	2.6.7.1.2	Should also reference detailed USGS split sampling protocols for preparing duplicate solid samples	Made a change to address comment
149	17	2.6	2.6.7.1.2	Suggest alternative statements for the first two sentences in the second paragraph of the section. Current - For duplicate sample collection for non-volatile organic analysis, the obtaining of duplicate samples in a soil or sediment matrix requires homogenization of the sample aliquot prior to filling sample containers. Homogenization of the sample for remaining parameters is necessary to generate two equally representative samples. Suggested change - Prior to the duplicate sample collection for non-volatile organic analysis, the soil or sediment sample aliquot requires homogenization. This is necessary in order to generate two equally representative samples.	Agreed to change
150	17	2.6	2.6.7.1.2	The heading "Non Aqueous" should be replaced with "Non Liquid" or "Solid Matrix" because "Non Aqueous" can also refer to NAPL.	Agreed to leave as non aqueous
151	17	2.6	2.6.7.1.2	The homogenization procedure should also discuss rejection of unprocessable materials, such as gravel or other extraneous articles that cannot be processed by the lab for analysis and may only result in biasing the aliquot weight and affect the reported concentrations. Exclusion of materials over 1/2 inch (12.5 mm) in their longest dimension is recommended.	In Chapter 5 in the soil sampling section under different methods we discuss procedures. That talks about removing any unwanted debris like rocks, sticks, or non soil material
152	18	2.6	2.6.7.2	For brevity, consider removing the first two words, (In order) "To maintain the integrity of"	Agreed to change
153	18	2.6	2.6.7.2	1st bullet: I disagree with promoting use of other parties' materials (bottles, preservatives) - these can introduce variability, making comparison of split samples difficult.	Agreed to change, rewrote sentence.
154	18	2.7		Last full paragraph lists some methods for which 1,4-Dioxane may be analyzed. This is not a complete list of methods for which this compound may be analyzed. Also, when referencing 1,4-dioxane in the last paragraph should it say for example? Why is 1,4-dioxane specifically pointed out here?	Agreed to change
155	18	2.7		Second sentence remove "certified" laboratory and replace with OQA certified SOP for specialty analyses (2.6.6) as specified in previous section.	Considered, no change
156	18	2.7		Add language "many of the low level methods such as 524.3 offer selected ion monitoring (SIM) option, so attention must be made to the data quality objectives of the study to make sure that the SIM option is specified to meet the low level sensitivity requirements.	Removed table
157	18	2.7		Reference to the need for special precautions during sample collection should be added. Also, a note should be added, that as new CECs are being added, the investigator must check with NJDEP and USEPA sources for proper handling.	Considered, no change
158	18	2.7		Special considerations may include avoiding the use of materials such as certain clothing, sunscreen, field notebooks, gloves, sample containers, preservatives, and hold times, etc. as well as guidelines for sample collection and handling which varies by parameter, method, and analytical laboratory.	Agreed to change
159	18	2.7		2nd paragraph / last sentence - needs reworking. It's not clear as is. "...avoiding the use of materials such as clothing, gloves, sample containers....."	Sentence rewritten
160	19	2.7		Table 2.1: preservative column needs slight correction for HCl (not HCL).	Removed table
161	19	2.7	Table 2.1	This table does not list a complete list of methods for which this compound (1,4-Dioxane) may be analyzed. In addition, the table references "8270D". It should reference "8270E" "D" is outdated and no longer offered for certification.	Removed table

Comment #	Page	Section	Subsection	COMMENTS	RESPONSE
162	19	2.7		First paragraph regarding PFAS samples; if noting method for drinking water there is an additional method to include (EPA 533). Also, while you say to contact the OQA for PFAS in other matrices that info should really be determined and noted in this doc. OQA is adding holding times and preservation for PFAS in other matrices to 7:18 subchapter 9 but it is helpful if specifics are also here instead of referring to call OQA.	Removed PFAS info
163	19	2.7		Four lines down from figure add "treatment" before environmental degradation or metabolism as well.	Removed information
