

# AOAC Official Methods of Analysis<sup>SM</sup> (OMA)

# AOAC EXPERT REVIEW PANEL FOR FERTILIZERS





# WEDNESDAY, MARCH 15, 2017 1:00PM – 4:00PM

# **Gaithersburg Marriott Washingtonian Center**

9751 Washingtonian Boulevard Gaithersburg, MD 20878 USA



# AOAC OFFICIAL METHODS OF ANALYSIS<sup>SM</sup>

The Official Methods of Analysis<sup>SM</sup> (OMA) program is AOAC INTERNATIONAL's premier methods program. The program evaluates chemistry, microbiology, and molecular biology methods. It also evaluates traditional benchtop methods, instrumental methods, and proprietary, commercial, and/or alternative methods. In 2011, AOAC augmented the Official Methods<sup>SM</sup> program by including an approach to First Action Official Methods<sup>SM</sup> status that relies on gathering the experts to develop voluntary consensus standards, followed by collective expert judgment of methods using the adopted standards.

The OMA program has undergone a series of transitions in support of AOAC's collaborations, evolving technology, and evolving technical requirements. Methods approved in this program have undergone rigorous scientific and systematic scrutiny such that analytical results by methods in the *Official Methods* of Analysis of AOAC INTERNATIONAL are deemed to be highly credible and defensible.

On September 7, 2012, AOAC INTERNATIONAL further clarified the AOAC *Official Methods*<sup>SM</sup> program by transitioning the conformity assessment component of the *Official Methods*<sup>SM</sup> program into the AOAC Research Institute. The AOAC Research Institute now administers the AOAC *Official Methods*<sup>SM</sup> program for all proprietary, single and sole source methods. Methods submitted through the PTM-OMA harmonized process also will be reviewed through the AOAC Research Institute. All methods in the AOAC *Official Methods*<sup>SM</sup> program are now reviewed by Expert Review Panels for First Action AOAC *Official Methods of Analysis*<sup>SM</sup> status.

# **EXPERT REVIEW PANEL (ERP)**

The AOAC Expert Review Panels (ERPs) are a key part of AOAC INTERNATIONAL's Method Approval Process. AOAC ERPs are authorized to adopt candidate methods as First Action *Official Methods* and to recommend adoption of these methods to Final Action *Official Methods* status. Scientists are recruited to serve on ERPs in a variety of ways. Normally, a call for experts is published at the same time as a call for methods is posted. Interested scientists are invited to submit their *curriculum vitae* (CV) for consideration. Advisory panel, stakeholder panel, and working group members may make recommendations to AOAC for ERP members. All CVs are reviewed and evaluated for expertise by the AOAC Chief Scientific Officer (CSO) and then to the AOAC Official Methods Board for formal review. The composition of the ERP must be fulfilled with qualified subject matter experts representing various perspectives. Please refer to our Call for Experts on the AOAC homepage for further information.

# AOAC INTERNATIONAL

2275 Research Blvd, Suite 300 Rockville, Maryland 20850 Phone: (301) 924-7077



# AOAC Official Methods of Analysis<sup>SM</sup> (OMA) Expert Review Panel for Fertilizers

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#### **EXPERT REVIEW PANEL (ERP) FOR FERTILIZERS**



Gaithersburg Marriott Washingtonian Center 9751 Washingtonian Boulevard, Gaithersburg, MD 20878 USA

#### WEDNESDAY, MARCH 15, 2017 1:00PM – 4:00PM

#### **MEETING AGENDA**

Expert Review Panel Chair: Dr. William Hall, Mosiac

- I. Welcome and Introductions Expert Review Panel Co-Chairs
- II. Review of AOAC Volunteer Policies & Expert Review Panel Process Overview and Guidelines Deborah McKenzie, Senior Director, Standards Development and Method Approval Processes, AOAC INTERNATIONAL and AOAC Research Institute

#### III. Review of Methods

For each method the assigned ERP members will present a review of the proposed collaborative study manuscript, after which the ERP will discuss the method and render a decision on the status for each method.

1) OMAMAN-28: Simultaneous Determination of Arsenic, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganeses, Molybdenum, Nickel, Selenium, and Zinc in Fertilizers by Microwave Acid Digestion and Inductively Coupled Plasma-Optical Emission Spectrometry Detection: Single Laboratory Validation

Study Director: Sharon Webb, University of Kentucky, Division of Regulatory Services, 103 Regulatory Services Bldg, Lexington, Kentucky 40546-0275

2) AOAC OFFICIAL METHOD 959.03: UREA IN FERTILIZERS [FINAL ACTION 1960] Study Director: Michael Hojjatie, Ph.D., 2248 W. Lower Buckeye, Phoenix, AZ 85009

#### IV. Discuss Final Action Requirements for First Action Official Methods (if applicable)

ERP will discuss, review and track First Action methods for 2 years after adoption, review any additional information (i.e., additional collaborative study data, proficiency testing, and other feedback) and make recommendations to the Official Methods Board regarding Final Action status.

#### V. Follow – Up of Previously Reviewed Methods

A. OMAMAN-24: Determination of Total Sulfur in Fertilizers by High Temperature Combustion Co-Study Directors: Tyson Rowland and Jean Bernius, elementar Americas, 520 Fellowship Road, Suite D-408, Mt. Laurel, New Jersey 08054

#### VI. Next Steps and Upcoming Meetings

VII. Adjournment



# AOAC INTERNATIONAL

# POLICY AND PROCEDURES ON

# **VOLUNTEER CONFLICT OF INTEREST**

# **Statement of Policy**

While it is not the intention of AOAC INTERNATIONAL (AOAC) to restrict the personal, professional, or proprietary activities of AOAC members nor to preclude or restrict participation in Association affairs solely by reason of such activities, it is the sense of AOAC that conflicts of interest or even the appearance of conflicts of interest on the part of AOAC volunteers should be avoided. Where this is not possible or practical under the circumstances, there shall be written disclosure by the volunteers of actual or potential conflicts of interest in order to ensure the credibility and integrity of AOAC. Such written disclosure shall be made to any individual or group within the Association which is reviewing a recommendation which the volunteer had a part in formulating and in which the volunteer has a material interest causing an actual or potential conflict of interest.

AOAC requires disclosure of actual or potential conflicts of interest as a condition of active participation in the business of the Association. The burden of disclosure of conflicts of interest or the appearance of conflicts of interest falls upon the volunteer.

A disclosed conflict of interest will not in itself bar an AOAC member from participation in Association activities, but a three-fourths majority of the AOAC group reviewing the issue presenting the conflict must concur by secret ballot that the volunteer's continued participation is necessary and will not unreasonably jeopardize the integrity of the decision-making process.

Employees of AOAC are governed by the provision of the AOAC policy on conflict of interest by staff. If that policy is in disagreement with or mute on matters covered by this policy, the provisions of this policy shall prevail and apply to staff as well.

# **Illustrations of Conflicts of Interest**

- 1. A volunteer who is serving as a committee member or referee engaged in the evaluation of a method or device; who is also an employee of or receiving a fee from the firm which is manufacturing or distributing the method or device or is an employee of or receiving a fee from a competing firm.
- 2. A volunteer who is requested to evaluate a proposed method or a related collaborative study in which data are presented that appear detrimental (or favorable) to a product distributed or a position supported by the volunteer's employer.
- 3. A referee who is conducting a study and evaluating the results of an instrument, a kit, or a piece of equipment which will be provided gratis by the manufacturer or distributor to one or more of the participating laboratories, including his or her own laboratory, at the conclusion of the study.

- 4. Sponsorship of a collaborative study by an interest (which may include the referee) which stands to profit from the results; such sponsorship usually involving the privilege granted by the investigator to permit the sponsor to review and comment upon the results prior to AOAC evaluation.
- 5. A volunteer asked to review a manuscript submitted for publication when the manuscript contains information which is critical of a proprietary or other interest of the reviewer.

The foregoing are intended as illustrative and should not be interpreted to be all-inclusive examples of conflicts of interest AOAC volunteers may find themselves involved in.

# Do's and Don'ts

Do avoid the appearance as well as the fact of a conflict of interest.

<u>Do</u> make written disclosure of any material interest which may constitute a conflict of interest or the appearance of a conflict of interest.

<u>Do not</u> accept payment or gifts for services rendered as a volunteer of the Association without disclosing such payment or gifts.

<u>Do not</u> vote on any issue before an AOAC decision-making body where you have the appearance of or an actual conflict of interest regarding the recommendation or decision before that body.

<u>Do not</u> participate in an AOAC decision-making body without written disclosure of actual or potential conflicts of interest in the issues before that body.

<u>Do not</u> accept a position of responsibility as an AOAC volunteer, without disclosure, where the discharge of the accepted responsibility will be or may appear to be influenced by proprietary or other conflicting interests.

# **Procedures**

Each volunteer elected or appointed to an AOAC position of responsibility shall be sent, at the time of election or appointment, a copy of this policy and shall be advised of the requirement to adhere to the provisions herein as a condition for active participation in the business of the Association. Each volunteer, at the time of his or her election or appointment, shall indicate, in writing, on a form provided for this purpose by AOAC, that he or she has read and accepts this policy.

Each year, at the spring meeting of the AOAC Board of Directors, the Executive Director shall submit a report certifying the requirements of this policy have been met; including the names and positions of any elected or appointed volunteers who have not at that time indicated in writing that they have accepted the policy.

Anyone with knowledge of specific instances in which the provisions of this policy have not been complied with shall report these instances to the Board of Directors, via the Office of the Executive Director, as soon as discovered.

\* \* \* \* \* \*

Adopted: March 2, 1989 Revised: March 28, 1990 Revised: October 1996

# AOAC INTERNATIONAL ANTITRUST POLICY STATEMENT AND GUIDELINES

# **Introduction**

It is the policy of AOAC INTERNATIONAL (AOAC) and its members to comply strictly with all laws applicable to AOAC activities. Because AOAC activities frequently involve cooperative undertakings and meetings where competitors may be present, it is important to emphasize the on\_going commitment of our members and the Association to full compliance with national and other antitrust laws. This statement is a reminder of that commitment and should be used as a general guide for AOAC and related individual activities and meetings.

# **Responsibility for Antitrust Compliance**

The Association's structure is fashioned and its programs are carried out in conformance with antitrust standards. However, an equal responsibility for antitrust compliance \_\_\_\_ which includes avoidance of even an appearance of improper activity \_\_\_\_ belongs to the individual. Even the appearance of improper activity must be avoided because the courts have taken the position that actual proof of misconduct is not required under the law. All that is required is whether misconduct can be inferred from the individual's activities.

Employers and AOAC depend on individual good judgment to avoid all discussions and activities which may involve improper subject matter and improper procedures. AOAC staff members work conscientiously to avoid subject matter or discussion which may have unintended implications, and counsel for the Association can provide guidance with regard to these matters. It is important for the individual to realize, however, that the competitive significance of a particular conduct or communication probably is evident only to the individual who is directly involved in such matters.

# Antitrust Guidelines

In general, the U.S. antitrust laws seek to preserve a free, competitive economy and trade in the United States and in commerce with foreign countries. Laws in other countries have similar objectives. Competitors (including individuals) may not restrain competition among themselves with reference to the price, quality, or distribution of their products, and they may not act in concert to restrict the competitive capabilities or opportunities of competitors, suppliers, or customers.

Although the Justice Department and Federal Trade Commission generally enforce the U.S. antitrust laws, private parties can bring their own lawsuits.

Penalties for violating the U.S. and other antitrust laws are severe: corporations are subject to heavy fines and injunctive decrees, and may have to pay substantial damage judgments to injured competitors, suppliers, or customers. Individuals are subject to criminal prosecution, and will be punished by fines and imprisonment.

Under current U.S. federal sentencing guidelines, individuals found guilty of bid rigging, price fixing, or market allocation must be sent to jail for at least 4 to 10 months and must pay substantial minimum fines.

Since the individual has an important responsibility in ensuring antitrust compliance in AOAC activities, everyone should read and heed the following guidelines.

- 1. Don't make any effort to bring about or prevent the standardization of any method or product for the purpose or intent of preventing the manufacture or sale of any method or product not conforming to a specified standard.
- 2. Don't discuss with competitors your own or the competitors' prices, or anything that might affect prices such as costs, discounts, terms of sale, distribution, volume of production, profit margins, territories, or customers.
- 3. Don't make announcements or statements at AOAC functions, outside leased exhibit space, about your own prices or those of competitors.
- 4. Don't disclose to others at meetings or otherwise any competitively sensitive information.
- 5. Don't attempt to use the Association to restrict the economic activities of any firm or any individual.
- 6. Don't stay at a meeting where any such price or anti\_competitive talk occurs.
- 7. Do conduct all AOAC business meetings in accordance with AOAC rules. These rules require that an AOAC staff member be present or available, the meeting be conducted by a knowledgeable chair, the agenda be followed, and minutes be kept.
- 8. Do confer with counsel before raising any topic or making any statement with competitive ramifications.
- 9. Do send copies of meeting minutes and all AOAC\_related correspondence to the staff member involved in the activity.
- 10. Do alert the AOAC staff to any inaccuracies in proposed or existing methods and statements issued, or to be issued, by AOAC and to any conduct not in conformance with these guidelines.

# **Conclusion**

Compliance with these guidelines involves not only avoidance of antitrust violations, but avoidance of any behavior which might be so construed. Bear in mind, however, that the above antitrust laws are stated in general terms, and that this statement is not a summary of applicable laws. It is intended only to highlight and emphasize the principal antitrust standards which are relevant to AOAC programs. You must, therefore, seek the guidance of either AOAC counsel or your own counsel if antitrust questions arise.

\* \* \* \* \*

Adopted by the AOAC Board of Directors: September 24, 1989 Revised: March 11, 1991 Revised October 1996

# <u>AOAC INTERNATIONAL</u> <u>POLICY ON THE USE OF THE</u> <u>ASSOCIATION NAME, INITIALS,</u> IDENTIFYING INSIGNIA, LETTERHEAD, AND BUSINESS CARDS

# **Introduction**

The following policy and guidelines for the use of the name, initials, and other identifying insignia of AOAC INTERNATIONAL have been developed in order to protect the reputation, image, legal integrity and property of the Association.

The name of the Association, as stated in its bylaws, is "AOAC INTERNATIONAL". The Association is also known by its initials, AOAC, and by its logo, illustrated below, which incorporates the Association name and a representation of a microscope, book, and flask. The AOAC logo is owned by the Association and is registered with the U.S. Patent and Trademark Office.



The full Association insignia, illustrated below, is comprised of the logo and the tagline, "The Scientific Association Dedicated to Analytical Excellence," shown below. The typeface used is Largo. The AOAC tagline is owned by the Association and is registered with the U.S. Patent and Trademark office.



The Scientific Association Dedicated to Analytical Excellence\*

AOAC INTERNATIONAL Policy on the Use of the Association Name, Initials, Identifying Insignia, Letterhead, and Business Cards Page 2

# **Policy**

Policy on the use of the Association's name and logo is established by the AOAC Board of Directors as follows:

"The Board approves and encourages reference to the Association by name, either as AOAC INTERNATIONAL or as AOAC; or reference to our registered trademark, AOAC®, in appropriate settings to describe our programs, products, etc., in scientific literature and other instances so long as the reference is fair, accurate, complete and truthful and does not indicate or imply unauthorized endorsement of any kind.

The insignia (logo) of AOAC INTERNATIONAL is a registered trade and service mark and shall not be reproduced or used by any person or organization other than the Association, its elected and appointed officers, sections, or committees, without the prior written permission of the Association. Those authorized to use the AOAC INTERNATIONAL insignia shall use it only for the purposes for which permission has been specifically granted.

The name and insignia of the Association shall not be used by any person or organization in any way which indicates, tends to indicate, or implies AOAC official endorsement of any product, service, program, company, organization, event or person, endorsement of which, has not been authorized by the Association, or which suggests that membership in the Association is available to any organization."

The Executive Director, in accordance with the above stated policy, is authorized to process, approve, fix rules, and make available materials containing the Association name and insignia.

It should be noted that neither the Association's name nor its insignia nor part of its insignia may be incorporated into any personal, company, organization, or any other stationery other than that of the Association; nor may any statement be included in the printed portion of such stationery which states or implies that an individual, company, or other organization is a Member of the Association.

# **Instructions**

- 1. Reproduction or use of the Association name or insignia requires prior approval by the Executive Director or his designate.
- 2. Association insignia should not be altered in any manner without approval of the Executive Director or his designate, except to be enlarged or reduced in their entirety.
- 3. Artwork for reproducing the Association name or insignia, including those incorporating approved alterations, will be provided on request to those authorized to use them (make such requests to the AOAC Marketing Department). Examples of the types of alterations that would be approved are inclusion of a section name in or the addition of an officer's name and address to the letterhead insignia.

AOAC INTERNATIONAL Policy on the Use of the Association Name, Initials, Identifying Insignia, Letterhead, and Business Cards Page 3

- 4. When the Association name is used without other text as a heading, it should, when possible, be set in the Largo typeface.
- 5. Although other colors may be used, AOAC blue, PMS 287, is the preferred color when printing the AOAC insignia, especially in formal and official documents. It is, of course, often necessary and acceptable to reproduce the insignia in black.
- 6. Do not print one part of the logo or insignia in one color and other parts in another color.
- 7. The letterhead of AOAC INTERNATIONAL shall not be used by any person or organization other than the Association, its elected and appointed officers, staff, sections, or committees; except by special permission.

Correspondence of AOAC official business should be conducted using AOAC letterhead. However, those authorized to use AOAC letterhead shall use it for official AOAC business only.

Copies of <u>all</u> correspondence using AOAC letterhead or conducting AOAC official business, whether on AOAC letterhead or not, must be sent to the appropriate office at AOAC headquarters.

8. AOAC INTERNATIONAL business cards shall not be used by any person or organization other than the Association, its staff, and elected officials, except by special permission.

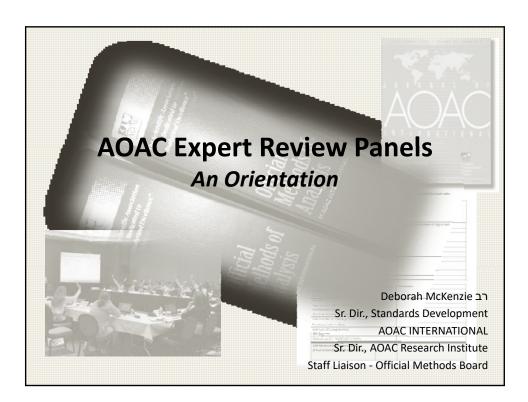
Those authorized to use AOAC business cards shall use them for official AOAC business only and shall not represent themselves as having authority to bind the Association beyond that authorized.

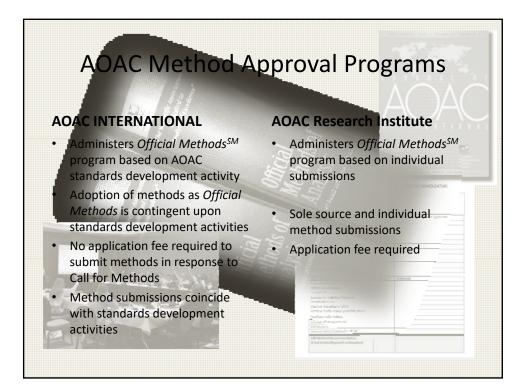
# **Sanctions**

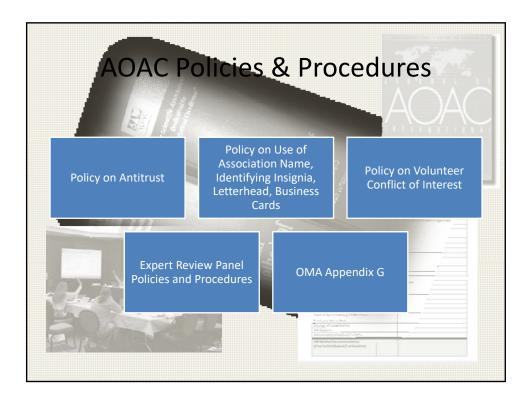
- 1. Upon learning of any violation of the above policy, the Executive Director or a designate will notify the individual or organization that they are in violation of AOAC policy and will ask them to refrain from further misuse of the AOAC name or insignia.
- 2. If the misuse is by an Individual Member or Sustaining Member of the Association, and the misuse continues after notification, the Board of Directors will take appropriate action.
- 3. If continued misuse is by a nonmember of the Association or if a member continues misuse in spite of notification and Board action, ultimately, the Association will take legal action to protect its property, legal integrity, reputation, and image.

\* \* \* \* \* \*

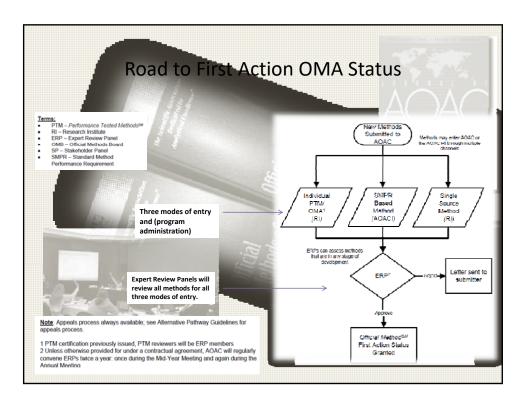
Adopted by the AOAC Board of Directors: September 24, 1989 Revised: June 13, 1991; February 26, 1992; March 21, 1995; October 1996

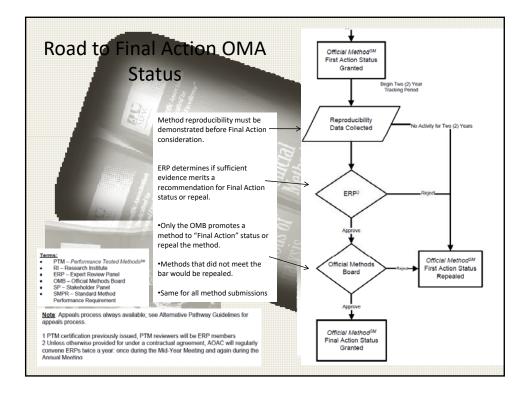


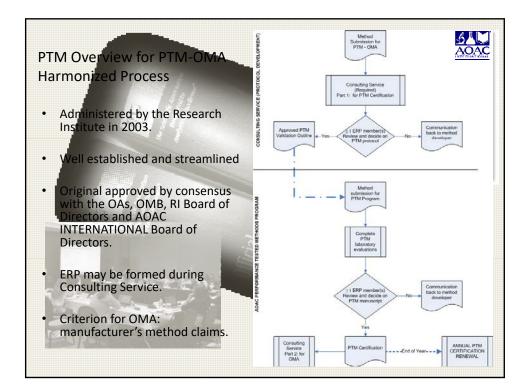


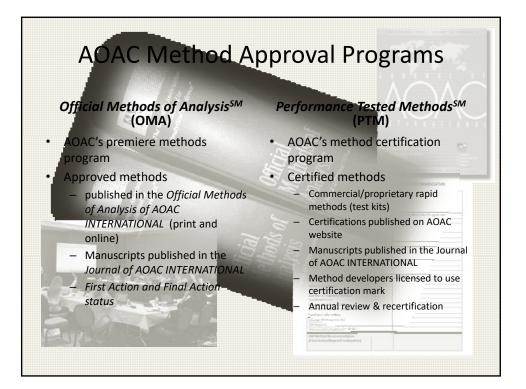


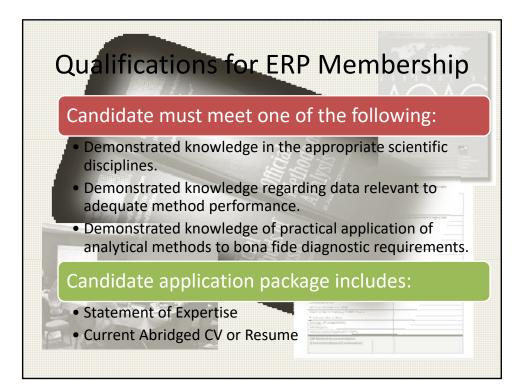




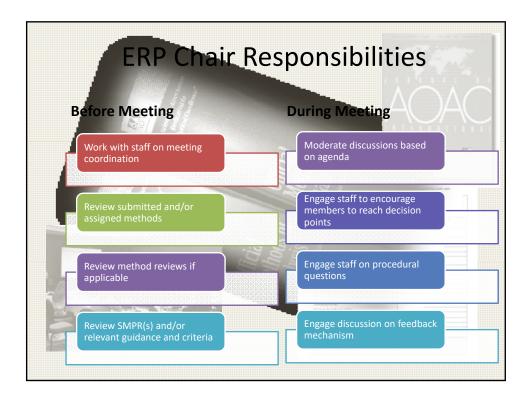


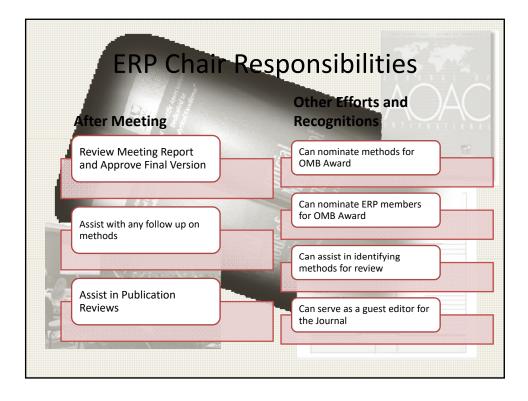


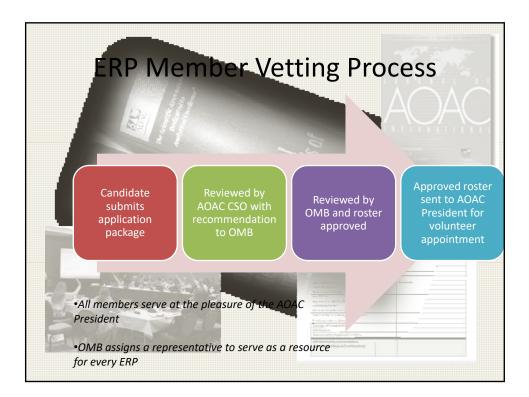


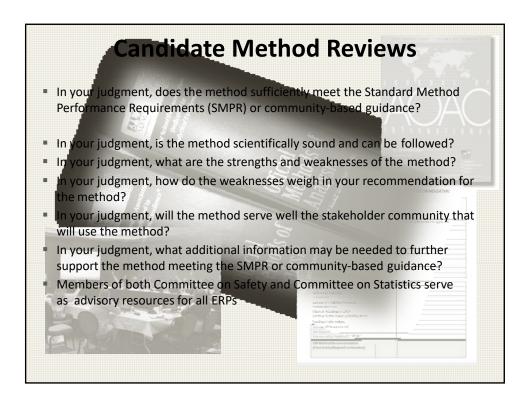


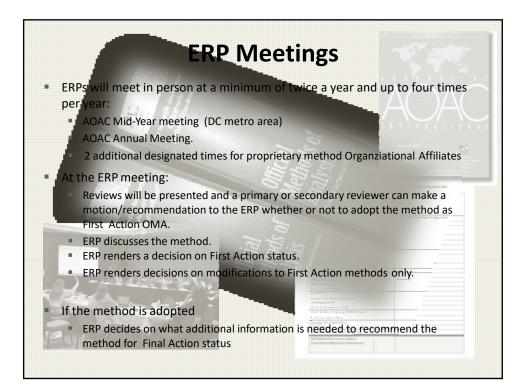


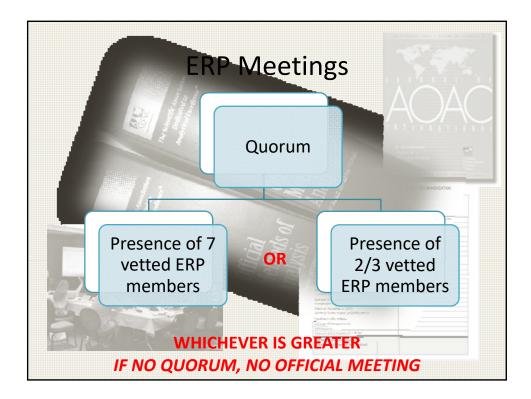


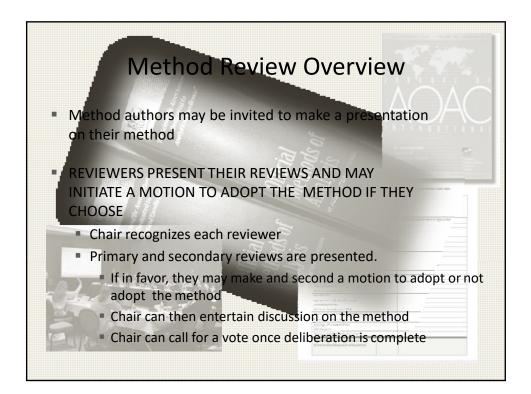


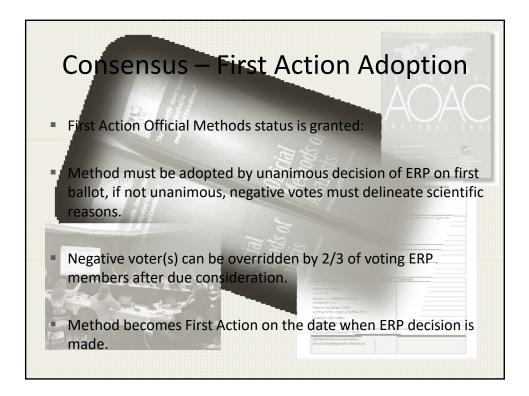


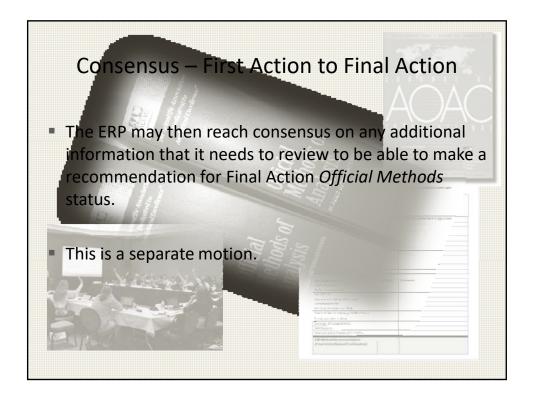


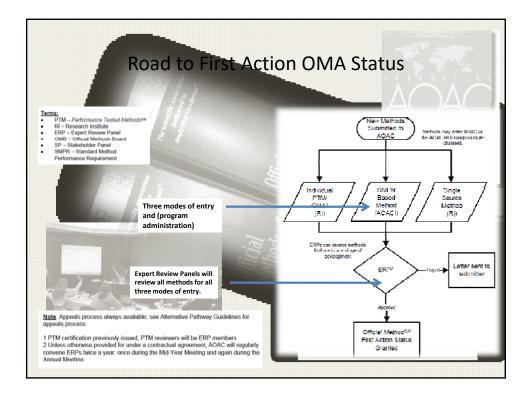


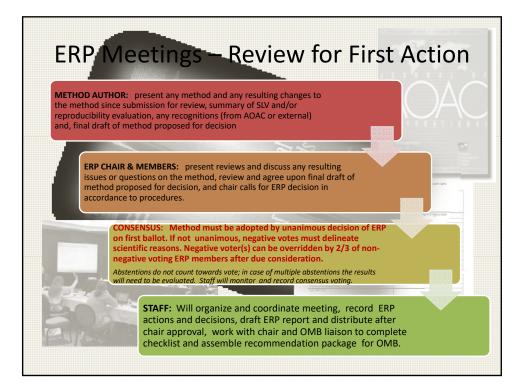


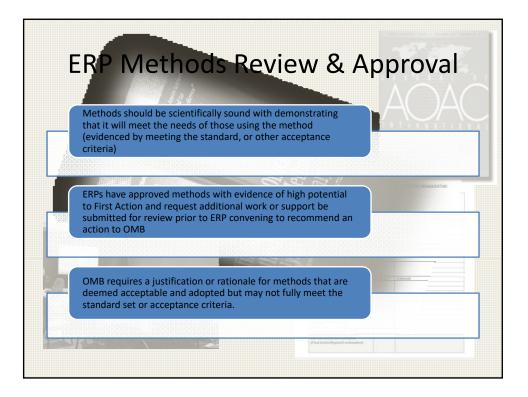


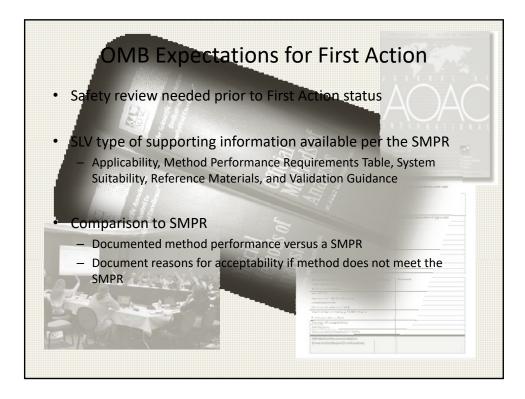


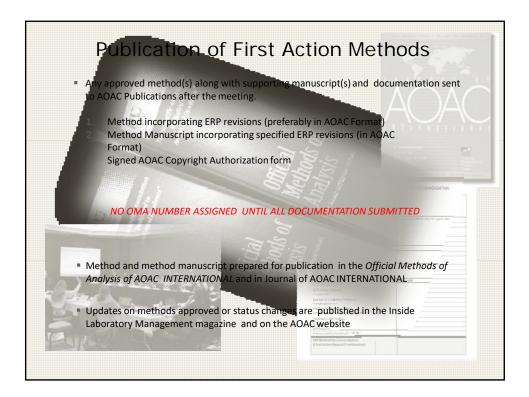


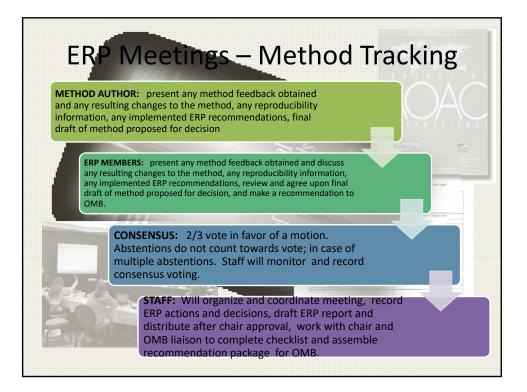


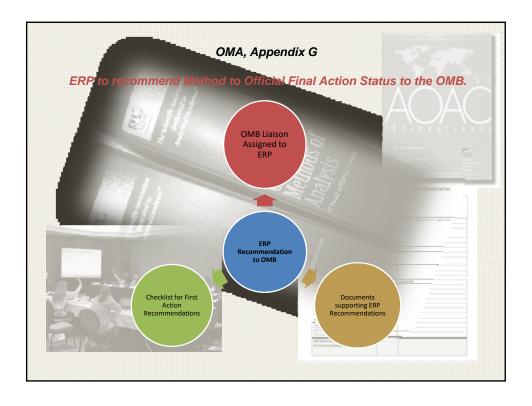


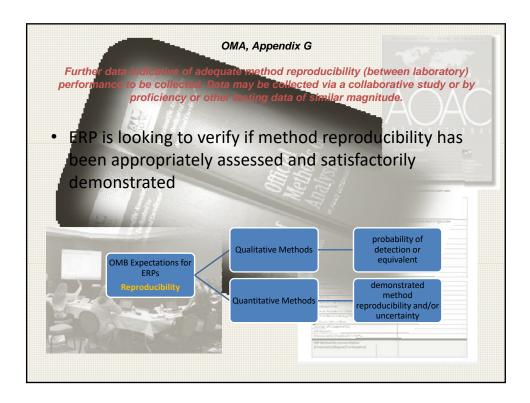


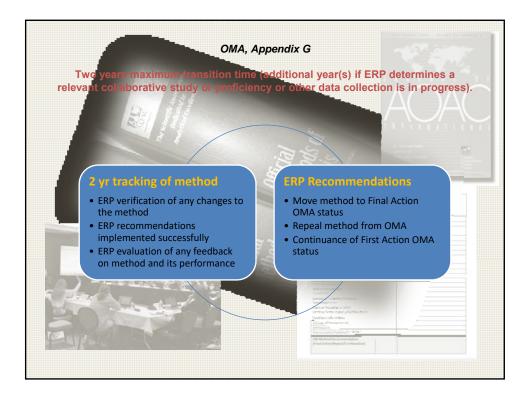


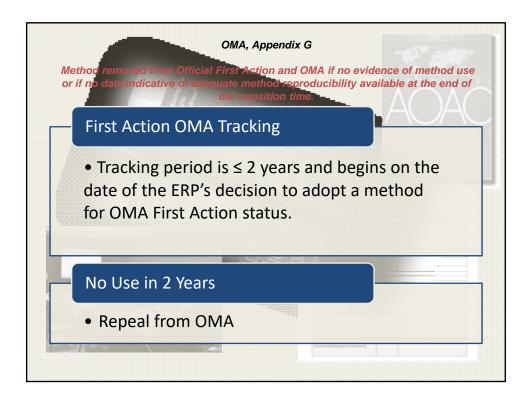


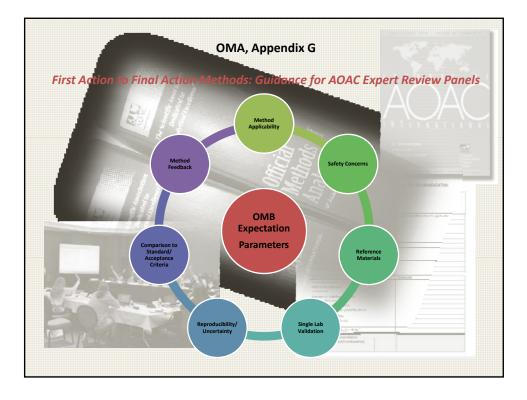






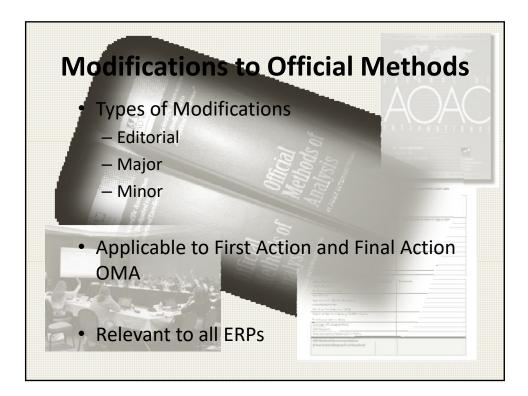


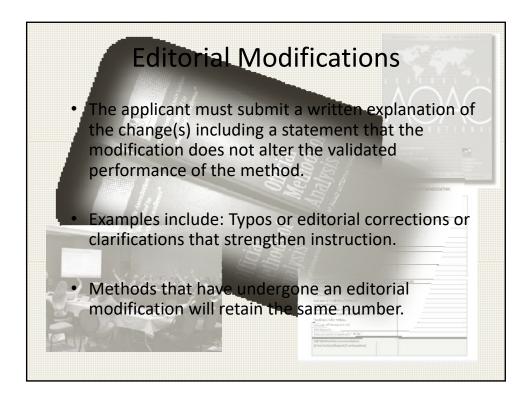


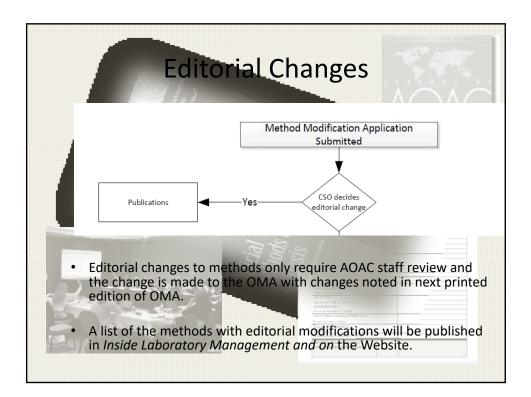


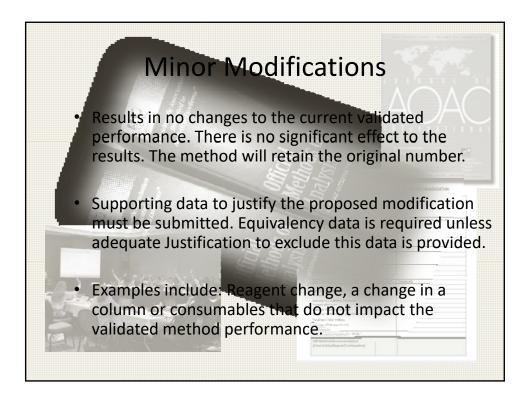


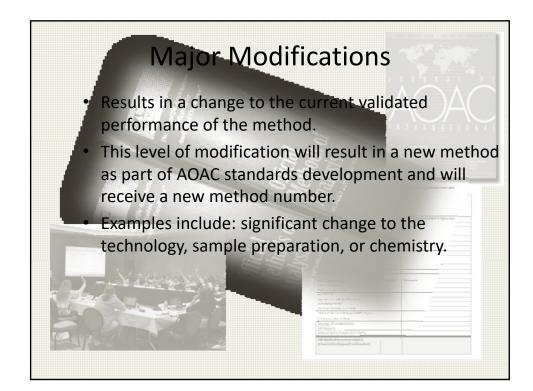


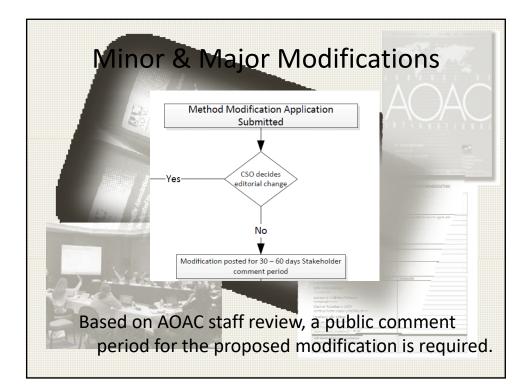


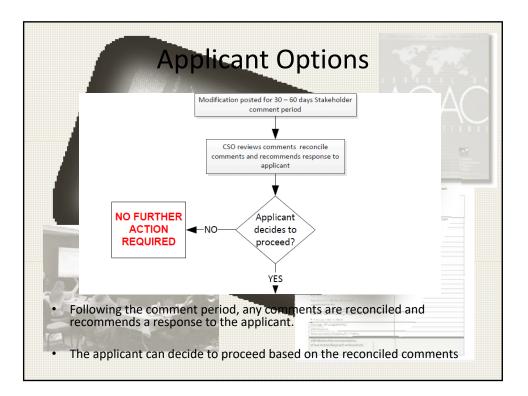


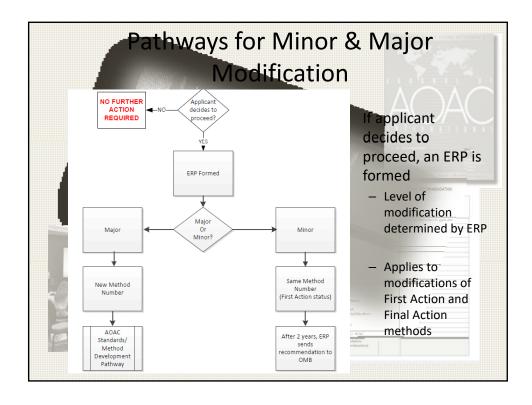


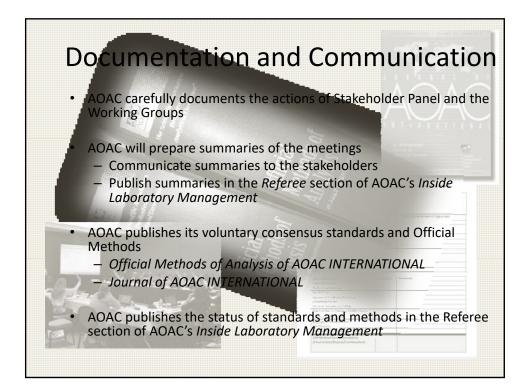




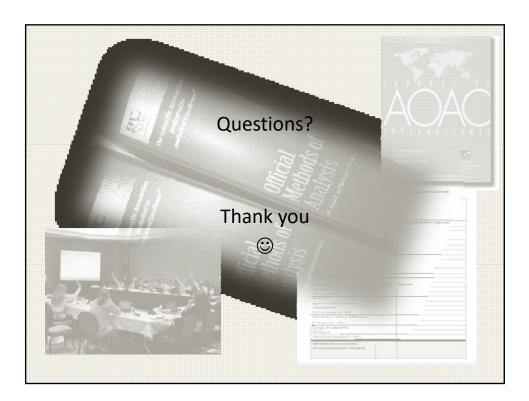








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AOAC Official Methods Board	AOAC Research Institute Independent Laboratories
/et and approve stakeholder panel chair & voting members /et and approve ERP membership and AOAC Experts	Conduct independent evaluation of candidate method using AOAC approved testing protocols
Render decisions on status of First Action methods (Final Action,	AOAC Stakeholder Panels
repeal, etc)	Develop voluntary consensus standards
Assign a liaison to each stakeholder panel and ERP Coordinate OMB Awards	Assign working groups to draft standards method performance requirements
AOAC Expert Review Panels	Voting members demonstrate consensus on behalf of stakeholders
Review methods and meet in person to render decisions on methods for First Action Official Methods <sup>SM</sup> status.	AOAC Staff
Track First Action Official Methods <sup>SM</sup> and modify, if necessary	Coordinate method reviews and method approval activities
Recommend First Action methods after 2 years or less to OMB	Coordinate OMB meetings
or Final Action, continuance, or Repeal	Provide trainings and orientations
Participate in Consulting Service and PTM reviews for OMA and narmonized PTM and harmonized OMA method studies	Maintain website and communication
	Document and publish actions and decisions
AOAC Experts	Coordinate standards development activities
Review and approve PTM validation testing protocol documentation	Publish standards and methods
Peer review of PTM validation manuscript and supporting locumentation	AOAC Research Institute Technical Consultants
AOAC Research Institute - PTM Expert Reviewers	Draft validation protocols in Consulting Service for assigned methods
Peer Review of PTM validation manuscripts and supporting	Facilitate PTM evaluation of assigned candidate methods
locumentation	Facilitate comments/responses for assigned OMA reviews





## Official Methods of Analysis<sup>SM</sup> (OMA) Expert Review Panel MEETING AND METHOD REVIEW GUIDANCE

The AOAC Research Institute administers AOAC INTERNATIONAL's premier methods program, the AOAC *Official Methods of Analysis*<sup>SM</sup> (OMA). The program evaluates chemistry, microbiology, and molecular biology methods. It also evaluates traditional benchtop methods, instrumental methods, and proprietary, commercial, and/or alternative methods and relies on gathering the experts to develop voluntary consensus standards, followed by collective expert judgment of methods using the adopted standards. The *Official Methods of Analysis of AOAC INTERNATIONAL* is deemed to be highly credible and defensible.

