

LQSR V4 Question	AIHA LAP LQSR Technical Group Response
<p>With the new revision to section 5.3.5.1 of the LQSR Rev 4, it states "The quantitation limit shall be “less than” (“<”) a value at least 1.6 times but no greater than 10 times the method detection limit as determined in Section 5.3.5."</p> <p>As a lab, are we allowed to change the factor in which we are multiplying our MDL to obtain our reporting limit (quantitation limit) without having the current MDL be out of range? Is the change in regulatory legislation enough cause to change the factor and then adjust the SOP after confirming being able to confirm obtaining passing results at the chosen reporting limit?</p> <p>Or would we have to perform a new initial MDL and then apply the new factor to obtain the reporting limit?</p>	<p>The MDL is used to determine the performance of the instrument and prep techniques. If neither the instrumentation nor the prep techniques change, then we do not think it is necessary to do a new MDL to accommodate the revised multiplier.</p>
<p>1: Do the limits apply to Texas?</p> <p>2: The email states the laboratory must determine a MDL. Isn't 2.5 MDL mandatory under the new rule?</p> <p>3: Since compliance deadline is December 2025, does that mean we can keep the old limit of <10ug/ft2 until then?</p> <p>4: Is the Reporting Limit <5 or <4ug/ft2?</p>	<p>1: Yes, these are Federal requirements. Texas may choose to implement lower limits but cannot implement higher limits.</p> <p>2: The new rule requires that the limits reported by the lab be between 1.6 and 10 times the lab's MDL.</p> <p>3: Compliance with the LQSR has until December 2025 but the new LDHL limits went into effect January 13th, 2025.</p> <p>4: The reporting limit is determined by the laboratory and is based on their method detection limit. The reporting limit determined by the lab may be no higher than 4 ug/square foot.</p>

There are various levels depending on the location of where the dust wipe would be. The lowest allowed limit 5 ug per square foot, and using the 80% rule, means we would have to report to <4 ug per square foot for floors.

My question is that the EPA originally published this rule for HUD-defined target housing. We are not housing but a lab. Are these new limits for dust swipe testing for customers or our self-safety monitoring as in LQSR 5.2.1.1? If this is for customers, then I feel this would not apply for us as we do not do that testing.

Language from the LQSR, Section 5.2.1.1 Lab Dust Wipe Checks.

Sample preparation and analysis is not to proceed until surface contamination is below the specified maximum allowable concentration of 80 percent (%) of the lowest regulatory limit for dust wipe samples.

So, this contamination limit is for any lab doing Pb analysis under the ELLAP Accreditation. There is no way they can document compliance without being able to see and quantitate to the 4 ug/ft² limit.

The LQSR Rev 4 came about partly due to the new EPA limits, therefore the lab, if accredited, must show compliance to the latest LQSR and the revised limits for dust wipes. In my opinion, if they do not perform dust sample analysis, but use it only for in-house contamination checks, I still think they must be able to see and report to the 4 ug/ft² level (80% of the regulatory limit of 5 ug/ft²). Our program fully incorporates the LQSR revision and the new limits.