164	19	2.7		2.7 Quality Assurance for Emerging Contaminants: (1) Need to add reference to EPA Method 533 for PFAS in drinking water. NJDEP OQA offers certification for this published EPA method. (2) Also need to add a reference to 'user defined' Lab SOP methods for PFAS in non-potable water and soil, as NJ-cert is offered for these modified methods. (3) Also need to add a sampling reference guide Table for PFAS methods for multiple sample matrices (drinking water, non-potable water, and soil, sediment and waste samples). Refer to next tab for Table.	Removed discussion
165	19	2.7		Below Table 2.1, there is a reference to analytical methods for PFAS. Drinking water samples for PFAS are typically preserved with Trizma. There is the concern that Trizma preservative may present a potential cross-contamination issue for PFAS analysis. Suggest adding any recommendations pertaining to groundwater sample preservation that the NJDEP may have regarding Trizma.	Removed table
166	19	2.7		Last paragraph on page 19 starting with "Analytical methods for perchlorates include..". At the end of the paragraph there appears to be an extra space between the link and the period.	sentence was removed
167	19	2.7		reference should include SOP methodologies, like LCLCMS.	agreed to not include that level of discussion for specific emerging contaminants
168	19	2.7		Also with regard to the groundwater analytical methods for PFAS, consider adding language indicating the investigator should discuss the PFAS analytical method with the selected laboratory, as the nomenclature of the method can vary from lab to lab. Thus the investigator should ensure they utilize the proper analytical method name in their QAPP, sample management, chain, etc. The investigator should also ensure the selected laboratory is certified in that method.	Removed pfas information
169	21		Refs	Delete the Tech Requirements from the list of references, unless you are citing to the July 1999 version for some reason.	Agreed to delete
170	21		Refs	Refs: ASTM is mis-identified. American Society for Testing and Materials (<i>not</i> Am Standards of Testing...)	Agreed to change
171	21		URLs	First URL listed is not valid - please check All URLs provided throughout Chapter 2.0 and its' appendices need to be checked and verified	URL fixed
172	21		URLs	The URL: http://www.epa.gov/quality1/qa_docs.html no longer works. Please replace it with www.epa.gov/quality or https://www.epa.gov/quality/agency-wide-quality-program-documents , which is located within www.epa.gov/quality	URL fixed (same comment as above)
173	21		URLs	The following links don't work: https://www.epa.gov/quality1/qa_docs.html https://www.epa.gov/superfund/programs/clp/index.htm Also the two links to the USGS NFM, go to the same page and I don't see a chapter 3 listed on that page	URL fixed (same comment as above and comment 128 below)
174	21		URLs	The "URLs" for the following is inactive. http://www.epa.gov/superfund/programs/clp/index.htm Not sure what link to insert? " https://www.epa.gov/clp/epa-contract-laboratory-program-statement-work-superfund-analytical-methods-multi-media-multi-0 "??	URL fixed
175	21		URLs	The URL: http://www.epa.gov/superfund/programs/clp/index.htm does not work. Please replace the link.	URL fixed (same comment as above)
176	21		URLs	The 5th link listed is not functioning.	agreed to change
177	21		URLs	The last two URLs on page 21 appear to lead to the same web page. I was unable to copy and paste them here	Deleted repetitive link

Comment #	Page	Section	Subsection	COMMENTS	RESPONSE
178	22	Appendix 2.1		Delete title reference "Solid/Hazardous Waste Samples" as Appendix 2.3 references this information.	agreed to change
179	22	Appendix 2.1		Consider changing the title to something like: Preservation, Container, and Hold Time Requirements for Samples (Except for Radiological Parameters) or at least delete the multiple uses of Samples, so something like: Required Preservation, Container, and Maximum Holding Times for Drinking Water, Wastewater, Ground Water, Surface Water, and Solid/Hazardous Waste Samples (Except Radiological Parameters) Should it be radiochemical in the title or radiological? I changed it to radiological based on the title of App 2.2/	Made changes to title
180	23	Appendix 2.2		7:18 is being updated please confirm the info contained in the table in appendix 2.2 (as well as other Appendice tables) is consistent with 7:18 prior to finalization.	Will be updated when the rule is final
181	23	Appendix 2.2		1st paragraph, last sentence to be corrected to read, "Field Sampling Procedures Manual, Chapter 12 which addresses radiological assessment in more detail." (Samples to Sampling; add the word "which" after 12; lower case radiological assessment (r and a).	Agreed to change