All Expert Review Panel (ERP) members are vetted by the AOAC Official Methods Board (OMB) and serve at the pleasure of the President of AOAC INTERNATIONAL. In accordance to the AOAC Expert Review Panel Member and Chair Volunteer Role Description all Expert Review Panel members are expected to 1) serve with the highest integrity, 2) perform duties and method reviews, and 3) adhere to review timelines and deadlines.

To assist the ERP Chair and its members, please note the following in preparation for Expert Review Panel meetings and method reviews.

### **Pre-Meeting Requirements**

- 1. Confirm availability and plan to be present to ensure a quorum of the ERP.
- (Please refer to page 25, Quorum Guidelines, Expert Review Panel Information Packet)
- 2. Ensure that your laptop, CPU or mobile device can access online web documentation.
- 3. Be prepared for the meeting by reviewing all relevant meeting materials and method documentation.

### **In-Person Meeting and Teleconference Conduct**

- 1. Arrive on time.
- 2. Advise the Chair and ERP members of any potential Conflicts of Interest at the beginning of the meeting.
- 3. Participation is required from all members of the ERP. All members have been deemed experts in the specific subject matter areas.
- 4. The ERP Chair will moderate the meeting to ensure that decisions can be made in a timely manner.
- 5. Follow Robert's Rules of Order for Motions.
- 6. Speak loud, clear, and concise so that all members may hear and understand your point of view.
- 7. Due to the openness of our meetings, it is imperative that all members communicate in a respectful manner and tone.
- 8. Refrain from disruptive behavior. Always allow one member to speak at a time. Please do not interrupt.
- 9. Please note that all methods reviewed and decisions made during the Expert Review Panel process are considered confidential and should not be discussed unless during an Expert Review Panel meeting to ensure transparency.

### **Reviewing Methods**

Prior to the Expert Review Panel meeting, ERP members are required to conduct method reviews. All methods are reviewed under the following criteria, technical evaluation, general comments, editorial criteria, and recommendation status. These methods are being reviewed against their collaborative study protocols as provided in the supplemental documentation. *Note: The method author(s) will be present during the Expert Review Panel session to answer any questions.* 



## **Official Methods of Analysis<sup>SM</sup> (OMA) Expert Review Panel** MEETING AND METHOD REVIEW GUIDANCE

### **Reviewing Methods (Cont'd)**

- Reviewers shall conduct in-depth review of method and any supporting information.
- In-depth reviews are completed electronically via the method review form. The method review form must be completed and submitted by the deadline date as provided.
- All reviews will be discussed during the Expert Review Panel meeting.
- Any ERP member can make the motion to adopt or not to adopt the method.
- If the method is adopted for AOAC First Action status, Expert Review Panel members must track and present feedback on assigned First Action *Official Methods*.
- Recommend additional feedback or information for Final Action consideration.

Here are some questions to consider during your review based on your scientific judgment:

- 1. Does the method sufficiently follow the collaborative study protocol?
- 2. Is the method scientifically sound and can be followed?
- 3. What are the strengths and weaknesses of the method?
- 4. How do the weaknesses weigh in your recommendation for the method?
- 5. Will the method serve the community that will use the method?
- 6. What additional information may be needed to further support the method?
- 7. Can this method be considered for AOAC First Action OMA status?

### **Reaching Consensus during Expert Review Panel Meeting**

- 1. Make your Motion.
- 2. Allow another member to Second the Motion.
- 3. The Chair will state the motion and offer the ERP an option to discuss the motion.
- 4. The Chair will call a vote once deliberations are complete.
- 5. Methods must be adopted by unanimous decision of ERP on first ballot, if not unanimous, negative votes must delineate scientific reasons. Negative voter(s) can be overridden by 2/3 of voting ERP members after due consideration.
- 6. All other motions will require 2/3 majority for vote to carry.

### Author Response to Reviewers:

1. Table 6, which is the comparison of the results of certified and consensus values for all elements included in this study, has been updated to include a bias for both the NIST-SRM 695 and Magruder 2009-06. Please see the attachment for corrections.

2. Table 7, which is demonstrates the method precision and comparability to the 2006.03 method using some of the original materials and original included elements, has been updated using the statistician's suggestion of multiplying the found Horrat value by two. Please see the attachment for corrections. Please see the attachment for corrections.

3. Table 8, which is the method precision for the proposed included elements (Ca, Cu, Fe, Mg, and Mn) using some of the original study materials, has been updated using the suggestion from the statistician of multiplying the found Horrat value by two. Please see the attachment for corrections.

4. The author recommends a change to the 2006.03 method for the removal from the scope of arsenic, selenium, and lead due to poor statistics. However, at the time of the publication, it was the best method available using common equipment found in both state regulatory and commercial laboratories. The improvement of the added hydrochloric acid to the method will provide adequate recovery, reproducibility, and trueness of the results lacking in the nitric only method.

5. Spike method: This method will be changed to a new method and it is not addressed at this time.

6. Please see the attachment labeled: "Fertilizer Subgroup Metals Statement Rev\_071516\_OMAMAN-28-AOAC 2006.03" for further explanations regarding this method.

		NIST S	RM 695		Magruder 2009-06				
Element	Certified	Mean	Recovery, %	Bias	Concensus, ICP	Mean	Recovery, %	Bias	
As, mg/kg	$200\pm5$	199.9	100.0	0.1	$330.58\pm20.55$	358.45	108.43	27.87	
Cd, mg/kg	$16.9\pm0.2$	17.1	111.2	0.2	$343.55\pm19.70$	348.14	101.33	4.59	
Co, mg/kg	$65.3 \pm 2.4$	61.7	103.9	3.6	$945.97\pm53.68$	959.33	101.41	13.36	
Cr, mg/kg	$244\pm 6$	226.4	92.8	17.6	$111.68 \pm 11.16$	127.93	114.55	16.25	
Mo, mg/kg	$20.0\pm0.3$	19.5	107.3	0.5	$17.80 \pm 2.70$	18.10	101.66	0.30	
Ni, mg/kg	$135 \pm 2$	127.6	94.5	7.4	1135.8 ± 81.32	1117.33	98.37	18.47	
Pb, mg/kg	276 ± 17	284.9	103.2	8.9	$\begin{array}{c} 3688.5 \pm \\ 1852.4 \end{array}$	4869.59	132.02	1181.1	
Se, mg/kg	$2.1\pm0.1*$	1.6	74.6	0.5	$116.46 \pm 8.33$	110.56	94.93	5.90	
Ca, %	$2.26\pm0.04$	2.3	102.5	0.0	$1.78\pm0.12$	1.79	100.43	0.01	
Cu, ppm	$1225\pm9$	1214.4	99.1	10.6	$334\pm38$	339.69	101.70	5.69	
Fe, %	$3.99\pm0.08$	4.0	99.7	0.0	$2.03 \pm 1.02$	3.03	149.03	1.00	
Mg, %	$1.79\pm0.05$	1.8	98.2	0.0	$0.18 \pm .12$	0.19	105.89	0.01	
Mn, %	$0.305 \pm 0.005$	0.3	101.9	0.0	$0.153\pm0.013$	0.18	115.54	0.02	
Zn, %	$0.325 \pm 0.005$	0.3	97.7	0.0	$0.165 \pm 0.11$	0.16	99.25	0.00	

\*Reference

Value

Table 6. Comparison of results of certified and consensus values with bias included.

	Proposed m	nethod (n=3)		rative study 03 results	_	
Material	Avg., mg/kg	RSD, %	Avg., mg/kg	RSDr, %	Recovery, %	Horrat(r
			As			
А	41.49	1.86	22.15	42.93	187.32	0.58
В	478.89	1.39	263.2	47.96	181.95	0.62
С	6.89	3.05	4.87	63.12	141.42	0.72
D	5917.76	3.43	4945	6.09	119.67	2.24
E	2953.58	0.62	2432	10.56	121.45	0.36
F	10.36	2.10	9.75	41.73	106.26	0.54
G	22.32	0.35	22.43	9.36	99.49	0.10
Н	2.92	3.32	2.36	17.6	123.63	0.70
Ι	11.95	1.77	13.04	13.27	91.63	0.46
J	189.46	2.23	185.45	4.27	102.16	0.86
K	168.49	2.23	175.28	7.84	96.13	0.86
L	bdl	NA	NA	NA	NA	NA
М	9.31	1.45	7.35	53.17	126.64	0.36
N	17.41	1.82	12.74	15.74	136.62	0.50
0	3.77	4.95	4.16	45.14	90.66	1.08
Р	60.72	3.73	47.83	2.22	126.94	1.22
Cd						
А	2.40	3.92	2.25	39.14	106.78	0.80
В	5.29	7.83	7.56	19.65	69.97	1.78
С	22.07	1.79	21.28	0.61	103.72	0.50
D	44.91	4.04	36.64	3.2	122.56	1.28
E	27.86	6.51	22.58	4.25	123.4	1.90
F	235.39	0.76	214.6	3.06	109.69	0.30
G	28.73	1.61	26.69	5.79	107.65	0.48
Н	63.58	0.9	55.29	1.25	115.00	0.30
I	bdl	NA	NA	NA	NA	NA
J	16.65	0.44	15.52	2.77	107.26	0.12
K	66.05	2.29	64.04	2.95	103.14	0.76
L	bdl	NA	NA	NA	NA	NA
М	4.32	9.64	4.19	3.18	103.17	2.14
N	bdl	NA	NA	NA	NA	NA
0	bdl	NA	NA	NA	NA	NA
Р	0.52	20.46	0.57	66.74	92.02	1.88
			Со			
А	119.71	2.69	97.75	4.12	122.47	0.98

## Table 7. Method precision and comparability to 2006.03, revised.

В	212.27	0.89	195.6	9.34	108.52	0.36
С	bdl	NA	NA	NA	NA	NA
D	19.8	0.39	17.33	4.00	114.25	0.10
Е	26.5	1.28	23.01	3.53	115.15	0.38
F	9.05	1.14	8.91	2.94	101.57	0.28
G	bdl	NA	NA	NA	NA	NA
Н	bdl	NA	NA	NA	NA	NA
Ι	bdl	NA	NA	NA	NA	NA
J	59.57	0.39	45.20	8.52	131.79	0.16
Κ	545.71	3.30	532.78	2.45	102.43	1.28
L	bdl	NA	NA	NA	NA	NA
М	22.54	4.39	21.25	4.98	106.08	1.52
Ν	bdl	NA	NA	NA	NA	NA
0	bdl	NA	NA	NA	NA	NA
Р	13.65	2.12	10.67	9.14	127.93	0.56
			Cr			
А	892.48	2.46	731.5	10.09	122.01	2.34
В	461.2	1.26	396.99	14.2	116.17	1.10
С	172.14	0.47	159.5	1.31	107.93	0.36
D	45.39	0.66	38.25	3.66	118.67	0.40
Е	122.57	1.23	101.15	2.29	121.18	0.88
F	586.13	0.83	566.16	8.00	103.53	0.76
G	302.41	1.00	281.91	2.88	107.27	0.84
Н	380.12	0.32	341.28	3.05	111.38	0.28
Ι	18.31	0.71	18.11	1.26	101.09	0.38
J	219.62	0.14	164.4	10.38	133.59	0.10
K	189.16	1.89	169.49	2.76	111.6	1.44
L	6.41	1.97	5.84	5.52	109.78	0.46
М	129.29	2.29	115.55	2.69	111.89	1.66
Ν	6305.07	2.55	5980.93	0.99	105.42	3.34
0	120.89	1.36	108.85	6.75	111.88	0.98
Р	146.07	2.83	134.77	7.08	108.38	2.10
			Мо			
А	109.17	0.90	69.16	7.35	157.85	0.6
В	156.58	2.47	116.69	18.28	134.18	1.78
С	4.84	2.5	3.89	10.04	124.4	1.08
D	3.72	3.19	2.73	21.89	136.22	1.32
E	6.88	6.27	4.39	22.27	156.79	1.40
F	20.48	1.26	18.47	1.68	110.91	0.68
G	4.41	1.47	4.00	12.49	110.31	0.64
-						

Н	13.69	0.79	11.74	4.75	116.61	0.40
Ι	bdl	NA	NA	NA	NA	NA
J	19.39	0.36	13.21	7.94	146.76	0.18
K	44.68	2.1	42.88	5.23	104.19	1.30
L	bdl	NA	NA	NA	NA	NA
М	14.7	1.93	11.53	15.03	127.53	0.98
N	9.31	1.92	7.83	7.22	118.88	0.46
0	bdl	NA	NA	NA	NA	NA
Р	15.53	0.76	12.44	14.46	124.83	0.40
			Ni			
А	384.29	0.57	331.92	3.94	115.78	0.70
В	330.3	3.66	295.83	18.02	111.65	1.10
С	30.10	3.63	26.60	3.55	113.14	0.74
D	bdl	NA	NA	NA	NA	NA
E	39.14	3.35	36.39	5.75	107.57	0.74
F	296.16	0.38	279.34	0.93	106.02	0.46
G	44.33	1.90	42.45	3.05	104.42	0.42
Н	60.14	1.83	52.76	3.73	113.98	1.70
I	bdl	NA	NA	NA	NA	NA
J	122.1	0.67	101.89	7.03	119.84	0.70
K	1683.6	3.08	1683.27	4.63	100.02	1.18
L	bdl	NA	NA	NA	NA	NA
М	85.14	4.00	86.22	21.3	98.75	0.98
N	20.96	3.12	18.55	12.64	112.97	0.52
0	bdl	NA	NA	NA	NA	NA
Р	38.90	3.89	33.39	13.42	116.5	NA
			Pb			
А	136.03	8.63	119.60	64.13	113.74	3.20
В	3729	8.23	3070.11	30.44	121.47	1.20
С	1072	1.22	996.25	1.64	107.64	0.62
D	3790	0.47	3292.06	4.55	115.12	0.40
E	4121	4.04	4075.75	16.36	101.11	2.50
F	4.08	6.44	3.08	4.54	132.53	2.00
G	4.35	3.56	3.81	15.89	114.16	0.78
Н	bdl	NA	NA	NA	NA	NA
I	bdl	NA	NA	NA	NA	NA
J	275.84	0.49	245.35	3.9	112.43	0.22
K	514.92	1.66	509.54	3.47	101.06	0.76
		NT A	NT A	NT A	<b>NT</b> 4	NT 4
L	bdl	NA	NA	NA	NA	NA

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Ν	62.25	7.02	58.53	6.55	106.36	2.32
0	3.25	13.07	3.34	61.88	97.38	2.78
Р	383.07	3.83	343.08	10.13	111.66	1.66
			Se			
А	3.09	9.06	6.96	12.43	44.34	1.90
В	30.31	1.47	31.03	14.15	97.68	0.44
С	bdl	NA	NA	NA	NA	NA
D	34.7	4.01	28.40	4.77	122.17	1.22
Е	26.73	1.37	25.90	11.05	103.2	0.40
F	7.10	6.93	1.4	83.34	507.16	1.66
G	5.54	14.00	1.73	47.46	320.11	3.22
Н	bdl	NA	NA	NA	NA	NA
Ι	bdl	NA	NA	NA	NA	NA
J	5.14	8.53	3.20	42.1	160.53	1.94
Κ	245.39	3.15	257.17	2.89	95.42	1.26
L	bdl	NA	NA	NA	NA	NA
М	9.16	10.35	9.47	8.57	96.70	2.56
Ν	bdl	NA	NA	NA	NA	NA
0	bdl	NA	NA	NA	NA	NA
Р	bdl	NA	NA	NA	NA	NA
	Dolour detection	limit				

BDL = Below detection limit.

NA = Not applicable.

	Calciu	m		Copper		Iron				Magn		
Material	Mean, % (n=3)	RSD, %	Horrat(r)	Mean, mg/kg (n=3)	RSD, %	Horrat(r)	Mean, % (n=3)	RSD, %	Horrat(r)	Mean, % (n=3)	R	
Α	0.869	1.07	0.52	6636.7	0.58	0.76	53.76	4.49	0.48	0.48		
В	2.497	0.93	0.54	9123.2	1.33	1.98	24.95	2.58	2.1	2.204		
С	0.51	1.94	0.88	11547	1.75	1.64	4.458	0.28	0.46	0.686	1	
D	3.411	1.42	0.86	14284	1.88	1.6	13.96	3.67	2.74	3.928		
Е	2.797	1.57	0.92	9767.8	0.95	0.58	16.59	2.88	2.2	3.456	(	
F	0.913	0.96	0.48	5421.2	1.06	0.24	1.074	0.74	0.38	1.304		
G	1.418	0.57	0.3	684.31	0.52	0.16	0.241	0.45	0.36	0.754	(	
Н	0.378	0.42	0.18	589.86	8.32	1.56	1.417	0.56	0.3	2.758	(	
Ι	0.149	2.81	1.06	498.88	1.98	0.38	0.62	0.33	0.32	2.088	(	
J	2.169	1.36	0.76	368.99	1.85	1.88	3.805	1.52	0.94	3.314		
K	4.58	2.35	1.48	370.35	0.7	0.66	2.268	1.13	0.64	2.7		
L	0.109	4.13	1.48	1800	1.86	0.4	2.103	0.63	0.36	0.336	(	
М	1.724	0.52	0.28	3192.9	1.04	0.84	4.045	0.89	0.56	1.136		
Ν	3.976	1.29	0.8	4651.4	2.39	1.86	8.927	1.15	0.8	0.774	(	
0	2.493	1.88	1.08	3214.1	3.12	0.88	0.23	2	1.6	0.416	(	
Р	6.511	0.39	0.26	1757.3	1.8	0.6	23.82	3.95	3.18	0.824	T	

Table 8. Method precision for Ca, Cu, Fe, Mg, Mn, and Zn with revised HorRat.

# Fertilizer Subgroup of the Agricultural Materials Community Statement of Method Need and Support

## **Trace metals in Fertilizer**

In 2002 the fertilizer community began holding annual meetings (Fertilizer Metals Forum) to discuss their needs pertaining to methods of analysis of trace metals in fertilizers. This need rose primarily from a regulatory impetus to establish limits for certain metals. Results of this work included guidance for setting metals limits in fertilizers that formed the basis for the current proposed guidance published in the AAPFCO annual publication (publication #69) as Statement of Uniform Interpretation and Policy No. 25 (SUIP #25) available from <a href="http://www.aapfco.org/rules.html">http://www.aapfco.org/rules.html</a>.

The second result was a fully collaborated method (AOAC 2006.03). This method came about as the result of input from the community between 2002 and 2006. While the method was successfully collaborated, it was done quickly in response to an urgent nation-wide need.. Several states had regulations in place but no "official" method. Any existing methods for the metals (primarily environmental methods) were not validated for fertilizers as a matrix. Fertilizers present a very unique matrix; it was determined that existing methods did not give reliable results due to high concentrations of salts, spectral interferences and ionization effects not properly controlled. The 2006 method was an improvement on the methodology used in the environmental sector, but still needed additional refinement as it was not optimized for all elements and interference posed by high levels of Iron.

With the success of the model, the Metals Forum evolved into the Methods Forum in 2008 to address a wide array of methods needs of the fertilizer community. Over the years hundreds of hours have been spent by dozens of volunteers discussing and forming proposals to establish science/risk based limits as well as develop and validate methods of analysis to monitor those limits.

The community continued to work on the improving the metals method and eventually requested that a revised method be collaborated that addressed the concerns of the community. Guidance to the study director was prepared to address the concerns and meet the needs of the community. Below are the primary charges to the study director and method champion.

The method must -

- Use equipment and instruments commonly available in state fertilizer laboratories –
- Utilize ICP-OES for detection, not ICP-MS as it is rarely available to state fertilizer labs
- Have detection limits that encompass the levels established in SUIP #25, but not overly aggressive avoiding undue time, acid quality and expensive clean room procedures
- Not be burdensome as it relates to digestion equipment or cross contamination
- Extend the current method to also encompass nutritive metals for greater efficiency
- Include a simple acid mixture of nitric and hydrochloric acids, avoid perchloric acid
- Ensure the greatest possible scope of materials be incorporated to include as many fertilizer matrices as possible, realizing that some sacrifices in performance would be worth the expanded scope.

The community has kept in close contact with the study director during method development and validation through face-to-face annual meetings and by the use of email and conference calls. The community has consensus that all of the above expectations are met in the currently proposed method as documented in *JAOAC* 97, pp 700-711 and as submitted to the Fertilizer ERP.



AOAC OFFICIAL METHODS OF ANALYSIS (OMA)

## OMAMAN-28/AOAC 2006.03

	VALUATION CRITERIA
Is the test kit	method scientifically and technically sound?
ER 1	Yes
ER 2	Yes
ER 3	<ul> <li>No, The method states it is intended for fertilizers but; 1). Targets some metals and ignores others (e.g. Al, Hg) that can be toxic to plants</li> <li>2). Has a bias toward metals extractable by acid whereas alkali extraction is ignored. It is known that some metals are more available in alkali environments.</li> <li>3). If a method is to be used for determining metals in fertilizers it should consider the pH range of soils wherein most crops are grown (pH 5.5-6.5) and, although environmental tests for metals may include highly acidic soils, this is not the case for agricultural soils where pH ranges are normally maintained within a specific range and may likely include alkali soils above pH 8.0. in areas of low rainfall or where irrigation waters contain high salts</li> <li>4). If the purpose is to limit plant availability then a leachable metals test would be more appropriate than a total metals test considering that metals must be released from the fertilizer into soil solution in order for plant uptake to occur and only certain forms of some metals are plant available</li> <li>5). To include plant macro- and micronutrients such as Ca, Mg, Fe, etc. in this method for total metals would not be indicative of plant availability and would be doing a great disservice to the end user. This has already happened in some states where a label warning is being construed as a nutrient guarantee.</li> <li>6.) As there are numerous methods for metals analysis if we are going to advance a method it should therefore have some value or indication of its solubility from the fertilizer material and potential plant availability in soil solution and leachability). This is not what this method is meant to determine (its scientific purpose).</li> </ul>
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
ER 8	Yes
ER 9	Yes
ER 10	Yes
	nt controls been used, including those required to calculate the rate of false-positive and e results where appropriate? No, The carbon interference/background for wavelengths below 250nm is not sufficiently addressed.
ER 2	Yes
ER 3	No, Should have both alkali and acidic measurements Should list pH of extractants. May have complexation with other elements during wait time



AOAC OFFICIAL METHODS OF ANALYSIS (OMA)

## OMAMAN-28/AOAC 2006.03

	which may decrease the final reading.
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
ER 8	Yes
ER 9	Yes
ER 10	Yes
Is sufficient testing?	information included for system suitability determination and product performance or acceptance
ER 1	Yes
ER 2	Yes
ER 3	Yes
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
ER 8	Yes
ER 9	Yes
ER 10	Yes
Are the cond	clusions statements valid based upon data presented?
ER 1	Yes
ER 2	Yes
ER 3	No, Not suitable for nutrients/metals that are increased in availability under alkali conditions or ones that may complex with other fertilizer constituents during extractant wait time.
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
ER 8	Yes
ER 9	Yes
ER 10	Yes
Do you agre statement?	e that the evidence or data from this and previous studies support the proposed applicability
ER 1	Yes
ER 2	Yes
ER 3	No, In addition to the items mentioned in #1 above, the purpose of a fertilizer test should be to determine the availability of any given metal/nutrient for plant uptake once applied to the soil. This method provides no such proof of it correlating in any way with plant uptake. Also, the



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	availability of metals can be affected by their concentration and other ions present, among other things.
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
ER 8	Yes
ER 9	Yes
ER 10	Yes
Are there	sufficient data points per product evaluated in accordance with AOAC requirements?
ER 1	Yes
ER 2	Yes
ER 3	Yes
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
ER 8	Yes
ER 9	Yes
ER 10	Yes
General C	omments about the Method Scope/Applicability:
ER 1	Sound methodology but it does not address the hardware (actual ICP differences) sufficiently. Without addressing this there will be biases based on plasma configuration used. Especially for the heavy metals.
ER 2	Authors are to be commended for undertaking this important correction and addition of additional elements to make this a more universal method for fertilizer analysis.
ER 3	The method states it is intended for fertilizers but; 1). Targets some metals and ignores others (e.g. Al, Hg) that can be toxic to plants 2). Has a bias toward metals extractable by acid whereas alkali extraction is ignored. It is known that some metals are more available in alkali environments. 3). If a method is to be used for determining metals in fertilizers it should consider the pH range of soils and crops, and, although an environmental test for metals may include highly acidic soils, this is not the case for agricultural soils where pH ranges are normally maintained within a specific range and may likely include alkali soils above pH 8.0. 4). If the purpose is to limit plant availability then a leachable metals test would be more appropriate than a total metals test considering the metals must be released from the fertilizer into soil solution in order for plant uptake to occur 5). To include plant nutrients such as Ca, Mg, Fe, etc. in this method for total metals could result in label guarantees for these fertilizer nutrients and an acid extraction for total metals would not be indicative of plant availability and would do a disservice to the end user. This has already happened in some states where a label warning is



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	being construed as a nutrient guarantee. If we are going to advance a method it should therefore have some value or indication of its solubility from the fertilizer material and potential plant availability. This is not what this
	method is meant to determine.
ER 4	Looks good.
ER 5	I think this method is taking advantage of the technology that is available. The simultaneous determination of the metals on ICP will be very beneficial to laboratories.
ER 6	more studies have to be done in order to improve the recovery of some elements
ER 7	Scope and applicability for ferilizers is appropriate for the specified metals.
ER 8	<ul> <li>Webb, S., Bartos, J., Boles, R., Hasty, E., Thuotte, E., &amp; Thiex, N. J. (2014). Simultaneous</li> <li>Determination of Arsenic, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead,</li> <li>Magnesium, Manganese, Molybdenum, Nickel, Selenium, and Zinc in Fertilizers by Microwave</li> <li>Acid Digestion and Inductively Coupled Plasma-Optical Emission Spectrometry Detection: Single-Laboratory Validation of a Modification and Extension of AOAC 2006.03. Journal of AOAC</li> <li>International, 97(3), 700-711.</li> </ul>
	The paper describes a single-laboratory validation study for the simultaneous determination of arsenic, cadmium, calcium, cobalt, copper, chromium, iron, lead, magnesium, manganese, molybdenum, nickel, selenium, and zinc in all major types of commercial fertilizer products by microwave digestion and inductively coupled plasma-optical emission spectroscopy (ICP-OES) analysis. The importance of the proposed method is correlated to the possible extension and modification of the current AOAC 2006.03 (determination of arsenic, cadmium, cobalt, chromium, lead, molybdenum, nickel and selenium, also named "Group A", in fertilizers) with the inclusion of calcium, copper, iron, magnesium, manganese, and zinc (also named "Group B"). The use of a dual acid digestion system - hydrochloric and nitric acids – instead of simple nitric acid is proposed as modification.
	On the basis of obtained results, the proposed method is reported to: a) Assure a significant increase in laboratory efficiency when compared to the use of both AOAC Methods 965.09 – Nutrients (Minor) in Fertilizers, Atomic Absorption, Spectrophotometric Method - and 2006.03. AOAC 695.09 is considered because of the necessity of validating results for calcium, copper, iron, magnesium, manganese, and zinc b) Assure a more efficient recovery of several metals in comparison with AOAC 2006.03 c) Meet the criteria recommended by the Association of American Plant Food Control Officials (AAPFCO) Laboratory Services Committee.
	The applicability of the proposed method has been declared. It has to be noted that AOAC 2006.03 mentions the use of nitric acid, while the proposed technique uses also hydrochloridric acid (in both situations, fertilizers can produced exothermic reactions) in a closed vessel microwave digestion system at 200 °C. The use of microwave digestion units has to be carefully considered.



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	17 materials have been utilized for the validation, including two samples for the determination
	of accuracy; in addition, data demonstrating calibration and linearity, accuracy, precision,
	comparability, working range, LOD/LOQ estimation, and ruggedness tests are present. In
	general, the document method performance is compliant with Standard Method Performance
	Requirements (SMPR) criteria.
ER 9	Method is well written and data presented supports most conclusions. Lot's of good work done
	in the study and background research. well thought out and much needed.
ER 10	None
Pros/Strengt	hs of the Manuscript:
ER 1	QC and analytical methodology is fine
ER 2	The purpose of the study is easy to understand and the data represents marked improvement
	over AOAC 2006.03 for Group B metals. The ruggedness testing section is excellent and well-
	done.
ER 3	Will expedite lab analyses and have cost savings
ER 4	Well written and validated
ER 5	The manuscript references many different methods, used Magruder samples for consistency.
ER 6	fast analysis
ER 7	Clear explanation of the results
ER 8	The paper considers the following aspects with high attention:
	1) Choice of samples for validation. 15 of the 30 original collaborative study materials from
	2006.03 have been used for method validation. In addition, NIST SRM 695 and Magruder 2009-
	06 have been incorporated as validation materials
	2) Description of needed equipments and reagents
	3) Description of operative procedures, from the description of the principle of the proposed
	method and instrumentation to calculations and quality control tests
	4) Validation study: Calibration and Linearity; Trueness or Accuracy; Precision; Comparability;
	Working range; LOD and LOQ estimation; Ruggedness tests.
	In detail, Authors claim (preliminary study results – Appendix - comparison of the new method
	with AOAC 965.09, AOAC 2006.03, hot block-acid digestion and microwave acid digestion) that
	the simultaneous digestion with two acids and the subsequent ICP-OES analysis allow a notable
	recovery for both metal Groups.
	There are not significant differences between AOAC 965.09 and the proposed method with
	relation to Ca, Cu, Mn and Zn (P = 0.05), while differences are significant for Mg (P level of 0.05).
	The same situation is observed when comparing the proposed extension and AOAC 2006.03. For
	this reason, it may be assumed that Mg should be recovered with addition of HCl. The same
	situation is observed with iron; in addition:
	a) Should Fe be derived from organic materials, AOAC 965.09 Part C method would not be
	applicable
	b) Should Fe be in the range: 10-50 %, the mixed digestion method should demonstrate slightly



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different results if compared with AOAC 965.09 c) AOAC 2006.03 does not adequately recover Fe if compared with other methods, including AOAC 965.09. As a consequence, it appears that the addition of HCl to the digestion system is useful. With relation to Group A- metals, comparisons have been made with AOAC 2006.03 and the hot-block system. In general, there are not statistical differences (P = 0.05) except for Co and Mo; in addition, Cr shows high statistical differences (P = 0.01): this behaviour can be interpreted as a possible bias of AOAC 2006.03. The following strengths of the proposed method have to be also mentioned: Calibration and linearity The most suitable type of calibration curve has been determined (linear or quadratic) using the software provided by the instrument. For this reason, the calibration should be easy enough. Observed correlation coefficient values are between 0.99909 and 1.000000. Linearity has been determined by comparing responses for the working standard solutions over the range of expected concentrations. All results reported have undergone corrective calculations to include the test portion weight and total volume to yield the corrected values. Trueness or Accuracy Accuracy has been determined by results of analysis for all elements of interest, Group A and Group B, in NIST SRM 695 Trace Elements in Multi-Nutrient Fertilizer. Additionally, the results by the proposed method have been compared to consensus values for Magruder 2009-06, and expressed as percentage recovery of the certified or consensus value. Generally, percent recovery results are in the range: 74.6 – 102.5 (for NIST SRM 695) and 94.9-149 (for Magruder 2009-06). Precision Method precision has been determined by independent analysis of the validation materials in triplicate, and variation has been expressed as relative standard deviation (RSD). Many results show HorRat values below 0.3 for a single validation study. In detail, HorRat values (total samples: 15) are below 0.3: a) seven times for calcium b) five times for cuprum c) eight times for iron (in addition, two HorRat values are reported are reported to be > 1.3) d) 12 times for magnesium e) three times for manganese (in addition, five HorRat values are reported to be > 1.3) f) three times for zinc (in addition, two HorRat values are reported to be > 1.3). However, RSD values for the proposed method are low if compared with collaborative study



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	<ul> <li>2006.03 results. Two examples can be made with concern to cobalt and nickel (Group A).</li> <li>a) Cobalt. Material 'P', result: 0.52 vs 0.57 (collaborative study), RSD = 20.46 vs 66.74 (collaborative study)</li> <li>b) Nickel. Material 'P', result: 38.90 vs 33.39 (collaborative study), RSD = 3.89 vs 13.42 (collaborative study).</li> <li>In general, RSD for Group B metals remain low enough.</li> <li>Comparability</li> <li>Comparability to AOAC 2006.03 for Group A elements has been calculated by testing 15 of the</li> </ul>
	original collaborative study materials with both digestion methods. Data are expressed as a percentage recovery of the original grand average result. Many results show higher recovery values. Probably, these results demonstrate the enhanced recovery "power" of the proposed method, on the basis of RDS values.
	Working Range The working range of the method is determined by the working calibration standards. Each laboratory should determine the range best suited to their instrument's capability. In general, 10 % extrapolation from the highest calibration standard often produces acceptable results for Group A and B elements.
	LOD and LOQ With reference to Group A, the paper shows the instrument LOD (estimated with standard solutions) and the method LOQ and LOD (estimated with validation materials). Interestingly, the LOQ for Group B elements are completely dependent upon the calibration range since the method is not working close to the instrument limits.
	Ruggedness trial Generally, results have not shown appreciable effects from the deviations of the method. Obtained results (differences) are all within normal variation and indicate that the method is sufficiently rugged with respect to the conditions studied.
ER 9	Significant work was done and data generated; information presented well. Method presents a step forward in speed, safety and scope. Digestion is relatively simple and straightforward, with few chances for human error beyond sample weight. Updating the instrumentation to ICP-OES is very important. Scope and ranges are well covered by the materials used. Digestion options are well researched.
ER 10	Robust Method
	knesses of the Manuscript:
ER 1	Some of the optimization steps are dated and based on studies from 30 years ago. System
	hardware and performance has changed and this needs to be considered. I.E. Meremt's
	robustness test is a guideline for plasma conditions BUT NOT for analytical optimization of the method/ICP. Also, Cs is a buffer for consideration on Axial/DV/TI systems, it is not typically used
	methody for . Also, co to a burner for consideration on Axial DV/ it systems, it is not typically used



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	in radial ICP systems. These need to be addressed because they can have an adverse affect
50.2	based on system hardware used.
ER 2	Perhaps more emphasis could be placed on Section F (e) regarding interelement interference in
	instruments that don't have software to correct for this issue.
ER 3	Favors metals that are extractable in acid rather than alkali
	Does not provide extractant pH levels
	Reports total metals which is not indicative of plant availability
	Could tend to mislead consumers if construed as a micronutrient label guarantee
	Not an appropriate method for fertilizer materials in determining plant availability
ER 4	N/A
ER 5	"cut" (page 112) could be replaced.
ER 6	may not be applicable foe all fertilizer products
ER 7	none
ER 8	The following weaknesses of the proposed method may be mentioned:
	Caliburation and linearity.
	Calibration and linearity
	Some deconvolution effects have to be considered (Fe, Co) when speaking of certain wavelengths for arsenic, cadmium, lead and selenium (calibration range: 0-10 µg/mL).
	Precision
	Many results show many HorRat values below 0.3 for a single validation study. However, RSD
	values for the proposed method are extremely reduced if compared with collaborative study 2006.03 results. In addition, RSD for Group B metals remain low enough, in general.
	LOD and LOQ
	It should be noted that lower limits for Group B elements can be achieved by altering the test
l .	portion size or choosing more sensitive wavelengths.
	Ruggedness trial
	It has to be noted that:
	1) Se values in the sample are at or below the method LOQ. For this reason, the proposed
	method is not recommended for Se
	2) Certain 'Relative percent difference' values show that the determination of iron has to be
	carried out carefully. This element is reported to be the most variable element and ruggedness
	test results seem to confirm the affirmation.
ER 9	All of the ruggedness work was done on the digestions portion of the study, but none was done



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ER 8	At present, there are no safety concerns with the exception of the contemporary use of nitric and hydrochloridric acids. In addition, the use of microwave digestion units at 200 °C has to be carefully considered.
ER 9	I have not seen a review by the safety advisor. The safety checklist seems appropriate. I do not have any additional concerns regarding the safety of this method.
ER 10	No cautions provided
Are there	any concerns regarding the data manipulation, data tables, or statistical analysis?
ER 1	No concerns
ER 2	No
ER 3	unknown, no access to this
ER 4	No
ER 5	none
ER 6	no
ER 7	No
ER 8	At present, there are no concerns with relation to data manipulation, data tables and statistical analysis.
ER 9	I have not seen a review by the statistical advisor. However I do not have any concerns regarding the statistics used to support this method other than the use of a broader selection o materials (organic derivation) used in future work or data reviews.
ER 10	None observed.
	AL EVALUATION CRITERIA lidation Study Manuscript in a format acceptable to AOAC?
ER 1	Yes
ER 2	Yes
ER 3	Yes
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
ER 8	Yes
ER 9	Yes
ER 10	Yes
	thod described in sufficient detail so that it is relatively easy to understand, including equations and
procedu	res for calculation of results (are all terms explained)?
ER 1	Yes
ER 2	Yes
ER 3	Yes

