



## State of Vermont

Department of Fish and Wildlife  
Department of Forests, Parks and Recreation  
Department of Environmental Conservation  
State Geologist  
RELAY SERVICE FOR THE HEARING IMPAIRED  
1-800-255-0191 TDD-Voice  
1-800-253-0195 Voice-TDD

AGENCY OF NATURAL RESOURCES  
Department of Environmental Conservation  
Dept. Environmental Conservation Laboratory  
103 South Main Street  
Waterbury, VT 05671-0409

FAX 802-241-1365  
TEL 802-241-1380

August 11, 2005

Philip L. Goss  
Manager of Core Technologies  
61 Main Street  
1 PSI Plaza  
Proctor, VT 05765

Dear Mr. Goss:

We have worked over the last year to qualify two methods, Liquid Chromatography – Mass Spectrometry (LC/MS) and AG24, to be used to determine the concentration of OMYA's flotation material (Custamine 51D) in environmental samples. LC/MS is an analyte specific method, which provides an analysis for the individual chemicals in Custamine 51D, and AG24 is a spectrophotometric method, which provides the total concentration of all chemicals in Custamine 51D. Your contract laboratory responsible for the LC/MS method is STL in Sacramento, California, and for Method AG24 is Endyne in Williston, Vermont.

Both Laboratories have been working through an Initial Demonstration of Capability (IDOC) process. For each Laboratory this process includes method development, determining the accuracy and precision of the method, establishing reporting limits using method detection limit studies and correct analysis of performance evaluation samples. The correct results are unknown to the Laboratories being evaluated. The current status of IDOCs for the Laboratories is:

STL – Except for successful analysis of performance evaluation samples, STL has completed the IDOC process. This needs to be completed before DEC should accept data from this Laboratory.

Endyne-

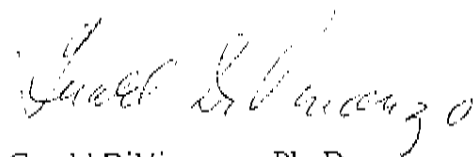
1. Endyne has completed the IDOC process. They have correctly analyzed aqueous performance evaluation samples with a concentration range of 35-200 ppb.
2. OMYA and Endyne have agreed to a process, which will demonstrate a continuing demonstration of capability. Every six months OMYA will provide Endyne with

performance evaluation samples and evaluate their performance using the same criteria used for the IDOC.

3. Endyne has not yet completed an IDOC process for solid samples for which concentration levels of several thousand ppm of the flotation material are typically found. All parts of the IDOC except the analysis of performance evaluation samples are in place. OMYA will provide Endyne with solid samples containing known concentrations of their flotation material (unknown to Endyne) and with consultation with the Department of Environmental Conservation (DEC) evaluate their performance.
4. Based on Endyne's successful completed of the IDOC process, I am recommending that for water samples DEC accept analytical data generated by Endyne using Method AG24. I expect the data generated accurately states the concentration of OMYA's flotation material in water samples.
5. Regarding solid samples I am recommending that DEC not accept analytical results generated by Method AG24 until the IDOC process is completed.

If you have any questions please feel free to contact me.

Sincerely,



Gerald DiVincenzo, Ph. D.  
DEC Laboratory Director

cc. Julie Hackbarth