182	23	Appendix 2.2		NJAC 7:18 reference needs editing of title to make the words "the", "of", "and" in lower case.	Agreed to change
183	23	Appendix 2.2		Consider numbering the Table. Also, Plutonium pres'n has slight typo. Edit HNO37o pH ... to HNO3 to pH	typo corrected, decided not to number table
184	24	Appendix 2.2		For brevity, consider removing the four words, ('that are to be') from first sentence. Modify to read, "Drinking water samples subject to radiochem..."	Addressed comment and made changes
185	24	Appendix 2.2		Footnote: **48-Hr Needs slight editing; modify private well testing Act (PWTA) to Private Well Testing Act (PWTA), i.e., requires capitalization.	Agreed to change
186	25	Appendix 2.3		Table contains TeflonR (trademark); however, the tables on pages 19 and 20 do Not contain the registered trademark R. Pointing out for consistency.	Agreed to change
187	25	Appendix 2.3		3rd row - under "Container", the description is unclear; may need some commas, or at least some editing.	Table reworked to be more clear and usable
188	25	Appendix 2.3		Add Aqueous matrix to title?	Added to text to address change
189	25	Appendix 2.3		I recommend only providing the link to the compendium and possibly a link the the page with all the chapters (https://www.epa.gov/hw-sw846/sw-846-compendium#chapters) but not to the specific chapters, because the specific links may not be the most current version, e.g. the specfic chapter 4 link is to Rev 5 while using the chapter 4 from the chapters page pulls up Rev 6.	Agreed to change
190	25	Appendix 2.3		Metals except Cr VI and Hg for solid samples None P, G 6 months	Agreed to change
191	26	Appendix 2.3		1st row - under "Container", edit PTFE-lines to PTFE-lined Caps; 2nd row under "Preservation" slight editing with commas or semi-colons is needed, as is removal of the "7 days" - a vestige that belongs under Max HT column.	Appendix changed to make more clear
192	26	Appendix 2.3		Volatile Organics (Aqueous samples with residual chlorine present) – For preservation, the manual states “Collect sample in a 125 ml container which has been pre-preserved with 4 drops of 10 % sodium thiosulfate solution. Gently swirl to mix sample and transfer to a 40-ml VOC vial. Cool to 0-6 degrees C and adjust pH to less than 2 with H2SO4, HCl, or solid NaHSO4.” To minimize agitation and possible loss of volatile organics in the sample, the 40-ml VOC vials should be pre-preserved with sodium thiosulfate and directly filled to ensure zero headspace. No pH adjustment is recommended. This would eliminate the need to swirl the sample and transfer from one container to another. However, the maximum holding time would change from 14 days to 7 days.	Made changes to the text and table to address the comment and make more clear
193	26	Appendix 2.3		Under the "Volatile Organics (Aqueous Samples-no residual chlorine present)" Paramter, the last sentence in the Preservation column needs a period at the end.	Table was redone

Comment #	Page	Section	Subsection	COMMENTS	RESPONSE
194	30	Appendix 2.4		Biological Table: under "Sample Container" for Cyanotoxins, what is PETG? Is it a typo, really PET or PETE?	Agreed to change
195	31	Appendix 2.4		This table is more a table of methodologies, so consider changing the title to something like: NJDEP Methodologies for the Analysis of BIOLOGICAL Samples from Freshwater, Estuarine and Marine Environments. Also why are the (live...) & (preserved...) entries in the Parameters column in () and the first character capitalized?	Agreed to change
196	31	Appendix 2.4 Macro-		where it says [95% ethanol, isopropyl alcohol]), I think it should say 95% ethanol or 70% isopropyl alcohol	Agreed to change
197	31	Appendix 2.4 zooplanton		The preservation description fails to identify the formalin concentration required which I assume is 5%.	The formalin concentration is listed: "5% formalin (5 ml neutralized formalin/100 ml tap water)"
198	33	Appendix 2.5		This table is more a table of methodologies, so consider changing the title to something like: NJDEP Methodologies for the Analysis of Nutrient Samples from Estuarine and Marine Environments.	Agreed to change
199	34	Appendix 2.6		Under the "Matrix Type/ Matrix Type Duplicate" Type, the last sentence in the Description column needs a period at the end.	Agreed to change
200	34	Appendix 2.6		Appendix 2.6 - Frequency column - Recommend replacing 5% with "1 per 20" or at least adding "(1 per 20)" after 5%. Also try to be consistent and either write out all of the numbers or don't write out any. In the frequency column I think numbers are better, but in the other columns writing out the numbers is better.	Agreed to change