ER 4

ER 5

Yes

Yes



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ER 6         Yes           ER 7         Yes           ER 8         Yes           ER 9         Yes           ER 10         Yes           Are the figures and tables sufficiently explanatory without the need to refer to the text?           ER 1         Yes           ER 1         Yes           ER 2         Yes           ER 3         Yes           ER 4         Yes           ER 5         Yes           ER 6         Yes           ER 7         Yes           ER 8         Yes           ER 9         Yes           ER 1         Yes           ER 4         Yes           ER 5         Yes           ER 6         Yes           ER 7         Yes           ER 8         Yes           ER 10         Yes           ER 2         Yes           ER 4         Yes           ER 5         Yes           ER 6         Yes           ER 7         Yes           ER 8         Yes           ER 9         Yes           ER 7         Yes           ER 7         Yes		
ER 8         Yes           ER 9         Yes           ER 10         Yes           ER 1         Yes           ER 1         Yes           ER 2         Yes           ER 3         Yes           ER 4         Yes           ER 7         Yes           ER 8         Yes           ER 7         Yes           ER 8         Yes           ER 9         Yes           ER 9         Yes           ER 9         Yes           ER 1         Yes           ER 4         Yes           ER 7         Yes           ER 8         Yes           ER 9         Yes           ER 10         Yes           ER 11         Yes           ER 2         Yes           ER 3         Yes           ER 4         Yes           ER 5         Yes           ER 6         Yes           ER 7         Yes           ER 8         Yes           ER 9         Yes           ER 10         Yes           Could some be omitted and covered by a simple statement?           ER 1	ER 6	Yes
ER 9         Yes           Are the figures and tables sufficiently explanatory without the need to refer to the text?           ER 1         Yes           ER 2         Yes           ER 3         Yes           ER 4         Yes           ER 5         Yes           ER 6         Yes           ER 7         Yes           ER 8         Yes           ER 9         Yes           ER 1         Yes           ER 8         Yes           ER 9         Yes           ER 9         Yes           ER 1         Yes           ER 1         Yes           ER 2         Yes           ER 1         Yes           ER 2         Yes           ER 3         Yes           ER 4         Yes           ER 5         Yes           ER 6         Yes           ER 7         Yes           ER 8         Yes           ER 9         Yes           ER 10         Yes           Could some be omitted and covered by a simple statement?           ER 2         No           ER 3         Yes, Table 1.Could be a summation of the numb		
ER 10YesAre the figures and tables sufficiently explanatory without the need to refer to the text?ER 1YesER 2YesER 3YesER 4YesER 5YesER 6YesER 7YesER 8YesER 9YesER 10YesER 10YesER 2YesER 3YesER 4YesER 5YesER 7YesER 8YesER 9YesER 10YesAre all the figures and tables pertinent?ER 2YesER 3YesER 4YesER 5YesER 6YesER 7YesER 8YesER 9YesER 10YesCould some be omitted and covered by a simple statement?ER 1NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 7NoER 8NoER 9NoER 8NoER 9NoER 9NoER 9NoER 9NoER 10No	ER 8	Yes
Are the figures and tables sufficiently explanatory without the need to refer to the text?ER 1YesER 2YesER 3YesER 4YesER 5YesER 6YesER 7YesER 8YesER 9YesER 1YesER 1YesER 2YesAre all the figures and tables pertinent?ER 1YesER 2YesER 3YesER 4YesER 4YesER 5YesCould some be omitted and covered by a simple statement?ER 1NoER 2NoER 3YesER 4NoER 5NoER 6NoER 7YesER 8YesER 9YesER 9YesER 1NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 10No	ER 9	Yes
ER 1       Yes         ER 2       Yes         ER 3       Yes         ER 4       Yes         ER 5       Yes         ER 6       Yes         ER 7       Yes         ER 8       Yes         ER 9       Yes         ER 10       Yes         ER 11       Yes         ER 2       Yes         ER 3       Yes         ER 4       Yes         ER 5       Yes         ER 4       Yes         ER 5       Yes         ER 6       Yes         ER 7       Yes         ER 8       Yes         ER 9       Yes         ER 9       Yes         Could some be omitted and covered by a simple statement?         ER 1       No         ER 2       No         ER 3       Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.         ER 4       No         ER 5       No         ER 6       No         ER 7       No         ER 8       No         ER 9       Yes, Table 1.Could be a summation of the number and types of fertilizer materials use	ER 10	Yes
ER 2       Yes         ER 4       Yes         ER 5       Yes         ER 6       Yes         ER 7       Yes         ER 8       Yes         ER 9       Yes         ER 10       Yes         ER 2       Yes         ER 3       Yes         ER 4       Yes         ER 7       Yes         ER 8       Yes         ER 9       Yes         ER 1       Yes         ER 2       Yes         ER 3       Yes         ER 4       Yes         ER 5       Yes         ER 6       Yes         ER 7       Yes         ER 8       Yes         ER 9       Yes         ER 9       Yes         Could some be omitted and covered by a simple statement?         ER 10       Yes         ER 1       No         ER 2       No         ER 3       Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.         ER 4       No         ER 5       No         ER 6       No         ER 7       No <tr< td=""><td>Are the figure</td><td>es and tables sufficiently explanatory without the need to refer to the text?</td></tr<>	Are the figure	es and tables sufficiently explanatory without the need to refer to the text?
ER 3       Yes         ER 4       Yes         ER 5       Yes         ER 6       Yes         ER 7       Yes         ER 8       Yes         ER 9       Yes         ER 10       Yes         Are all the figures and tables pertinent?         ER 1       Yes         ER 3       Yes         ER 4       Yes         ER 5       Yes         ER 4       Yes         ER 5       Yes         ER 6       Yes         ER 7       Yes         ER 8       Yes         ER 9       Yes         ER 6       Yes         ER 7       Yes         ER 8       Yes         ER 9       Yes         ER 10       Yes         Could some be omitted and covered by a simple statement?         ER 1       No         ER 2       No         ER 3       Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.         ER 4       No         ER 5       No         ER 6       No         ER 7       No         ER 8       No	ER 1	Yes
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ER 5       Yes         ER 6       Yes         ER 7       Yes         ER 8       Yes         ER 9       Yes         ER 10       Yes         Are all the figures and tables pertinent?         ER 1       Yes         ER 2       Yes         ER 4       Yes         ER 7       Yes         ER 8       Yes         ER 9       Yes         ER 4       Yes         ER 5       Yes         ER 6       Yes         ER 7       Yes         ER 8       Yes         ER 9       Yes         ER 10       Yes         Could some be omitted and covered by a simple statement?         ER 1       No         ER 2       No         ER 3       Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.         ER 4       No         ER 5       No         ER 6       No         ER 7       No         ER 8       No         ER 7       No         ER 8       No         ER 9       No         ER 9       No	ER 3	Yes
ER 6         Yes           ER 7         Yes           ER 8         Yes           ER 9         Yes           Are all the figures and tables pertinent?         Image: Constraint of the second seco	ER 4	Yes
ER 7YesER 8YesER 9YesER 10YesAre all the figures and tables pertinent?ER 1YesER 2YesER 3YesER 4YesER 5YesER 6YesER 7YesER 8YesER 9YesER 10YesER 10YesER 1NoER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 7NoER 8NoER 7NoER 8NoER 7NoER 8NoER 7NoER 8NoER 9NoER 9NoER 10No	ER 5	Yes
ER 8YesER 9YesER 10YesAre all the figures and tables pertinent?ER 1YesER 1YesER 2YesER 3YesER 4YesER 5YesER 6YesER 7YesER 8YesER 9YesER 10YesCould some be omitted and covered by a simple statement?ER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 8NoER 9NoER 10NoER 3NoER 4NoER 5NoER 6NoER 7NoER 8NoER 7NoER 7NoER 8NoER 9NoER 10No	ER 6	Yes
ER 9YesER 10YesAre all the figures and tables pertinent?ER 1YesER 2YesER 3YesER 4YesER 5YesER 6YesER 7YesER 8YesER 9YesER 10YesCould some be omitted and covered by a simple statement?ER 1NoER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 9NoER 10NoER 3NoER 4NoER 5NoER 6NoER 7NoER 7NoER 8NoER 9NoER 10No	ER 7	Yes
ER 10YesAre all the figures and tables pertinent?ER 1YesER 1YesER 2YesER 3YesER 4YesER 5YesER 6YesER 8YesER 9YesER 10YesCould some be omitted and covered by a simple statement?ER 1NoER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 9NoER 10No	ER 8	Yes
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ER 2YesER 3YesER 4YesER 5YesER 6YesER 7YesER 8YesER 9YesER 10YesCould some be omitted and covered by a simple statement?ER 1NoER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 9NoER 10No	Are all the fi	gures and tables pertinent?
ER 3       Yes         ER 4       Yes         ER 5       Yes         ER 6       Yes         ER 7       Yes         ER 8       Yes         ER 9       Yes         ER 10       Yes         Could some be omitted and covered by a simple statement?         ER 1       No         ER 2       No         ER 3       Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.         ER 4       No         ER 5       No         ER 6       No         ER 7       No         ER 8       No         ER 9       No         ER 8       No         ER 9       No         ER 9       No	ER 1	Yes
ER 4YesER 5YesER 6YesER 7YesER 8YesER 9YesER 10YesCould some be omitted and covered by a simple statement?ER 1NoER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 10No	ER 2	Yes
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ER 6YesER 7YesER 8YesER 9YesER 10YesCould some be omitted and covered by a simple statement?ER 1NoER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 10No	ER 4	Yes
ER 7YesER 8YesER 9YesER 10YesCould some be omitted and covered by a simple statement?ER 1NoER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 10No	ER 5	Yes
ER 8YesER 9YesER 10YesCould some be omitted and covered by a simple statement?ER 1NoER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 10No	ER 6	Yes
ER 9YesER 10YesCould some be omitted and covered by a simple statement?ER 1NoER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 10No	ER 7	Yes
ER 10YesCould some be omitted and covered by a simple statement?ER 1NoER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 10No	ER 8	Yes
Could some be omitted and covered by a simple statement?ER 1NoER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 10No	ER 9	Yes
ER 1NoER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 10No	ER 10	Yes
ER 2NoER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 10No	Could some b	e omitted and covered by a simple statement?
ER 3Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.ER 4NoER 5NoER 6NoER 7NoER 8NoER 9NoER 10No	ER 1	No
ER 4         No           ER 5         No           ER 6         No           ER 7         No           ER 8         No           ER 9         No           ER 10         No	ER 2	No
ER 5         No           ER 6         No           ER 7         No           ER 8         No           ER 9         No           ER 10         No	ER 3	Yes, Table 1.Could be a summation of the number and types of fertilizer materials used.
ER 6         No           ER 7         No           ER 8         No           ER 9         No           ER 10         No	ER 4	No
ER 7         No           ER 8         No           ER 9         No           ER 10         No	ER 5	No
ER 8         No           ER 9         No           ER 10         No	ER 6	No
ER 9         No           ER 10         No	ER 7	No
ER 10 No	ER 8	No
	ER 9	No
Are the references complete and correctly annotated?	ER 10	No
	Are the refere	ences complete and correctly annotated?



AOAC OFFICIAL METHODS OF ANALYSIS (OMA)

## OMAMAN-28/AOAC 2006.03

ER 1	No, Outlier ratio should be described (ie. 0/0 versus 1/0)
ER 2	Yes
ER 3	No, I would think the Magruder samples and testing which are used quite frequently within the text should be listed as a reference. Shouldn't method 965.09 also be referenced similarly to 2006.03?
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
ER 8	Yes
ER 9	Yes
ER 10	Yes
Does the me	ethod contain adequate safety precaution reference and/or statements?
ER 1	Yes
ER 2	Yes
ER 3	Yes
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
ER 8	Yes
ER 9	Yes
ER 10	Yes

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#### SPECIAL GUEST EDITOR SECTION

Simultaneous Determination of Arsenic, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Molybdenum, Nickel, Selenium, and Zinc in Fertilizers by Microwave Acid Digestion and Inductively Coupled Plasma-Optical Emission Spectrometry Detection: Single-Laboratory Validation of a Modification and Extension of AOAC 2006.03

#### SHARON WEBB

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Thiex Laboratory Solutions LLC, 46747 214th St, Brookings, SD 57306

A single-laboratory validation study was conducted for the simultaneous determination of arscon; cadmium, calcium, cobalt, copper, chromium, iron, lead, magnesium, manganese, molybaenum, nickel, selenium, and zinc in all major types of commercial fertilizer products by microwave digestion and inductively coupled plasma-optical emission spectroscopy analysis. This validation study proposes an extension and modification of AOAC 2006,03. The extension is the inclusion of calcium, copper, iron, magnesium, manganese and zinc, and the modification is incorporation of hydrochloric acid in the digestion system. This dual acid digestion utilizes both hydrochlor ic and nitric acids in a 3 to 9 mL volume ratio/100 mL, In addition to 15 of the 30 original validation materials used in the 2006,03 collaborative study, National Institute of Standards and Technology Standard Reference Material 695 and Magruder 2009-06 were incorporated as accuracy materials. The main benefits of this proposed method are a significant increase in laboratory efficiency when compared to the use of both AOAC Methods 965.09 and 2006.03 to achieve

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the same objective and an enhanced recovery of ceveral metals.

ane ct. al. (1, 2) developed a standard analytical method, AOAC 2006.03, for the determination of the metals, arsenic (As), cadmium (Cd), cobalt (Co), chromium (Cr), lead (Pb), molybdenum (Mo), nickel (Ni), and sclenium (Se) in fertilizers as an answer to the Association of American Plant Food Control Officials (AAPFCO) call for a Statement of Uniform Interpretation and Policy (SUIP No. 25; 3). This policy addresses the acceptable levels of specific metals in fertilizers. Utilized together, the analytical method and SUIP allow commercial fertilizers to be monitored for metal levels so that informed decisions can be made to ensure that the longterm quality of soil and food is protected. This investigation led to the formation of the Metals Forum in 2002, and evolved into the Methods Forum, which is comprised of chemists from regulatory, academia, industry, commercial, and private laboratories as well as instrument vendors. This forum meets annually to discuss how to best satisfy the rising call for new or improved fertilizer methods; decreased turnaround time; new instrument technology and efficiencies; QC; and new state, federal, or trade regulations and to address method needs as new commercial fertilizer products are introduced.

This proposed method modification and extension addresses several of the aforementioned needs. By combining everything into one single digestion and detection technique, substantial efficiencies are realized. This method will simultaneously determine As, Cd, calcium (Ca), Cr, Co, copper (Cu), iron (Fc),

Guest edited as a special report from the AOAC Agricultural Community on "Collaborations in New and Improved Methods of Analysis for Plant Food Materials" by Nancy Thiex.

Corresponding author's c-mail: sharon.wcbb@uky.cdu An appendix is available on the J. AOAC Int. website, http://aoao. publisher.ingeutaconnect.com/content/aoao/jaoao

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slv ID	ID from 2006.03 Collaborative Study	Description		
A	4321/2025	Metal Fe oxysulfate		
в	4031/5938	Magruder 2002-098		
C.	5488/5890	Zinc exysulfate		
D	2818/7669	Granulated mine waste		
E	1615/2056	Metal oxysuifate		
F	3313/6267	Western MAP*		
G	7999/3375	DAP from North African rock		
н	6501/4812	NC MAP		
ł	7738/7418	China DAP <sup>6</sup>		
J	3917/8165	Magnuder 2003-11		
к	4459/8931	Magruder 2004-07		
L	8873/9469	N-P-K lawn product blend		
м	9886/9774	Organic biosolid		
Ň	4626/8088	Organic mixed fertilizer + biosolid		
þ	6411/3401	Composted manure		
5	3716/4606	Fehumate		
2	NA°	NIST SRM <sup>d</sup> 695		
र	NA .	Magruder 2009-06		

 Table 1. Validation materials used for the microwave mixed acid SLV study

<sup>a</sup> MAP = Monoammonium phosphate.

DAP = Diammonium phosphate,

NA = Not applicable.

<sup>d</sup> NIST SRM = National Institute of Standards and Tec'me logy Standard Reference Material.

Pb, magnesium (Mg), manganese (van), Mo, Ni, Se, and z no (Zn) in all types of fertilizers. For the purpose of this paper, the metals in the 2006.03 paper (1) will be referred to as Group A metals" (As, Cd, Cr, Co, Pb, Mc Ni, and Sc). These proposed elements to be added to the scope will be referred to as "Group B metals" (Ca, Cu, Fe, Nu<sub>b</sub>, Wm, and Zn).

#### Background

In 2008, a small interlaboratory study involving four laboratorieswas undertaken by a group of regulatory and industry chemists, led by the Office of the indiana State Chemist (4). Based upon the results of the interlaboratory study, a single-laboratory validation (SLV) study was initiated to determine if a universal method could be viable for both Group A and Group B metals in all classes of fertilizers and to evaluate if using mixed acids rather than a single acid enhances recoveries. A complete description of the initial study is found in an Appendix on the *J. AOAC Int.*, website (http:// aoac.publisher.ingentaconnect.com/content/aoac/jaoac).

#### Methods and Materials

#### Validation Materials

Fifteen of the 30 original collaborative study materials from 2006.03 were used for method validation. In addition, NIST SRM 695 and Magruder 2009-06 were incorporated as validation materials. Magruder 2009-06 was included because it was formulated to contain measurable amounts of all the Group A metals and because consensus values were available from the Magruder Check Sample Program. NIST 695 was included because of the availability of either a certified or reference value for all of the elements for which the method was validated (see Table 1).

The proposed modification and extension of AOAC Official Method<sup>SM</sup> 2006.03 is described below.

Simultaneous Determination of Arsenic, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Molybdenum, Nickel, Selenium, and Zinc in Fertilizers by Microwave Acid Digestion and ICP-OES Detection

Scope

The method 1. applicable to the determination of As, Cd, Co, Cr, Pb, Mo, Ni, and Sc and to the determination of Ca, Cu, Fe, Mg, M1, and Zn in all classes of fertilizers.

#### Safety

Observe standard precautions when handling concentrated acids and acid digests. When dispensing acid or venting vessels, use  $_{\rm B}$  loves, eye and face protection, and a laboratory coat. Never 1 on we hat vessels from the microwave; wait until they are near room temperature. Keep microwave door closed while vessels are hot. The door is the primary safety device if a vessel vents.

#### Proposed Digestion Method

#### A. Principle

Test portion is heated with either nitric acid (option 1) or with nitrie and hydrochlorie acids (option 2) in a closed vessel microwave digestion system at 200°C.

#### B. Apparatus

*Miorowave.*—Commercial miorowave designed for laboratory use at 200°C, with olosed vessel system and controlled temperature ramping capability. It is recommended that a vessel design be selected that will withstand the maximum possible pressure, since some organic fertilizer products, and also carbonates if not given sufficient time to predigest, will generate significant pressure during digestion. (Vessels can reach 700 psi or more on occasion.) Vent according to manufacturer's recommendation. (*Cantion:* Microwave operation involves hot pressurized acid solutions. Use appropriate face protection and laboratory clothing.)

#### C. Reagents (Option 1 Applicable to Group A Metals Only): Nitric Acid Digestion

- (a) Water .---- Use 18 Megaohm water throughout.

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throughout (nitric acid-HNO<sub>3</sub>, 67–70%, OmniTrace grade; EMD Chemicals, Darmstadt Germany).

#### D. Determination

(a) Option 1 (applicable to Group A metal only).---Refer to Official Methods of Analysis, Official Method<sup>SM</sup> 2006.03D.

(b) Option 2 (applicable to Group A and Group B metals).-Prepare solid materials according to AOAC Method 929.02. Accurately weigh  $1.000 \pm 0.10$  g (0.500 g for organic matrixes) test portion and transfer to digestion vessel. Use a weighing paper insert to line the vessel walls during transfer, which will keep test portion from adhering to the sides of vessel. Fluid materials may be weighed directly after mixing. Add 9.0  $\pm$  0.2 mL trace metal grade HNO3, G(b), allow samples to sit for approximately 20 min, and then add 3.0 ± 0.2 mL HCl, G(c). Loosely cap vessels without sealing, predigest at room temperature until vigorous foaming subsides, or overnight if time allows. Seal vessels according to manufacturer's directions and place in microwave. With power setting appropriate to microwave model and number of vessels used, ramp temperature from ambient to 200°C in 15 min. Hold at 200°C for 20 min. Cool vessels according to manufacturer's directions, vent, and transfer digests to 100 mL volumetric flasks. Rinse each digestion vessel three times with approximately 10 mL water, C(a), and transfer rinse solution to the volumetric flask; dilute flask to volume with water, C(a), and mix. Filtering the digestate is optional, but necessary if problems with nebulizer elogging are experienced. Transfer to polypropylene, or other suitable, containers within 2 h, unless solutions are to be analyzed immediately. Dilute any digestate that are found to be above the standard ourve range. Secondary dilutions require addition of appropriate amounts of H VO1 and HCl to maintain the proportion of 9% HNO3 and 3% HCl in the final solution to be analyzed.

#### Proposed Detection Method

#### E. Principle

Digested test solution, or an approximate dilution, is presented to the inductively coupled plan mapping emission spectrometry (ICP-OES) instrument calibra id with acid matched standard calibrant solutions. An ionization buffer (cesium) is used to minimize easily ionized element (PE) effects, and scandium and/or beryllium are used as intermal standard(s).

#### F. Instrumentation and Consiguration

(a) *ICP* optical emission spectrometer.—Capable of determining multiple wavelengths for each element of interest. A 3-channel peristaltic pump is desirable to avoid the necessity of having to manually add ionization buffer and internal standard to each test solution. Use a Meinhard or Seaspray nebulizer and Cyclonic spray chamber, or other components designed to optimize aerosol formation and maximize precision. Select sample and internal standard pump tubes, and peristaltic pump rotation speed, with regard to manufacturer's recommendations, but try to keep sample and internal standard pump tubes of similar size, to maximize mixing accuracy, while maintaining needed detection levels.

The analyst must compensate for EIE effects in the plasma since fertilizer materials can contain substantial concentrations

Element	Wavelength(s)			
As	188.980°, 193.696°			
Ca	183,944, 318,127, 430,253			
Cd	214.439°, 226.502°, 228.802			
Co	228.615, 230.786, 258.033			
Cr	205.560, 267.716, 276.653			
Cu	217,895, 222,778, 324,754, 327,395			
Fe	234.350, 238.204, 240.489, 259.837			
Mg	277.983, 278.297, 285.213, 383.829			
Mn	260,568, 261,815, 263,817, 293,931			
Мо	202,032, 204,598			
NI	210 55!, 222.486, 231.601			
Pb	220.35 <sup>-1#</sup>			
Se	96.02 3 <sup>4</sup>			
Zn	206.200, 213.857, 334.502, 472.215			

Wavelengths with potential spectral interference.

of elements that provide a significant source of electrons to the plasma, such as K and Ca. The presence of an ionization buffer in all est solutions and standards will minimize the effect of varying so centrations of bills in the sample, Power settings and nebulizer cas flow should be optimized for robust plasma conditions. The malys' needs to ensure that the Mg 285,213;Mg 280,271 ratio (dermet principle of robust plasma) demonstrates robust operating conditions in accordance with the ratio established by the instrument manufacturer. Two to three replicate readings with relatively long integration times are recommended to improve precision and detection capabilities. Properly matched test solution and calibration matrices and optimized instrument settings should result in internal standard ratios for most test solutions consistently in the range of 0.9 to 1.1. It is not typical to have the ratio lower than 0.8 over a very wide range of fertilizer material types. The occurrence of lower ratios is cause for troubleshooting. Select ionization buffer/internal standard solution, G(f), such that after mixing unknown and internal standard solutions using the instrument's peristattic pump, the combined solution presented to the nebulizer contains 22200 mg/kg cesium chloride; 0.75 to 1.0 mg/kg internal standard; and ≤7.2 mg/mL actual fertilizer material. [For example, these conditions would be met with a 1 g test portion digested and diluted to 100 mL; an ionization buffer/internal standard solution of 8000 mg/kg oesium ohloride and 3 mg/kg scandium and/or beryllium internal standard(s); and pump tubes of white/white (1.02 mm id) sample and orange/white (0.64 mm id) internal standard, the white/white contributing about 72%, and the orange/white contributing about 28%, to the final nebulized solution.] All analytical wavelengths should be corrected using an internal standard wavelength.

However, best practice is to utilize similar transitions between analyte and internal standard. For example, the 188.980 wavelength is from arsenic in the atomic state, so the internal standard wavelength used for correction should also be from the atomic state, such as So 361.383. Conversely, match ionic sample lines with ionic internal standard lines. (*Note:* Do not use yttrium

Table 2. Recommended inductively coupled plasmaoptical emission spectrometry wavelengths for Group A and B metals

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Std	Final working std concn, mg/l.	intermediate Std [G(l)], mL	Stook	Std [G(m)], ml.	HNO3" [G(b)], mL	HCI <sup>#</sup> [@(c)], mL 30	Final vol., mL
Blank	0	0	0	0	90		1000
1 .	0.1 A/0.5 B	5			45	15	500
2	0.5 A/1 Đ	25			45	15	500
Э	1 A/3 B	50			90	30	1000
4	5 A & B		5		90	30	1000
5	10 A & B		5		45	15	500
6	30 8			3	90	30	1000
7	50 B			5	90	30	1000
8	80 B			4	45	15	500
9	100 B			10	90	30	1000
10	200 B			10	45	15	500
11	300 B			15	45	15	500
12	400 B	<b>`</b>		20	40	15	500
13	600 B			Cao	40	15	500
14	10 A		5	$\sim$	45	15	

#### Table 3. Preparation of working standards

Since commercial stock standards are often stored or preserved in acids, the volume of HNO3 and HC added to the calibration standards should be adjusted to include any contribution of HNO3 and/or HCI from the commercial stock standard source.

as an internal standard, since it is found native at low levels in some phosphate ore sources.)

(b) ICP wavelengths .-- A number of wavelengths may be used for analysis of the elements of interest, depending on the capability of the analytical instrument used. At a minimum, select at least two wavelengths for each element of intere t and report the averaged value of closely a reeing results, with the exception of lead and selenium, for which there is only one reliable wavelength available. Table .' provides a list of 'uk rested wavelengths, not in any order of ne erence, that have been found acceptable for most fertilize, mate tals. Other in ic. of appropriate sensitivity free of interfere, ses o corrected for morferences may be just as acceptable. However, it is imperative that instrument response (both the wa elongth peak scan and the calculated concentration) be reviewed for each test solution and element. Fertilizer materials are extremely variable in composition, and a wide concentration range of potential interfering elements is expected, so no single wave ength will work in every instance. Occasionally, data with an interference will inevitably be found and must be eliminated from inclusion in the mean calculation result for that particular element and sample.

(c) Wavelength interference treatment.—Interelement interference can cause substantial error in analytical result. Error can be minimized by several techniques: (1) Three or more analytical lines may be used for a given element, and when an interferent is present in a particular line, the result for that line is omitted from the mean value reported. (2) Some ICP software has the capability of mathematically modeling potential interferents and deconvoluting the instrument response into an analytical element portion and an interferent portion. (3) Interelement correction is an alternative mathematical technique to use with instruments for which mathematic modeling is not available, or where direct spectral overlap negates use of the deconvolution technique. The following lines, if used, must utilize one of the correction behavious; corrections for other wavelengths may be applied as needed and appropriate; (1) As 188,980: Correct for Cr interfecence, or verify that Cr is not present at an interfering level in the test portion analyzed. (2) As 193,696: Fe affects the arsenio peak. Remove with an Fe model, or verify that Fe is not present at an interfering level in the test portion analyzed. (3) Cd 214,439 and 226,502: Fe, present in many fertilizers, interferes with both suggested Cd wavelengths. Mathematically correct instrument Cd response for the interference, or verify analytically that Fe is not present at an interfering level in the test portion analyzed. (4) Pb 220,353: Mathematically correct instrument Pb response for Fe interference, or verify that Fe is not present at an interfering level in the test portion analyzed. (5) Se 196,026; Mathematically correct instrument Se response for Fe interference, or verify that Fe is not present at an interfering level in the test portion analyzed.

(d) *ICP instrument calibration*.—Prepare Group A working standard solutions from 1000 mg/L commercial stock standards. Custom blended multiclement stock standard in au acid ratio (9%  $HNO_3$ :3% HCI) is acceptable. Working standards should be prepared at concentrations listed in Table 3, if they fit the sensitivity of the available instrumentation. Calibration concentrations should be adjusted to match the sensitivity of an instrument. However, linear curves should have correlation coefficients of at least 0.999 and a standard error of no more than 10%. Quadratic calibrations should have a correlation coefficient of at least 0.999, a standard error of less than 10%, a curvature of no more than 25%, and an upward curvature of no more than 400%.

#### G. Reagents (Option 2): Dual Acid Digestion

(a) Water .- Use 18 Megaohm water,

(b) *HNO*<sub>3</sub>.—Use trace metal grade HNO<sub>3</sub> (nitrio acid-HNO<sub>3</sub>, 67–70%, OmniTrace grade; EMD Chemicais).

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No.	Optimization factor	Major value	Minor value	
1.	Aold ratio (HNO3;HCI)	A ≈ 10:2	a = 8:4	
2	Test portion, g	B = 1.200	0008.0 = đ	
3	Digestion time, min	C = 25	c ≈ 15	
4	Digestion temp., °C	D = 220	d = 180	
5	Dilution vol., ml.	E = 110	e = 90	
6	Filtering	No	Yes	
7	Dilution	Weight	Volume	

Table 4. Optimization factors for ruggedness testing

(c) *HCL*—Use trace metal grade HCl (hydrochlorie acid-HCl, 35–38%, trace metal grade; Cat. No. A508-500, Fisher Scientific, Pittsburgh, PA).

(d) Triton X-100 solution.---Triton X-100.--Octyl phenol ethoxylate (J.T. Baker Chemicals, Center Valley, PA).

(e) 0.5% Triton X-100 solution.—Dilute 0.5 mL Triton X-100 G(d), to 100 mL with H<sub>2</sub>O, G(a).

(f) Cesium chloride.—Formula weight 168.36, trace metal basis, purity >99.999%, Cat. No. 203025-50G (Sigma-Aldrich, St. Louis, MO).

(g) 1000 mg/L Sc standard.—In 4% HNO<sub>3</sub>, Product No. 100048-1 (High Purity Standards, Charleston, SC).

(h) 1000 mg/L Be standard.—In 4% HNO<sub>3</sub>, Product No. 1005-1 (High Purity Standards).

(i) Ionization buffer/internal standard solution.—Weigh 8.0 g CsCl, G(f), into a 1000 mL acid-washed volumetric flask. Add 3 mL each of ICP grade scandium, G(g), and beryllium, G(h), 1000 mg/L stock solution, as internal standards. Also add 1 and of 0.5% Triton X-100, G(e), dilute to volume, and mix. Store in a polypropylene bottle. (Note: Reagent concent atic -- assume the use of white/white, 1.02 mm id sample pump tube, and orange/white, 0.64 mm id internal standard pump tube. If the test solutions and internal standard solutions are united in different proportions by the instrument's perist. It's pump, the todjust the reagent concentrations to mest core natation recaincancents of mixed solution nebulized by the instrument, as o tilined in F. Note that sample and internal structure, not proportional to pump tube IDs.)

(j) Stock standard solutions, As, Cd, Co, Ci; Pb, Mo, Ni, and Se.—Working standards can be prenared from ICP grade 1000 mg/L commercial stoc' strada d solutions for As, Cd, Co, Cr, Pb, Mo, Ni, and Sc. A number of companies provide this stock standard service.

(k) Stock standard solutions, Ca, Cu, Fe, Mg, Mn, and Zn.— Working standards can be prepared from 10 000 mg/L individual element ICP grade commercial stock standard solutions for Ca, Cu, Fe, Mg, Mu, and Zn. However, it is also acceptable to use commercially prepared oustom blended stock standard mixtures containing some or all elements at stock concentrations. A number of companies provide this stock standard service.

(1) 10 mg/L intermediate standard solution for preparation of low-level working standards for As, Cd, Co, Cr, Pb, Mo, Ni, and Se.—Dilute 5.0 mL of stock 1000 mg/L standard solution, G(j), to 500 mL. Prepare fresh each time standards are prepared, and use immediately after preparation.

(m) 50 mg/l. intermediate standard solution for preparation of low-level working standards for Ca, Cu, Fe, Mg, Mn, and Zn.—Dilute 5.0 mL of stock 10 000 mg/L standard solution to 1000 mL. Prepare fresh each time standards are prepared, and use immediately after preparation.

(n) Working standard solutions (see Table 3) for Ca, Cu, Fe, Mg, Mn, and Zn.—Standards should have the same acid concentration as digested test solutions. Date all calibration solutions when made, which are stable at room temperature for 60 days. Monitor standard ourve fit and intensity for signs of change and degradation over time. (Note: Based on instrumentation, the calibration standards may be adjusted to fit the manufacturer guidelines regarding standard curve requirements. However, linear curves should have correlation coefficients of at least 0.999 and a standard error of no more than 10%. Quadratic calibrations should have a correlation coefficient of at least 0.999, a standard error of less than 10%, a curvature of no more than 25%, and an upward curvature of no more than 400%.)

(1) 10 mg/L Ca, Cu, Fe, Mg  $\alpha$  n, and Zn — Pit et 100.0 mL intermediate standard solution, G (m), into a 500 mL a id-washed volumetric flask. Add 45 mL mee metal grade HCl, tilule to volume with H<sub>2</sub>O, mix, and transfer to acid-washed polypropylene bottle.

(2) 5 mg/L Co. C.; Fe, Mg, Mn and Zn.—Pipet 100 mL of combined '0 mg/L element stock solution into a 1000 mL acid-washed volumetric flack. Add 90 mL trace metal grade HNC<sub>2</sub> and 30 mL trace retail grade HCl, dilute to volume with  $H_2O$ , m/x, and transport to an acid-washed polypropylene bottle.

(1) mg/L Ca, Cu, Fe, Mg, Mn, and Zn.—Pipet 50.0 mL of 10 mg/L interractive stock solution into a 500 mL acid-washed volumetric first. Add 45 mL trace metal grade HNO<sub>3</sub> and 15 mL trace metal grade HCl, dilute to volume with H<sub>2</sub>O, mix, and transform on an acid-washed polypropylene bottle.

(4) 0.5 mg/L Ca, Cu, Fe, Mg, Mn, and Zn.—Pipet 25.0 mL of 10 mg/L intermediate stock solution into a 500 mL acid-washed volumetric flask. Add 45 mL trace metal grade  $\text{HNO}_3$  and 15 mL trace metal grade  $\text{HNO}_3$  and 15 mL trace metal grade HCl, dilute to volume with  $\text{H}_2\text{O}_3$ , mix, and transfer to an acid-washed polypropylene bottle.

(5) 0.1 mg/L Ca, Cu, Fe, Mg, Mn, and Zn.—Pipet 5.0 mL of .10 mg/kg intermediate stock solution into a 500 mL acid-washed volumetrio flask. Add 45 mL trace metal grade HNO<sub>3</sub> and 15 mL trace metal grade HCl, dilute to volume with  $H_2O_3$ , mix, and transfer to an acid-washed polypropylene bottle.

(6) 600 mg/L Ca, Cu, Fe, Mg, Mn, and Zn.—Pipet 30.0 mL of single element or combined 10 000 mg/L multielement stock standard solution into a 500 mL acid-washed volumetric flask. Add 45 mL trace metal grade HNO<sub>3</sub> and 15 mL trace metal grade HCl, dilute to volume with H<sub>2</sub>O<sub>3</sub> mix, and transfer to acid-washed polypropylene bottle.

(7) 400 mg/kg Ca, Cu, Fe, Mg, Mn, and Zn.—Pipet 20.0 mL of single element or combined 10 000 mg/L multielement stock solution into a 1 L acid-washed volumetrie flask. Add 45 mL trace metal grade HNO<sub>3</sub> and 15 mL trace metal grade HCl, dilute to volume with  $H_2O$ , mix, and transfer to an acid-washed polypropylene bottle.

(8) 300 mg/L Ca, Cu, Fe, Mg, Mn, and Zn.—Pipet 15.0 mL of single element or combined 10 000 mg/L multielement stock standard solution into a 500 mL acid-washed volumetric flask. Add 45 mL trace metal grade HNO<sub>3</sub> and 15 mL trace metal grade HCl, dilute to volume with  $H_2O$ , mix, and transfer to an acid-washed polypropylene boltle.

(9) 200 mg/L Ca, Cu, Fe, Mg, Mn, and Zn,---Pipet 10.0 mL of single element or combined 10 000 mg/L multielement stock

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Table 5.	Calibration wavelength,	relative intensity,	curve type,	range, corre	elation coefficient, and error	

Element	Wavelength, nm	Relative intensity	Curve	Deconvolution	Callbration range, µg/mL	Observed correlation coefficient	Error <sup>a</sup>	
<b>\</b> s	188,98	Weak	Linear	Fe	0-10	0.99993		
15	193,696	Weak	Linear	Fe	0–10 0–10	0,99999	10	
Ca	183.944	Intermediate	Quadratic	None	0600	0.999448	10"	
)a	318.127	Intermediate	Quadratic	None	0-600	0.999687	10 <sup>a</sup>	
Da	430.253	Internediate	Quadratic	None	10-600	0,999711	10°	
2d	214,439	Strong	Linear	Fe	0-10	0.999243	10	
Dd	226,502	Strong	Linear	Fe	0-10	0.999642	10	
 Cd	228.802	Strong	Linear	None	0-10	0.999996	10	
00	228,615	Strong	Linear	None	010	0,999957	10	
Co	230,786	Strong	Linear	None	0-10	0,999997	10	
20	258.033	Strong	Linear	None	0-10	0,999933	10	
Dr	205.56	Strong	Linear	None	0-10	0.909990	15	
7 X	267.716	Strong	Linear	None	0-10	0,939992	10	
)r	276,653	Strong	Linear	None	0-10	0,999608	10	
л Хи	217.895	Intermediate	Quadratic	None	30-600	0.999631	10	
24	222.778	Intermediate	Quadratic	None	30-000	0.9999991	10	
Cu	324,754	Strong	Quadratic	None	0-50	0,9999999	10	
u	327.395	Strong	Quadratic	None	0-30	0.999205	10	
e	234,35	Intermediate	Quadratic	None	30-400	0.999995	10	
ė	238,204	Strong	Quadratio	None	0-10	0,999993	15	
e	240.489	Strong	Quadrallo	tone	0-30	0,999433	10	
e	259.837	Intermediate	Quadratio	None	10-600	0.999564	10	
- /Ig	277,983	Intermediate	Quadratic	None	10600	D.999774	15	
ng.	278.297	Intermediate	Quadratic	None	30-600	0,999996	10	
ng	285,213	St ong	Qua 'ra'io	None	0-30	0,999811	10	
lg	383,829	Strong	Cuaciallo	None	0-200	0,999983	10	
•s In	260,568	Strong	Quadratic	None	0-30	0.999702	10	
in.	261.815	Intermediate	Quadratio	None	30-600	0.999653	10	
in in	263.817	Interme dia.	Quadralic	None	30-600	0.999825	15	
in In	293.931	Strung	Quadratic	None	0-50	0,999999	10	
lo	202,032	Strong	Quadratic	None	0-10	0.999998	15	
10	204,598	Intermediate	Linear	None	0-10	0.999937	15	
li	216.5.5	Strong	Quadratic	None	0-10	0,999978	15	
1	222.486	Intermediate	Linear	None	0-10	0.999909	15	
N	231,604	Strong	Quadratic	None	010	0,999998	15	
b	220.353	Intermediate	Linear	Co	0-10	1.000000	15	
e	196,026	Weak	Linear	Fe	D10	0,99909	15	
'n	206.2	Strong	Quadralic	None	0-50	0,999802	10	
'n	213,857	Strong	Quadralic	None	0-30	0.999996	15	
'n	334.502	Intermediate	Quadralic	None	30-600	0.999751	15	
n	472.215	Intermediate	Quadratic	None	30-600	0,999575	10	

\* Error may exceed 10% for some of the lowest concentration standards.

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		NIST SRM 695		Magruder 2009-06				
Element	Certified	Mean	Recovery, %	Consensus, iCP	Mean	Recovery, %		
As, mg/kg	$200 \pm 5$	199.9	100.0	330.58 ± 20.55	358.4	108,4		
Cd, mg/kg	16.9 ± 0.2	17.1	101.2	343,55 ± 19,70	348.1	101.3		
Co, mg/kg	65,3 ± 2,4	61.7	94.5	945,97±53.68	959,3	101.4		
Cr, mg/kg	$244 \pm 6$	226.4	92.8	111.68 ± 11.16	127.9	114.6		
Mo, mg/kg	$20.0 \pm 0.3$	19.5	97.5	17.80 ± 2.70	18.1	101.7		
Ni, mg/kg	135 ± 2	127.6	94.5	1135.8 ± 81.32	1117.3	98,4		
Pb, mg/kg	276 ± 17	284.9	103.2	3688.5±1852.4	4869,6	132.0		
Se, mg/kg	$2.1 \pm 0.1''$	1.6	74.6	116,46 ± 8,33	110.6	94.9		
Ca, %	2,26 ± 0.04	2,28	102.5	1.78 ± 0.12	1.79	100.4		
Cu, mg/kg	1225±9	1214	99.1	334±38	339.7	101.7		
Fe, %	3.99 ± 0.08	3.98	99,7	2.03 ± 1.02	3.03	149.0		
Wg, %	1,79 ± 0.05	1.76	98.2	0.18±.12	0.151	105,9		
Vin, %	0.305 ± 0.005	0.311	101.9	0.153 a, 0,013	0.177	115,5		
Zn, %	0,325 ± 0,005	0.317	97,7	0.165-10.11	0.164	99.3		

Table 6. Comparison of results of certified and consensus values

Reference value.

standard solution into a 500 mL acid-washed volumetric flask. Add 45 mL trace metal grade  $HNO_3$  and 15 mL trace metal grade HCl, dilute to volume with  $H_2O$ , mix, and transfer to an acid-washed polypropylene bottle.

(10) 100 mg/L Ca, Cu, Fe, Mg, Mn, and Zn.—Pipet 10.0 ml. of single element or combined 10 000 mg/L multiclement stross standard solution into a 1000 mL acid-washed volumet ic flask. Add 90 mL trace metal grade HNO<sub>3</sub> and 30 mL trace metal grade HCl, dilute to volume with  $H_2O$ , mix, and transfer to an acidwashed polypropylene bottle.

(11) 80 mg/L Ca, Cu, Fe, Mg, Mn,  $a_1d_2n_1$ —Pipet 4.0 million of single element or combined 10 000 mg/L multiclement stock standard solution into a 500 mL reid-y ashed volumetric flask. Add 45 mL trace metal grade 11NO and 15 mL trace metal grade HCl, dilute to volume with H<sub>2</sub>O, mix, and honster to an acid-washed polypropylene bottle.

(12) 50 mg/L Ca, Cu, Fe, Mg, Ma, and Zn.—Pipet 5.0 mL of single element or combined 10 0.0 m<sub>2</sub>/L multielement stock standard solution into a 1 L cold-washed volumetrio flask. Add 90 mL trace metal grade HNO<sub>3</sub> and 30 mL trace metal grade HCl, dilute to volume with  $H_2O$ , mix, and transfer to an acid-washed polypropylene bottle.

(13) 30 mg/L Ca, Cu, Fe, Mg, Mn, and Zn.—Pipet 3.0 mL of single element or combined 10 000 mg/L multiclement stock standard solution into a 1 L acid-washed volumetric flask. Add 90 mL trace metal grade HNO<sub>3</sub> and 30 mL trace metal grade HCl, dilute to volume with  $H_2O$ , mix, and transfer to an acid-washed polypropylene bottle.

(14) 0.0 mg/L all Ca, Cu, Fe, Mg, Mn, and Zn.—Add 45 mL trace metal grade HNO<sub>3</sub> and 30 mL trace metal grade HCl into a 500 mL volumetric flask, dilute to volume with  $H_2O$ , mix, and transfer to an acid-washed polypropylene bottle.

(p) Sampler wash solution, 9% HNO3:3% HCl.-Dilute

90 m. trace metal grade  $I^{m}O_3$ , G(b), and 30 mL trace metal grade HCl, G(c), to 1000 mL with H<sub>2</sub>O.

#### H. Detern. Inallon

A alvze test solutions using an ICP-OES instrument calibrated with standard solutions. Insert a 10 mg/kg working standard or ther suitable quality control solution every 10 test portions to mainter for instrument drift. For quality control, see section J.

I. Calculations

$$Element_{e}\frac{mg}{kg} = \left(instrument\ conc_{e}\frac{mg}{k}\right) * \left(\frac{100\ mb}{sample\ wt_{eg}}\right) * \left(\frac{1\ b}{1000\ mL}\right) * \left(\frac{1000g}{1\ kg}\right)$$

where 100 mL assumes the microwave digest is diluted to 100 mL.

Some of the Group A and B elements are routinely reported as percent concentrations. To convert a mg/kg result to percent, divide the mg/kg result by 10 000 and change the unit from mg/kg to percent,

#### J. Quality Control

Each run should contain adequate quality control to monitor the analytical system. The following are recommended to be included with each batch prepared for digestion.

(a) Accuracy check.—One or more digested reference materials of known concentration (e.g., NIST 695, Magruder Check Samples, AFPC Check Samples, etc.).

(b) *Precision check.*—One of the unknowns should be duplicated to ensure that the process can repeat a similar result.

