

Here's that final review comment on 9111 which I mentioned in today's meeting. I think this completes the review comments we expect for the meth methods.

Greg

From: :
Sent: Tuesday, October 20, 2009 11:46 AM
To: Lotz, William G. (Greg) (CDC/NIOSH/DART)
Subject: Gregory Lotz

Good Morning, Dr. Lotz:

I glanced at Method 9111 (Methamphetamine on Wipes by Liquid Chromatography-Mass Spectrometry-SIM), which was also identified as Method 0911 (I'm not sure if one is a typo).

In this case, I also glanced at the DataChem Backup Data Report, and would like to make a comment about the nature of the Colorado Standard listed there. The DataChem report identifies Colorado's clean-up level of 0.5 µg/100 cm² as a "feasibility-based" clean-up standard. In my mind a "feasibility-based" standard implies a standard that is generally recognized as inadequate, but technically feasible to achieve.

When we developed the level of 0.5 µg/100 cm², we actually looked at body burden modeling at various levels of residual contamination and on various surfaces to determine if we could see evidence of significant risk of adverse physiological harm based on the little known tox info for chronic low doses available at the time. What we found was that at the proposed threshold levels, there did not appear to be evidence that would support a strong argument for elevated risk. So, while not exactly an health-based standard either, I think it could be at least described as a "risk-based" standard.

Although I didn't perform an in depth review of the method, I think that many of the concerns I raised regarding the 9109 and 9106 methods would apply.

If asked again, I will provide a more timely review of the methods in the future.

Cheers!