(c) Method blank.—A digestion tube containing all reagents with no test portion that is processed identically to all others

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	Proposed method $(n = 3)$		Collaborative study 2006.03 results					Proposed method		Collaborative study 2006.03 results			
	Avg.	RSD,	2006,03	RSD <sub>1</sub>	- Recovery,	HarDat		(n ≓ 3) Avg., RSD,			RSD,	Recovery,	SlovDo
Material	mg/kg	%	mg/kg	%	% %	(ľ)	Material	mg/kg	% %	Avg., Ing/kg	ка <u>р</u> , %	% %	(r)
			As			•	Ĺ	BDL.	NA	NA	NA	NA	NA
A	41.49	1.86	22.15	42,93	187,32	0.29	м	22,54	4.39	21.25	4.98	106.08	0.76
В	478.89	1.39	263,2	47,96	181.95	0,31	N	BOL	NA	NA	NA	NA	NA
c	6,89	3,05	4.87	63.12	141.42	0.36	0	BDL	NA	NA	NA	NA	ΝA
D	5917.76	3.43	4945	6.09	119.67	1.12	P	13.65	2,12	10.67	9,14	127.93	0.28
E	2953,58	0.62	2432	10,56	121.45	0.18				Cr			
F	10,36	2.10	9,75	41,73	106,26	0,27	A	892.48	2.46	731.5	10,09	122.01	1.17
G	22.32	0.35	22.43	9.36	99.49	0.05	В	461,20	1.26	396.99	14.20	116.17	0,55
н	2,92	3.32	2.36	17,60	123.63	0.35	С	172.14	0.47	159 <b>.</b> 5	1.31	107.93	0.18
I	11,95	1.77	13.04	13,27	91,63	0.23	D	45.39	0.66	38,25	3,66	118,67	0.20
]	189,46	2.23	185.45	4.27	102,16	0.43	E	122.57	1.23	101.15	2.23	121.18	0.44
к	168.49	2.23	175.28	7.84	96.13	0.43	F	586.13	U.83	566.16	8,00	103,53	0.38
L	BDL*	NA <sup>b</sup>	NĄ	NA	NA	NA	G	302.41	1.00	281.91	2.88	107.27	0.42
M	9,31	1.45	7.35	53,17	126.64	0.18	н	180,12	0.32	3 11.28	3.05	111.38	0.14
N	17.41	1.82	12.74	15,74	136.62	0.25	E	18.31	0.71	18.11	1.26	101,09	0,19
0	3.77	4.95	4,16	45,14	90,66	0.54	L	219.62	0.14	164.4	10.38	133,59	0,05
2	60.72	3,73	47,83	2.22	126.94		K	189.16	1.19	169.49	2.76	111.60	0.72
-	00.72	3,13		4.44	120.94	0.61	- <u>1</u>	6.41	1.97	5.84	5.52	109.78	0.23
۹	01.0	2.02	Cd	20.44	400 70		м	1297.0	2,29	115,55	2,69	111.89	0,83
3	2,40	3.92	2.25	39.14 40.65	106.78	0.40	N	6305.07	2.55	5980.93	0,99	105,42	1.67
2	5.29	7.83	7.56	19.65	69.97	0.99	$\sim$	120.89	1.36	108.85	6.75	111.88	0.49
	22,07	1.79	21.28	0.61	103 72	0,25	Р	146.07	2.83	134.77	7.08	108.38	1.05
2 -	44,91	4.04	36.64	3.2	122.50	0,64				Мо			
=	27.86	6.51	22,58	4.25	125.40	0,95	A	109,17	0.90	69.16	7.35	157.85	0.30
	235.39	0.76 1.64	214.6	3,06	109.69	0:15	в	156.58	2.47	116.69	18.28	134.18	0.89
3	28,73	1.61	26,69	5,79	107,65	0.24	С	4.84	2,50	3,89	10.04	124.40	0,54
4	63,58	0,90	55.29	1.25	115.00	0.15	D	3,72	3,19	2,73	21,89	136,22	0,66
	BDL	NA	NA	NA	N/L	NA	E	6,88	6.27	4.39	22.27	156,79	0.70
)	16.65	0,44	15,52	2.77	107,26	0,06	F	20,48	1.26	18.47	1.68	110.91	0.34
<	66,05	2.2.2	64.04	2.95	103.14	0.38	G	4.41	1.47	4,00	12,49	110.31	0,32
. ,	BDL	NA	NA	NA	NA	NA	н	13,69	0,79	11.74	4.75	116,61	0.20
vi	4,32	9,64	4.19	3.18	103.17	1.07	I	BDL	NA	NA	NA	NA	NA
V	BDL.	NA	NA	NA	NA	NA	J	19.39	0,36	13.21	7.94	146.76	0,09
)	BDL	NA.	NA	NA	NA	NA	ĸ	44.68	2.10	42,88	•5,23	104,19	0.65
<b>.</b>	0.52	20,46	0,57	66.74	92.02	0.94		BDL					
•			Co				L. Na	14.70	NA 1.02	NA	NA 15.03	NA	NA n 40
٩	119.71	2.69	97.75	4.12	122.47	0,49	M		1.93	11,53	15.03	127.53	0.49
3	212.27	0.89	195.6	9.34	108,52	0.18	N	9,31 POI	1.92 NA	7,83	7,22	118.88 NA	0.23 NA
>	BDL	NA	NA	NA	NA	NA	O D	BDL 15.52	NA 0.78	NA 42.44	NA	NA 124.92	NA 0.20
)	19,80	0,39	17.33	4	114.25	0.05	P	15.53	0.76	12.44	14.46	124.83	0.20
ī	26.50	1.28	23,01	3,53	115,15	0.19	*	60,400	0 E7	NI			Apri
-	9.05	1.14	8.91	2.94	101.57	0.14	A	384,29	0.57	331,92	3,94	115.78	0.35
3	BDL	NA	NA	NA	NA	NA	в	330,30	3.66	295,83	18.02	111.65	0.55
ł	BDL	NA	NA	NA	۰ NA	NA	C	30,10	3.63	26.60	3.55	113.14	0.37
	BDI.	NA	NA	NA	NA	ħΛ	Ð	BDL	NA	NA	NA	NA	NA
1	59.57	0.39	45.2	8.52	131.79	0.08	E	39.14	3.35	36,39	5,75	107,57	0.37
<	545.71	3,30	532,78	2.45	102.43	0.64	F	296,16	0.38	279.34	0.93	106.02	0,23

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	,	d method = 3)		ative study 13 results		
Material	Avg., mg/kg	RSD, %	Avg., mg/kg	RSD, %	Recovery, %	HorRat (7)
G	44.33	1.90	42.45	3.05	104.42	0,21
H	60.14	1.83	52.76	3.73	113.98	0.85
I	BDL	NA	NA	NA	NA	NA
J.	122.10	0.67	101.89	7.03	119.84	0.35
к.	1683.6	3.08	1683.27	4.63	100.02	0.59
L	BDI.	NA	NA	NA	NA	NA
м	85.14	4.00	86.22	21.3	98.75	0.49
N	20,96	3.12	18.55	12.64	112.97	0,26
0	BDL	NA	NA	NA	NA	NA
Р	38.90	3.89	33.39	13.42	116.50	0,42
			Pb			
٨	136.03	8,63	119.6	64.13	113.74	1.60
в	3729	8.23	3070.11	30.44	121.47	0.60
С	1072	1.22	996,25	1.64	107,64	0.31
D	3790	0.47	3292,06	4.55	115.12	0.20
E	4121	4.04	4075.75	16,36	101.11	1,25
F	4.08	6,44	3,08	4,54	132,53	1.00
G	4.35	3,56	3.81	15.89	114.16	0.39
Н	BDL	NA	NA	NA	NA	NA
1	BDL	NA	NA	NA	NA	NA
1	275.84	0.49	245.35	3.90	112,43	0.11
к	514.92	1.66	509,54	3,47	101.06	0.38
L	BDL	NA	NA	NA	AA	NA
М	70.73	0.24	66,29	17.21	106.09	0,04
N	62.25	7.02	58,53	6.55	106.36	1.16
0	3,25	13.07	3.34	61.38	97.38	1,30
P	383.07	3.83	343.08	10. 3	117.00	0.33
			Se			······
٨	3.09	9,08	6.36	12,43	. 44.34	0.95
в	30.31	1.47	31.03	14.15	97.68	0,22
с	BDL	NA	NA	MĄ	NA	NA
D	34.70	4.01	28.4	4.77	122,17	0,61
E	26,73	1.37	25,9	11.05	103.20	0,20
F	7.10	6,93	1.0	83.34	507.16	0.83
G	5.54	14.00	1.73	47.46	320,11	1.61
Н	BDL	NA	NA	NA	NA	NÁ
I	BDL	NA	NA	NA	NA	NA
J	5.14	8,53	3.20	42,10	160.53	0.97
к	245,39	3.15	257.17	2.89	95.42	0,63
L	BDL	NA	NA	NA	NA	NA
М	9,16	10,35	9.47	8.57	96.70	1.28
N	BDL	NA	NA	NA	NA	NA
0	BD1	NA	NA	NA	NA	NA
Р	BDL.	NA	NA	NA	NA	NA

Table 7. (continued)

BDL = Below detection limit.

NA = Not applicable.

within the batch is recommended to ensure that no contamination of reagents, glassware, etc. has occurred.

(d) Matrix spike recovery (optional).—One of the unknowns or reference materials can be spiked with a known concentration of all elements to ensure that the matrix does not significantly reduce or enhance the recovery of the desired analyte.

(e) Continuing calibration verification (CCV).--A calibration standard run at periodic intervals (every 10th test solution) to verify the instrument is maintaining calibration.

(f) Internal calibration verification (ICV).—An undigested reference solution from a source different from the calibration standards is run after the calibration to check the accuracy of the calibration.

(g) For each element not reaching predetermined QC criteria, the instrument must be recalibrated and the impacted samples must be reanalyzed.

(h) Limits of quantitation and detection (LOD: and LOQs) should be determined for each element by each aboratory using the method. The author', LODs and LOQs should be used only as a guide, but due to different instrument, and configurations, these will vary from use to user.

(i) A typical analytical sequence is as follows: (1) Instrument calibration stantards, (2) ICV, (5) a series of test solutions based on digestion batch size, including digested QC, spike blanks, and OC duplicates and spikes, (4) CCV, (5) another group of test solutions and periodic CCV until finished, (6) final CCV and QC. It is recommended that one or more QC samples be included after overy 10 digests.

## Experimental (Validation Experiments)

#### Colibration and Linearity

Calibrations for elements at wavelengths listed in Table 2 nsing the working standard concentrations in Table 3 were investigated. The most suitable type of oslibration curve was determined (linear or quadratic) using the software provided by the instrument. Linearity was determined by comparing responses for the working standard solutions over the range of expected concentrations.

#### Trueness or Accuracy

Accuracy was determined by results of analysis for all elements of interest, Group A and Group B, in NIST SRM 695 Trace Elements in Multi-Nutrient Fortilizer. Additionally, the results by the proposed method were compared to consensus values for Magnuder 2009-06, and expressed as percentage recovery of the certified or consensus value.

#### Precision

Method precision was determined by independent analysis of the validation materials in triplicate, and variation was expressed as RSD.

#### Comparability

Comparability to AOAC 2006.03 for Group A elements was established by testing 15 of the original collaborative study

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£	Mean, % (n=3)	RSD, %	HorRat (r)	Mean, mg/kg (n = 3)	RSD,	% HorRat (r)	Mean, % ( <i>n</i> = 3)	RSD, %	RSD, % HorRat (r)	Mean, % ( <i>n</i> = 3)	RSD, %	RSD, % HorRat (r)	Mean, mg/kg (n = 3)	1	RSD, % HorRat (r)	Mean, % $(n=3)$	RSD, %	RSD, % HorRat (r)
¥	0.869	1.07	0.26	6636.7	0.58	0,38	53.76	4.49	0.24	0.240	0.81	D.16	15065	122	1.30	1,506	2.51	1.33
മ	2.497	58,0	0.27	9123.2	1.33	0.99	24.95	2.58	1.05	1,102	0.74	D.19	63109	1.07	1.41	5.371	0.79	0.51
ο	0.510	1.94	0.44	1.547	1.75	0.62	4,458	D,28	0.23	0.343	0.92	0.20	6251.7	0.58	0,54	36.57	0.91	0.78
۵	3.411	1.42	0,43	14284	1.88	0.80	13.96	3.67	1.37	1,984	123	0.34	780.77	1.36	0.93	1,265	0.96	0.50
<b>٤</b> L)	2,797	1.57	0.46	9767.8	0 55	0.29	16.50	2,88	1.10	1.728	0,84	0.23	10646	1.17	1.18	4,115	1.00	0.62
ш.	0.913	0.96	0.24	5421.2	1.00	0,12	4.D.A	0.74	0.19	0.652	0.90	0.21	227,94	0.81	0.48	0.287	1.18	0.49
G	1,418	0.57	0.15	684,31	0.52	0,08	0.241	0 12	0.18	0,377	0.51	0.11	25.76	1,14	0.46	0.0424	0.74	0.23
н	0.378	0,42	0.09	589,83	8.32	0.75	1,417	0.03	0.15	1.379	0.58	0.15	146.61	0.36	0.19	0.098	0,78	0.28
	- 0.149	2.81	0,53	493.88	1.98	0.19	1.52	0.37	0.16	1.044	0.65	0.16	217.12	0.28	0.16	0.0176	<u>1</u> .0	0.28
····	2.169	1.36	0.38	368.99	1.85	0.94	3.305	1.52	L 47	1.657	1.34	0.36	2835.0	2.09	1.73	0.302	1.36	0.57
×	4,580	2,35	0.74	370.35	0.70	0.33	2.268	1.13	0.10	1.350	1.91	0.50	2084.3	2.36	1.86	0.356	4.18	1.79
	0.109	4.13	0.74	1800.0	1.86	020	2.103	000	0.18	0.168	0.65	0.12	167.15	1.26	0.68	0.0046	2.87	0.64
M	1.724	0.52	D.14	3192.9	1.04	0.42	4.045	0.89	0.20	1.565	1.11	0.26	269.41	2.61	1.52	0.0568	1.08	0.35
z	3.976	1.29	0.40	4651.4	2.39	0.93	8.927	1.15	0.40	0.367	0.55	0.12	1618.5	0.11	0.08	0.0353	1.95	0.59
0	2.493	1.88	0.54	3214.1	3.12	0.44	0.23	2.00	0.60	0.208	0.79	0.16	114.46	3.49	1.78	0.0085	1.70	0.42
<u>م</u>	6.511	0.39	0.13	1757.3	1.80	0.30	23.82	3.95	1.59	0412	1.10	0.24	9625.0	1.00	0.99	0.0065	2.22	0.52
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					mg/l.			
	As	Cd	Cr	Co	Мо	Ni	Pb	Se
Instrument LOD	0.10	0,048	0,038	0.036	0.10	0.0006	0.0007	0.0003
Instrument LOQ	0.36	0.17	0.13	0.13	0,36	0,0023	0,0023	0.0011
Melhod LOD	0.57	0.11	2.13	0.97	0.15	0.49	0.59	0.45
Method LOQ	2,03	0,39	7.55	3.43	0,53	1.74	2,09	1.60

#### Table 9. Group A instrument and method LOD and LOQ

materials with both digestion methods. Data are expressed as a percentage recovery of the original grand average result.

#### Range

.... . . . . . . . . .

The working range of the method is determined by the working oalibration standards listed in Table 3. Each laboratory should determine the range best snited to their instrument's capability. In general, 10% extrapolation from the highest calibration standard shown in Table 3 often produces acceptable results for Group A and B elements. Preferably, any analyte that exceeds the instrument response should be diluted so that the instrument response falls between the upper and lower calibration standards and so that the matrix of 9% HNO<sub>3</sub> and 3% HCl is maintained.

### LOD

The LOD was determined two ways. The instrument LOD was determined by running 10 reagent blanks. The method LOD was determined by analyzing an N-P-K blend known to contain the Group A elements below the suspected level of detection 10 separate times. The SD of the results was anti-inded by 2.821 to determine the LOD, and the LOQ was determined by multiplying the LOD times 3 (8).

#### Method Ruggedness Tests

Optimization testing was conducted using the Youden ruggedness trial (6) to determine the effects of even variables: (7) acid ratio, (2) test portion, (3) digestion time, (4) digestion temperature, (5) volume of dilution, (6) filt tion, and (7) dilation method. The major and minor oriteria, relisted in Table 4.

### Results

#### Calibration and Linearity

Calibrations were evaluated and results are provided in Table 5. All results reported have undergone corrective calculations, in the instrument manufacturer's software Section I, to include the test portion weight and total volume to yield the corrected values.

#### Trueness or Accuracy

Results obtained for NIST SRM 695 were compared with the certified or reference values, and results obtained for Magruder 2009-06 were compared to consensus values. Percent recovery for As, Cd, Co, Cr, Mo, Ni, Pb, Se, Ca, Cu, Fc, Mg, Mn, and Zn for NIST SRM 695 were 100, 101, 94.5, 92.8, 97.5, 94.5, 103.2, 74.6, 102.5, 102, 99.1, 99.7, 102, 97.7, respectively, and

for Magruder 2009-06 were 108, 101, 101, 115, 102, 98.4, 132, 94.9, 100, 102, 149, 106, 115, and 99.3, respectively. Results are found in Table 6.

#### Precision

Results of precision experiment, are found in Tables 7 and 8.

### Comparability

Results of comparability experiments are found in Table 7.

## LOQ and LOD

The I OQ and LCD for Group A elements and the practical LOD (LOQ) for Group P were found to be as provided in Tables 9 and 10. Table 9 p, wides the instrument LOD (estimated with studard solutions) and the method LOQ and LOD (estimated with velidation materials) for the Group A metals. The LOQ for Group P elements are listed in Table 10 are completely dependent upon the calibration range since the method is not working close the instrument limits. Lower limits for Group B elements can be achieved by altering the test portion size or choosing more sensitive wavelengths. Table 10 presents LOQ's for Group B metals based on the calibrations as suggested in the proposed method.

#### Method Ruggedness Tests

Optimization testing was conducted using the Youden ruggedness trial (6) to determine the effects of seven variables: (1) acid ratio, (2) test portion, (3) digestion time, (4) digestion temperature, (5) volume of dilution, (6) filtration, and (7) dilution method. The major and minor oritoria are listed in Table 4. Results are provided in Table 11. The differences in Table 11 are all within normal variation and indicate that the method is sufficiently rugged with respect to the conditions studied.

The Se values in the sample are at or below the method LOQ, so the values obtained are not accurate. Also, as noted in the interlaboratory study (*see* Appendix) Fe is the most variable element. So, the RSDs obtained for Fe in the ruggedness study are a little higher than the other elements as is expected. This represents an advanced ICP-OES method, so familiarization, practice, and demonstration of proficiency before use is strongly recommended, Also, since ICP-OES instruments differ in design,

Table	10.	Practical	LOQ for	group	B metals
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	Ca, %	Cu, mg/L	Fe, %	Mg, %	Mn, %	Zn, %
Practical LOQ	0.0045	0.49	0.0018	0.0015	0.00003	0,0009

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				Average of majo	or values—average	of nilnor values		
Metal	Result	Acid ratio <sup>4</sup>	Test portion®	Digestion time <sup>4</sup>	Digestion temp."	Dilution vol. <sup>0</sup>	Filtering	Dilution technique
As, mg/kg	199,9	0.64	7.80	1.46	2.29	1.43	1.96	2.05
Cd, mg/kg	17.1	-0,15	0,50	0,048	0,45	0,36	0.44	0,031
Co, mg/kg	61.7	4,17	0.35	4,18	1.39	1.9	0.70	-4,97
Cr, mg/kg	226.4	-6.32	7.42	1.91	0,76	3.35	9.10	7.09
Mo, mg/kg	19,5	-0.94	1.98	1.67	-1.58	-0,85	0.076	0.001
Ni, mg/kg	127.6	6.29	-0.033	-0.22	1.43	0.74	-2.41	0,85
Pb, mg/kg	284,9	4.81	-0.59	0.50	2.52	1.38	0.38	-0.76
Se, mg/kg	1.6	0,56	-0.26	-0.20	0.26	0.24	-0.22	0.22
Ca, %	2.28	-0.022	0.093	0.013	-0.0080	-0.010	0.040	0.013
Cu, ppm	1214	-9.67	30,60	16,46	-26.15	0,93	11.00	-13,39
Fe, %	3,98	0.12	0.46	0,39	0.10	U.1F	J.41	0.072
Vig, %	1.76	0.0058	0.010	0.014	-0.020	0.013	-0.0018	-0.0014
Mr., %	0.311	0.0070	0.0033	0.0013	0,0021	0.0018	0,00043	-0,0032
Zn, %	0,317	0.011	0,0057	-0.0082	-0.0030	0.0015	0.0070	-0.0029
		Average	of major values-	-average of mino	r values expressed	as RPD"		
As, mg/kg	199.9	0.32	3.90	0,73	1.14	0.72	0,98	1.01
Cd, mg/kg	17.1	0.88	2,92	0,28	2,63	2.11	2.57	0,18
Co, mg/kg	61.7	6.76	0.57	6.77	2.25	3,08	1.13	8.06
Cr, mg/kg	226.4	2.79	3,28	0.34	0.54	1.48	4.02	3.13
vio, mg/kg	19,5	4.82	10.2	8.56	8,10	4,36	0,39	0.005
vi, mg/kg	127.6	4,93	0.026	0.17	1.12.	0,58	1,89	0,67
°b, mg/kg	284.9	1.69	0,21	0.18	0.88	0.48	0.13	0.27
Se, mg/kg	1.6°	35.0	16.3	12.5	16,25	15,0	13,75	13.7
Ca, %	2.28	0,96	4,08	0.57	0,35	0.44	1.75	0,57
Cu, ppm	1214	0.80	2,52	1.36	2.15	0,068	0.90	1.10
e, %	3,98	3.02	11.56	9.80	2.51	4.02	10.30	1.81
/g, %	1.76	0.33	0.57	0.080	1.14	0,74	0.10	0,080
un, %	0.311	2.25	1.08	0.42	0.68	0.58	0.14	1.03
Zn, %	0.317	3. 47	1.80	2.59	0,95	0.47	2.21	0.91

#### Table 11. Ruggedness tests results

4 Values in table are the Ufference between the major and minor variable, or RPD; units for the variables are listed in Table 4.

<sup>b</sup> RPD = Relative percent difference.

° <LOQ.

introduction system, plasma ethiciency, viewing orientation, RF generation, etc., s me minor adjustments to the instrument conditions may be necessary. Any adjustments must be performance based, using a variety of known reference materials over a wide range of analyte concentrations.

#### Conclusions

The proposed method is suitable for the simultaneous determination of Group A (As, Cd, Co, Cr, Pb, Mo, Ni, and Se) and Group B (Ca, Cu, Fe, Mg, Mn, and Zn) metals in fertilizers with digestion by microwave mixed acid digestion and detection by ICP-OES. It meets the criteria recommended by the AAPFCO Laboratory Services Committee. This method is proposed for adoption as a regulatory method and for further collaborative study.

### References

- (1) Kane, P., & Hall, W. (2006) J. AOAC Int. 89, 1447-1466
- (2) Official Methods of Analysis, 18th Ed. (2005) AOAC INTERNATIONAL, Gaithersburg, MD, Method 2006.03
- (3) Association of American Plant Food Control Officials (AAPFCO) Official Publication, No. 66 (2013) p. 66
- (4) Wobb, S., Bartos, J., Boles, R., Hasty, E., Thuotte, E., & Falls, H. (2009) Simultaneous Determination of Nutritive and Nonmutritive Metals in Fertilizers by ICP-OES, September 2009, Proceedings, Abstract 1804, 123rd AOAC INTERNATIONAL Annual Meeting and Exposition, Philadelphia, PA
- (5) EPA Method 3051A, Microwave Assisted Microwave Digestion of Sediments, Sludges, Soils and Oils (2007) U.S. Environmental Protection Agency, Cincinnati, OH. www.epa.gov/region9/qa/ pdfs/40efr13603.pdf, p. 31 (accessed May 23, 2013)
- (6) Youden, W.J., & Steiner, E.H. (1975) Statistical Manual of the AOAC, AOAC INTERNATIONAL, Gaithersburg, MD, pp 33–36

## **II. SINGLE LABORATORY VALIDATION:**

# 1. Method Protocol in AOAC format.

The proposed method in AOAC format is found in the attached manuscript, Appendix 2 ("Simultaneous Determination of Arsenic, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Molybdenum, Nickel, Selenium, and Zinc in Fertilizers by Microwave Acid Digestion and Inductively Coupled Plasma-Optical Emission Spectrometry Detection: Single-Laboratory Validation of a Modification and Extension of AOAC 2006.03), beginning in the second column on page 2 and ending in the second column on page 9.

# 2. Method Validation / Method Performance:

The attached manuscript, Appendix 2, has been peer reviewed and published in JAOAC. It describes the single laboratory validation in detail.

# **II. RECOMMENDATION:**

Study Director(s): Sharon Webb **Proposed ERP Members:** 

Patty Lucas, Harold Falls, Dennis Sebastian, Victoria Siegel, Lawrence Novotny, and Frank Sikora.

# **IV. STUDY DESIGN PROPOSAL**

# 1. Scope/applicability:

This method is applicable to the determination of arsenic (As), cadmium (Cd), calcium (Ca), cobalt (Co), chromium (Cr), copper (Cu), iron (Fe), lead (Pb), magnesium (Mg), manganese (Mn), molybdenum (Mo), nickel (Ni), selenium (Se), and zinc (Zn) in all classes of fertilizers. This is an extension and modification to AOAC Method 2006.03 by extending the analytes to include micronutrients (Ca, Cu, Fe, Mg Mn, and Zn) and adding hydrochloric acid to the digestion to increase recoveries of several metals. For ease of presentation and discussion of results, the metals are broken cowr into two groups. "Group A metals" are all the metals referred to in AOAC 2006.03 (A., Cd. Cr, Co. Pb, Mo, Ni, and Se). The proposed elements to be added to the scope will be referred to as "Group B metals" (Ca, Cu, Mg, Mn, and Zn).

# 2. Materials/matrices:

The validation materials consist of test materials from the previous collaborative study that adequately represent all classes of fertilizer ingredients and fertilizer blends in a wide range of concentrations of all analytes. There are 5 fertilizer classes represented: micronutrient mixes, concentrated phosphate products, N-P-K blends, organic materials, and phosphate ores. Magruder 2009-06 and NIST SRM 695 will be included as test materials to be used to assess the recovery (i.e. accuracy/bias) and reproducibility of the proposed method. Each analyte is represented in high, medium, and low concentration as seen in Tables 1C and 2C.

Metal	High Concentration	Medium Concentration	Low Concentration
As,(ppm)	5900	190	2.03
Cd,(ppm)	235	66	0.39

## Table 1C: Concentration Ranges of Group A Metals

Co,(ppm)	546	26	0.97
Cr,(ppm)	6300	220	2.13
Mo,(ppm)	157	45	0.53
Ni,(ppm)	1684	296	1.74
Pb,(ppm)	4121	136	2.09
Se,(ppm)	245	30	1.60

## Table 2C: Concentration Ranges of Group B Metals

Metal	<b>High Concentration</b>	Medium Concentration	Low Concentration
Ca, (%)	6	0.9	0.0045
Cu,(ppm)	14000	1.33	0.49
Fe, ( %)	54	0.241	0.0018
Mg, ( %)	2	0.4	0.0015
Mn, ( %)	15000	147	0.00003
Zn, (%)	36	0.3	0.0009

## 3. Test sample preparation and handling:

The solid test materials were prepared using AOAC method **929.02**. The unground sample was ground using a Model MC 200 Electric Miracle Seed & Coffee Mill. Once ground, the material was passed through a 40 mesh sieve, and any remaining +40 mesh sieve was reground until it passed through the 40 mesh sieve. The entire ground sample was then rolled 125 times. Then a spatula was used to "cut" the sample to break up any lumps of material tending to clump. This procedure was performed 4 times until the sample had been rolled 100 times. The material was then placed in the middle of the rolling cloth, and individual ground sample portions were extracted from random locations in the pile using a small weighing spatula. This is the same procedure used to propare proficiency samples for the Magruder and Rock Check Programs.

Approximately 5 g sub-samples will be placed in 20 mL glass vials for distribution to participants. The sixteen sample, used in the single laboratory validation will be distributed in blind duplicates. Therefore a total of 18 samples, including NIST SRM 695, Magruder 2009-06, and a method blank sample (Boric Acid) which has been specially formulated to contain a high concentration of Group A metals.

The study samples are given a unique identification and then put into a spreadsheet to randomize the distribution of the blind duplicates. So to minimize confusion for the collaborators, the individual samples will only contain sequential number identifiers from the order contained in the randomized key.

ID	ID from 2006.03 Collaborative Study	Description
А	4321/2025	Metal Fe oxysulfate
В	4031/5938	Magruder 2002-09B (micronutrient mix)
С	5488/5890	Zinc oxysulfate

D	2818/7669	Granulated mine waste
E	1615/2056	Metal oxysulfate
F	3313/6267	Western MAP
G	7999/3375	DAP from North African rock
н	6501/4812	NC MAP
1	7738/7418	China DAP
J	3917/8165	Magruder 2003-11 (14-14-14 blend)
к	4459/8931	Magruder 2004-07 (10-10-10)
L	8873/9469	N-P-K lawn product blend
м	9886/9774	Organic biosolid
N	4626/8088	Organic mixed fertilizer + biosolid
0	6411/3401	Composted manure
Р	3716/4606	Fe humate
Q	NA	NIST SRM 695
R	NA	Magruder 2009-06 (12-12-12)

The samples have demonstrated homogeneity from their use in the 2006.03 collaborative study. The NIST SRM 695 and the Magruder 2002-06 samples will not be tested for homogeneity either, as their homogeneity has been demonstrated as well.

Fertilizer samples have a known stability well beyond the test window assigned to this study.

Test materials will be sealed and carefully backaged into shipping containers, and the test materials, cover letter, instructions, a SOP, and data recording sheets will be shipped via carriers to the contact person at the address provided by the collaborating laboratory.

# 4. Quality Assurance

Practice samples will be provided to collaborators as part of the pre-trial method familiarization process. These samples are identified in Table 4 and will include certified reference/accuracy materials, and representation of fertilizer types and matrices with low, medium, and high concentrations of the metals in the study.

		As,	Cd,	Co,	Cr,	Mo,	Ni,	Pb,	Se,
	Source	ppm							
12-12-12	M 2009-06	333.85	345.16	958.74	108.8	17.65	1153.3	3815.4	116.01
Micros	M 2007-03	33.8	4.67	41.33	63.06	575.68	5394.6	49.72	16.15
0-46-0	AFPC08-07B	29	100	2	364	5	38	5	5
Cu-Zn Mix	M 2008-10	4.71	1.86	50.9	214.94	28.38	149.45	101.79	6.7

# Table 4: Proposed materials to be used in the familiarization study

46-0-22	M 2008-01	2.87	0.44	3.83	117.8	12.08	11.15	11.12	O
0-0-0 MEM		104.00	10.00						
	M 2006-04	184.88	12.86	83.59	158.38	20.78	77.12	681.24	36.46
5488/5890	2006.03	4.87	21.28	4.79	159.5	3.89	26.6	996	4.62
4321/2025	2006.03	22.15	2.25	97 <i>.</i> 8	731.4	69.16	331.9	119.6	6.69
Boric Acid									
(method blank)	NIST	0	0	0	0	0	0	0	0
NIST 695	NIST	200.3	16.92	65.3	244	15	134.9	273	2.12

Table 5. Group A Instrument and Method Detection and Quantitation Limits									
	As, mg/L	Cd, mg/L	Cr, mg/L	Co, mg/L	Mo, mg/L	Ni, mg/L	Pi, mg/L	Se, mg/L	
Instrument									
LOD	0.10	0.048	0.038	0.036	0.10	0.0006	0.0007	0.0003	
Instrument									
LOQ	0.36	0.17	0.13	0.13	0.36	0.0023	0.0023	0.0011	
Method						$\mathbf{O}$			
LOD	0.57	0.11	2.13	0.97	0.15	0.49	0.59	0.45	
Method				3	S				
LOQ	2.03	0.39	7.55	3.43	0.53	1.74	2.09	1.60	

Table 6. Group B Practical Quantitation Limits.								
	Ca, %	Cu, mg/L	Fe, %	Mg, %	Mn, %	Zn, %		
Practical LOQ	0.0045	0.49	0.0018	0.0015	0.00003	0.0009		

Based upon the result of the practice samples,, the limit of detection from the method blank will be recalculated and assessed. The above tables (Tables 5 and 6) are the results based on the single laboratory validation.

The results from the practice samples will be evaluated by three criteria to determine the performance of the collaborating laboratory. First, the results obtained by the collaborating laboratory will be compared to the values from the certified reference and check sample materials to verify they are within or very near the prescribed variability for all analytes of interest. Second, the results will be assessed to verify that they fall within two standard deviations from all collaborating laboratories. Third, the recoveries will be calculated and checked that they fall within the recommended recovery limits as seen in Table 7. Laboratories that exceed in more than one of these criteria will be notified and if they still wish to participate, the Study Director will work closely with the lab to attempt to identify and resolve the source of variability.

The results from the analysis of the practice samples will be used to determine if the laboratory can meet the suitability requirements and proceed to the final study stage of the process.

# 5. Proposed approach to data analysis.

After any Cochran or Grubbs outliers are identified and removed, the percent recoveries from the certified reference and check sample materials will be calculated. The recoveries will be compared with those recommended for SLV studies, which are listed in Table 7 below.

Table 7. Recommended recovery limits f	or single lab validation:
Concentration	Recovery (%)
100%	98-101
10%	95 - 102
1%	92 - 105
0.1%	90-108
0.01%	85 - 110
10 µg/g (ppm)	80 - 115
1 μg/g (ppm)	75 - 120

Calculations for repeatability (s<sub>r</sub>) and reproducibility (s<sub>R</sub>), as defined by the AOAC guidelines found in the *Official Methods of Analysis*, 18th Edition (2005), Appendix D: "Guidelines for Collaborative Study Procedures to Validate Characteristics of a Method of Analysis." HORRAT values will be calculated, with recommended HORRAT(r) repeatability values between 0.3 and 1.3 and HORRAT(R) reproducibility values between 0.5 and 2.0 for overall method assessment.

# 6. Other participating organizations.

The collaborative study has been planned and organized by Dr. Sharon F. Webb from the University of Kentucky. Division of Regulatory Services. Sample preparation assistance was received from Bill Hall with Mosaic. Technical support was provided by Nancy Thiex with Thiex Laboratory Solution, and financial support was provided by The Fertilizer Institute (TFI) and several fertilizer manufacturers.

Current organizations and laboratories that have expressed an interest in participating include: the North Carolina Department of Agriculture (State Regulatory), Oregon Department of Agriculture (State Regulatory), Milwaukee Metro Sewage Dist. Milorganite (Industry Laboratory), CEM Corporation (Instrument Vendor), Mosaic (Industry Laboratory), Florida Department of Agriculture and Consumer Services (State Regulatory), Agilent (Instrument Vendor), the Canadian Food Inspection Agency (International Regulatory), Thornton Labs (Private Laboratory), Office of the Indiana State Chemist (State Regulatory), Fritz Industries (Industry Laboratory), Georgia Department of Agriculture (State Regulatory), the University of Missouri (State Regulatory), EDW C. Levy Company (Industry Laboratory), California Department of Food and Agriculture (State Regulatory), Ohio Department of Agriculture (State Regulatory), Spectro Analytical Instruments Inc. (Industry Vendor), Washington Department of Agriculture (State Regulatory), Office of the Texas State Chemist (State Regulatory), Montana Department of Agriculture (State Regulatory), New York Department of Agriculture (State Regulatory), State Regulatory), New York Department of Agriculture (State Regulatory), State Regulatory), New York Department of Agriculture (State Regulatory), State Regulatory), New York Department of Agriculture (State Regulatory), State Regulatory), New York Department of Agriculture (State Regulatory), New York Department of Agriculture (State Regulatory), State Regulatory), New York Department of Agriculture (State Regulatory), State Regulatory), New York Department of Agriculture (State Regulatory), State Regulatory), New York Department of Agriculture (State Regulatory), State Regulatory), New York Department of Agriculture (State Regulatory), New York Department of Agriculture (State Regulatory), State Regulatory), New York Department of Agriculture (State Regulatory), New York Department of Agriculture (State Regulatory), New York Department of Agricultu

Simplot (Industry Laboratory), PCS Phosphate Inc. (Industry Laboratory), and Nachurs Alpine Solutions (Industry Laboratory).

# 7. Estimated number of collaborators.

As outlined above to date 23 laboratories have expressed an interest in participating in this collaborative study. The current composition of the collaborators is as follows: 12 state regulatory laboratories, one international regulatory laboratory, 7 fertilizer industry laboratories, two ICP-OES instrument manufacturers, and one private laboratory. If necessary, some laboratories have multiple ICP-OES instruments and experienced chemists, so the study could be performed twice independently by the same laboratory.

The primary selection criteria for participation in the collaborative study include the following: an ICP-OES instrument, an experienced operator familiar with configuring methods, chemists familiar with testing fertilizer or other agricultural products and laboratories that can document the quality of their data through their participation in check sample programs, proficiency programs or other laboratory certifications.

# 8. Communication to collaborators,

colleagues a. Research and Review The following cover letter will be distributed to colleagues and contacts who have expressed an interest in participating in this study:

Division of Regulatory Services University of Kentucky 103 Regulatory Services Bldg. Lexington, KY 40546-0275 USA

November 1, 2014

Dear Colleague,

I have been appointed the Study Director of an AOAC collaborative study of a method for the determination of several nutrient and nonnutrient metals in fertilizers using a mixed-acid microwave digestion and analysis by ICP-OES. I am writing to formally invite your laboratory to participate in this collaborative study, as we have previously communicated. At that time you expressed an interest in participating.

The single laboratory validation method has been published in the Journal of the AOAC International Volume 97, No. 3, 2014. The collaborative study is planned for 2014 and consists of 2 phases. The first phase will involve the analysis of a set of pre-study practice samples using the method. These samples will be used to verify shipping arrangements, to allow laboratories to familiarize themselves with the method and to work out any technical issues with the method, which may arise during the familiarization timeframe. The results from the pre-study practice samples should be submitted to the study director for evaluation. If necessary, technical recommendations

will be made to the individual laboratories to further refine their analysis to ensure validity of the final study results. The second phase of the study will involve the analysis of 36 study samples. This second phase will finalize the performance parameters of the nutrient and nonnutrient metals in fertilizers by microwave digestion and analysis via ICP-OES method. If the results meet the requirements of AOAC, the method will be published in the Journal of AOAC International and the Official Method of Analysis compendium.

Accompanying the study samples are several relevant documents. First is this cover letter and instructions. Second is the method SOP. Please note that it is critical to the success of the study that you follow the method exactly as written, without any modifications. If you are unable to attain the recommended chemicals, standards, supplies or instrument settings listed, please inform the Study Director prior to commencement of analyses. Also include this information in the comments section provided when reporting your results. Third is a *Data Record Sheei* on which you should record the weight of each sample and your final results. If you are missing any of these documents, or have any questions, please contact the Study Director.

Stability testing has indicated that the samples will be stable for the duration of the study period when stored at room temperature (~25 °C/75 °F). To address any settling and to ensure sample homogeneity, it is recommended that the sample vials be rolled on a bench top and that the liquid samples be shaken prior to taking a subsample portion.

The fertilizer samples are composed princarily or sales, so a lab coat, safety glasses and acid resistant gloves are recommended for protection. As outlined in the SOP the method requires the use of concentrate racids which should only be used in the fume hood. Allow the samples after digestion to cool for at least 30 minutes prior to uncapping and transferring the digestate to the volumetric flask and bringing to volume. Be sure to follow all safety recommendations provided in the MSDS and your laboratory chemical hygiene plan. Solution, generated from this method are considered hazardous waste due to the high acid content and should be labeled as such and disposed in the manner as proscribed by your chemical hygiene plan.

Some hard copies of the data are required for archival purposes. Record your sample weights and your final results for the practice samples (PS) and study samples (SS) on the "Data Record Sheet" (see Attached). On the Data Record Sheets, you will find a comments section where you can record any information or exceptions that will be evaluated by the Study Director. While an electronic or hard copy of the data does not need to be reported to the Study Director, it is recommended that a hard copy of the data be archived for seven years. If this is impractical, you may print a copy of your ICP-OES sample results, which can be archived by the Study Director.

Please report your practice study results by January 15, 2015 and your study sample results by December 31, 2015 to Sharon Webb.

Your contribution to this collaborative study is highly valued and appreciated. Should you have any questions or concerns, please contact the Study Director.

Respectfully,

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Sharon F. Webb, Ph.D. Study Director University of Kentucky **Division of Regulatory Services** Email: sharon.webb@uky.edu Phone: 859-218-2451

# SIGNATURES AND CONTACT INFORMATION FOR STAKEHOLDERS

See Attached

AOAC Review Panel Use only AoAc Review Panel

# Appendix

Background – Work leading to Single Laboratory Validation

In 2008, a small inter-laboratory study involving four laboratories was undertaken by a group of regulatory and industry chemists, led by the Office of Indiana State Chemist (1). The goals of the study were to determine the viability of a single universal method for the digestion and analysis of fourteen metals in fertilizers, and to evaluate the possible enhancement of recoveries by using a dual acid digestion system versus a single acid. One laboratory, the Missouri Experiment Station, performed AOAC Method 965.09 (2) to yield results for the Group B metals in fertilizer. The Office of Indiana State Chemist performed AOAC Method 2006.03 (3) to yield results for the Group A metals in fertil zer. The Florida Department of Agriculture and Consumer Services performed a hot block digestion of the test portions using nitric and hydrochloric acids by EPA 3050B (4) digestion. The CEM Corporation provided digestates via microwave digestion using the proposed dual acid method. All microwave and hot block digests were analyzed at the Office of Indiana Suite Chemist using matrix matched calibration standards and ICP-OES. This study compared AOAC 965.09 results, for the Group B metals and AOAC 2006.03 (5) results for the Group A metals against results from hot block and microwave mixed acid digestions and ICP-OES detection. AOAC 965.09 utilizes hot plate HCl digestion with atomic absorption detection. AOAC 2006.03 utilizes HNO3 microv ave digestion followed by ICP-OES detection. EPA 3050B utilizes a HNO<sub>3</sub>, H<sub>2</sub>O<sub>2</sub> and HC! hot block digestion followed by ICP-OES detection. The proposed modification and extension of AOAC 2006.03 utilizes HNO<sub>3</sub> + HCl digestion with ICP-OES detection. Nine study materials from the Magruder Check Sample Program (5) and five commercial fertilizer materials were used as validation materials to cover a dynamic range of metal concentrations and reagent grade potassium chloride was included as a method blank. Values for the validation materials used for the digestion and method comparison part of this study are listed in Tables A1 and A2.

Preliminary Studies on Group B Metals:

The results for the Group B metals using the proposed nitric and hydrochloric acid microwave digestion and ICP-OES detection were compared to the published Magruder Check Sample "Method Group Grand Average" consensus results. For the Group B metals 78% of 108 data points were within 1 standard deviation and 91% were within 2 standard deviations. For the results that exceeded two standard deviations of the "Method Group Grand Average," all were higher concentrations than the published values suggesting enhanced recoveries with the two acid mixture. Examination of the Group A metals results demonstrated that 63% of the 137 data points were within 1 standard deviations of the Magruder "Method Group Grand Average" all were higher than the published values suggesting enhanced recoveries and the results that exceeded two standard deviations of the Magruder "Method Group Grand Average" all were higher than the published values suggesting enhanced recoveries and the two acid mixture. All data showed a reasonably normal distribution, with a slightly higher percent outside the two standard deviation window. The results showed that simultaneous digestion and detection of both groups of metals in fertilizer compounds is possible when compared to the single acid digestions. (3)

Results obtained from AOAC 565.09 were used as the basis of comparison for statistical analysis of the Group B elements. Results obtained from AOAC 2006.03 were used as the basis of comparison for statistical analysis of the Group A elements. The statistical analysis for the Group B analytes when comparing the results from AOAC 965.09, AOAC 2006.03, hot block mixed acid (HB-Mix), and microwave mixed acid digestions (MW-Mix), showed no significant difference in results for Ca, Cu, Mn and Zn (P = 0.05), suggesting any of these methods will produce comparable results. In the case of Mg, the statistical results indicated no significant difference between AOAC 965.09 and 2006.03 results; however, when comparing the results from AOAC 965.09 with the mixed acid microwave and the mixed acid hot block methods, the results from the mixed acids were significantly higher at a P level of 0.05, but not highly significant at a P level of 0.01.

To determine if this difference could be attributed to the dual acid system, results from the single acid 2006.03 method were compared with results from the proposed dual acid microwave digest. At a P level of 0.05, the difference in Mg results was significant, but not highly significant (P = 0.01). The affect of the hydrochloric acid can be seen by an enhanced recovery of Mg. This is consistent with the application note in EPA Method 3051A (6) which states that Mg is one of the elements that typically requires the addition of hydrochloric acid to achieve adequate recovery.

Statistical analysis of the Fe data revealed that between the three alternative methods being considered for use, the microwave mixed acid system had the best agreement with ACAC 965.09. The method that produced Fe results that were most different from AOAC 965.09 was 2006.03. This can be attributed to the absence of hydrochloric acid in the 2006.03 method, which can cause a low Fe recovery. As is the case with Mg, Fe is another element which EPA Method 3051A states that hydrochloric acid is recommended for better recovery. Overall, there was good statistical agreement between the proposed mixed acid microwave digestion method and the official 965.09 method. The enhanced recoveries of Fe using 1 oth nitric and 1 ydrochloric acid during digestion are demonstrated in Figures A1, A2 and A3. In Figure A1, the difference in Fe results for the methods employed in this inter-laboratory study, for fe tilizers containing less than 2%, is shown. For materials containing less than 0.5% Fe, there was relatively good agreement among methods. Once the amount of iron exceeded about 1.0%, the agreement across all methods declined. Sample 12 contained considerable Fe derived from an organic material, so it is not a valid matrix for the AOAC 965.09 part C method. Nitric acid would be required to adequately recover any Fe linked with an organic source. Figure A2 shows the recovery of iron for materials containing mid-level concentrations ranging from 5 to 10% Fe. Overall, there is good agreement among the methods except for 2006.03, which is the only method that does not contain any hydrochloric acid. This suggests this method would not fully recover Fe. Figure A3 shows results for materials containing high-level Fe concentrations in the range of 10 to 50% Fe, and demonstrates the most variability in recovery. The method that yielded the lowest Fe recovery was 2006.03. There is also

low recovery from the hot block mixed acid digestion across all high-level Fe materials. Only the official method 965.09 demonstrated good recovery for the 50% Fe containing material (Figure A3). Based upon the results presented in Figure A3, some modifications to the proposed mixed acid microwave method, such as a lower test portion weight, are needed to be explored to ensure sufficient recovery of Fe in materials that contain over 20% Fe.

# Preliminary Studies on Group A Metals:

Statistical analysis of the Group A metals results was performed. AOAC method 2006.03 served as the basis for comparison against results obtained with both the proposed n icrowave mixed acid digestion (MW-Mix) and the hot block mixed acid digestion (HB-Mix) methods.

# Comparison of Microwave Mixed-Acid and AOAC 2006.03 Data:

For As, Cd, Pb, Ni, and Se, at the P = 0.05 level, there was no difference between the values obtained by method 2006.03 and values obtained by the proposed microwave mixed acid digestion method or by the hot block mixed acid digestion. For Co and Mo, there was a significant difference (P = 0.05) between the AOAC 2006.03 method and the proposed microwave mixed acid method, but the differences were not highly significant (P = 0.01) Of the 28 Ce and Mo values used for comparison, all but one was higher when using the proposed method extension and modification, again suggesting an enhanced recovery of some metals when using the microwave mixed acid digest. For Cr, the difference between the values obtained by 2006.03 and the values obtained by the proposed microwave mixed acid digestion were highly significant (P = 0.01), with all values higher by the proposed method modification and extension. As a result, it is likely that the proposed method extension and modification will generate higher Cr results than the parent AOAC 2006.03 method. Since the microwave mixed acid and the hot block mixed acid both consistently produced higher chromium results than AOAC 2006.03, it is more likely that AOAC method 2006.03 has a low bias with some fertilizer materials.

# Comparison of Hot-Block Mixed-Acid and AOAC 2006.03 Data:

For As, Cr, Ni, and Pb, at the P = 0.05 level, there was no difference between the values obtained by method 2006.03 and values obtained by the hot block mixed acid digestion method. For Cd, Co, and Mo, there was a significant difference (P = 0.05) between 2006.03 and the hot block mixed acid method, but the differences were not highly significant (P = 0.01). Of the values reported for Cd, Co, and Mo, 63% were higher by the hot block mixed acid method, supporting the theory that mixed acids will enhance recovery of some metals. For Se, statistical comparison of the hot block mixed acid and 2006.03 data was not possible due to grossly elevated Se values generated from the hot block mixed acid dota. Possibly, contamination from one of the reagents (or from the digestion vessels) resulted in these elevated levels. Since the main objective of this study was to compare the single acid AOAC 2006.03 microwave digestion with its proposed modification and extension, this matter was not pursued further.

A further representation of the enhanced recoveries using the proposed extension and modification of 2006.03 is demonstrated in Figures A4 and A5. Magruder 2006-04B was one of the materials used for the inter-laboratory digestion and method comparison study. As these figures show, with the exception of Cd, all other metal values were considerably higher when using a mixed acid digest. Given the concerns that exist regarding several of these metals, it was decided that a method modification is warranted. For all elements, enhanced recovery using the dual acid digestion system was demonstrated. For As and Cr, the recoveries doubled, and for Mo the recovery increased significantly. Overall method differences may not be highly significant (P = 0.01); however, the addition of hydrochloric acid enhances the recovery of both Group A and Group B for some fertilizer materials.

Based upon the results of the inter-laboratory study, a single laboratory validation was initiated to verify if a universal method is viable for both Group A and Group B metals in all classes of fertilizers and to evaluate if using mixed acids rather than a single acid enhances recoveries.

(1) Webb, S., Bartos, J., Boles, R., Hasty, E., Thuotte, E., & Falls, H. (2009) Simultaneous Determination of Nutritive and Nonnutritive Metals in Fertilizers by ICP-OES, September 2009, Proceedings (Abstract 1804) 123rd AOAC International Annual Meeting and Exposition, Philadelphia, PA

(2) Official Methods of Analysis, 18th Ed. (2005) AOAC International, Gaithersburg, MD Method 965.09

(3) Official Method of Analysis, 18th Ed. (2005) AOAC International, Gaithersburg, MD Method 2006.03

(4) EPA Method 3050B, Acid Digestion of Sediments, Sludges, and Soils (1996), U.S. Environmental

Protection Agency, Cincinnati, OH

(5) Magruder Fertilizer Check Sample Program, www.magruderchecksample.org (accessed on May 2013)

(6) EPA Method 3051A, Microwave Assisted Digestion of Sediments, Sludges, Soils, and Oils (2007), U.S.

Environmental Protection Agency, Cincinnati, OH

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Source	Sample	% Ca	<b>% Ca</b>	% Fe	% Mg	% Mn	% Zn
Mag 2001-08 *	2	5.17	0.006	0.23	4.54	0.161	0.148
Mag 2002-02 *	3	0.71	0.020	0.60	0.19	0.013	0.088
Mag 2002-09B *	4	2.56	1.754	24.18	0.86	4.679	6.644
Mag 2003-01 *	5	1.30	0.018	5.23	2.37	0.038	0.046
Mag 2004-10 *	6	6.52	0.120	0.43	1.77	1.555	0.454
Mag 2005-06 *	7	1.63	0.022	5.36	0.49	0.040	0.038
Mag 2006-04B *	8	6.01	0.129	1.27	3.05	13.179	4.125
Mag 2006-07 *	9	0.21	0.003	1.22	1.65	0.590	0.025
Mag 2007-03 *	10	3.17	7.252	14.62	0.38	7.274	6.079
Material A **	11	0.02	0.000	0.35	0.00	0.000	0.000
Material B **	- 12	11.19	0.001	1.17	2.16	0.033	0.001
Material C **	13	18.35	0.005	4.54	2.86	0.040	0.018
Material D **	14	2.31	0.008	11.03	0.21	0.063	0.018
Material E **	15	2.08	0.445	52.44	0.62	1.698	1.302

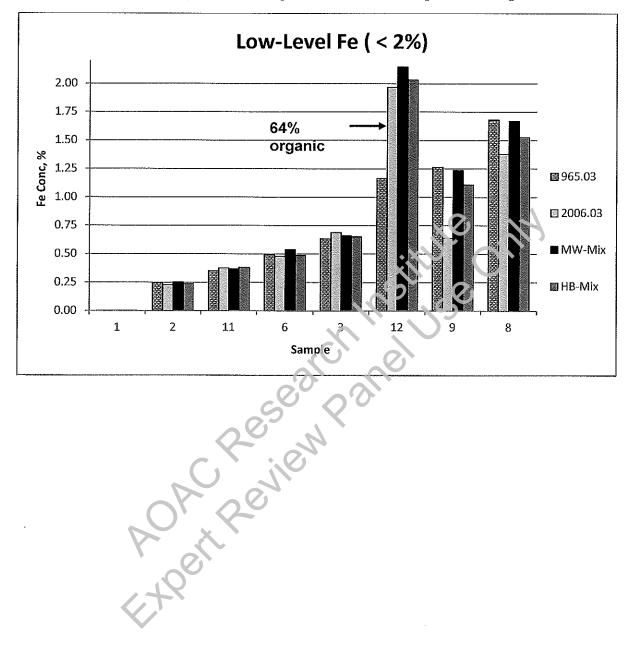
Table A1. Group B results for the digestion and method comparison inter-laboratory study

\* Magruder check sample consensus values reported for AA or atomic absorption

\*\*Commercial fertilizers with a range of micronutrient values determined by AOAC 965.03

	Sample	_	Cd			Mo			
Source		As ppm	ppm	Co ppm	Cr ppm		Ni ppm	Pb ppm	Se ppm
Mag 2001-08*	2	5.32	2.80	8.63	nvr	4.96	22.08	11.87	3.20
Mag 2002-02*	3	1.10	0.89	2.92	29.32	2.26	15.44	35.06	1.67
Mag 2002-09B*	4	624.41	25.33	210.13	526.29	198,93	377.97	4302.50	nvr
Mag 2003-01*	5	54.19	2.72	15.36	567.65	8.19	33.75	90.74	2.86
Mag 2004-10*	6	44.89	1.55	56.86	185.12	14.33	89.67	21.64	2.47
Mag 2005-06*	7	4.47	2.79	8.10	185.07	13.95	27.80	40.42	4.92
Mag 2006-04B*	8	193.12	12.79	77.52	148.29	20.56	81.80	632.38	36.46
Mag 2006-07*	9	0.60	0.92	12.38	62.88	3.90	30.33	9.19	9.99
Mag 2007-03*	10	32.93	5.34	41.80	62.88	575.68	5342	52.15	16.13
Material A**	11	bdl	bdl	0.39	0.79	0.62	0.65	bdl	0.00
Material B**	12	bdl	bdl	10.33	27.05	2.58	30.83	2.72	3.80
Material C**	13	bdl	bdl	8.37	14.87	0.88	10.38	4.24	4.02
Material D**	14	bdl	bdl	11.10	31.31	0.65	18.88	bdl	13.35
Material E**	15	bdl	bdl	89.09	525.52	150.51	326.78	322.77	89.16
** Commercial fe nvr = no value rep bdl = below instru	ported iment detec	_	ese evil			AUAC 20			

Table A2. Group A results for the digestion and method comparison inter-laboratory study



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Figure A1. Recovery of Fe by the various digestion methods for samples containing low-level Fe

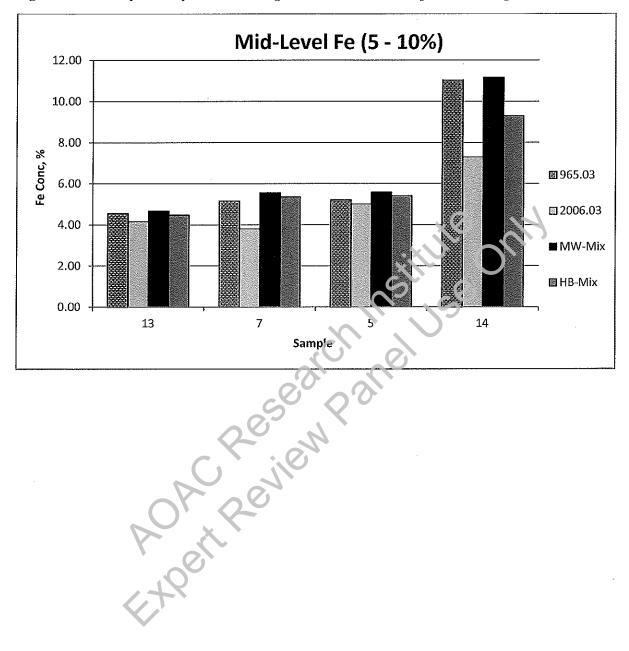


Figure A2.Recovery of Fe by the various digestion methods for samples containing mid-level Fe

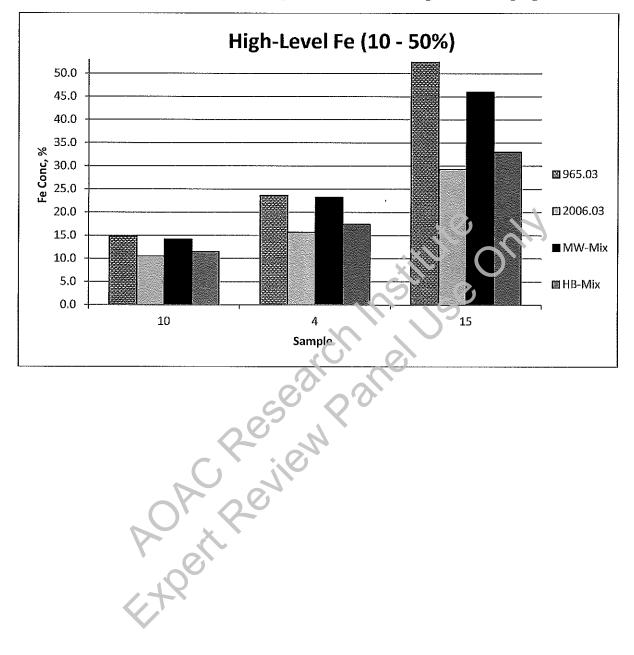


Figure A3. Recovery of Fe by the various digestion methods for samples containing high-level Fe

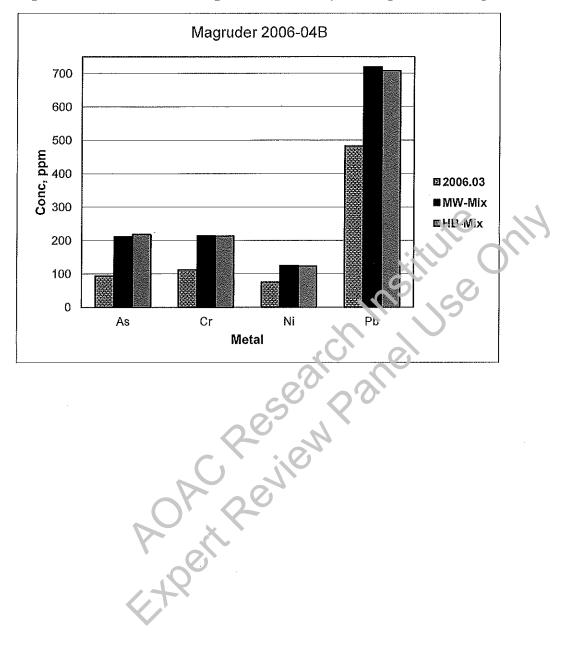


Figure A4. Results demonstrating enhanced recovery of Group A metals using the mixed acids

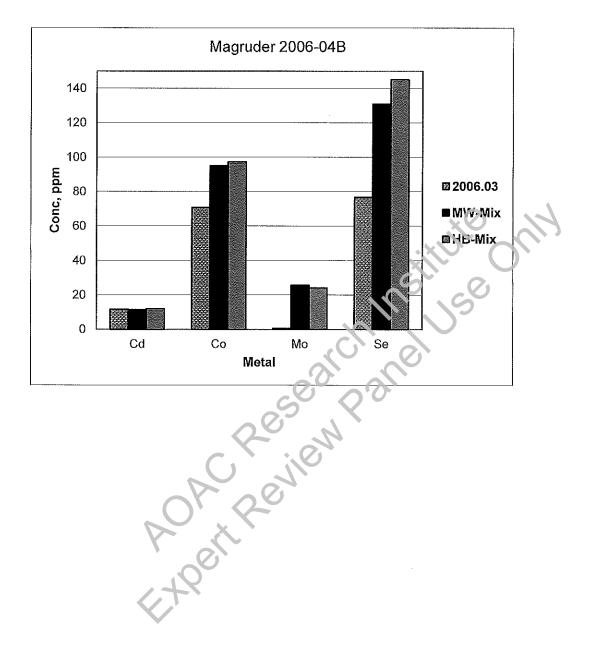


Figure A5. Results demonstrating enhanced recovery of Group A metals using the mixed acids

Division of Regulatory Services University of Kentucky 103 Regulatory Services Bldg. Lexington, KY 40546-0275 USA

November 1, 2014

Dear Colleague,

I have been appointed the Study Director of an AOAC collaborative study of a method for the determination of several nutrient and nonnutrient metals in fertilizers using a mixed-acid microwave digestion and analysis by ICP-OES. I am writing to formally invite your laboratory to participate in this collaborative study, as we have previously communicated. At that time you expressed an interest in participating.

The single laboratory validation method has been published in the Journal of the AOAC International Volume 97, No. 3, 2014. The collaborative study is planned for 2014 and consists of 2 phases. The first phase will involve the analysis of a set of pre-study practice samples using the method. These samples will be used to verify shipping arrangements, to allow laboratories to familiarize themselves with the method and to work out any technical issues with the method, which may arise during the familiarization timeframe. The results from the pre-study practice samples should be submitted to the study director for evaluation. If necessary, technical recommendations will be made to the individual laboratories to further refine their analysis to ensure validity of the final study results. The second phase of the study will involve the analysis of 36 study samples. This second phase will finalize the performance parameters of the nutrient and nonnutrient metals in fertilizers by microwave digestion and analysis via ICP-OES method. If the results meet the requirements of AOAC, the method will be published in the Journal of ACAC International and the Official Method of Analysis compendium.

Accompanying the study samples are several relevant documents. First is this cover letter and instructions. Second is the method SOP. Please note that it is critical to the success of the study that you follow the method exactly as written, without any modifications. It you are unable to attain the recommended chemicals, standards, supplies or instrument settings listed, please inform the Study Director prior to commencement of analyses. Also include this information in the comments section provided when reporting your results. Third is a *Data Record Sheet* on which you should record the weight of each sample and your final results. If you are missing any of these documents, or have any questions, please contact the Study Director.

Stability testing has indicated that the samples will be stable for the duration of the study period when stored at room temperature ( $\sim 25^{\circ}$  C/75° F). To address any settling and to ensure sample homogeneity, it is recommended that the sample vials be rolled on a bench top and that the liquid samples be shaken prior to taking a subsample portion.

The fertilizer samples are composed primarily of salts, so a lab coat, safety glasses and acid resistant gloves are recommended for protection. As outlined in the SOP the method requires the use of concentrated acids which should only be used in the fume hood. Allow the samples after digestion to cool for at least 30 minutes prior to uncapping and transferring the digestate to the volumetric flask and bringing to volume. Be sure to follow all safety recommendations provided in the MSDS and your laboratory chemical hygiene plan. Solutions generated from this method are considered hazardous waste due to the high acid content and should be labeled as such and disposed in the manner as proscribed by your chemical hygiene plan.

Some hard copies of the data are required for archival purposes. Record your sample weights and your final results for the practice samples (PS) and study samples (SS) on the "Data Record Sheet" (see Appendix C and D). On the Data Record Sheets, you will find a comments section where you can record any information or exceptions that will be evaluated by the Study Director. While an electronic or hard cory of the data does not need to be reported to the Study Director, it is recommended that a hard copy of the data be archived for seven years. If this is impractical, you may print a copy of your ICP-OES sample results, which can be archived by the Study Director.

Please report your practice study results by January 15, 2015 and your study sample results by December 31, 2015 to Sharon Webb.

Your contribution to this collaborative study is highly valued and appreciated. Should you have any questions or concerns, please connect the Study Director.

Respectfully,

Devile Sharon F. Webb, Ph.D. Study Director University of Kertucky Division of Regulatory Services Email: sharon.webb@uky.edu Phone: 859-218-2451

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Contact Person:									
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Comments: (Optional)				<u> </u>	<u>.</u>				

Lab Name: Contact Person: Reporting Date:							
Sample ID	Sample Wt, g	Ca, %	Cu,ppm	Fe, %	Mg, %	Mn, %	Zn, %
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If you have any questions about reporting, please contact Sharon Webb (sharon.webb@uky.edu; phone: 859-218-2451)

Comments:

(Optional)

# SAFETY CHECKLIST

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# (To be completed by the Study Director)

Method Title: Simultaneous Determination of Arsenic, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Molybdenum, Nickel, Selenium and Zinc in Fertilizers by Microwave Acid Digestion and ICP-OES Detection: Single Laboratory Validation of a Modification and Extension of AOAC 2006.03.

Please click on desired check box:

QUESTIONS	YES	NO
1. Are any materials used or compounds formed that are explosive or flammable?		X
2. Are there any side reactions that could occur that might produce flammable or explosive products or conditions?		X
3. Are there any hazards created from electric or mechanical equipment?	X	
4. Are pressure differentials created that could result in an explosion or implosion?	X	
5. Are any substances used or formed which are:		
<ul> <li>a) radioactive?</li> <li>b) carcinogenic?</li> <li>c) mutagenic?</li> <li>d) tetratogenic?</li> <li>e) abortogenic:</li> <li>f) otherwise a significant health hazurd?</li> </ul>		X X X X X X
6. Would there be increased hat ards if the reaction temperature were increased even modestly?	$\boxtimes$	
7. Are special procedures required if a spill of the reaction mixture occurs?		X
8. Is there a risk in producing a dangerous aerosol?		Х
9. Are special procedures required for the disposal of reagents or reaction products? reaction products?	$\boxtimes$	
10. Are there any organisms and/or their products used/present that are:		
<ul> <li>a) pathogenic?</li> <li>b) allergenic?</li> <li>c) carcinogenic?</li> <li>d) mutagenic?</li> <li>e) tetratogenic?</li> <li>f) otherwise a significant health hazard?</li> </ul>		X X X X X X
11. Are there any potential hazards in handling or storage of reagents, test samples, or standards?	X	

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	N-28 C/Method S pert Review Pane Se	
12. Are there any other hazards that should be addressed regarding the method?	YES	NO X
13. Does your method use chlorinated solvents?		X
14. If "yes" to question 13, have non-chlorinated solvents equivalent to chlorinated solvents been investigated?	n/a	

## If the answer to any question above is <u>yes</u>:

- 1. Include appropriate precautionary statements in method write-up.
- 2. Provide specific information on hazard and attach it to this sheet for review by the Safety Committee Advisor.

Comments: Concentrated Hydrochloric Acid and concentrated Nuric Acid are used as digestion solvents and to make up of the standards used in this procedure. Preparation of these is innited to fume hoods. Care must be taken when adding the acids to the samples because some fertilizer the terials upon contact with acids may produce an exothermic reaction. Once the samples are digested by the microwave, a sufficient time must be allowed before uncapping and transferring to the volumetric flacks. Most commercial microwave digestion units are equipped with temperature and/or pressure monitors and other safety devices such as venting and resealing vessels and containment systems. Proper safety procedures are listed in the microwave user's manual and should always be followed.

Name: Dr. Sharon F. Webb Study Director

Date: 06/13/14

Please complete, date and en ail to Sharon webb@uky.edu

### AOAC Official Method 2006.03 Arsenic, Cadmium, Cobalt, Chromium, Lead, Molybdenum, Nickel, and Selenium in Fertilizers Microwave Digestion and Inductively Coupled Plasma-Optical Emission Spectrometry First Action 2006 Final Action 2009

[Applicable to analysis of As, Cd, Co, Cr, Pb, Mo, Ni, and Se in all classes of fertilizers. Limit of quantitation (LOQ; mg/kg): As, 14.4; Cd, 2.46; Co, 3.3; Cr, 33.9; Mo, 7.5; Ni, 8.1; Pb, 13.2; Se 13.2.]

See Tables 2006.03A–H for the results of the interlaboratory study supporting acceptance of the method. Note that materials with iron content >5% require special cautions as noted in the method, and may experience varying degrees of degradation of precision.

#### Digestion

### A. Principle

Test portion is heated with nitric acid in closed vessel microwave digestion system at 200 C.

### B. Apparatus

*Microwave.*—Commercial microwave designed for laboratory use at 200 C, with closed vessel system and controlled temperature ramping capability. It is recommended that vessel design be selected that will withstand the maximum possible pressure, since some organic fertilizer products, and also carbonates if not given sufficient time to predigest, will generate significant pressure during digestion. (Vessels can reach 700 psi or more on occasion.) Vert according to manufacturer's recommendation. (*Countorn*. Microwave operation involves hot pressurized acid solutions. Use appropriate face protection and laboratory clothing)

### C. Reagents

(a) Water.—Use 18 Megaohm water throughout for dilution.
(b) Concentrated HNO<sub>3</sub>.—Use trace metal grade HNO<sub>3</sub> throughout.

#### D. Determination

(*Caution*: Observe standard precuritons with concentrated acid. When dispensing acid or vening vessels, use gloves, face protection, and laboratory coats. Never remove hot vessels from microwave; wait until they are near room temperature. Keep microwave door closed while vessels are hot. The door is the primary safety device if a vessel vents.)

Prepare solid samples as in 929.02 (see 2.1.05). Accurately weigh  $1.0000 \pm 0.010$  g (0.5000 g for organic matrixes) test portion to digestion vessel. Use weighing paper insert to line the vessel walls during sample transfer, to keep sample from adhering to sides of vessel. Fluid samples may be weighed directly after mixing. Add  $10.0 \pm 0.2$  mL trace metal grade HNO<sub>3</sub>, loosely cap vessels without sealing, predigest at room temperature until vigorous foaming subsides, or overnight if time allows. Seal vessels according to manufacturer's directions and place in microwave. With power setting appropriate to microwave model and number of vessels used, ramp temperature from ambient to 200 C in 15 min. Hold at 200 C for 20 min. Cool vessels according to manufacturer's directions, vent, and transfer digests to 100 mL volumetric flasks, dilute to volume, and mix. Transfer to polypropylene containers within 2 h, unless solutions are to be analyzed immediately. Dilute samples that are found to be above the standard curve range, or have content of metals higher than 1000 mg/kg. Final dilutions require addition of appropriate amounts of  $HNO_3$  to maintain the proportion of 10%  $HNO_3$  in the final solution to be analyzed.

### Detection

### E. Principle

Digested test solution, or an appropriate dilution, is presented to the inductively coupled plasma-optical emission spectrometry (ICP-OES) instrument calibrated with acid matched standard calibrant solutions. An ionization buffer (cesium) is used to minimize easily ionizable element (EIE) effects, and scandium and/or beryllium are used as internal standard(s).

### F. Instrumentation

(a) *ICP emission spectrometer*.—Capable of determining multiple wavelengths for each element of interest. A 3-channel peristaltic pump is desirable to avoid the necessity of having to manually add ionization unfer and internal tandard to each sample solution. Use a Meinhard or Seaspray nebulizer and Cyclonic Spray Chamber, or other components designed to optimize aerosol and maximize precision. Select sample and internal standard pump tubes, and peristaltic pump rotation speed, with regard to manufacturers recommendations, but try to keep sample and internal standard pump thoes of similar size, to maximize mixing accuracy, while maint ining needed detection levels.

The analyst must compensate for EIE effects in the plasma since fertilizer meterials can contain substantial concentrations of elements that provide a significant source of electrons to the plasma, such as K and Ca. The presence of ionization buffer in all samples and standards will minimize the effect of varying concentrations of L'Es in the sample. Power settings and nebulizer gas flow should be optimized for robust plasma conditions. The analyst needs to ensure that the Mg 285.213:Mg 280.271 ratio (Mermet principle of robust plasma) demonstrates robust operating conditions in accordance with the ratio established by the instrument manufacturer. Two or 3 replicate readings of the same sample are desirable, with relatively longer integration time to minimize noise. Properly optimized instruments should have internal standard ratios for most samples consistently in the range 0.9 to 1.0. It is unusual to have the ratio lower than 0.8 over a very wide range of fertilizer material types. The occurrence of lower ratios is cause for troubleshooting. Select ionization buffer/internal standard solution, G(d), such that after mixing sample and internal standard solutions using the instrument's peristaltic pump, the combined solution presented to the nebulizer contains 2200 mg/kg or greater cesium chloride; 0.75 to 1.0 mg/kg internal standard; and 7.2 mg/mL or less actual fertilizer material. (For example, these conditions would be met with a 1 g sample digested and diluted to 100 mL before instrument analysis; an ionization buffer/internal standard solution of 8000 mg/kg cesium chloride and 3 mg/kg scandium and/or beryllium internal standard(s); and pump tubes of white/white (1.02 mm id) sample and orange/white (0.64 mm id) internal standard, the white/white contributing about 72%, and the orange/white contributing about 28%, to the final nebulized solution.)

At a minimum, all sample instrument responses for each element should be corrected using one internal standard wavelength. However, best practice is to utilize similar transitions between analyte and internal standard. For example, the As 188.980 wavelength is from arsenic in the atomic state, so the internal standard wavelength used for correction should also be from the atomic state, such as Sc 361.383. Conversely, match ionic sample lines with ionic internal standard lines. (*Note*: Do not use yttrium as an internal standard, since it is found native at low levels in some phosphate ore sources.)

(b) ICP wavelengths.—A number of wavelengths may be used for analysis of the 8 elements of interest, depending on the capability of the analytical instrument used. As a minimum, select at least 2 wavelengths for each element of interest, and report the average value of closely agreeing results, except for lead and selenium, for which there is only one reliable wavelength available. Following is a list of suggested wavelengths, not in any priority order, that have been found acceptable for most fertilizer materials. Other lines of appropriate sensitivity, free of interferences or corrected for interferences, may be just as acceptable. However, it is imperative that instrument response (both instrument graphic output and calculated concentration) be reviewed for each sample and element. Fertilizer materials are extremely variable in composition, and a wide concentration range of potential interfering elements is expected, so no single wavelength will work in every instance. Occasional data with interference will inevitably be found, and must be eliminated from inclusion in the mean calculation for that particular element and sample.

Wavelengths (nm): As: 188.980, 193.696; Cd: 214.439, 226.502; Co: 228.615, 230.786, 235.341; Cr: 205.560, 267.716, 276.653; Mo: 201.512, 202.032, 203.846, 204.598; Ni: 216.555, 222.295, 222.486, 227.877, 231.604, 239.452; Pb: 220.353; Se: 196.026; Sc: 361.383, 431.408; Be: 234.861, 249.473.

(c) Wavelength interference treatment.—Interelement interference can cause substantial error in analytical result. Error can be minimized by several techniques: (1) Three or more analytical lines may be used for a given element, and when an interferent is present in a particular line, the result or mat line is omitted from the mean value reported. (2) Certain vendors' instrument software has the capability of mathematically modeling potential interferents, and deconvoluting the instrument response into an analytical element portion and an interferent portion. (3) Interelement correction is an alternative mathematic d technique to use with instruments for which mathematic modeling is not available, or where direct spectral overlap negates use of the deconvolution technique.

The following lines, if used, must utilize one of the correction techniques; corrections for other lines may be applied as needed and appropriate: (1) As 188.980: Correct for Cr interference at 188.995, or verify that Cr is not present in the test portion analyzed. (2) As 193.696: Fe affects the arsenic peak. Remove with an Fe model, or verify that Fe is not present in the test portion analyzed. (3) Cd 214.439 and 226.502: Fe, present in many fertilizers, interferes with both suggested Cd wavelengths. Mathematically correct instrument Cd response for the interference, or verify analytically that Fe is not present in the test portion analyzed. (4) Pb 220.353: Mathematically correct instrument Pb response for Fe interference, or verify that Fe is not present in the test portion analyzed. (5) Se 196.026: Mathematically correct instrument Se response for Fe interference, or verify that Fe is not present in the test portion analyzed.

(d) *ICP instrument calibration.*—Prepare working standard solutions from commercial stock standards at 1000 mg/kg. Custom blended multielement stock standard in HNO<sub>3</sub> is acceptable. Prepare a minimum of 5 working standards at 0.1, 0.5, 1.0, 5.0, and 10.0 mg/kg,

plus blank, of each element, in 10% trace metal grade HNO<sub>3</sub>. Working standards should be in the linear range, with correlation coefficients of at least 0.9999.

### G. Reagents

(a) Water.—Use 18 Megaohm water for dilution.

(**b**)  $HNO_3$ .—Use trace metal grade HNO<sub>3</sub>.

(c) 0.5% Triton X100 solution.—Dilute 0.5 mL Triton X100 to 100 mL with  $H_2O$ .

(d) Ionization buffer/internal standard solution.—Weigh 8.0 g CsCl into a 1000 mL acid-washed volumetric flask. Add 3 mL each of ICP grade scandium and beryllium 1000 mg/kg stock solution, as internal standards. Also add 1 mL of 0.5% Triton X100, dilute to volume, and mix. Store in a polypropylene bottle. (*Note:* Reagent concentrations assume the use of white/white, 1.02 mm id sample pump tube, and orange/white, 0.64 mm id internal standard pump tube. If the sample and internal star dard solutions are mixed in different proportions by the instrument's peristaltic pump, then adjust the reagent concentrations to meet concentration requirements of mixed solution nebulized by the instrument, as outlined in F. Note that sample and internal standard solution mixing ratio is proportional to pump tube flow rates, not proportional to pump tue IDs.)

(e) Stock standard solution.—Working standards can be prepared from ICP grade individual element 1000 mg/kg commercial stock standard solutions. However, it is also acceptable to use connercially prepared custom blended stock standard mixtures containing all of the 8 elements at 1000 mg/kg. A number of commanies provide this stock standard service.

(f) 10 mg/kg intermediate stock standard solution for preparation of low-level working standards.—Dilute 5.0 mL of stock standard solution to 500 mL. Prepare fresh each time standards are prepared, and use immediately after preparation.

(g) Working standard solutions.—Standards are designed to have the same acid concentration as digested test solutions. Date all calibration solutions when made, which should be stable for at least 1 month, but not longer than 2 months. Monitor standard curve fit and intensity for signs of change and degradation over time. (1)10 mg/kg elements.-Pipet 5.0 mL of combined 1000 mg/kg element stock solution into a 500 mL acid-washed volumetric flask. Add 50 mL of trace metal grade HNO<sub>3</sub>, dilute to volume with H<sub>2</sub>O, mix, and transfer to acid-washed polypropylene bottle. (2) 5 mg/kg elements.-Pipet 5.0 mL of combined 1000 mg/kg element stock solution into a 1000 mL acid-washed volumetric flask. Add 100 mL of trace metal grade HNO<sub>3</sub>, dilute to volume with H<sub>2</sub>O, mix, and transfer to an acid-washed polypropylene bottle. (3) 1 mg/kg elements.-Pipet 50.0 mL of 10 mg/kg intermediate stock solution into a 500 mL acid-washed volumetric flask. Add 50 mL of trace metal grade HNO<sub>3</sub>, dilute to volume with H<sub>2</sub>O, mix, and transfer to an acid-washed polypropylene bottle. (4) 0.5 mg/kgelements.-Pipet 25.0 mL of 10 mg/kg intermediate stock solution into a 500 mL acid-washed volumetric flask. Add 50 mL of trace metal grade HNO<sub>3</sub>, dilute to volume with H<sub>2</sub>O, mix, and transfer to an acid-washed polypropylene bottle. (5) 0.1 mg/kg elements.-Pipet 5.0 mL of 10 mg/kg intermediate stock solution into a 500 mL acid-washed volumetric flask. Add 50 mL of trace metal grade HNO<sub>3</sub>, dilute to volume with H<sub>2</sub>O, mix, and transfer to an acid-washed polypropylene bottle. (6) 0.0 mg/kg elements (blank).-Add 50 mL of trace metal grade HNO3 into a 500 mL

I able 2006.03A.	Blind duplicate statistics for arsenic									
Sample ID	Sample description	$\overline{X}$ , mg/kg	sr <sup>a</sup>	$s_R^b$	RSD <sup>c</sup> , %	RSD <sub>R</sub> <sup>d</sup> , %	e L	R <sup>f</sup>	HorRat	Outliers
4321/2025	Metal Fe oxysulfate	22.15	9.51	19.26	42.93	86.98	26.63	53.95	8.67	0/0
4031/5938	Magruder 2002-09B	263.18	96.95	126.22	26.58	47.96	195.88	353.43	6.94	0/0
6341/1436	31% ZnSO <sub>4</sub>	0.47	0.72	1.21	154.18	257.52	2.03	3.38	14.37	0/0
5488/5890	Zinc oxysulfate	4.87	0.69	3.07	14.21	63.12	1.94	8.60	5.01	0/0
2818/7669	Granulated mine waste	4945.31	301.32	1034.06	6.09	20.91	843.70	2895.37	4.70	1/2
1615/2056	Metal oxysulfate	2432.25	256.97	570.69	10.56	23.46	719.50	1597.94	4.74	0/2
9978/4085	Florida DAP	1.00	1.18	3.96	10.77	35.98	3.32	11.08	3.23	0/2
3313/6267	Western MAP	9.75	4.07	5.74	41.73	58.87	11.39	16.07	5.18	0/0
7161/6990	Western DAP	5.77	0.88	4.11	5.61	26.03	2.48	11.49	2.46	1/0
7999/3375	DAP from North African rock	22.43	2.10	4.26	9.36	18.99	5.88	11.92	1.90	0/0
6501/4812	NC MAP	2.36	0.42	1.89	17.60	79.97	1.17	5.29	5.69	0/2
7738/7418	China DAP	13.04	1.73	3.81	13.27	29.26	4.84	10.67	2.69	0/0
3917/8165	Magruder 2003-11	155.45	1.53	18.35	4.27	9.90	22.19	51.39	1.36	0/0
4459/8931	Magruder 2004-07	175.28	13.74	19.97	7.84	11.39	38.48	55.91	1.55	0/1
6895/4337	N-P-K blend + iron	6.89	0.72	1.27	10.45	18.50	2.02	3.57	1.55	0/2
7946/3692	Magruder 2001-03	7.44	1.21	2 7 2	16.27	36.60	3.39	7.63	3.10	0/2
8873/9469	N-P-K lawn product blend	-0.33	0 05	1.4.1	-14.38	-441.57	0.13	4.03		2/0
9886/9774	Organic biosolid	7.35	3.91	5.30	53.17	72.15	10.94	14.34	6.09	2/0
4626/8088	Organic mixed fertilizer + biosolid	12.74	2.01	7.22	15.74	56.70	5.61	20.22	5.20	0/0
6411/3401	Composted manure	4.16	1.88	2.70	45.14	64.87	5.25	7.55	5.02	0/1
3716/4606	Fe humate	47.83	9.67	18.25	2.22	38.15	27.08	51.09	4.27	0/0
4397/5149	Bone meal	2.80	0.76	2.40	27.32	85.92	2.14	6.73	6.27	1/1
4760/2264	Blood/feather/bone	2.91	2.01	2.59	68.89	88.77	5.62	7.24	6.52	0/2
6883/6583	Feather/bone/sulfate/gypsum	1.85	0.46	2.79	25.03	150.70	1.30	7.80	10.33	0/3
4924/7924	NIST SRM 694 Western Phos Rock	11.95	0.81	7.90	6.75	60.06	2.26	22.11	6.00	0/2
4131/1340	AFPC rock check 22	10.569	1.93	4.34	18.24	41.10	5.39	12.16	3.66	1/0
5682/8537	Peru rock	14.04	0.87	2.94	6.17	z0.91	2.43	8.22	1.95	1/0
7883/3887	African rock	13.27	0.72	4.97	5.44	37.42	2.02	13.91	3.45	1/0
<sup>a</sup> s <sub>r</sub> = Repeatability standard deviation.	standard deviation.					C				
<sup>b</sup> s <sub>R</sub> = Reproducibili	s <sub>R</sub> = Reproducibility standard deviation.									
	RSD <sub>r</sub> = Repeatability relative standard deviation.					•				
<sup>a</sup> RSD <sub>R</sub> = Reproduc	RSD <sub>R</sub> = Reproducibility relative standard deviation.									
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Table 2006.03A. Blind duplicate statistics for arsenic

<sup>e</sup> r = Repeatability value. <sup>f</sup> R = Reproducibility value.

1 able 2006.03B.	Blind duplicate statistics for cadmium	um								
Sample ID	Sample description	$\overline{X}$ , mg/kg	Š	S <sub>R</sub>	RSD <sub>r</sub> , %	RSD <sub>R</sub> , %	-	Я	HorRat	Outliers
4321/2025	Metal Fe oxysulfate	2.25	0.88	3.19	39.14	141.86	2.46	8.93	10.02	1/0
4031/5938	Magruder 2002-09B	7.56	1.49	2.37	19.65	31.30	4.16	6.62	2.65	0/2
6341/1436	$31\% \text{ ZnSO}_4$	0.94	0.44	0.44	46.56	46.56	1.23	1.23	2.88	0/0
5488/5890	Zinc oxysulfate	21.28	0.13	6.10	0.61	28.67	0.36	17.08	2.84	2/0
2818/7669	Granulated mine waste	36.64	1.17	3.33	3.20	9.09	3.28	9.33	0.98	1/0
1615/2056	Metal oxysulfate	22.58	0.96	2.38	4.25	10.52	2.68	6.66	1.05	1/0
9978/4085	Florida DAP	14.04	3.48	4.80	23.33	32.14	9.76	13.44	3.02	1/0
3313/6267	Western MAP	214.59	6.57	16.89	3.06	7.87	18.39	47.29	1.10	0/0
7161/6990	Western DAP	85.26	0.44	6.96	0.51	8.16	1.22	19.48	1.00	1/0
7999/3375	DAP from North African rock	26.69	1.55	2.50	5.79	9.37	4.33	7.00	0.96	0/0
6501/4812	NC MAP	55,29	0.69	6.44	1.25	12.02	1.94	18.60	1.37	1/0
7738/7418	China DAP	0.52	0.03	0.39	5.13	75.83	0.07	1.10	4.30	1/0
3917/8165	Magruder 2003-11	15.52	0.43	1.77	2.77	11.42	1.20	4.96	1.08	0/0
4459/8931	Magruder 2004-07	64.04	1.89	3.80	2.95	5.93	5.29	10.63	0.69	0/0
6895/4337	N-P-K blend + iron	33.17	1 40	2.41	4.23	7.28	3.93	6.76	0.77	0/0
7946/3692	Magruder 2001-03	42.81	1.07	2.34	2.50	6.63	2.99	7.94	0.73	0/0
8873/9469	N-P-K lawn product blend	0.40	0.02	0.32	4.21	80.66	0.05	06.0	4.39	1/1
9886/9774	Organic biosolid	4.19	0.13	1 45	3.18	34.65	0.37	4.06	2.69	0/0
4626/8088	Organic mixed fertilizer + biosolid	0.54	0.10	113	17.35	209.26	0.27	3.17	11.93	2/0
6411/3401	Composted manure	0.12	0.03	0.53	25.30	439.21	0.09	1.49	19.99	1/0
3716/4606	Fe humate	0.57	0.38	2.45	66.74	430.46	1.06	6.87	24.72	1/0
4397/5149	Bone meal	2.97	0.35	0.77	11.80	25.76	0.98	2.14	1.90	0/0
4760/2264	Blood/feather/bone	0.73	0.47	0.75	o4.63	152.00	1.33	2.09	6.08	0/0
6883/6583	Feather/bone/sulfate/gypsum	0.54	0.14	0.51	25 34	94 72	0.39	1.43	5.40	0/0
4924/7924	NIST SRM 694 Western Phos Rock	128.75	4.55	14.27	3.53	11.03	12.74	39.95	1.44	0/0
4131/1340	AFPC rock check 22	5.04	1.14	1.50	22.67	29.68	3.20	4.19	2.37	0/0
5682/8537	Peru rock	12.94	0.79	1.33	6.08	10.20	2.20	3.73	0.95	0/0
7883/3887	African rock	36.94	0.60	3.52	1.63	9.54	1.68	9.87	1.03	1/0
							2			
						3				

Sample ID	Sample description	X, mg/kg	Ŷ	S <sub>R</sub>	RSD <sub>r</sub> , %	RSD <sub>R</sub> , %	L	Я	HorRat	Outliers
4321/2025	Metal Fe oxysulfate	97.75	4.03	6.50	4.12	6.65	11.28	18.19	0.83	0/0
4031/5938	Magruder 2002-09B	195.61	18.27	33.56	9.34	17.16	51.16	93.97	2.37	0/0
6341/1436	$31\% \text{ ZnSO}_4$	4.00	0.47	0.75	11.75	18.76	1.32	2.10	1.44	0/0
5488/5890	Zinc oxysulfate	4.79	0.25	1.97	5.16	41.06	0.69	5.51	3.25	1/0
2818/7669	Granulated mine waste	17.33	0.69	2.50	4.00	14.41	1.94	6.99	1.38	0/0
1615/2056	Metal oxysulfate	23.01	0.81	2.30	3.53	9.98	2.27	6.43	1.00	0/2
9978/4085	Florida DAP	264	0.27	1.04	10.27	39.49	0.76	2.92	2.86	0/0
3313/6267	Western MAP	8.51	0.26	1.16	2.94	13.06	0.73	3.26	1.13	1/0
7161/6990	Western DAP	4.05	0.05	0.66	1.31	16.26	0.15	1.84	1.25	1/0
7999/3375	DAP from North African rock	1.24	0.23	0.62	18.49	49.60	0.64	1.73	3.20	0/0
6501/4812	NC MAP	2.35	0.15	1.23	6.40	52.54	0.42	3.46	3.73	0/0
7738/7418	China DAP	1.16	0.03	0.62	2.39	53.33	0.08	1.73	3.41	1/0
3917/8165	Magruder 2003-11	45.20	3.85	13.39	8.52	29.62	10.79	37.49	3.29	0/0
4459/8931	Magruder 2004-07	532.78	13.07	34.93	2.45	6.56	36.60	97.82	1.05	0/0
6895/4337	N-P-K blend + iron	6.73	0.50	0.96	7.43	14.28	1.40	2.69	1.19	0/0
7946/3692	Magruder 2001-03	6.22	0.53	110	9.28	19.12	1.62	3.33	1.57	0/0
8873/9469	N-P-K lawn product blend	4.34	0.7.0	1.25	16.02	28.79	1.95	3.50	2.25	0/0
9886/9774	Organic biosolid	21.25	1.06	2 60	4.98	12.26	2.96	7.29	1.21	1/0
4626/8088	Organic mixed fertilizer + biosolid	5.61	0.45	1.0	8.07	71.61	1.27	11.24	5.80	0/0
6411/3401	Composted manure	1.63	0.44	68 0	27.21	54.67	1.24	2.50	3.68	0/0
3716/4606	Fe humate	10.67	0.98	5.24	9.14	49.08	2.73	14.67	4.38	1/0
4397/5149	Bone meal	06.0	0.09	0.79	9.63	87.55	0.24	2.21	5.39	1/0
4760/2264	Blood/feather/bone	3.54	0.36	0.84	10.24	23 54	1.01	2.34	1.79	1/0
6883/6583	Feather/bone/sulfate/gypsum	0.88	0.10	0.84	10.80	95.05	0.27	2.35	5.83	0/0
4924/7924	NIST SRM 694 Western Phos Rock	2.381	0.10	0.68	4.32	28.55	0.29	1.90	2.04	1/0
4131/1340	AFPC rock check 22	3.69	0.13	0.58	357	15.63	0.37	1.61	1.19	1/0
5682/8537	Peru rock	3.73	0.13	0.57	3.43	15.24	0.36	1.59	1.16	2/0
7883/3887	African rock	1.56	0.23	0.76	14.54	48.56	0.63	2.11	3.24	0/0

Sample ID Sa 4321/2025 Me 4031/5938 Ma 6341/1436 5488/5890 Z	Sample description	$\overline{X}$ , mg/kg	s,	SD	RSD. %	RSD_ %	-	٥	HorDof	Outliers
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	Metal Fe oxysulfate	731.45	73.77	167.68	10.09	22.92	206.57	469.51	3.87	0/0
	Magruder 2002-09B	396.99	56.39	78.37	14.20	19.74	157.90	219.44	3.04	0/0
	$31\% \text{ ZnSO}_4$	1.88	0.46	1.14	24.30	60.69	1.28	3.20	4.17	2/0
	Zinc oxysulfate	159.52	2.09	10.22	1.31	6.41	5.84	28.62	0.86	1/0
2818/7669 Gran	Granulated mine waste	38.25	1.40	8.68	3.66	22.70	3.92	24.31	2.46	1/0
1615/2056 N	Metal oxysulfate	101.15	5.65	19.82	5.59	19.59	15.83	55.50	2.45	0/0
9978/4085	Florida DAP	74.40	0.41	3.11	0.55	4.18	1.14	8.71	0.50	2/0
3313/6267	Western MAP	566.) ŝ	3.84	29.14	8	5.15	10.74	81.58	0.84	1/0
7161/6990	Western DAP	393.37	3.94	14.31	1.00	3.64	11.04	40.08	0.56	1/0
7999/3375 DAP frc	DAP from North African rock	281.91	8.12	18.76	2.88	6.66	22.74	52.54	0.97	0/0
6501/4812	NC MAP	341.28	10.40	29.96	3.05	8.78	29.12	83.89	1.32	0/1
7738/7418	China DAP	18.11	0.23	2.25	1.26	12.43	0.64	6.30	1.20	1/0
3917/8165 Ma	Magruder 2003-11	164.40	17.07	21.00	10.38	12.77	47.80	58.79	1.72	0/1
4459/8931 Ma	Magruder 2004-07	169.49	4.68	6.01	2.76	9.44	13.10	44.82	1.28	2/0
6895/4337 N-I	N-P-K blend + iron	276.54	10.46	20.49	3.78	10.66	29.30	82.57	1.55	1/0
7946/3692 Ma	Magruder 2001-03	196.91	2.12	9.23	1.08	4.69	5.95	25.85	0.65	1/0
8873/9469 N-P-K	N-P-K lawn product blend	5.84	0.32	1.84	5.52	31.55	06.0	5.16	2.57	0/3
9886/9774 C	Organic biosolid	115.55	3.11	5.07	2.69	4.39	8.70	14.21	0.56	1/0
4626/8088 Organic m	Organic mixed fertilizer + biosolid	5980.93	59.18	205 41	0 90	4.44	165.69	743.23	1.03	1/0
6411/3401 Col	Composted manure	108.85	7.35	11.43	6.7.5	10.50	20.58	32.00	1.33	0/0
3716/4606	Fe humate	134.77	9.54	23.18	7.08	17.20	26.70	64.89	2.25	0/0
4397/5149	Bone meal	3.64	0.37	1.76	0.04	48.25	1.02	4.92	3.66	0/0
4760/2264 Blc	Blood/feather/bone	8.64	1.66	1.66	19.19	19.19	4.64	4.64	1.66	0/0
6883/6583 Feather	Feather/bone/sulfate/gypsum	18.01	0.92	2.70	5.12	14.99	2.58	7.56	1.45	0/0
4924/7924 NIST SRM	NIST SRM 694 Western Phos Rock	746.72	20.65	88.62	2.77	11.87	57.83	248.13	2.01	0/0
4131/1340 AFF	AFPC rock check 22	51.01	0.45	4.27	0.87	8.37	1.25	11.96	0.95	1/0
5682/8537	Peru rock	119.24	3.70	10.11	3.10	8.10	10.36	28.31	1.09	0/0
7883/3887	African rock	109.95	2.49	11.30	2.26	10 28	6.97	31.65	1.30	0/0

Table 2006.03D. Blind duplicate statistics for chromium

Sample ID	Sample description	X, mg/kg	s	S <sub>R</sub>	RSD <sub>r</sub> , %	RSD <sub>R</sub> , %	L	۲	HorRat	Outliers
4321/2025	Metal Fe oxysulfate	69.16	5.08	18.78	7.35	27.16	14.24	52.59	3.21	0/0
4031/5938	Magruder 2002-09B	116.69	21.33	29.55	18.28	25.32	59.72	82.73	3.24	0/0
6341/1436	31% ZnSO <sub>4</sub>	0.32	0.67	1.51	213.01	478.56	1.88	4.23	25.15	0/0
5488/5890	Zinc oxysulfate	3.89	0.39	1.64	10.04	42.19	1.09	4.59	3.24	0/0
2818/7669	Granulated mine waste	2.73	09.0	1.19	21.89	43.64	1.67	3.34	3.17	0/1
1615/2056	Metal oxysulfate	4.39	0.98	2.80	22.27	63.90	2.73	7.85	4.99	0/0
9978/4085	Florida DAP	11.55	0.65	1.17	5.67	10.13	1.83	3.28	0.92	0/0
3313/6267	Western MAP	18.4	0.31	1.85	1.68	9.99	0.87	5.17	0.97	1/0
7161/6990	Western DAP	9.36	0.12	1.04	1.32	11.11	0.35	2.91	0.97	1/0
7999/3375	DAP from North African rock	4.00	0.50	0.71	12.49	17.68	1.40	1.98	1.36	0/0
6501/4812	NC MAP	11.74	0.56	1.34	4.75	11.44	1.56	3.76	1.04	1/0
7738/7418	China DAP	0 65	0.13	0.21	19.29	32.37	0.32	0.35	1.90	1/2
3917/8165	Magruder 2003-11	13.21	1.05	1.45	7.94	10.99	2.94	4.06	1.01	0/0
4459/8931	Magruder 2004-07	42.88	2.24	2.24	5.23	5.23	6.27	6.27	0.58	0/1
6895/4337	N-P-K blend + iron	6.75	0 31	0.80	4.61	11.86	0.87	2.24	0.99	0/0
7946/3692	Magruder 2001-03	5.42	0 11	0.55	2.11	15.68	0.32	2.38	1.26	2/0
8873/9469	N-P-K lawn product blend	0. 74	0.08	0.65	10.65	88.14	0.22	1.83	5.27	1/0
9886/9774	Organic biosolid	11.53	1.73	2.30	15.03	19.96	4.85	6.44	1.80	0/0
4626/8088	Organic mixed fertilizer + biosolid	7.83	0.57	171	7.22	21.84	1.58	4.79	1.86	0/0
6411/3401	Composted manure	1.03	0.54	1.00	52.29	97.20	1.50	2.80	6.10	2/0
3716/4606	Fe humate	12.44	1.80	4.40	14.46	35.39	5.04	12.33	3.23	0/0
4397/5149	Bone meal	4.28	0:30	1.10	7.08	25.77	0.85	3.09	2.00	1/0
4760/2264	Blood/feather/bone	0.59	0.47	0.88	\$0.12	1,8.92	1.32	2.45	8.59	0/0
6883/6583	Feather/bone/sulfate/gypsum	0.82	0.86	1.04	104.40	126 34	2.40	2.92	7.70	0/0
4924/7924	NIST SRM 694 Western Phos Rock	18.40	0.87	2.51	4.73	13.63	2.44	7.02	1.32	0/0
4131/1340	AFPC rock check 22	6.59	1.47	1.96	22.33	29.81	4.12	5.50	2.48	0/0
5682/8537	Peru rock	23.62	09.0	1.57	2.55	6.03	1.69	4.39	0.67	0/0
7883/3887	African rock	2.12	0.19	0.46	8.72	21.45	0.52	1.28	1.50	1/0

Sample description         X mplot         s, s         RSD, % s         R         Pohetal s         Outers           4211238         Maguder 200-youtfate         331         313         313         315         315         315         315         315         316         325         00           63401580         Tambre markate         330         053         112         2305         553         165         315         316         326         00           63405760         Meander mixate         330         053         152         553         165         270         00           6315205         Meander mixate         353         152         553         153         356         153         154         153           7161690         Western DAP         1146         7.10         0.73         553         154         153         154         153         154         153         154         153         154         154         153         154         154         153         154         153	I ADIE ZUUD.UDF.	r. Dilla auplicate statistics for flicker									
Meral Fe oryalitate         331.2         1307         49.17         334         14.81         36.59         137.65         2.22           Magnuder 2002-0BB         296.83         53.30         54.20         18.02         18.32         149.24         151.75         2.87           3.16         7.800         25.03         0.59         1.12         296.05         5.60         1.49         2.66         1.64         2.17         3.85           2.70         Vasterin MAP         3.63         2.03         3.65         1.69         2.66         1.65         1.16         1.66         1.64         3.85         1.61         1.64         1.73         3.76         1.73         3.76         1.73         3.76         1.75         3.76         1.73         3.76         1.75         3.76         1.75         3.76         1.75         3.76         1.75         3.76         1.75         3.76         1.72         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         1.76         <	Sample ID	Sample description	X, mg/kg	s	s <sub>R</sub>	RSD <sub>r</sub> , %	RSD <sub>R</sub> , %	L	К	HorRat	Outliers
Maguder Z002-0BB         296.83         53.30         54.20         18.02         18.32         148.24         151.75         2.70           31% ZrSOL4         206         0.59         1.12         29.05         55.30         165         1.35         3.85           Toronalised mine waste         1301         0.45         210         3.45         16.15         1.26         5.86         1.49           Fordiad DAP         111.14         0.73         1.62         15.50         1.55         1.55         1.55         1.55         1.55         1.59         1.69           Fordiad DAP         114.14         0.73         1.56         5.54         5.75         1.52         5.66         1.59         1.69           Western DAP         270-3         1.56         3.75         1.52         5.66         1.59         1.29           Western DAP         146.57         1.30         3.56         3.73         1.22         3.73         5.73         5.71         1.89         2.73         1.43         7.76         7.76         7.73         7.76         7.73         7.73         7.73         7.73         7.73         7.73         7.73         7.73         7.73         7.73         7	4321/2025	Metal Fe oxysulfate	331.92	13.07	49.17	3.94	14.81	36.59	137.68	2.22	0/0
31% ZnSO4         2.03         0.59         1.12         2.905         55.30         1.65         3.15         3.86           Zine oxysultate         2.86         0.94         3.99         3.55         14.99         2.64         11.16         1.54           Renatiated mine waste         13.01         0.45         2.10         3.45         16.15         1.26         5.80         1.49           Metal oxysultate         3.80         2.90         5.45         5.75         1.45         2.91         1.54           Western MAP         279.31         2.61         1.65         1.65         2.04         4.55         1.33           Western MAP         279.31         2.61         1.963         0.93         7.03         7.31         5.497         1.03           Western MAP         27.51         2.45         1.96         1.25         2.45         1.96         1.22           Magruder 2003-11         101.85         1.26         1.963         1.22         1.03         1.22           Magruder 2003-11         101.85         2.16         5.37         2.23         1.22         1.00         1.23           Magruder 2003-11         101.85         1.23         1.22	4031/5938	Magruder 2002-09B	295.83	53.30	54.20	18.02	18.32	149.24	151.75	2.70	0/0
Zinc oxyatifate         26.60         0.94         3.99         3.55         14.99         2.64         11.16         1.54           Granulated mine waste         13.01         0.45         2.10         3.45         16.15         1.26         5.88         1.49           Meastern MAP         279.34         2.61         19.63         0.33         7.03         7.31         5.84         1.31           Western MAP         279.34         2.61         19.63         0.33         7.03         7.31         5.497         1.03           Western MAP         279.34         2.61         19.63         0.33         7.03         7.31         5.497         1.03           DAP from North African rock         273.45         1.30         3.55         3.05         8.33         3.63         9.99         0.92         1.49         1.22           DAP from North African rock         273.4         1.45         1.23         3.55         1.22         1.22         1.23         2.64         1.116         1.55         1.12           Magruder 2004-07         1683.27         1.76         1.565         2.04         4.55         1.20         2.04           Magruder 2001-03         16.11         10.18	6341/1436	31% ZnSO <sub>4</sub>	2.03	0.59	1.12	29.05	55.30	1.65	3.15	3.85	0/2
Granualated mine waste         13.01         0.45         2.10         3.45         16.15         1.26         5.88         1.49           Meal oxysultate         36.39         2.09         554         5.75         15.20         1550         153           Nestem MAP         11.14         0.73         162         5.54         5.55         15.20         1550         153           Westem MAP         279.31         26.91         156         13.52         100         9.22         4.37         37.85         1.31           Westem MAP         146.57         1.50         3.56         3.05         8.39         2.09         0.92         1.35           Westem MAP         42.45         1.30         3.56         3.05         8.39         3.63         9.98         0.92           NC MAP         5.57         0.67         0.66         1.46         1.30         1.22         2.437         37.86         1.29           NC MAP         5.57         0.45         7.33         164         5.37         2.457         100         4.55         1.36         1.36           Network Maguder 2004-07         168.327         7.71         122.33         122.22         2.64         <	5488/5890	Zinc oxysulfate	26.60	0.94	3.99	3.55	14.99	2.64	11.16	1.54	0/0
Metal oxysulfate         36.39         2.09         5.54         5.75         15.22         5.86         15.50         1.63           Florida DAP         11.14         0.73         162         6.55         14.58         2.04         4.55         1.31           Western MAP         279.34         2.61         19.63         0.93         7.03         7.31         5.497         1.03           Western MAP         279.34         2.61         1.56         1.56         1.35         1.06         9.22         4.37         37.85         1.23           DAP from Noth African rock         2.2.45         1.30         3.55         1.06         9.22         4.97         1.03           NC MAP         55.76         9.97         6.45         3.73         12.23         5.51         1807         1.32           Maguder 2001-01         101.85         7.16         4.63         5.66         5.67         1.06         1.12           Maguder 2001-03         7.5.5         2.460         12.65         6.161         1.126         2.93         1.13           Maguder 2001-01         86.82         1.67         3.651         1.665         2.04         4.65         2.466         1.12	2818/7669	Granulated mine waste	13.01	0.45	2.10	3.45	16.15	1.26	5.88	1.49	0/0
Florida DAP         1114         0.73         152         6.55         14.58         2.04         4.55         1.31           Western MAP         2731         261         1963         0.93         7.03         7.31         54.97         1.03           Western MAP         2731         1.56         1.352         1.06         9.22         4.37         37.85         1.03           DAP from North African rock         4.57         1.30         3.56         3.05         9.23         5.12         1.03           DAP from North African rock         5.276         97         6.45         3.73         12.23         9.89         0.92         0.92         0.92           NC MAP         Maguder 2003-11         101.89         7.16         15.95         7.03         15.65         2.04         4.59         1.96           Maguder 2004-07         183.327         7.791         9.89         4.63         7.65         1.06         1.26         0.92           Maguder 2004-07         183.27         7.791         9.89         4.63         7.16         1.26         2.04         4.465         1.96           Maguder 2004-07         183.27         7.791         2.19         2.18         7.1	1615/2056	Metal oxysulfate	36.39	2.09	5.54	5.75	15.22	5.86	15.50	1.63	0/0
Western MAP         2733-4         261         1963         0.93         7.03         7.31         54.97         1.03           Western DAP         146.57         1.56         1.352         1.06         922         4.37         37.85         1.22           Western DAP         6.67         1.352         1.06         922         4.37         37.85         1.22           DAP from North African rock         42.45         1.30         3.55         1.00         922         4.37         37.85         1.22           China DAP         6.67         1.64         5.37         24.57         1.00         4.59         2.04           Maguuder 2001-01         101.88         7.16         15.85         7.03         15.65         2.04         4.46         1.35           Maguuder 2001-03         7.52.5         2.45         1.01         4.63         16.65         2.03         1.43           Maguuder 2001-03         7.52.5         2.45         1.01         2.05         1.126         1.126         1.126         1.126           Maguuder 2001-03         7.52.5         2.45         1.126         1.126         1.126         1.126         1.12         1.12           Organic biso	9978/4085	Florida DAP	11.14	0.73	1.62	6.55	14.58	2.04	4.55	1.31	0/0
Western DAP         146.57         1,56         13.52         1,06         9,22         4,37         37.85         1,22           DAP from North African rock         24.45         1,30         3.56         3.05         8.39         3.63         9.98         0.92           NC MAP         55.76         797         6.45         3.73         12.23         5.51         1.807         1.39           NC MAP         6.67         0.366         1.64         5.37         24.57         1.00         4.59         2.04           Magruder 2003-11         10118         7.161         1585         7.03         1565         2.04         4.465         1.96           Magruder 2001-03         7.5.25         2.45         5.6         3.26         1.65         1.12         2.833         1.43           NP-K lawn product blend         6.00         0.28         0.75         2.45         5.6         3.26         7.65         6.87         1.61         1.03           Organic biscold         86.22         2.45         5.6         3.26         7.65         6.87         1.61         1.03           Organic biscold         86.22         2.45         2.46         1.22         2.43 <t< td=""><td>3313/6267</td><td>Western MAP</td><td>279.34</td><td>2.61</td><td>19.63</td><td>0.93</td><td>7.03</td><td>7.31</td><td>54.97</td><td>1.03</td><td>1/1</td></t<>	3313/6267	Western MAP	279.34	2.61	19.63	0.93	7.03	7.31	54.97	1.03	1/1
DAP from North African rock         42.45         1.30         3.56         3.05         8.39         3.63         9.98         0.92           NC MAP         5.2.76         1.97         6.45         3.73         12.23         5.51         18.07         1.39           China DAP         6.67         0.06         16.45         5.37         24.57         1.00         4.59         2.04           Magnuder 2003-11         101.88         7.16         15.95         7.03         15.65         2.004         44.65         1.39         1.43           N-P-K blend + iron         86.88         .0.2         2.45         5.6         4.63         11.66         1.126         2.833         1.43           N-P-K blend blend         6         0         2.85         5.6         4.63         1.65         2.04         1.43           Organic blosolid         86.22         1.837         2.231         2.43         1.65         1.43         1.63           Organic mixed farilitzer + blosolid         86.22         1.837         2.234         4.99         4.74         2.16         2.143         1.6           Organic mixed farilitzer + blosolid         86.22         1.342         2.649         6.76	7161/6990	Western DAP	146.57	1.56	13.52	1.06	9.22	4.37	37.85	1.22	0/0
NC MAP         5.7.6         (.97)         6.45         3.73         12.23         5.51         18.07         1.39           China DAP         €.67         0.35         1.64         5.37         24.57         1.00         4.59         2.04           Maguder 2003-11         101.88         7.16         15.95         7.03         15.65         2.004         44.65         1.96           Maguder 2004-07         1683.27         7.191         98.89         4.63         5.88         218.16         276.90         1.12           N-P-K blend +iron         86.88         4.02         10.12         4.63         1.65         2.004         44.65         1.96           N-P-K lawn product blend         6.00         0.28         0.75         3.26         7.65         6.87         16.12         1.12           Organic blosolid         86.22         18.37         22.31         22.46         3.76         2.76         0.37         2.71         1.03           Organic blosolid         86.22         18.37         27.3         2.34         1.43         3.76         2.76         0.32         2.04         2.46         1.43           Organic blosolid         86.22         1.34         2.4	7999/3375	DAP from North African rock	42.45	1.30	3.56	3.05	8.39	3.63	9.98	0.92	0/0
China DAP         6.67         0.35         1.64         5.37         24.57         1.00         4.59         2.04           Magruder 2003-11         101.85         7.16         15.95         7.03         15.65         2004         44.65         1.96         1.12           Magruder 2003-11         101.85         7.16         15.95         7.03         15.65         2004         44.65         1.96         1.12           N-P-K blend + iron         86.88         4.02         10.12         4.63         11.65         11.26         28.33         1.43           N-P-K lawn product blend         6.00         0.28         0.75         5.6         3.26         7.65         6.87         16.12         0.92           Organic blosolid         86.22         18.37         2.34         4.95         16.12         2.11         1.03           Organic blosolid         86.22         18.37         2.34         1.243         2.66         6.87         16.12         0.92           Organic blosolid         86.22         18.37         2.34         1.342         2.54         2.59         2.74         2.94         3.16           Organic blosolid         18.55         2.34         1.748	6501/4812	NC MAP	52.76	797	6.45	3.73	12.23	5.51	18.07	1.39	0/0
Magruder 2003-11         101.85         7.16         15.95         7.03         15.65         2.004         44.65         1.96           Magruder 2004-07         1683.27         77.91         78.89         4.63         5.88         218.16         276.90         1.12           N-P-K blend + iron         86.88         4.02         1(12         4.63         11.65         11.26         28.33         143           Magruder 2001-03         75.25         2.45         51.6         3.26         7.65         6.87         16.12         0.92           N-P-K lawn product blend         6.00         0.28         0.75         4.60         12.56         0.77         2.11         1.03           Organic biosolid         86.22         18.37         22.31         2.130         25.68         51.42         65.47         3.16           Organic mixed farilizer + biosolid         86.22         18.37         22.31         2.130         25.68         51.42         65.47         3.16           Organic mixed farilizer + biosolid         8.55         2.34         4.98         7.74         2.31         2.36           Composted manue         10.17         1.78         3.26         6.56         3.47         2.49	7738/7418	China DAP	6.67	0:00	1.64	5.37	24.57	1.00	4.59	2.04	1/2
Magruder 2004-07         1683.27         77.91         78.89         4.63         5.88         218.16         276.90         1.12           N-P-K blend + iron         86.88         4.02         10.12         4.63         11.65         11.26         28.33         1.43           Magruder 2001-03         75.25         2.45         5.16         3.26         7.65         6.87         16.12         0.92           Magruder 2001-03         75.25         2.46         1.367         2.460         12.58         0.77         2.11         1.03           Organic biosolid         86.22         18.37         22.31         21.30         25.88         51.42         62.47         3.16           Organic mixed fertilizer + biosolid         18.55         2.34         4.99         12.43         2.669         6.56         13.87         2.59           Organic mixed fertilizer + biosolid         18.55         2.34         4.99         12.43         2.69         1.61         2.78           Composted manure         10.17         1.78         3.74         2.669         6.56         1.387         2.59           Blood/feather/bone         7.73         0.58         12.43         2.659         1.67         2.74	3917/8165	Magruder 2003-11	101.89	7.16	15.95	7.03	15.65	20.04	44.65	1.96	0/0
N-P-K blend + iron         86.88         4.02         1(12         4.63         11.65         11.26         28.33         1.43           Maguder 2001-03         75.25         2.45         5.6         3.26         7.65         6.87         16.12         0.92           N-P-K lawn product blend         6.00         0.28         0.75         4.60         12.58         0.77         2.11         1.03           Organic mixed fertilizer + biosolid         86.22         18.37         22.31         21.30         25.88         51.42         6.247         3.16           Organic mixed fertilizer + biosolid         86.22         18.37         22.31         21.30         25.88         51.42         65.61         3.87         2.59           Organic mixed fertilizer + biosolid         86.22         18.37         22.31         21.30         25.88         51.42         65.61         3.87         2.59           Composted manure         10.17         17.78         3.24         4.98         9.18         2.66         7.47         2.31         2.74           Bood/feather/bone         2.06         0.86         7.48         7.36         2.74         2.69         2.74         2.74         2.74         2.74         2.76	4459/8931	Magruder 2004-07	1683.27	7.91	£8.89	4.63	5.88	218.16	276.90	1.12	0/0
Magruder 2001-03         75.25         2.45         5.6         3.26         7.65         6.87         16.12         0.92           N-P-K lawn product blend         6.00         0.28         0.75         4.60         12.58         0.77         2.11         1.03           Organic biosolid         86.22         18.37         22.31         21.30         25.88         51.42         62.47         3.16           Organic mixed fertilizer + biosolid         86.22         18.37         22.34         4.95         72.04         26.69         6.56         13.87         2.59           Organic mixed fertilizer + biosolid         18.55         2.34         4.95         17.48         26.69         6.56         13.87         2.59           Composted manue         10.17         1.78         3.24         4.98         17.41         2.31         2.74         3.16           Blood/reather/bone         2.06         0.82         0.98         1.21         7.43         2.74         2.78         3.31           Blood/reather/bone/sulfate/gypsum         2.77         0.17         1.03         7.74         2.31         2.73         3.31           Feather/bone/sulfate/gypsum         2.77         0.16         7.48	6895/4337	N-P-K blend + iron	86.88	4.02	10.12	4.63	11.65	11.26	28.33	1.43	0/0
N-P-K lawn product blend         6.00         0.28         0.75         4.60         12.58         0.77         2.11         1.03           Organic biosolid         86.22         18.37         22.31         21.30         25.88         51.42         62.47         3.16           Organic mixed fertilizer + biosolid         86.22         18.37         22.34         4.99         12.64         6.56         13.87         2.59           Organic mixed fertilizer + biosolid         18.55         2.34         4.99         12.04         26.69         6.56         13.87         2.59           Composted manure         10.17         1.78         3.29         14.48         8.64         13.42         25.68         9.18         2.42         2.59           Bone meal         2.06         0.82         0.98         40.99         17.47         2.31         2.73         3.31           Blood/feather/bone         7.73         0.58         1.21         7.48         5.69         1.65         3.40         1.33           STST M 694 Western Phos Rock         129.53         2.67         14.51         2.67         7.43         2.64         1.33           AFPC rock check 22         10.08         1.53         2.56	7946/3692	Magruder 2001-03	75.25	2.45	5. <sup>0</sup>	3.26	7.65	6.87	16.12	0.92	0/0
Organic biosolid         86.22         18.37         22.31         21.30         25.88         51.42         62.47         3.16           Organic mixed fertilizer + biosolid         18.55         2.34         4.95         7.2,3         26.69         6.56         13.87         2.59           Organic mixed fertilizer + biosolid         18.55         2.34         4.95         7.2,4         28.69         6.56         13.87         2.59           Composted manue         10.17         1.78         3.78         17.48         32.24         4.98         9.18         2.86           Fe humate         33.39         4.48         8.64         13.42         25.88         12.55         2.420         2.74           Bone meal         2.06         0.82         0.98         40.09         47.47         2.31         2.73         3.31           Blood/feather/bone/sulfate/gysum         2.77         0.17         1.03         7.53         45.04         0.48         3.50         1.46           NIST SRM 694 Western Phos Rock         129.53         2.67         14.51         2.06         1.45         7.48         40.63         3.22           AFPC rock check 22         10.08         1.53         2.55         15.15	8873/9469	N-P-K lawn product blend	6.00	0.28	0.75	4.60	12.58	0.77	2.11	1.03	2/0
Organic mixed fertilizer + biosolid       18.55       2.34       4.95       12.54       26.69       6.56       13.87       2.59         Composted manure       10.17       1.78       3.28       17.48       32.24       4.98       9.18       2.86         Fe humate       33.39       4.48       8.64       13.42       25.88       12.55       24.20       2.74         Bone meal       2.06       0.82       0.98       40.09       7.47       2.31       2.73       3.31         Blood/feather/bone       7.73       0.58       1.21       7.48       1.559       2.40       1.33         Reather/bone/sulfate/gypsum       2.27       0.17       1.03       7.53       45.54       0.48       1.33         NIST SRM 694 Western Phos Rock       129.53       2.67       14.51       2.06       11.20       7.48       2.89       3.22         NIST SRM 694 Western Phos Rock       129.53       2.67       14.51       2.06       11.20       7.48       2.89       3.24         AFPC rock check 22       10.08       1.515       25.56       4.27       7.13       2.24         Peru rock       14.81       0.55       15.15       25.26       4.74	9886/9774	Organic biosolid	86.22	18.37	22 31	21.30	25.88	51.42	62.47	3.16	0/0
Composted manure         10.17         1.78         3.28         17.48         32.24         4.98         9.18         2.86           Fe humate         33.39         4.48         8.64         13.42         25.88         12.55         24.20         2.74           Bone meal         2.06         0.82         0.98         40.09         47.47         2.31         2.73         3.31           Blood/feather/bone         7.73         0.58         1.21         7.48         15.69         1.62         3.40         1.33           Feather/bone/sulfate/gypsum         2.27         0.17         1.03         7.53         45.4         0.48         3.30           NIST SRM 694 Western Phos Rock         129.53         2.67         14.51         2.06         1.45         2.66         1.45         2.89         3.22           AFPC rock check 22         10.08         1.53         2.55         15.15         25.26         4.74         1.76           Peru rock         14.81         0.52         1.69         3.50         114.5         7.13         2.24           African rock         10.18         1.28         3.20         12.54         3.47         1.07	4626/8088	Organic mixed fertilizer + biosolid	18.55	2.34	4; 9£	12 04	26.69	6.56	13.87	2.59	0/0
Fe humate         33.39         4.48         8.64         13.42         25.88         12.55         24.20         2.74           Bone meal         2.06         0.82         0.98         0.09         47.47         2.31         2.73         3.31           Blood/feather/bone         7.73         0.58         1.21         7.48         15.69         1.62         3.40         1.33           Feather/bone/sulfate/gysum         2.27         0.17         1.03         7.53         45.74         0.48         2.89         3.22           NIST SRM 694 Western Phos Rock         129.53         2.67         14.51         2.06         11.20         7.48         40.63         1.46           AFPC rock check 22         10.08         1.53         2.55         15.15         25.26         4.74         1.73         2.24           Peru rock         14.81         0.52         16.15         2.566         4.75         7.13         2.24           African rock         10.18         1.28         3.20         11.45         4.74         1.07	6411/3401	Composted manure	10.17	1.78	3.28	17.48	32.24	4.98	9.18	2.86	0/0
Bone meal         2.06         0.82         0.98         20.09         47.47         2.31         2.73         3.31           Blood/feather/bone         7.73         0.58         1.21         7.48         1.5.69         1.62         3.40         1.33           Feather/bone/sulfate/gysum         2.27         0.17         1.03         7.53         45.04         0.48         2.89         3.22           NIST SRM 694 Western Phos Rock         129.53         2.67         14.51         2.06         11.20         7.48         40.63         1.46           Peru rock         14.81         0.52         15.15         25.26         4.27         7.13         2.24           Peru rock         14.81         0.52         15.15         25.26         4.74         1.07           African rock         10.18         1.28         3.20         11.45         7.45         4.74         1.07	3716/4606	Fe humate	33.39	4.48	8.64	13.42	25.88	12.55	24.20	2.74	0/0
Blood/feather/bone       7.73       0.58       1.21       7.48       1.5.69       1.62       3.40       1.33         Feather/bone/sulfate/gypsum       2.27       0.17       1.03       7.53       45.54       0.48       2.89       3.22       3         NIST SRM 694 Western Phos Rock       129.53       2.67       14.51       2.06       11.20       7.48       40.63       1.46       1         AFPC rock check 22       10.08       1.53       2.55       15.15       25.26       4.27       7.13       2.24       0         Peru rock       14.81       0.52       1.69       3.50       11.45       1.45       4.74       1.07       3         African rock       10.18       1.28       3.20       12.54       3.47       3.57       8.97       2.79       0	4397/5149	Bone meal	2.06	0.82	0.98	¢10.09	27.47	2.31	2.73	3.31	1/0
Feather/bone/sulfate/gypsum         2.27         0.17         1.03         7.53         45.54         0.48         2.89         3.22         3           NIST SRM 694 Western Phos Rock         129.53         2.67         14.51         2.06         11.20         7.48         40.63         1.46         1.46           AFPC rock check 22         10.08         1.53         2.55         15.15         25.26         4.27         7.13         2.24         0           Peru rock         14.81         0.52         1.69         3.50         11.45         4.74         1.07         3           African rock         10.18         1.28         3.20         12.54         3.47         3.57         8.97         2.79         0	4760/2264	Blood/feather/bone	7.73	0.58	1.21	1.48	13.69	1.62	3.40	1.33	1/2
NIST SRM 694 Western Phos Rock         129.53         2.67         14.51         2.06         11.20         7.48         40.63         1.46         1           AFPC rock check 22         10.08         1.53         2.55         15.15         25.26         4.27         7.13         2.24         0           Peru rock         14.81         0.52         1.69         3.50         11.45         4.74         1.07         3           African rock         10.18         1.28         3.20         12.54         3.47         3.57         8.97         2.79         0	6883/6583	Feather/bone/sulfate/gypsum	2.27	0.17	1.03	7.53	45.54	0.48	2.89	3.22	2/0
AFPC rock check 22         10.08         1.53         2.55         15.15         25.26         4.27         7.13         2.24           Peru rock         14.81         0.52         1.69         3.50         114.5         4.74         1.07           African rock         10.18         1.28         3.20         12.54         3.47         3.57         8.97         2.79	4924/7924	NIST SRM 694 Western Phos Rock	129.53	2.67	14.51	2.06	11.20	7.48	40.63	1.46	1/0
Peru rock         14.81         0.52         1.69         3.50         11.45         4.74         1.07         3.50         3.57         8.97         2.79         1.01         3.57         8.97         2.79         1.01         3.57         8.97         2.79         1.01         3.51         3.57         8.97         2.79         1.01         3.51         3.57         8.97         2.79         1.01         3.51         3.57         8.97         2.79         1.01         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02         1.02	4131/1340	AFPC rock check 22	10.08	1.53	2.55	15.15	25.26	4.27	7.13	2.24	0/0
African rock 10.18 1.28 3.20 12.54 3.47 3.57 8.97	5682/8537	Peru rock		0.52	1.69	3.50	11 +3	1.45	4.74	1.07	2/0
	7883/3887	African rock	10.18	1.28	3.20	12.54	3.47	3.57	8.97	2.79	0/0

Table 2006.03F. Blind duplicate statistics for nickel

Sample ID	Sample description	$\overline{X}$ , mg/kg	S	S <sub>R</sub>	RSD <sub>r</sub> , %	RSD <sub>R</sub> , %	<u>ب</u>	Ъ	HorRat	Outliers
4321/2025	Metal Fe oxysulfate	119.60	76.70	76.70	64.13	64.13	214.75	214.75	8.24	0/0
4031/5938	Magruder 2002-09B	3070.11	934.61	934.61	30.44	30.44	2616.91	2616.91	6.37	0/0
6341/1436	31% ZnSO4	1.49	0.35	1.18	23.50	79.21	0.98	3.31	5.25	3/0
5488/5890	Zinc oxysulfate	996.25	16.37	54.41	1.64	5.46	45.84	152.36	0.97	0/0
2818/7669	Granulated mine waste	3292.06	149.93	304.57	4.55	9.25	419.80	852.80	1.96	1/0
1615/2056	Metal oxysulfate	4075.75	666.82	666.82	16.36	16.36	1867.09	1867.09	3.57	0/0
9978/4085	Florida DAP	1.27	0.44	1.39	34.22	109.03	1.22	3.88	7.07	1/0
3313/6267	Western MAP	3.02	0.14	3.11	4.54	101.11	0.39	8.71	7.49	1/0
7161/6990	Western DAP	3.58	0.27	2.62	7.48	73.16	0.75	7.34	5.54	1/0
7999/3375	DAP from North African rock	3.81	0.60	2.62	15.89	68.85	1.69	7.34	5.26	0/0
6501/4812	NC MAP	1.14	0.20	1.49	17.22	130.84	0.55	4.16	8.34	2/0
7738/7418	China DAP	0.60	0.12	0.89	20.54	147.48	0.35	2.49	8.54	1/0
3917/8165	Magruder 2003-11	245.35	9.56	19.15	3.90	7.80	26.77	53.61	1.12	0/0
4459/8931	Magruder 2004-07	509.54	17.69	41 75	3.47	8.19	49.52	116.90	1.31	0/0
6895/4337	N-P-K blend + iron	6.52	0.38	4.37	5.89	66.99	1.07	12.23	5.55	1/0
7946/3692	Magruder 2001-03	3.42	0.54	2.55	15.77	74.78	1.51	7.15	5.62	0/0
8873/9469	N-P-K lawn product blend	0.51	0.19	0.51	37.95	99.65	0.54	1.43	5.68	1/1
9886/9774	Organic biosolid	66.29	11.41	17.75	17.21	26.78	31.95	49.71	3.15	0/0
4626/8088	Organic mixed fertilizer + biosolid	58.53	3.83	<b>5</b> . <sup>7</sup> 0	6.55	9.73	10.738	15.95	1.12	0/4
6411/3401	Composted manure	3.34	2.06	2.54	61.83	76.10	5.78	7.11	5.70	0/0
3716/4606	Fe humate	343.08	34.76	35.91	10.13	10.47	97.34	100.56	1.58	0/0
4397/5149	Bone meal	1.94	0.93	1.62	47.76	83.42	2.59	4.53	5.76	0/0
4760/2264	Blood/feather/bone	3.73	1.33	2.07	3571	55.43	3.73	5.50	4.23	1/0
6883/6583	Feather/bone/sulfate/gypsum	3.74	1.63	3.05	43.56	81.63	4.56	8.54	6.22	0/0
4924/7924	NIST SRM 694 Western Phos Rock	10.957	0.45	5.84	4.07	53.35	1.25	16.36	4.78	1/0
4131/1340	AFPC rock check 22	15.05	0.45	6.54	2.98	43.47	1.25	18.31	4.09	1/0
5682/8537	Peru rock	4.88	0.59	3.09	12.08	63.39	1.65	8.66	5.03	0/0
7883/3887	African rock	0 24	0.86	3 46	9.36	37 41	2 42	9,68	3 27	0/0

Table 2006.03H.	Blind duplicate statistics for selenium									
Sample ID	Sample description	$\overline{X}$ , mg/kg	Sr	S <sub>R</sub>	RSD <sub>r</sub> , %	RSD <sub>R</sub> , %	L	R	HorRat	Outliers
4321/2025	Metal Fe oxysulfate	6.96	0.87	7.42	12.43	106.53	2.42	20.77	8.92	1/0
4031/5938	Magruder 2002-09B	31.03	4.39	24.27	14.15	78.23	12.29	67.96	8.20	0/0
6341/1436	$31\% \text{ ZnSO}_4$	4.71	0.66	3.19	13.97	67.62	1.84	8.92	5.34	0/0
5488/5890	Zinc oxysulfate	4.62	0.47	2.61	10.08	56.44	1.30	7.30	4.44	1/0
2818/7669	Granulated mine waste	28.40	1.35	21.12	4.77	74.36	3.79	59.13	7.69	1/0
1615/2056	Metal oxysulfate	25.90	2.86	14.40	11.05	55.61	8.02	40.32	5.67	0/0
9978/4085	Florida DAP	1.50	0.36	1.35	24.25	90.06	1.02	3.78	5.98	1/0
3313/6267	Western MAP	1.40	1.17	1.63	83.34	116.84	3.26	4.57	7.68	0/0
7161/6990	Western DAP	1.13	0.22	1.33	19.22	118.16	0.61	3.73	7.52	0/0
7999/3375	DAP from North African rock	1.73	0.82	1.80	47.46	103.86	2.30	5.04	7.05	0/0
6501/4812	NC MAP	0.98	0.63	1.03	63.86	105.30	1.75	2.89	6.56	0/1
7738/7418	China DAP	1 02	0.41	0.97	39.68	94.95	1.13	2.71	5.95	0/2
3917/8165	Magruder 2003-11	3,20	1.35	3.00	42.10	93.68	3.78	8.40	6.98	0/0
4459/8931	Magruder 2004-07	257.17	Z-4-2	18.50	2.89	7.19	20.82	51.80	1.04	1/0
6895/4337	N-P-K blend + iron	1.88	1.10	2.13	58.35	113.49	3.07	5.96	7.80	0/0
7946/3692	Magruder 2001-03	0.67	0.82	1.67	121.76	249.30	2.29	4.68	14.68	0/0
8873/9469	N-P-K lawn product blend	0.25	0 19		75.67	634.02	0.53	4.43	32.16	1/0
9886/9774	Organic biosolid	9.47	0.81	2.42	8.57	25.55	2.27	6.77	2.24	1/0
4626/8088	Organic mixed fertilizer + biosolid	2.05	1.09	3.80	53.30	185.24	3.06	10.64	12.90	0/0
6411/3401	Composted manure	1.69	1.38	148	81.29	87.14	3.86	4.13	5.90	0/1
3716/4606	Fe humate	4.73	0.73	5 42	15.45	114.63	2.05	15.18	9.05	0/0
4397/5149	Bone meal	1.71	0.39	2.87	22.91	167.51	1.10	8.02	11.35	2/0
4760/2264	Blood/feather/bone	3.34	1.52	2.60	45.36	77 78	4.25	7.28	5.83	0/0
6883/6583	Feather/bone/sulfate/gypsum	2.19	0.65	2.62	29.51	1 19.62	1.81	7.33	8.41	1/0
4924/7924	NIST SRM 694 Western Phos Rock	13.56	1.24	1.85	9.14	13.65	3.47	5.18	1.26	0/0
4131/1340	AFPC rock check 22	1.59	0.69	1.00	43.72	62.79	1.94	2.79	4.21	0/0
5682/8537	Peru rock	5.18	0.49	1.67	9.49	32 19	1.38	4.67	2.58	1/0
7883/3887	African rock	2.84	1.11	2.40	39.14	84 35	3.11	6.71	6.17	0/0
						01				
						5				

Table 2006.03H. Blind duplicate statistics for selenium

volumetric flask, dilute to volume with  $H_2O$ , mix, and transfer to an acid-washed polypropylene bottle.

(h) Sampler wash solution, 1% HNO<sub>3</sub>.—Dilute 10 mL of trace metal grade HNO<sub>3</sub> to 1000 mL with H<sub>2</sub>O.

#### H. Determination

Analyze test solutions using an ICP-OES instrument calibrated with standard solutions. Insert a 10 mg/kg working standard or other suitable quality control solution every 10 test portions, to monitor for instrument drift. The inclusion of a digestion blank, a sample duplicate, and known reference materials is highly encouraged.

#### I. Calculations

Element, mg / kg =  $\frac{(\text{instrument concentration, mg / L})(100 \text{ mL})(1 \text{ L / 1000 mL})}{(\text{sample weight, g})(1 \text{ kg / 1000 g})}$ 

where 100 mL assumes the microwave digest is diluted to 100 mL. Reference: J. AOAC Int. 89, 1447(2006).

AOAC Research Institute only AOAC Review Panel Use

#### AOAC Official Method 959.03 Urea in Fertilizers Urease Method First Action 1959 Final Action 1960

#### A. Reagent

*Neutral urease solution.*—Use fresh commercial 1% urease solution, or dissolve 1 g urease powder in 100 mL  $H_2O$ , or shake 1 g jack bean meal with 100 mL  $H_2O$  5 min. Transfer 10 mL solution to 250 mL Erlenmeyer, dilute with 50 mL  $H_2O$ , and add 4 drops methyl purple (available from Fisher Scientific Co.; No. SI9-500). Titrate with 0.1M HCl to reddish purple; then back-titrate to green with 0.1M NaOH. From difference in mL, calculate volume 0.1M HCl required to neutralize remainder of solution (usually ca 2.5 mL/100 mL), add this amount of acid, and shake well.

Verify enzyme activity of urease source periodically. Discard any source which does not produce solution capable of hydrolyzing 0.1 g urea/20 mL solution.

#### B. Determination

Weigh  $10 \pm 0.01$  g test portion ( 1.0 g of urea) and transfer to 15 cm Whatman No. 12 fluted filter paper. Leach with ca 300 mL H<sub>2</sub>O into 500 mL volumetric flask. Add 75–100 mL saturated

Ba(OH)<sub>2</sub> solution to precipitate phosphates. Let settle and test for complete precipitation with few drops saturated Ba(OH)<sub>2</sub> solution. Add 20 mL 10% Na<sub>2</sub>CO<sub>3</sub> solution to precipitate excess Ba and any soluble Ca salts. Let settle and test for complete precipitation. Dilute to volume, mix, and filter through 15 cm Whatman No. 12 fluted paper. Transfer 50 mL aliquot (equivalent to 1 g test portion) to 200 or 250 mL Erlenmeyer and add 1–2 drops of methyl purple. Acidify with 2M HCl and add 2–3 drops excess. Neutralize solution with 0.1M NaOH to first change in color of indicator. Add 20 mL neutral urease solution, close flask with rubber stopper, and let stand 1 h at 20°–25°C. Cool flask in ice-water slurry and titrate at once with 0.1M HCl to full purple; then add ca 5 mL excess. Record total volume added. Back-titrate excess HCl with 0.1M NaOH to neutral end point.

Percent urea =  $\frac{(\text{mL } 0.1\text{ M HCl} - \text{mL } 0.1\text{ M NaOH}) \times 0.3003}{\text{g test portion}}$ 

References: Ind. Eng. Chem. Anal. Ed. 7, 259(1935). JAOAC 41, 637(1958); 42, 494(1959); 43, 123(1960).

CAS-57-13-6 (urea)

# **OPEN FOR COMMENTS**

#### Proposed Modification to AOAC Official Method 959.03 Urea In Fertilizers

**July 25, 2016:** The AOAC Research Institute announces a notification of a proposed change in status of an AOAC Final Action Official Method 959.03 [Final Action 1960]. The open public comment period for the proposed modification of AOAC Official Method 959.03 will be posted for a minimum of 30 days. The comment period opens on **Monday, July 25, 2016** and closes **Wednesday, August 17, 2016**. Comments will be compiled, reviewed, and intended to obtain input on the proposed modification. The documents may be revised if necessary, based on comments received. Any interested party may submit comments.

A modification to AOAC Official Method 959.03: Urea in Fertilizers [Final Action 1960] is being proposed. Please see the following information regarding the modification:

#### Summary of Proposed Modification or Extension

By providing the statistical data, it will prove that the AOAC Official Method 959.03 is not suitable for urea-formaldehyde condensate fertilizer products and an editorial/clerical change is proposed.

#### Summary of how the proposed modification will be evaluated

By providing statistical data measuring the free urea contents in at least 8 different samples of these fertilizers by comparing the results of their free urea contents using both AOAC Official Method 959.03 (Urease Method) and AOAC Official Method 2003.14 Urea in Water-Soluble Urea-Formaldehyde Fertilizer Products and in Aqueous Urea Solutions [Final Action 2009].

# **Comment Process**

AOAC requests that the following guidelines be observed in providing comments regarding the above modification:

- 1. Please specify if the comment is an editorial, content, or disagreement comment.
- 2. Provide rationale as to why the comments should be considered.
- All comments are due within 30 days of the initial posting date (deadline: Wednesday, August 17, 2016). AOAC reserves the right to not to accept comments received after the deadline.
- 4. Editorial comments provide additional clarification or correct typographical errors. Please suggest alternative wording or typographical corrections.
- 5. Content-related comments provide technical clarity and comprehensiveness. Please suggest the appropriate technical language. Documents will be reviewed by AOAC for technical accuracy and clarity.
- 6. Disagreement comments reflect a perspective on content documented/undocumented in the drafts. Please provide language that document the perspective or position.

To provide comments and review the proposed modification of AOAC Official Method 959.03, please use the link at <u>HTTPS://FORM.JOTFORM.COM/61666298869175</u>.

## Evaluation of the Determination of Free Urea in Water-Soluble Liquid Fertilizers containing Urea and Ureaforms by Urease Method and by HPLC Methods

Michael M. Hojjatie, and Dean Abrams, R&D Department, Tessenderlo Kerley, Inc., 2248 West Lower Buckeye, Phoenix, AZ 85009

## Abstract

Currently there are three AOAC Official Methods for the determination of urea in fertilizers.

AOAC Official Method 959.03, Urea in Fertilizers, Urease Method, First Action 1959, Final Action 1960. This method is based on the use of fresh commercial 1% urease solution, or preparation of such solution from urease powder in water, or from jack bean meal in water<sup>1</sup>.

AOAC official Method 983.01, Urea and Methyleneureas (Water-Soluble) in Fertilizers, First Action 1983, Final Action 1984, is based on liquid chromatography with refractive index detector using water as mobile phase and an ODS column<sup>1</sup>.

AOAC Official Method 2003-14, Determination of Urea in Water-Soluble Urea-Formaldehyde Fertilizer Products and in Aqueous Urea Solutions, First Action 2003, Final Action 2008, is also based on liquid chromatography with UV detector using 85%:15% Acetonitrile: Water as mobile phase and a propylamine column<sup>2</sup>.

The Urea Method, AOAC Official 959.03 is very much dependent to the nature of the urease enzyme. The method was developed in 1960 and used for simple urea fertilizer solutions. With the advent of complex fertilizers compositions, especially with the class of liquid Triazone Fertilizers, and watersoluble ureaforms, the analyses of free urea in these fertilizers by the urease method is often inaccurate and inconsistent.

The AOAC Official Method 983.01 is not always reliable due to the interference of some of the components of these fertilizers, and due to the fact that the use of water as mobile phase does not always separate the free urea from other components<sup>3</sup>.

The AOAC Official Method 2003.14 was subjected to Ring Test Studies and showed it could be used for the determination of "free urea" in these classes of fertilizers with good accuracy and precision<sup>3</sup>.

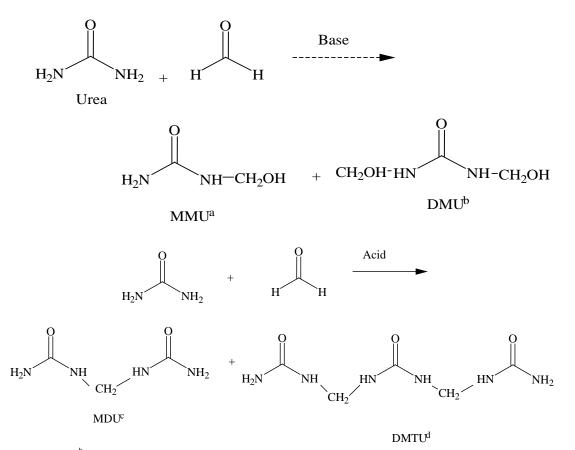
### Introduction

The critical comparison of some currently manufactured commercial slow and controlled release nitrogen (SRN, and CRN)-containing fertilizers, especially liquid products, whether by means of technical

data sheets, product labels or otherwise, is unfortunately not always as an easy task for the potential user. In this matter, particular attention must be paid to the methods used by various manufacturers for the determination and reporting of the amount of SRN, and CRN present.

The SRN in most commercial liquid SRN-containing fertilizers presently manufacture in the United States, Canada, and Europe is comprised of the water-soluble reaction products of urea with formaldehyde, or from the reaction products of urea, formaldehyde and ammonia.

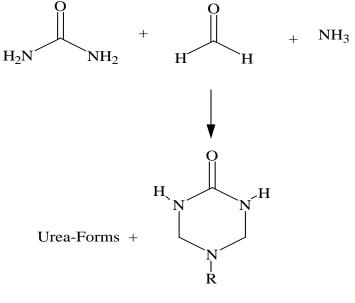
In the reaction of urea and formaldehyde, based on the nature of the catalysts, whether an acid catalyzed reaction, or a based catalyzed reaction, different urea-formaldehyde adducts (ureaforms) will form and the resulting product will be either liquid or solid<sup>4</sup>.



<sup>a</sup> monomethylourea; <sup>b</sup>dimethylolurea; <sup>c</sup>methylenediurea; <sup>d</sup>dimethylenetriurea

Reaction of urea and formaldehyde is not 100% and some unreacted urea will remain in the final product. If the reaction product is a solid, the amount of unreacted and free urea could be determined by AOAC Official Method 945.01 (Water-Soluble Nitrogen), and AOAC Official Method 955.05 (Nitrogen Activity Index). Determination of water-insoluble nitrogen in mixed fertilizers has been studied by Katz, et.al.<sup>5,6</sup>

In the reaction of urea, formaldehyde, and ammonia, a highly water soluble ring structure known as urea-triazone predominantly forms.

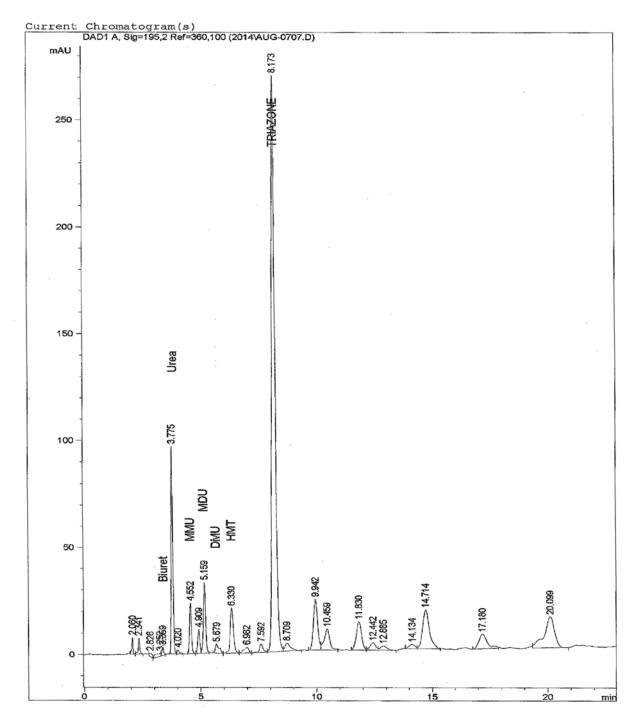


 $R = H, CH_3, CH_2OH, CH_2NHCONH_2$ 

In most of these products produced from the reaction of urea and formaldehyde, or urea-formaldehydeammonia, the reaction products contain SRN in the form of aqueous solutions of water-soluble organic nitrogen species and some unreacted, free urea. The unreacted or free urea provides readily available nitrogen and therefore should be deducted from the slowly released nitrogen portion.

Quantitative analysis of these SRN fertilizer solutions for all of the reacted nitrogen forms in these fertilizers is time consuming and impractical or even impossible. The complex composition of an example of a fertilizer produced from the reaction of urea, formaldehyde, and ammonia is shown in Figure - 1 below:

Figure 1 Liquid Chromatography of Triazone Fertilizer



(MMU = monomethylolurea; MDU = methylenediurea; DMU = dimethylolurea; and HMT = hexamethylenetetramine)

Therefore, the direct determination of the amount of SRN by summingthe amounts of reacted organic N from various forms is not a viable option. Consequently, SRN content is most often determined as the difference of the unreacted free urea subtracted from total the N, both of which can be fairly easily determined. The remainder from this subtraction is the combined reacted organic N (or SRN), except in cases where some other nitrogen form such as nitrate may have been added after the reaction in order to make a mixed fertilizer.

Currently, there are three AOAC Official Methods available for the determination of the free and unreacted urea in liquid and water-soluble urea containing fertilizers.

The AOAC Official Method 959.03 is the most well-known and the oldest method for urea determination in fertilizers. This method, which was introduced in 1959, is based on the quantitative hydrolysis of urea to ammonia by means of urease enzyme. The amount of ammonia generated by hydrolysis is subsequently determined and reported as equivalent urea or urea N by a simple titration. With most simple and conventional (i.e. non-SRN-containing) liquid fertilizers, the urease method works very well. Urea-based methods are well accepted and usually quite suitable for urea determinations in most urea-containing fertilizers, however, they have been found to demonstrate significant problems, particularly with incomplete recovery of urea, when applied to such determinations in Urea-Formaldehyde (UF) fertilizer solutions. Comparisons of the HPLC methods, particularly the AOAC Official Method 2003.14 with results from the urease method, frequently produced results that were not in agreement with each other. Further study also showed that urea results from the urease methods often were not reproducible. Thus a controlled study, which is the principle subject of this article, was carried out to confirm and elaborate upon these observations, and to suggest some likely reasons for the reduced effectiveness of the urease method with UF fertilizers.

## **Experimental**

#### Materials

Twelve of the most commonly available commercial liquid urea-based fertilizers were selected for the determination of their free urea contents using the three aforementioned methods. These commercial samples were:

- 1. LF3060 (30-0-0), Koch Agronomic Services, LLC, 4111 E. 37<sup>th</sup> St. N, Wichita, KS 67220, USA
- 2. CoRoN (28-0-0), Helena Chemical Company, 225 Schilling Blvd., Collierville, TN 38017
- 3. Arclin 28-0-0, Arclin Resins, Research & Technology, 4754 28<sup>th</sup> St., Springfield, OR 97477
- 4. Greenfeed 27-0-0 (light Green liquid), Plant Food Company, 38 Hightstown-Cranbury Station Road, Cranbury, NJ 08512
- 5. Greenfeed 27-0-0 (Dark Green liquid), Plant Food Company, 38 Hightstown-Cranbury Station Road, Cranbury, NJ 08512
- 6. NDemand 30-0-0, Wilbur-Ellis Agribusiness, 3300 S. Parker Road, Suite 500, Aurora, CO 80014, USA
- 7. NDemand 30L, Wilbur-Ellis Agribusiness, 3300 S. Parker Road, Suite 500, Aurora, CO 80014, USA
- 8. Gradual N (30-0-0), Winfield Solutions, LLC, 1080 County Road West, Shoreview, MN 55126
- 9. N-28 clear Fertilizer (28-0-0), Advachem, Route de Wallonie, Darse d'Hautrage, BE 7334 Hautrage
- 10. N-Sure (28-0-0), Tessenderlo Kerley, Inc., 2255 N. 44<sup>th</sup> St., Suite 300, Phoenix, AZ
- 11. Trisert NB (26-0-0), Tessenderlo Kerley, Inc., 2255 N. 44<sup>th</sup> St., Suite 300, Phoenix, AZ
- 12. Formolene Plus (30-0-0), Tessenderlo Kerley, Inc., 2255 N. 44<sup>th</sup> St., Suite 300, Phoenix, AZ

These fertilizers are liquid and were used without any further modifications, unless specified in the method, (i.e., dilution).

The abovetwelve commercially available U-F liquid fertilizers were tested by the authors' lab (Lab 1) and by an independent lab (Lab 2) using AOAC Official Method 2003.14 for the determination of their unreacted (free) urea by HPLC. Each sample was analyzed for its free urea content in duplicate. The inter laboratory results were compared to each other for the consistency of this method for the determination of free urea contents in these fertilizers by comparing each value obtained from the means of duplicate analyses. Analytical results, means and standard deviations are shown in Table 2.

The same materials were also analyzed by a commercial lab using the AOAC Official Method 953.01 (Urease Method) for the determination of their free urea contents. Each sample was analyzed in duplicate and their means were used for comparisons with the means of those results obtained by Lab 1, and Lab 2 using the AOAC Official method 2003.14. The commercial lab used powdered form of urease made from Jack bean meal.

In addition, different sources and forms of urease enzyme were tested to understand what effects (if any) of the urease enzyme has on the determination of free urea contents of this class of fertilizers.

## Analytical methods

AOAC Official Method 2003.14<sup>2</sup>

### A. Principle

A precisely weighed portion of homogenous urea or homogenous water-soluble urea-containing liquid UF fertilizer sample was diluted to volume with solvent of the same composition used as the liquid chromatographic mobile phase. Ureawas determined via high performance liquid chromatography (HPLC) employing ultraviolet wavelength detection. The area beneath the absorption peak due to urea in the sample was compared with the area beneath the absorption peak for urea in an external standard solution prepared with pure urea in the mobile phase solvent.

#### B. Apparatus

(a) Liquid Chromatograph. – Requires a high performance liquid chromatograph capable of isocratic delivery of mobile phase at 2 ml/min at 204 bars (3000 psig) and having a UV absorption detector capable of stable operation at 195 nm (Acetonitrile and water absorption cutoff). Instrument operating conditions are listed in Table 1:

Operating conditions	Setting
Flow Rate	1.3ml/min
Mobile Phase Temperature	Ambient
Column temperature	35 <sup>0</sup> C
Detector Wavelength	195nm
Injection Volume	10 µl

#### Table - 1 HPLC Operating Conditions and Settings

For best precision a fixed volume sample loop is preferred to syringe injection of samples and standards. To analyze fertilizer solution for urea, allocate 14 minutes for each injection, 12 minutes for run time and 2 minutes for post run time. For more complex fertilizer solutions, allocate a total of 43 minutes for each injection, which includes 23 min of run time and 20 min of post-run timeto avoid overlapping.

**(b)** *HPLC Column* – The chromatography column is a 4.6 mm ID x 250 mm length amino propyl ( $NH_2$ ) column, 5µ particle size. Examples are Phenomenex amino propyl column Spherex, Part # 00G-00051-E0, or Thermo Scientific Hypersil APS-2 column, Part # 30703-254630. Before use, new columns must be conditioned as described in Section (c) hereof.

(c) If the HPLC column is new or has not been in service for about a week or more, it must be conditioned as follows before using. A conditioned column will usually last for about a year depending on the number of analyses. This conditioning step is only applied to new columns or columns that are not used on a weekly basis:

- (1) Using the HPLC instrument, wash the column for about two to four hours at room temperature with HPLC-grade isopropanol at a flow rate which will maintain at least 200 bars column back pressure (typically about 1 ml/min).
- (2) Follow step 1 with a second column wash with 100% HPLC-grade acetonitrile at room temperature for 4 hours.
- (3) Follow step 2 with a final column wash using mobile phase solution [see C(a)] at 1.3 ml/min and normal analytical operating conditions. This wash should continue for 2 hours or as long thereafter as needed to obtain a stable base line.

#### C. Reagents

- (a) Mobile Phase 85% (v/v) acetonitrile with water. Use LC grade acetonitrile having 190 nm maximum UV cutoff and LC grade water.
- (b) Urea standard-ACS reagent, 99-100.5%, Sigma-Aldrich Chemical Company, Milwaukee, WI.

### **D. External Standard**

<u>Urea Standard</u> - Accurately weigh amounts of 100% pure urea of approximately 0.0150g and 0.0300g into separate 100 ml volumetric flasks. Use ultrasound for three minutes to dissolve and then dilute to volume with mobile phase solution. Shake well.

#### **E. Sample Preparation**

Accurately weigh a portion of uniform sample containing an estimated amount of free urea between 0.0150g and 0.0300g into a 100 ml volumetric flask. Use ultrasound for three minutes to dissolve and then dilute to volume with mobile phase solution and shake well to assure homogeneity. (Note: For solid samples or fluids containing substantial undissolved solids, ultrasound for 5 minutes shake periodically over a period of about 15 minutes to ensure that all urea has an opportunity to dissolve.) Filter a portion through a 0.45  $\mu$ m porosity (or finer) filter before injecting onto HPLC column. Samples should be analyzed on the same day as prepared.

#### Determination

- (a) Inject 10  $\mu$ l of each urea standard until two consecutive injections of each give the same peak area within ± 2% for the same standard. Average the peak areas for the accepted standard determinations.
- (b) Inject 10  $\mu$ I of prepared sample. Identify the urea peak by retention time relative to a urea standard and note if the peak area falls within the range of the high and low standards. If not, prepare a new sample with the weight adjusted to permit peak to fall within the standard range.
- (c) Perform sufficient sample injections (minimum of two) from the same sample flask such that at least two consecutive determinations yield peak areas which agree with each other to a precision of at least  $\pm 2\%$ .<sup>2</sup> Determine the average value of agreeing peak areas.

#### Calculations

Calculate the average instrument urea working standard response from n standards as:

Urea Factor = 
$$\left[\sum_{r} \left(\frac{AP_r}{W_r}\right)\right] / n$$

Where AP is the average response of 2 or more agreeing peak area for the working standard r,  $W_r$  is the weight of urea in the 100 ml working standard and n is the number of agreeing working standards used in the calculation.

AOAC Official Method 959.03<sup>1</sup>

#### Reagents

Either fresh commercial 1% urease solution was used or the urease solution was prepared by dissolving 1 gram of urease powder in 100 ml of distilled water, or one gram jack bean meal was transferred into 100 ml of distilled water and shaken for 5 minutes. Ten ml of this solution was transferred into a 250 ml Erlenmeyer flask, and diluted with 50 ml distilled water. The enzyme activity was determined by titration with 0.1 N HCl in the presence of methyl purple (Fisher Scientific, Suwanee, GA) to a reddish purple color, then back titrated with 0.1N NaOH to a green color. The amount of 0.1 N hydrochloric acid required to neutralize the remainder of solution was calculated and added to this solution. The enzyme

activity was verified periodically, and any source which did not produce solution capable of hydrolyzing 0.1 g urea/20 mL solution was discarded.

#### Determination

Ten grams of each liquid ureaformaldehyde fertilizer sample (containing  $\leq$ 1.0g of urea) was transferred to a 15 cm Whatman No. 12 fluted filter paper (Fisher Scientific). This was leached with approximately 300 ml of de-ionized water (D-H<sub>2</sub>O) into a 500 ml volumetric flask. Next, 75-100 ml of saturated barium hydroxide, Ba(OH)<sub>2</sub>(Fisher Scientific) was added to precipitate out any phosphate present. Then, 20 ml of 10% sodium carbonate, Na<sub>2</sub>CO<sub>3</sub>(Fisher Scientific) solution was added to precipitate any excess Ba. This was diluted to volume, mixed, and filtered through a 15 cm Whatman No. 12 fluted filter paper. Then, 50 ml of the filtrate was transferred to a 250 ml Erlenmeyer flask, and 2-4 drops of methyl purple was added followed by addition of 2N HCl to form a reddish purple color (acidic). This was neutralized with 0.1 N NaOH to a green color. Finally, 20 ml of neutral urease solution was added and the flask closed with a rubber stopper. After one hour storage at room temperature, the flask was cooled in an ice-water bath and its content was titrated with 0.1N HClto a full purple color, and then a 5ml excess of 0.1 N HCl was added. Excess HCl was back titrated with 0.1 N NaOH to a neutral end point (green color).

Percent urea calculated as follow:

% Urea = 
$$\frac{[ml \ 0.1 \ N \ HCl - ml \ 0.1 \ N \ NaOH)x \ 0.3003^*]}{g \ sample}$$

\*0.3003 = this factor takes into account the molecular weight of urea, the conversion of the milliequivalent result of V x N, and the conversion to %.

### **Results and Discussion**

The free urea contents of each fertilizer sample were measured in duplicates by the AOAC Official Method 2003.14 by Lab 1 and Lab 2.

The results of analyses and t-test calculation of the twelve commercial liquid fertilizer sampleslisted above from Lab 1 and Lab 2 by the AOAC Official Method 2003.14 are listed in Table 2.

Fertilizer	Lab ID	Total -N*	<b>% U</b> 1	rea-N	M	
Sample			Lab 1	Lab 2	Mean	Std. dev.
1	26-068-03	29.89	12.04	12.45	12.25	0.21
2	26-051-01	28.54	8.63	8.51	8.57	0.06
3	26-068-02	28.44	8.68	8.57	8.63	0.05
4	26-076-07	28.33	8.45	8.45	8.45	0.00
5	26-076-06	28.47	8.58	8.60	8.59	0.01
6	26-076-08	24.95	16.08	15.70	15.89	0.19
7	26-079-01	30.78	12.55	12.70	12.63	0.07
8	26-086-04	30.06	12.56	12.07	12.32	0.25
9	26-103-02	28.01	12.09	11.36	11.73	0.37
10	26-103-03	28.13	6.85	6.83	6.84	0.01
11	26-100-03	26.36	15.55	15.28	15.42	0.14
12	26-010-02	29.87	9.37	9.51	9.44	0.07
Average		X	10.95	10.84	-	-
Standard De	eviation	σ <sub>x</sub>	2.97	2.87	-	-
Number of	samples	n	12	12	-	-
Variance		$\sigma^2$	8.80	8.21	-	-
Pearson Co	rrelation	0.99	-	-	-	-
T Stat		1.30	-	-	-	-
P(T <t) one-t<="" th=""><td>ail</td><td>0.11</td><td>-</td><td>-</td><td>-</td><td>-</td></t)>	ail	0.11	-	-	-	-
t Critical on	e-tail	1.80	-	-	-	-
P(T<=t) two	-tail	0.22	-	-	-	-
T Critical tw	o-tail	2.20	-	-	-	-

 Table – 2

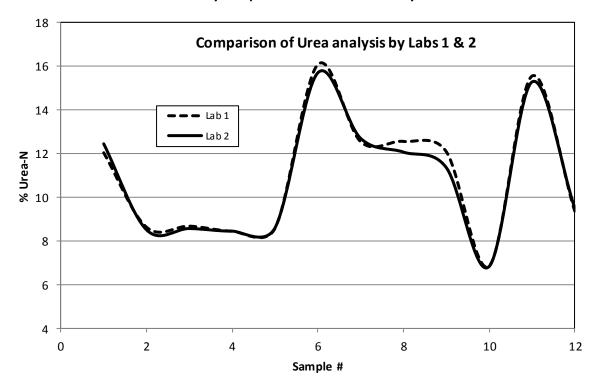
 Analyses of Twelve Fertilizer Samples for Urea by AOAC Method 2003.14

\*Note: Total-N includes other forms of nitrogen in addition to unreacted (free) urea

A statistical comparison (Students t-test, df, and, P) indicated that the results from two labs were statistically similar.

The results for the analyses of the Free and Unreacted urea in these twelve fertilizers by two independent Labs using AOAC Official Method 2003.14 are shown graphically as well in Figure 2.

Figure 2 Schematically comparisons of HPLC Results by two Labs



When the same samples were analyzed by urease method based on the AOAC Official Method 959.03, the results are much different and in this case showed a high biased in ten of the analyses and low biased in the remaining two analyses. The results and the differences between the results from the urease method and the HPLC method are shown in Table 3. The lowest % Urea-N difference from the two methods shown in Table 3 -0.45 and the highest % Urea-N difference is 2.42. These results were obtained by a commercial lab using powdered form of urease made from Jack Bean meal.

		% Urea-N	%Urea-N	% Urea-N
Total-N	Fertilizer Sample	Urease Method AOAC 959.03	HPLC Method AOAC 2003.14 (Means from two Labs)	Difference Urease-HPLC (Mean)
29.89	1	13.26	12.25	+1.02
28.54	2	9.87	8.57	+1.30
28.44	3	10.06	8.63	+1.44
28.33	4	9.33	8.45	+0.88
28.47	5	9.91	8.59	+1.32
24.95	6	15.44	15.89	-0.45
30.78	7	14.81	12.63	+2.19
30.06	8	14.08	12.32	+1.77
28.01	9	8.89	11.37	-2.48
28.13	10	8.94	6.84	+2.10
26.36	11	16.18	15.42	+0.77
29.87	12	11.86	9.44	+2.42

 Table-3

 Urease Analyses of Twelve Fertilizer Samples & Comparisons with the HPLC Results for Urea

In another series of studies supplies of seven different analytical quality urease enzyme sources were obtained from five well-known suppliers of laboratory chemicals which are identified as numbers 1 through 7. It is highly probable that one or more of these common sources are found in a large number of fertilizer analytical laboratories. Represented are four brands of urease powder, one brand of urease tablets and two brands of urease-glycerol extract solution. Only one supplier provided the information regarding the urease activity as part of its product label.

Tests using the urease enzymes in this study were carried out in accordance with the AOAC Official Method 959.03, with one exception where anaccommodation for the use of urease tablets or glycerol extract was required. The AOAC urease method specifies the use of a 1% aqueous solution of urease powder or Jack bean meal.

According to the AOAC urease method, 20ml of 1% solution of urease should be used and also the urease activity should be such that it will hydrolyze at least 0.1 gram of urea under the conditions specified in the method. The weight of fertilizer sample should also be such that the amount of urea in the final working volume does not exceed 0.1 gram.

In one series of tests, pure urea (99.4%) was used. The weights of urea samples used were 0.1g, 0.3g, 0.6 g, and 1.0 gram. These urea samples were analyzed using seven ureasematerials from different sources. The degrees of urea hydrolysis with the seven different urease materials are shown in Table 4.

Urease	Urease Amount	% Hydroly	sis of urea f	rom the amo	ount used
Source		0.1 g	0.3 g	0.6 g	1.0 g
1	20 ml (1% Sol.)	100.1	100.1	99.7	99.9
2	10 ml Glycerol Ext.	99.9	99.7	99.7	69.9
2	20 ml Glycerol Ext.	99.9	99.7	99.7	99.4
3	20 ml (1% Sol.)	99.6	99.7	97.6	62.7
4	20 ml (1% Sol.)	99.3	99.7	83.2	52.6
5	2 tablets	100	98.6	69.3	45.5
6	20 ml Glycerol Ext.	99.9	99.9	99.7	99.5
7	20 ml (1% Sol.)	100.3	100.1	99.9	99.6

Table-4 Analyses of Urea using Different Sources of Urease

In the amount used, all seven urease sourceshydrolyzed up to about 0.3 grams, thus exceeding the AOAC method requirements. However the urease tablets (source No. 5) begins to fade in effectiveness at 0.3 grams urea, with only 98.6% hydrolyzed, and two urease powders (No. 3and No. 4) begin to fail at about 0.6 grams of urea. The two other powder samples (No. 1 and No. 7) and the two urease glycerol extracts (No. 2 and No. 6) in 20 ml increments all hydrolyzed up to 1.0 gram of urea. Powder No.7 was known from the manufacturer's label to have a very high urease activity. From the results, it appears that sources 1, 2, and 6 were high activity urease samples. These data show that the AOAC Official Method 959.03 works well for pure urea when applied within the limits of the method. However, if the amount of urea exceeds the recommended amount in the method, there are inconsistencies with the results and some urease sources work better than others.

The inconsistencies with the Urease Method are obvious when the method applies to the more complex fertilizer samples, namely, the Urea-Triazone liquid solution containing mixed compositions of urea-forms and triazone moieties (Table 2).

More tests were done to further illustrate these inconsistencies even further.

In the following sets of experiments, five Urea-Triazone fertilizers from four different manufacturers were analyzed for their claim of %SRN. The percentage of free and unreacted urea in these samples was analyzed by the HPLC and by the urease methodusing powdered urease enzyme from Jack bean meal. The results are shown in Table 5.

		SRN Dete	rmination
Product % Total N	%SRN Claimed	Met	hod
		HPLC (2003-14)	Urease
28-0-0	72	72	88
30-0-0	60	60	77
30-0-0	50	50	68
28-0-0	75	50	70
30-0-0	85	46	80

Table 5Comparisons of the Results by HPLC (2003-14) and by UreaseMethod(Powdered Sample)

The results by the urease method for the SRN contents (i.e., Total N minus Free Urea-N) of these known fertilizers were always different from the claimed amount, while the results by HPLC were on target for three of five samples and off for two samples.

The following results further illustrate the inconsistencies of the Urease Method when applied to this class of fertilizers<sup>7</sup>. Comparisons of the urea results obtained with the different urease sources listed in Table 4 with the HPLC Method 2003.14 are shown in Table6. The results are for four different aqueous Urea-Triazone fertilizers and are shown in three ways, (1) as the absolute weight of urea found in each sample volume by both methods, (2) as the weight percent urea in the fertilizers, and (3) as the percent recovery of urea by the Urease Method relative to 100% recovery by the HPLC Method.

These results clearly show that the Urease Method using urease sources 1, 3 and 4 finds less urea in all four fertilizer samples in comparisons with the results from the HPLC Method. The differences are substantial. For example, sometimes less than half as much urea is recovered by the Urease Method. For the source No. 2, it makes a significant difference whether 10 ml of Glycerol extract or 20 ml of glycerol extract was used. Source No. 5 (Urease tablets) showed the poorest recovery results. All of these urease sources should normally be expected to totally hydrolyze the urea in these fertilizers. However, four of these Urease sources (Nos. 1, 3, 4, and 5) plus 10 ml of the source No.2 Glycerol extract significantly failed to hydrolyze all of the urea in any of these four fertilizer samples.

amount used Sample Urease vs Urease HPLC HPLC Urease HPLC 1 Α 0.20 0.34 20.2 33.7 60 20ml 1% Solution В 0.11 0.16 10.9 16.1 68 С 0.24 32.1 73 0.32 23.5 D 0.27 0.35 78 27.3 35.1 2 Α 0.17 0.34 16.9 33.7 50 10ml Glycerol Ext. в 0.08 0.16 7.5 16.1 47 С 0.14 0.32 14.2 32.1 44 D 0.25 0.35 25.4 35.1 72 2 Α 0.34 0.34 34.3 33.7 102 20ml Glycerol Ext. В 106 0.17 0.16 17.0 16.1 С 0.32 101 0.32 32.4 32.1 D 0.33 0.35 33.4 35.1 95 3 Α 0.15 0.34 15.0 33.7 45 20ml 1% Solution В 59 0.10 0.16 9.5 16.1 С 0.18 0.32 17.8 32.1 55 D 0.32 0.35 32.4 35.1 92 4 Α 0.18 0.34 18.1 33.7 54 20ml 1% Solution В 0.11 0.16 11.0 16.1 68 С 0.18 0.32 18.4 32.1 57 D 67 0.24 0.35 23.5 35.1 5 Α 0.17 0.16 6.9 16.1 43 **Two Tablets** В 0.13 0.32 13.0 32.1 40 6 В 0.17 0.16 16.9 16.1 105 10 ml Glycerol Ext. С 0.33 0.32 33.1 32.1 103 6 В 0.17 0.16 17.1 16.1 106 20 ml Glycerol Ext. С 0.33 0.32 33.2 32.1 103 7 Α 0.34 0.34 34.0 33.7 101 20ml 1% Solution в 16.2 16.1 101 0.16 0.16 С 101 0.32 0.32 32.3 32.1 D 0.33 0.35 33.0 35.1 94

Table-6 AOAC 959.03 (Urease Method) vs. AOAC 2003.14 (HPLC) Results for Analyses of Unreacted Urea in Urea-Triazone Liguid Fertilizers

In quantitative terms, hydrolyses of urea in these four fertilizer samples by these urease sources tended to be in the range of 40-80%. Each of the urease sources should have hydrolyzed all the urea in these type of fertilizers based on the tests done using the pure urea (Table 4), within the scope of the Urease Method. Fertilizer "B" contains only about half of the urea of the other three fertilizer samples (A, C, and

D). However, even with less free, unreacted urea in the sample, recovery by these urease sources was not improved. From the data in Table 5, the lower activity urease sources failed substantially to hydrolyze all the urea in these UF fertilizers, while the high activity sources did hydrolyze all the urea. The fact that high activity sources (No. 1, 7, and 20 ml extracts of No.2) show the same percent urea hydrolyses as the amount found by HPLC analyses, support that such percentages urea are indeed present in these UF fertilizers samples. The combined performances of HPLC and the high activity urease sources indicate that the AOAC Method 959.03 is very much dependent on the type of urease.

The above data show that analyses of Urea-Formaldehyde fertilizer solutions using the urease method are not consistent. In most cases, the amount of free and unreacted urea analyzed by the urease method showed a low biased (Table 6). However, in some occasions the results showed a high bias (Table 3).

These data support the discussion that AOAC official Method 959.03 (Urease Method) is not suitable for the determination of free-unreacted urea in the Urea-Formaldehyde fertilizer solutions. The HPLC Method consistently provides more accurate analyses of unreacted urea in this class of fertilizers.

As mentioned above, there are two AOAC Official Methods by HPLC for the determination of unreacted urea in these fertilizers, namely AOAC Official Method 983.01, and AOAC Official Method 2003.14.

The advantage with AOAC 983.01 is the use of water as the mobile phase, however due to the use of water, the peak separations in the complex compositions of these fertilizers (Figure 1) is not efficient and some of the peaks might overlap with that of urea resulting in erroneous data. A collaborative study<sup>3</sup> by the International Standards organization (ISO-CD 18643) involving 13 laboratories for the biuret content of several fertilizers, including the water-soluble Urea Triazone fertilizers, has showed that AOAC 983.01 HPLC method results in erroneous analyses of some of these UF fertilizer solutions. The same study showed that the AOAC 2003.14 method accurately predicts the amounts of urea result urea in these fertilizers.

Table 8 shows the inconsistency of the AOAC Official Method 983.01 (HPLC) for the determination of biuret in the Urea-Triazone fertilizers (Grade 26-0-0). The biuret co-elutes with the free and unreacted urea in these fertilizers and their peaks overlap resulting in erroneous analytical data.

Comp	parisons of the anal	ylical rest		aue 20-0-0	U DY AUA	- 302.1 Ø	AUA 2005.	14
Sample ID	Samples Analyzed by Lab-1	Grade	% Biuret Test 1	% Biuret Test 2	% Biuret Test 3	% Biuret Test 4	Average % Biuret	STDEV
By 2003-14	4 Method				I			I
25-012-05	Sulfur coated urea	39-0-0	0.911	0.943	0.979	0.933	0.942	0.025
25-068-06	Triazone Fertilizer	26-0-0	0.118	0.124	0.131	0.139	0.128	0.008
25-070-01	Fertilizer "A"	15-15-15	0.668	0.689	0.762	0.708	0.707	0.035
25-070-02	Fertilizer "B"	25-11-10	0.296	0.356	0.440	0.416	0.377	0.056
By 983.1 N	<b>Nethod</b>							
25-012-05	Sulfur coated urea	39-0-0	0.795	0.795	0.794	0.791	0.794	0.002
25-068-06	Triazone Fertilizer	26-0-0	5.793	5.854	5.856	5.814	5.829	0.027
25-070-01	Fertilizer "A"	15-15-15	0.560	0.560	0.557	0.555	0.558	0.002
25-070-02	Fertilizer "B"	25-11-10	0.299	0.302	0.303	0.300	0.301	0.002
By SRIC <sup>*</sup> N	lethod (same as 2	003-14)						
25-012-05	Sulfur coated urea	39-0-0	0.934	0.965	0.987	0.974	0.965	0.019
25-068-06	Triazone Fertilizer	26-0-0	0.120	0.131	0.130	0.134	0.129	0.005
25-070-01	Fertilizer "A"	15-15-15	0.663	0.711	0.734	0.727	0.709	0.028
25-070-02	Fertilizer "B"	25-11-10	0.286	0.367	0.388	0.382	0.356	0.041

Table 7Comparisons of the analytical results for Grade 26-0-0 by AOAC 983.1 & AOA 2003.14

\*Shanghai Research Institute of Chemical Industry Testing Center

In another sets of tests, three of the commercial liquid fertilizers listed above, namely samples number 10, 11, and 12 were tested by three laboratories. Lab 1, and Lab 2 used the AOAC Official Method 2003.14, and Lab 3 used the AOAC 983.1 Official Method. Results are listed in Table 8.

	Table8			
C	omparisons of results for sample #10, #11, and #12 by two HPLC Methods			

Sample # 10 (28-0-0)	Sample # 11 (26-0-0)	Sample #12 (30-0-0)	
% Free Urea			
(AOAC 2	(AOAC 983.1)		
Lab 1	Lab 2	Lab 3	
13.6	13.9	15.8	
30.5	30.3	30.2	
21.9	21.7	23.7	

Results from Table 8 showed that AOAC Official Method 983.1 was not suitable for accurate analyses of this class of liquid fertilizer samples, due to incomplete separation of the urea peak from others.

### Conclusions

The AOAC Official Methods 959.03 (Urease Method) and 983.01 (HPLC Method) are frequently inaccurate and therefore not suitable for measuring the amounts of free and unreacted urea in liquid urea-formaldehyde condensate products. AOAC Official Method 2003.14 consistently provides more accurate analytical results for measuring the contents of free urea in these classes of fertilizers.

### Acknowledgements

We give special thanks to Hugh Rodriguez, Thornton Laboratory, Tampa, FL, and John Hartshorn, Morral Chemical Co., Morral, OH, for collaborative support of this study. We are also indebted to Nancy Thiex and James Bartos for many helpful suggestions.

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# **OPEN FOR COMMENTS**

#### Proposed Modification to AOAC Official Method 959.03 Urea In Fertilizers

**July 25, 2016:** The AOAC Research Institute announces a notification of a proposed change in status of an AOAC Final Action Official Method 959.03 [Final Action 1960]. The open public comment period for the proposed modification of AOAC Official Method 959.03 will be posted for a minimum of 30 days. The comment period opens on **Monday, July 25, 2016** and closes **Wednesday, August 17, 2016**. Comments will be compiled, reviewed, and intended to obtain input on the proposed modification. The documents may be revised if necessary, based on comments received. Any interested party may submit comments.

A modification to AOAC Official Method 959.03: Urea in Fertilizers [Final Action 1960] is being proposed. Please see the following information regarding the modification:

#### Summary of Proposed Modification or Extension

By providing the statistical data, it will prove that the AOAC Official Method 959.03 is not suitable for urea-formaldehyde condensate fertilizer products and an editorial/clerical change is proposed.

#### Summary of how the proposed modification will be evaluated

By providing statistical data measuring the free urea contents in at least 8 different samples of these fertilizers by comparing the results of their free urea contents using both AOAC Official Method 959.03 (Urease Method) and AOAC Official Method 2003.14 Urea in Water-Soluble Urea-Formaldehyde Fertilizer Products and in Aqueous Urea Solutions [Final Action 2009].

# **Comment Process**

AOAC requests that the following guidelines be observed in providing comments regarding the above modification:

- 1. Please specify if the comment is an editorial, content, or disagreement comment.
- 2. Provide rationale as to why the comments should be considered.
- All comments are due within 30 days of the initial posting date (deadline: Wednesday, August 17, 2016). AOAC reserves the right to not to accept comments received after the deadline.
- 4. Editorial comments provide additional clarification or correct typographical errors. Please suggest alternative wording or typographical corrections.
- 5. Content-related comments provide technical clarity and comprehensiveness. Please suggest the appropriate technical language. Documents will be reviewed by AOAC for technical accuracy and clarity.
- 6. Disagreement comments reflect a perspective on content documented/undocumented in the drafts. Please provide language that document the perspective or position.

To provide comments and review the proposed modification of AOAC Official Method 959.03, please use the link at <u>HTTPS://FORM.JOTFORM.COM/61666298869175</u>.

## Evaluation of the Determination of Free Urea in Water-Soluble Liquid Fertilizers containing Urea and Ureaforms by Urease Method and by HPLC Methods

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## Abstract

Currently there are three AOAC Official Methods for the determination of urea in fertilizers.

AOAC Official Method 959.03, Urea in Fertilizers, Urease Method, First Action 1959, Final Action 1960. This method is based on the use of fresh commercial 1% urease solution, or preparation of such solution from urease powder in water, or from jack bean meal in water<sup>1</sup>.

AOAC official Method 983.01, Urea and Methyleneureas (Water-Soluble) in Fertilizers, First Action 1983, Final Action 1984, is based on liquid chromatography with refractive index detector using water as mobile phase and an ODS column<sup>1</sup>.

AOAC Official Method 2003-14, Determination of Urea in Water-Soluble Urea-Formaldehyde Fertilizer Products and in Aqueous Urea Solutions, First Action 2003, Final Action 2008, is also based on liquid chromatography with UV detector using 85%:15% Acetonitrile: Water as mobile phase and a propylamine column<sup>2</sup>.

The Urea Method, AOAC Official 959.03 is very much dependent to the nature of the urease enzyme. The method was developed in 1960 and used for simple urea fertilizer solutions. With the advent of complex fertilizers compositions, especially with the class of liquid Triazone Fertilizers, and watersoluble ureaforms, the analyses of free urea in these fertilizers by the urease method is often inaccurate and inconsistent.

The AOAC Official Method 983.01 is not always reliable due to the interference of some of the components of these fertilizers, and due to the fact that the use of water as mobile phase does not always separate the free urea from other components<sup>3</sup>.

The AOAC Official Method 2003.14 was subjected to Ring Test Studies and showed it could be used for the determination of "free urea" in these classes of fertilizers with good accuracy and precision<sup>3</sup>.

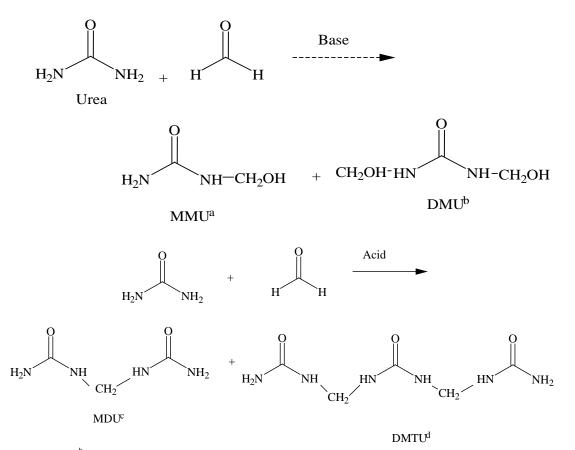
### Introduction

The critical comparison of some currently manufactured commercial slow and controlled release nitrogen (SRN, and CRN)-containing fertilizers, especially liquid products, whether by means of technical

data sheets, product labels or otherwise, is unfortunately not always as an easy task for the potential user. In this matter, particular attention must be paid to the methods used by various manufacturers for the determination and reporting of the amount of SRN, and CRN present.

The SRN in most commercial liquid SRN-containing fertilizers presently manufacture in the United States, Canada, and Europe is comprised of the water-soluble reaction products of urea with formaldehyde, or from the reaction products of urea, formaldehyde and ammonia.

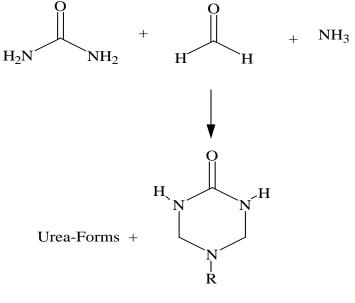
In the reaction of urea and formaldehyde, based on the nature of the catalysts, whether an acid catalyzed reaction, or a based catalyzed reaction, different urea-formaldehyde adducts (ureaforms) will form and the resulting product will be either liquid or solid<sup>4</sup>.



<sup>a</sup> monomethylourea; <sup>b</sup>dimethylolurea; <sup>c</sup>methylenediurea; <sup>d</sup>dimethylenetriurea

Reaction of urea and formaldehyde is not 100% and some unreacted urea will remain in the final product. If the reaction product is a solid, the amount of unreacted and free urea could be determined by AOAC Official Method 945.01 (Water-Soluble Nitrogen), and AOAC Official Method 955.05 (Nitrogen Activity Index). Determination of water-insoluble nitrogen in mixed fertilizers has been studied by Katz, et.al.<sup>5,6</sup>

In the reaction of urea, formaldehyde, and ammonia, a highly water soluble ring structure known as urea-triazone predominantly forms.

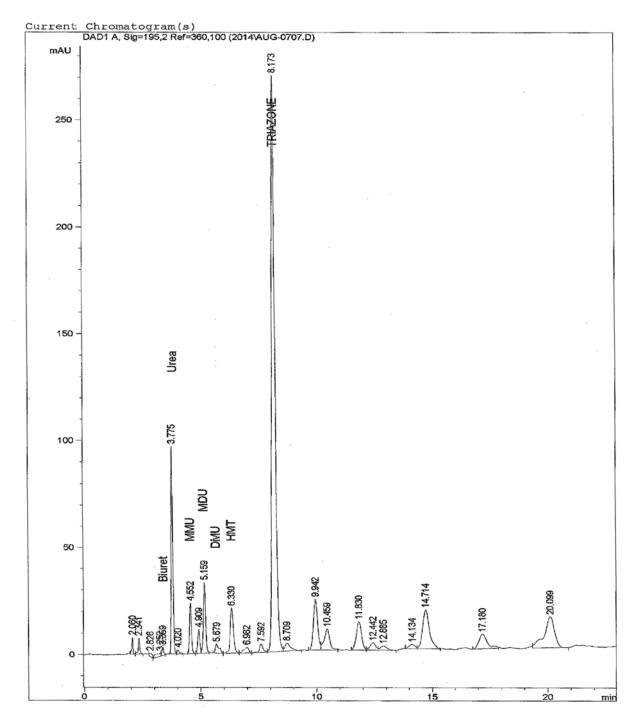


 $R = H, CH_3, CH_2OH, CH_2NHCONH_2$ 

In most of these products produced from the reaction of urea and formaldehyde, or urea-formaldehydeammonia, the reaction products contain SRN in the form of aqueous solutions of water-soluble organic nitrogen species and some unreacted, free urea. The unreacted or free urea provides readily available nitrogen and therefore should be deducted from the slowly released nitrogen portion.

Quantitative analysis of these SRN fertilizer solutions for all of the reacted nitrogen forms in these fertilizers is time consuming and impractical or even impossible. The complex composition of an example of a fertilizer produced from the reaction of urea, formaldehyde, and ammonia is shown in Figure - 1 below:

Figure 1 Liquid Chromatography of Triazone Fertilizer



(MMU = monomethylolurea; MDU = methylenediurea; DMU = dimethylolurea; and HMT = hexamethylenetetramine)

Therefore, the direct determination of the amount of SRN by summingthe amounts of reacted organic N from various forms is not a viable option. Consequently, SRN content is most often determined as the difference of the unreacted free urea subtracted from total the N, both of which can be fairly easily determined. The remainder from this subtraction is the combined reacted organic N (or SRN), except in cases where some other nitrogen form such as nitrate may have been added after the reaction in order to make a mixed fertilizer.

Currently, there are three AOAC Official Methods available for the determination of the free and unreacted urea in liquid and water-soluble urea containing fertilizers.

The AOAC Official Method 959.03 is the most well-known and the oldest method for urea determination in fertilizers. This method, which was introduced in 1959, is based on the quantitative hydrolysis of urea to ammonia by means of urease enzyme. The amount of ammonia generated by hydrolysis is subsequently determined and reported as equivalent urea or urea N by a simple titration. With most simple and conventional (i.e. non-SRN-containing) liquid fertilizers, the urease method works very well. Urea-based methods are well accepted and usually quite suitable for urea determinations in most urea-containing fertilizers, however, they have been found to demonstrate significant problems, particularly with incomplete recovery of urea, when applied to such determinations in Urea-Formaldehyde (UF) fertilizer solutions. Comparisons of the HPLC methods, particularly the AOAC Official Method 2003.14 with results from the urease method, frequently produced results that were not in agreement with each other. Further study also showed that urea results from the urease methods often were not reproducible. Thus a controlled study, which is the principle subject of this article, was carried out to confirm and elaborate upon these observations, and to suggest some likely reasons for the reduced effectiveness of the urease method with UF fertilizers.

# **Experimental**

#### Materials

Twelve of the most commonly available commercial liquid urea-based fertilizers were selected for the determination of their free urea contents using the three aforementioned methods. These commercial samples were:

- 1. LF3060 (30-0-0), Koch Agronomic Services, LLC, 4111 E. 37<sup>th</sup> St. N, Wichita, KS 67220, USA
- 2. CoRoN (28-0-0), Helena Chemical Company, 225 Schilling Blvd., Collierville, TN 38017
- 3. Arclin 28-0-0, Arclin Resins, Research & Technology, 4754 28<sup>th</sup> St., Springfield, OR 97477
- 4. Greenfeed 27-0-0 (light Green liquid), Plant Food Company, 38 Hightstown-Cranbury Station Road, Cranbury, NJ 08512
- 5. Greenfeed 27-0-0 (Dark Green liquid), Plant Food Company, 38 Hightstown-Cranbury Station Road, Cranbury, NJ 08512
- 6. NDemand 30-0-0, Wilbur-Ellis Agribusiness, 3300 S. Parker Road, Suite 500, Aurora, CO 80014, USA
- 7. NDemand 30L, Wilbur-Ellis Agribusiness, 3300 S. Parker Road, Suite 500, Aurora, CO 80014, USA
- 8. Gradual N (30-0-0), Winfield Solutions, LLC, 1080 County Road West, Shoreview, MN 55126
- 9. N-28 clear Fertilizer (28-0-0), Advachem, Route de Wallonie, Darse d'Hautrage, BE 7334 Hautrage
- 10. N-Sure (28-0-0), Tessenderlo Kerley, Inc., 2255 N. 44<sup>th</sup> St., Suite 300, Phoenix, AZ
- 11. Trisert NB (26-0-0), Tessenderlo Kerley, Inc., 2255 N. 44<sup>th</sup> St., Suite 300, Phoenix, AZ
- 12. Formolene Plus (30-0-0), Tessenderlo Kerley, Inc., 2255 N. 44<sup>th</sup> St., Suite 300, Phoenix, AZ

These fertilizers are liquid and were used without any further modifications, unless specified in the method, (i.e., dilution).

The abovetwelve commercially available U-F liquid fertilizers were tested by the authors' lab (Lab 1) and by an independent lab (Lab 2) using AOAC Official Method 2003.14 for the determination of their unreacted (free) urea by HPLC. Each sample was analyzed for its free urea content in duplicate. The inter laboratory results were compared to each other for the consistency of this method for the determination of free urea contents in these fertilizers by comparing each value obtained from the means of duplicate analyses. Analytical results, means and standard deviations are shown in Table 2.

The same materials were also analyzed by a commercial lab using the AOAC Official Method 953.01 (Urease Method) for the determination of their free urea contents. Each sample was analyzed in duplicate and their means were used for comparisons with the means of those results obtained by Lab 1, and Lab 2 using the AOAC Official method 2003.14. The commercial lab used powdered form of urease made from Jack bean meal.

In addition, different sources and forms of urease enzyme were tested to understand what effects (if any) of the urease enzyme has on the determination of free urea contents of this class of fertilizers.

# Analytical methods

AOAC Official Method 2003.14<sup>2</sup>

# A. Principle

A precisely weighed portion of homogenous urea or homogenous water-soluble urea-containing liquid UF fertilizer sample was diluted to volume with solvent of the same composition used as the liquid chromatographic mobile phase. Ureawas determined via high performance liquid chromatography (HPLC) employing ultraviolet wavelength detection. The area beneath the absorption peak due to urea in the sample was compared with the area beneath the absorption peak for urea in an external standard solution prepared with pure urea in the mobile phase solvent.

#### B. Apparatus

(a) Liquid Chromatograph. – Requires a high performance liquid chromatograph capable of isocratic delivery of mobile phase at 2 ml/min at 204 bars (3000 psig) and having a UV absorption detector capable of stable operation at 195 nm (Acetonitrile and water absorption cutoff). Instrument operating conditions are listed in Table 1:

Operating conditions	Setting
Flow Rate	1.3ml/min
Mobile Phase Temperature	Ambient
Column temperature	35 <sup>0</sup> C
Detector Wavelength	195nm
Injection Volume	10 µl

# Table - 1 HPLC Operating Conditions and Settings

For best precision a fixed volume sample loop is preferred to syringe injection of samples and standards. To analyze fertilizer solution for urea, allocate 14 minutes for each injection, 12 minutes for run time and 2 minutes for post run time. For more complex fertilizer solutions, allocate a total of 43 minutes for each injection, which includes 23 min of run time and 20 min of post-run timeto avoid overlapping.

**(b)** *HPLC Column* – The chromatography column is a 4.6 mm ID x 250 mm length amino propyl ( $NH_2$ ) column, 5µ particle size. Examples are Phenomenex amino propyl column Spherex, Part # 00G-00051-E0, or Thermo Scientific Hypersil APS-2 column, Part # 30703-254630. Before use, new columns must be conditioned as described in Section (c) hereof.

(c) If the HPLC column is new or has not been in service for about a week or more, it must be conditioned as follows before using. A conditioned column will usually last for about a year depending on the number of analyses. This conditioning step is only applied to new columns or columns that are not used on a weekly basis:

- (1) Using the HPLC instrument, wash the column for about two to four hours at room temperature with HPLC-grade isopropanol at a flow rate which will maintain at least 200 bars column back pressure (typically about 1 ml/min).
- (2) Follow step 1 with a second column wash with 100% HPLC-grade acetonitrile at room temperature for 4 hours.
- (3) Follow step 2 with a final column wash using mobile phase solution [see C(a)] at 1.3 ml/min and normal analytical operating conditions. This wash should continue for 2 hours or as long thereafter as needed to obtain a stable base line.

#### C. Reagents

- (a) Mobile Phase 85% (v/v) acetonitrile with water. Use LC grade acetonitrile having 190 nm maximum UV cutoff and LC grade water.
- (b) Urea standard-ACS reagent, 99-100.5%, Sigma-Aldrich Chemical Company, Milwaukee, WI.

# **D. External Standard**

<u>Urea Standard</u> - Accurately weigh amounts of 100% pure urea of approximately 0.0150g and 0.0300g into separate 100 ml volumetric flasks. Use ultrasound for three minutes to dissolve and then dilute to volume with mobile phase solution. Shake well.

#### **E. Sample Preparation**

Accurately weigh a portion of uniform sample containing an estimated amount of free urea between 0.0150g and 0.0300g into a 100 ml volumetric flask. Use ultrasound for three minutes to dissolve and then dilute to volume with mobile phase solution and shake well to assure homogeneity. (Note: For solid samples or fluids containing substantial undissolved solids, ultrasound for 5 minutes shake periodically over a period of about 15 minutes to ensure that all urea has an opportunity to dissolve.) Filter a portion through a 0.45  $\mu$ m porosity (or finer) filter before injecting onto HPLC column. Samples should be analyzed on the same day as prepared.

#### Determination

- (a) Inject 10  $\mu$ l of each urea standard until two consecutive injections of each give the same peak area within ± 2% for the same standard. Average the peak areas for the accepted standard determinations.
- (b) Inject 10  $\mu$ I of prepared sample. Identify the urea peak by retention time relative to a urea standard and note if the peak area falls within the range of the high and low standards. If not, prepare a new sample with the weight adjusted to permit peak to fall within the standard range.
- (c) Perform sufficient sample injections (minimum of two) from the same sample flask such that at least two consecutive determinations yield peak areas which agree with each other to a precision of at least  $\pm 2\%$ .<sup>2</sup> Determine the average value of agreeing peak areas.

#### Calculations

Calculate the average instrument urea working standard response from n standards as:

Urea Factor = 
$$\left[\sum_{r} \left(\frac{AP_r}{W_r}\right)\right] / n$$

Where AP is the average response of 2 or more agreeing peak area for the working standard r,  $W_r$  is the weight of urea in the 100 ml working standard and n is the number of agreeing working standards used in the calculation.

AOAC Official Method 959.03<sup>1</sup>

#### Reagents

Either fresh commercial 1% urease solution was used or the urease solution was prepared by dissolving 1 gram of urease powder in 100 ml of distilled water, or one gram jack bean meal was transferred into 100 ml of distilled water and shaken for 5 minutes. Ten ml of this solution was transferred into a 250 ml Erlenmeyer flask, and diluted with 50 ml distilled water. The enzyme activity was determined by titration with 0.1 N HCl in the presence of methyl purple (Fisher Scientific, Suwanee, GA) to a reddish purple color, then back titrated with 0.1N NaOH to a green color. The amount of 0.1 N hydrochloric acid required to neutralize the remainder of solution was calculated and added to this solution. The enzyme

activity was verified periodically, and any source which did not produce solution capable of hydrolyzing 0.1 g urea/20 mL solution was discarded.

#### Determination

Ten grams of each liquid ureaformaldehyde fertilizer sample (containing  $\leq$ 1.0g of urea) was transferred to a 15 cm Whatman No. 12 fluted filter paper (Fisher Scientific). This was leached with approximately 300 ml of de-ionized water (D-H<sub>2</sub>O) into a 500 ml volumetric flask. Next, 75-100 ml of saturated barium hydroxide, Ba(OH)<sub>2</sub>(Fisher Scientific) was added to precipitate out any phosphate present. Then, 20 ml of 10% sodium carbonate, Na<sub>2</sub>CO<sub>3</sub>(Fisher Scientific) solution was added to precipitate any excess Ba. This was diluted to volume, mixed, and filtered through a 15 cm Whatman No. 12 fluted filter paper. Then, 50 ml of the filtrate was transferred to a 250 ml Erlenmeyer flask, and 2-4 drops of methyl purple was added followed by addition of 2N HCl to form a reddish purple color (acidic). This was neutralized with 0.1 N NaOH to a green color. Finally, 20 ml of neutral urease solution was added and the flask closed with a rubber stopper. After one hour storage at room temperature, the flask was cooled in an ice-water bath and its content was titrated with 0.1N HClto a full purple color, and then a 5ml excess of 0.1 N HCl was added. Excess HCl was back titrated with 0.1 N NaOH to a neutral end point (green color).

Percent urea calculated as follow:

% Urea = 
$$\frac{[ml \ 0.1 \ N \ HCl - ml \ 0.1 \ N \ NaOH)x \ 0.3003^*]}{g \ sample}$$

\*0.3003 = this factor takes into account the molecular weight of urea, the conversion of the milliequivalent result of V x N, and the conversion to %.

# **Results and Discussion**

The free urea contents of each fertilizer sample were measured in duplicates by the AOAC Official Method 2003.14 by Lab 1 and Lab 2.

The results of analyses and t-test calculation of the twelve commercial liquid fertilizer sampleslisted above from Lab 1 and Lab 2 by the AOAC Official Method 2003.14 are listed in Table 2.

Fertilizer	Lab ID	Total -N*	% Urea-N		M	
Sample			Lab 1	Lab 2	Mean	Std. dev.
1	26-068-03	29.89	12.04	12.45	12.25	0.21
2	26-051-01	28.54	8.63	8.51	8.57	0.06
3	26-068-02	28.44	8.68	8.57	8.63	0.05
4	26-076-07	28.33	8.45	8.45	8.45	0.00
5	26-076-06	28.47	8.58	8.60	8.59	0.01
6	26-076-08	24.95	16.08	15.70	15.89	0.19
7	26-079-01	30.78	12.55	12.70	12.63	0.07
8	26-086-04	30.06	12.56	12.07	12.32	0.25
9	26-103-02	28.01	12.09	11.36	11.73	0.37
10	26-103-03	28.13	6.85	6.83	6.84	0.01
11	26-100-03	26.36	15.55	15.28	15.42	0.14
12	26-010-02	29.87	9.37	9.51	9.44	0.07
Average		X	10.95	10.84	-	-
Standard De	eviation	σ <sub>x</sub>	2.97	2.87	-	-
Number of	samples	n	12	12	-	-
Variance		$\sigma^2$	8.80	8.21	-	-
Pearson Co	rrelation	0.99	-	-	-	-
T Stat		1.30	-	-	-	-
P(T <t) one-tail<="" td=""><td>0.11</td><td>-</td><td>-</td><td>-</td><td>-</td></t)>		0.11	-	-	-	-
t Critical one-tail		1.80	-	-	-	-
P(T<=t) two-tail		0.22	-	-	-	-
T Critical tw	o-tail	2.20	-	-	-	-

 Table – 2

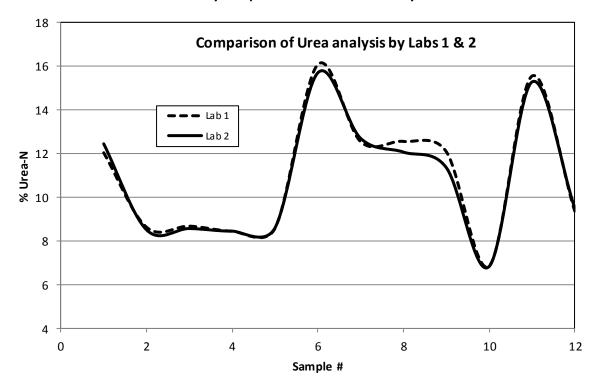
 Analyses of Twelve Fertilizer Samples for Urea by AOAC Method 2003.14

\*Note: Total-N includes other forms of nitrogen in addition to unreacted (free) urea

A statistical comparison (Students t-test, df, and, P) indicated that the results from two labs were statistically similar.

The results for the analyses of the Free and Unreacted urea in these twelve fertilizers by two independent Labs using AOAC Official Method 2003.14 are shown graphically as well in Figure 2.

Figure 2 Schematically comparisons of HPLC Results by two Labs



When the same samples were analyzed by urease method based on the AOAC Official Method 959.03, the results are much different and in this case showed a high biased in ten of the analyses and low biased in the remaining two analyses. The results and the differences between the results from the urease method and the HPLC method are shown in Table 3. The lowest % Urea-N difference from the two methods shown in Table 3 -0.45 and the highest % Urea-N difference is 2.42. These results were obtained by a commercial lab using powdered form of urease made from Jack Bean meal.

		% Urea-N	%Urea-N	% Urea-N
Total-N	Fertilizer Sample	Urease Method AOAC 959.03	HPLC Method AOAC 2003.14 (Means from two Labs)	Difference Urease-HPLC (Mean)
29.89	1	13.26	12.25	+1.02
28.54	2	9.87	8.57	+1.30
28.44	3	10.06	8.63	+1.44
28.33	4	9.33	8.45	+0.88
28.47	5	9.91	8.59	+1.32
24.95	6	15.44	15.89	-0.45
30.78	7	14.81	12.63	+2.19
30.06	8	14.08	12.32	+1.77
28.01	9	8.89	11.37	-2.48
28.13	10	8.94	6.84	+2.10
26.36	11	16.18	15.42	+0.77
29.87	12	11.86	9.44	+2.42

 Table-3

 Urease Analyses of Twelve Fertilizer Samples & Comparisons with the HPLC Results for Urea

In another series of studies supplies of seven different analytical quality urease enzyme sources were obtained from five well-known suppliers of laboratory chemicals which are identified as numbers 1 through 7. It is highly probable that one or more of these common sources are found in a large number of fertilizer analytical laboratories. Represented are four brands of urease powder, one brand of urease tablets and two brands of urease-glycerol extract solution. Only one supplier provided the information regarding the urease activity as part of its product label.

Tests using the urease enzymes in this study were carried out in accordance with the AOAC Official Method 959.03, with one exception where anaccommodation for the use of urease tablets or glycerol extract was required. The AOAC urease method specifies the use of a 1% aqueous solution of urease powder or Jack bean meal.

According to the AOAC urease method, 20ml of 1% solution of urease should be used and also the urease activity should be such that it will hydrolyze at least 0.1 gram of urea under the conditions specified in the method. The weight of fertilizer sample should also be such that the amount of urea in the final working volume does not exceed 0.1 gram.

In one series of tests, pure urea (99.4%) was used. The weights of urea samples used were 0.1g, 0.3g, 0.6 g, and 1.0 gram. These urea samples were analyzed using seven ureasematerials from different sources. The degrees of urea hydrolysis with the seven different urease materials are shown in Table 4.

Urease Source	Urease Amount	% Hydrolysis of urea from the amount used			
		0.1 g	0.3 g	0.6 g	1.0 g
1	20 ml (1% Sol.)	100.1	100.1	99.7	99.9
2	10 ml Glycerol Ext.	99.9	99.7	99.7	69.9
2	20 ml Glycerol Ext.	99.9	99.7	99.7	99.4
3	20 ml (1% Sol.)	99.6	99.7	97.6	62.7
4	20 ml (1% Sol.)	99.3	99.7	83.2	52.6
5	2 tablets	100	98.6	69.3	45.5
6	20 ml Glycerol Ext.	99.9	99.9	99.7	99.5
7	20 ml (1% Sol.)	100.3	100.1	99.9	99.6

Table-4 Analyses of Urea using Different Sources of Urease

In the amount used, all seven urease sourceshydrolyzed up to about 0.3 grams, thus exceeding the AOAC method requirements. However the urease tablets (source No. 5) begins to fade in effectiveness at 0.3 grams urea, with only 98.6% hydrolyzed, and two urease powders (No. 3and No. 4) begin to fail at about 0.6 grams of urea. The two other powder samples (No. 1 and No. 7) and the two urease glycerol extracts (No. 2 and No. 6) in 20 ml increments all hydrolyzed up to 1.0 gram of urea. Powder No.7 was known from the manufacturer's label to have a very high urease activity. From the results, it appears that sources 1, 2, and 6 were high activity urease samples. These data show that the AOAC Official Method 959.03 works well for pure urea when applied within the limits of the method. However, if the amount of urea exceeds the recommended amount in the method, there are inconsistencies with the results and some urease sources work better than others.

The inconsistencies with the Urease Method are obvious when the method applies to the more complex fertilizer samples, namely, the Urea-Triazone liquid solution containing mixed compositions of urea-forms and triazone moieties (Table 2).

More tests were done to further illustrate these inconsistencies even further.

In the following sets of experiments, five Urea-Triazone fertilizers from four different manufacturers were analyzed for their claim of %SRN. The percentage of free and unreacted urea in these samples was analyzed by the HPLC and by the urease methodusing powdered urease enzyme from Jack bean meal. The results are shown in Table 5.

		SRN Dete	rmination
Product % Total N	%SRN Claimed	Met	hod
		HPLC (2003-14)	Urease
28-0-0	72	72	88
30-0-0	60	60	77
30-0-0	50	50	68
28-0-0	75	50	70
30-0-0	85	46	80

Table 5Comparisons of the Results by HPLC (2003-14) and by UreaseMethod(Powdered Sample)

The results by the urease method for the SRN contents (i.e., Total N minus Free Urea-N) of these known fertilizers were always different from the claimed amount, while the results by HPLC were on target for three of five samples and off for two samples.

The following results further illustrate the inconsistencies of the Urease Method when applied to this class of fertilizers<sup>7</sup>. Comparisons of the urea results obtained with the different urease sources listed in Table 4 with the HPLC Method 2003.14 are shown in Table6. The results are for four different aqueous Urea-Triazone fertilizers and are shown in three ways, (1) as the absolute weight of urea found in each sample volume by both methods, (2) as the weight percent urea in the fertilizers, and (3) as the percent recovery of urea by the Urease Method relative to 100% recovery by the HPLC Method.

These results clearly show that the Urease Method using urease sources 1, 3 and 4 finds less urea in all four fertilizer samples in comparisons with the results from the HPLC Method. The differences are substantial. For example, sometimes less than half as much urea is recovered by the Urease Method. For the source No. 2, it makes a significant difference whether 10 ml of Glycerol extract or 20 ml of glycerol extract was used. Source No. 5 (Urease tablets) showed the poorest recovery results. All of these urease sources should normally be expected to totally hydrolyze the urea in these fertilizers. However, four of these Urease sources (Nos. 1, 3, 4, and 5) plus 10 ml of the source No.2 Glycerol extract significantly failed to hydrolyze all of the urea in any of these four fertilizer samples.

amount used Sample Urease vs Urease HPLC HPLC Urease HPLC 1 Α 0.20 0.34 20.2 33.7 60 20ml 1% Solution В 0.11 0.16 10.9 16.1 68 С 0.24 32.1 73 0.32 23.5 D 0.27 0.35 78 27.3 35.1 2 Α 0.17 0.34 16.9 33.7 50 10ml Glycerol Ext. в 0.08 0.16 7.5 16.1 47 С 0.14 0.32 14.2 32.1 44 D 0.25 0.35 25.4 35.1 72 2 Α 0.34 0.34 34.3 33.7 102 20ml Glycerol Ext. В 106 0.17 0.16 17.0 16.1 С 0.32 101 0.32 32.4 32.1 D 0.33 0.35 33.4 35.1 95 3 Α 0.15 0.34 15.0 33.7 45 20ml 1% Solution В 59 0.10 0.16 9.5 16.1 С 0.18 0.32 17.8 32.1 55 D 0.32 0.35 32.4 35.1 92 4 Α 0.18 0.34 18.1 33.7 54 20ml 1% Solution В 0.11 0.16 11.0 16.1 68 С 0.18 0.32 18.4 32.1 57 D 67 0.24 0.35 23.5 35.1 5 Α 0.17 0.16 6.9 16.1 43 **Two Tablets** В 0.13 0.32 13.0 32.1 40 6 В 0.17 0.16 16.9 16.1 105 10 ml Glycerol Ext. С 0.33 0.32 33.1 32.1 103 6 В 0.17 0.16 17.1 16.1 106 20 ml Glycerol Ext. С 0.33 0.32 33.2 32.1 103 7 Α 0.34 0.34 34.0 33.7 101 20ml 1% Solution в 16.2 16.1 101 0.16 0.16 С 101 0.32 0.32 32.3 32.1 D 0.33 0.35 33.0 35.1 94

Table-6 AOAC 959.03 (Urease Method) vs. AOAC 2003.14 (HPLC) Results for Analyses of Unreacted Urea in Urea-Triazone Liguid Fertilizers

In quantitative terms, hydrolyses of urea in these four fertilizer samples by these urease sources tended to be in the range of 40-80%. Each of the urease sources should have hydrolyzed all the urea in these type of fertilizers based on the tests done using the pure urea (Table 4), within the scope of the Urease Method. Fertilizer "B" contains only about half of the urea of the other three fertilizer samples (A, C, and

D). However, even with less free, unreacted urea in the sample, recovery by these urease sources was not improved. From the data in Table 5, the lower activity urease sources failed substantially to hydrolyze all the urea in these UF fertilizers, while the high activity sources did hydrolyze all the urea. The fact that high activity sources (No. 1, 7, and 20 ml extracts of No.2) show the same percent urea hydrolyses as the amount found by HPLC analyses, support that such percentages urea are indeed present in these UF fertilizers samples. The combined performances of HPLC and the high activity urease sources indicate that the AOAC Method 959.03 is very much dependent on the type of urease.

The above data show that analyses of Urea-Formaldehyde fertilizer solutions using the urease method are not consistent. In most cases, the amount of free and unreacted urea analyzed by the urease method showed a low biased (Table 6). However, in some occasions the results showed a high bias (Table 3).

These data support the discussion that AOAC official Method 959.03 (Urease Method) is not suitable for the determination of free-unreacted urea in the Urea-Formaldehyde fertilizer solutions. The HPLC Method consistently provides more accurate analyses of unreacted urea in this class of fertilizers.

As mentioned above, there are two AOAC Official Methods by HPLC for the determination of unreacted urea in these fertilizers, namely AOAC Official Method 983.01, and AOAC Official Method 2003.14.

The advantage with AOAC 983.01 is the use of water as the mobile phase, however due to the use of water, the peak separations in the complex compositions of these fertilizers (Figure 1) is not efficient and some of the peaks might overlap with that of urea resulting in erroneous data. A collaborative study<sup>3</sup> by the International Standards organization (ISO-CD 18643) involving 13 laboratories for the biuret content of several fertilizers, including the water-soluble Urea Triazone fertilizers, has showed that AOAC 983.01 HPLC method results in erroneous analyses of some of these UF fertilizer solutions. The same study showed that the AOAC 2003.14 method accurately predicts the amounts of urea result urea in these fertilizers.

Table 8 shows the inconsistency of the AOAC Official Method 983.01 (HPLC) for the determination of biuret in the Urea-Triazone fertilizers (Grade 26-0-0). The biuret co-elutes with the free and unreacted urea in these fertilizers and their peaks overlap resulting in erroneous analytical data.

Comparisons of the analytical results for Grade 26-0-0 by AOAC 983.1 & AOA 2003.14								
Sample ID	Samples Analyzed by Lab-1	Grade	% Biuret Test 1	% Biuret Test 2	% Biuret Test 3	% Biuret Test 4	Average % Biuret	STDEV
By 2003-14	4 Method				I			I
25-012-05	Sulfur coated urea	39-0-0	0.911	0.943	0.979	0.933	0.942	0.025
25-068-06	Triazone Fertilizer	26-0-0	0.118	0.124	0.131	0.139	0.128	0.008
25-070-01	Fertilizer "A"	15-15-15	0.668	0.689	0.762	0.708	0.707	0.035
25-070-02	Fertilizer "B"	25-11-10	0.296	0.356	0.440	0.416	0.377	0.056
By 983.1 N	<b>Nethod</b>							
25-012-05	Sulfur coated urea	39-0-0	0.795	0.795	0.794	0.791	0.794	0.002
25-068-06	Triazone Fertilizer	26-0-0	5.793	5.854	5.856	5.814	5.829	0.027
25-070-01	Fertilizer "A"	15-15-15	0.560	0.560	0.557	0.555	0.558	0.002
25-070-02	Fertilizer "B"	25-11-10	0.299	0.302	0.303	0.300	0.301	0.002
By SRIC <sup>*</sup> N	By SRIC <sup>*</sup> Method (same as 2003-14)							
25-012-05	Sulfur coated urea	39-0-0	0.934	0.965	0.987	0.974	0.965	0.019
25-068-06	Triazone Fertilizer	26-0-0	0.120	0.131	0.130	0.134	0.129	0.005
25-070-01	Fertilizer "A"	15-15-15	0.663	0.711	0.734	0.727	0.709	0.028
25-070-02	Fertilizer "B"	25-11-10	0.286	0.367	0.388	0.382	0.356	0.041

Table 7Comparisons of the analytical results for Grade 26-0-0 by AOAC 983.1 & AOA 2003.14

\*Shanghai Research Institute of Chemical Industry Testing Center

In another sets of tests, three of the commercial liquid fertilizers listed above, namely samples number 10, 11, and 12 were tested by three laboratories. Lab 1, and Lab 2 used the AOAC Official Method 2003.14, and Lab 3 used the AOAC 983.1 Official Method. Results are listed in Table 8.

	Table8
C	omparisons of results for sample #10, #11, and #12 by two HPLC Methods

Sample # 10 (28-0-0)	Sample # 11 (26-0-0)	Sample #12 (30-0-0)				
	% Free Urea					
(AOAC 2	(AOAC 2003.14) (AOAC					
Lab 1	Lab 2	Lab 3				
13.6	13.9	15.8				
30.5	30.3	30.2				
21.9	21.7	23.7				

Results from Table 8 showed that AOAC Official Method 983.1 was not suitable for accurate analyses of this class of liquid fertilizer samples, due to incomplete separation of the urea peak from others.

# Conclusions

The AOAC Official Methods 959.03 (Urease Method) and 983.01 (HPLC Method) are frequently inaccurate and therefore not suitable for measuring the amounts of free and unreacted urea in liquid urea-formaldehyde condensate products. AOAC Official Method 2003.14 consistently provides more accurate analytical results for measuring the contents of free urea in these classes of fertilizers.

# Acknowledgements

We give special thanks to Hugh Rodriguez, Thornton Laboratory, Tampa, FL, and John Hartshorn, Morral Chemical Co., Morral, OH, for collaborative support of this study. We are also indebted to Nancy Thiex and James Bartos for many helpful suggestions.

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TECHN	NICAL EVALUATION CRITERIA
Is the t	test kit method scientifically and technically sound?
ER 1	Yes
ER 2	Yes
ER 3	Yes
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
	sufficient controls been used, including those required to calculate the rate of false-positive and
	negative results where appropriate?
ER 1	Yes
ER 2	Yes
ER 3	Yes
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
ls suffi testing	icient information included for system suitability determination and product performance or acceptance
ER 1	Yes
ER 2	Yes
ER 3	Yes
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
Are the	e conclusions statements valid based upon data presented?
ER 1	Yes
ER 2	Yes
ER 3	Yes
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
	u agree that the evidence or data from this and previous studies support the proposed applicability
statem	
ER 1	Yes
ER 2	Yes
ER 3	Yes



ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
Are th	ere sufficient data points per product evaluated in accordance with AOAC requirements?
ER 1	Yes
ER 2	Yes
ER 3	Yes
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
Gener	al Comments about the Method Scope/Applicability:
ER 1	Follows good Inorganic protocols. Similar to both EPA and ASTM methodology.
ER 2	Excellent work! This method will enable state fertilizer regulatory laboratories to simultaneously analyze nutrient guarantees and evaluate fertilizer metal levels in support of AAPFCO SUIP #25 requirements. The ability to obtain these results with a single sample preparation and analysis for a broad scope of commercial fertilizer product samples is invaluable. Our laboratory intends to adopt this methodology for the analysis of official fertilizer samples in support of Chapter 576, F.S.
ER 3	A multitude of elements (both hazardous and nutritive) are analyzed in a single digestate of fertilizer materials.
	Wonder if it would be possible to include S in the scope of the method for interlaboratory evaluation.
ER 4	Very good method verification. Draws attention to watchouts such as wavelength interferences.
ER 5	The addition of Group B metals is a reasonable modification to AOAC 2006.03. This method is needed to replace AOAC 965.09.
ER 6	Scope and applicability for this method appears suitable for mentioned metals.
ER 7	The method is applicable to a broad range of fertilizers.
ER 1	Basic Methodology
ER 2	The high level of detail provided in the digestion and detection sections is extremely helpful and will assist laboratories in performing the method properly. Method QC is very strong. Tables 6 and 7 and the Experimental Validation (method ruggedness tests) section are excellent. Finally, the results provided for the Magruder 2009-06 and NIST SRM695 demonstrate the effectiveness of this methodology.
ER 3	<ol> <li>A multitude of elements (both hazardous and nutritive) analyzed in a single digestate greatly improves laboratory efficiencty.</li> <li>Good details and creating calibration standards and results of calibration curves.</li> </ol>
ER 4	Run sequence defined well to maintain calibration integrity.
ER 5	The manuscript is well written. The conclusions are supported by data within the manuscript.
ER 6	The manuscript explains well the scope of the method, the procedure and analytical results.



ER 7	Usable for a number of different ICP-OES models
Cons/	Weaknesses of the Manuscript:
ER 1	Address the importance of the sample prep reagents, especially for the Heavy Metals.
ER 2	None
ER 3	<ol> <li>The unit in Table 9 for LOD and LOQ is incorrectly showing mg/L when it should be mg/kg. These are detection limits in the fertilizer in mg/kg after taking into account factors with digestate of 100 mL and sample wt of 1 g. They are not detection limits in the digestate which the mg/L units imply.</li> <li>The instrument LOD and LOQ for Ni, Pb, and Se appear much too low. Are these possibly detection limits in the digestate at mg/L before calculated detection limits in the fertilizer in mg/kg?</li> <li>A reference is presented on how LOD and LOQ were determined with a reference to (8). However, the reference list only goes up to (6).</li> </ol>
	4. Probably not necessary, but some interpretation and discussion of results for accuracy, precision, and
ER 4	comparability would have been nice.Perhaps state this is intended for total metal analyses and not for water soluble.
ER 5	Error in section G.(7). 400 mg/kg should be changed to 400 mg/L. 1 L acid-washed flask should be changed to 500 mL acid washed flask.
ER 6	This method could not be applicable for all possible fertilizers and metals (example: selenium).
ER 7	Not all of the metals are equally responsive to this method.
Yes	Address the importance of the sample prep reagents, especially for the Heavy Metals.
Supp <u>o</u>	rting Data and Information: Does data from collaborative study support the method as written?
ER 1	Yes
ER 2	Yes (SLV)
ER 3	yes
ER 4	Yes
ER 5	Yes
ER 6	Yes.
ER 7	Yes, it appears to.
Suppo protoc	rting Data and information: Does data collected support the criteria given in the collaborative study ol?
ER 1	Yes
ER 2	Yes
ER 3	yes
ER 4	Yes
ER 5	Yes
ER 6	Yes.
ER 7	Yes, it appears to.
	ere any concerns regarding the safety of the method?
ER 1	No
ER 2	No, applicable safety information is included.
ER 3	no
ER 4	No



ER 5	No
ER 6	No.
ER 7	No
Are the	re any concerns regarding the data manipulation, data tables, or statistical analysis?
ER 1	No
ER 2	No
ER 3	no
ER 4	No
ER 5	I have not seen the review provided by the Statistical Advisor.
ER 6	No.
ER 7	No



EDITORIAL EVALUATION CRITERIA		
ER 1	Validation Study Manuscript in a format acceptable to AOAC? Yes	
ER 1 ER 2	Yes	
-		
ER 3	Yes	
ER 4	Yes	
ER 5	Yes	
ER 6	Yes	
ER 7	Yes	
	method described in sufficient detail so that it is relatively easy to understand, including equations and	
	dures for calculation of results (are all terms explained)?	
ER 1	Yes	
ER 2	Yes	
ER 3	Yes	
ER 4	Yes	
ER 5	Yes	
ER 6	Yes	
ER 7	Yes	
Are the	e figures and tables sufficiently explanatory without the need to refer to the text?	
ER 1	Yes	
ER 2	Yes	
ER 3	Yes	
ER 4	Yes	
ER 5	Yes	
ER 6	Yes	
ER 7	Yes	
Are al	I the figures and tables pertinent?	
ER 1	Yes	
ER 2	Yes	
ER 3	Yes	
ER 4	Yes	
ER 5	Yes	
ER 6	Yes	
ER 7	Yes	
	some be omitted and covered by a simple statement?	
ER 1	No	
ER 2	No	
ER 3	No	
ER 4	No	
ER 5	No	



ER 6	No
ER 7	No



Are the references complete and correctly annotated?		
ER 1	Yes	
ER 2	Yes	
ER 3	No, Only 6 references shown in reference list, but LOD section makes a reference to #8 reference.	
ER 4	Yes	
ER 5	Yes	
ER 6	Yes	
ER 7	Yes	
Does the method contain adequate safety precaution reference and/or statements?		
ER 1	Yes	
ER 2	Yes	
ER 3	Yes	
ER 4	Yes	
ER 5	Yes	
ER 6	Yes	
ER 7	Yes	



	recommend that the ERP adopt this method as an AOAC Official Method of Analysis (First Action
status)?	
ER 1	Yes
ER 2	Yes
ER 3	Yes
ER 4	Yes
ER 5	Yes
ER 6	Yes
ER 7	Yes
AFTER F	IRST ACTION STATUS:
Is there	any additional information that the ERP should consider in order to recommend the method for
Final Ac	tion status?
ER 1	No
ER 2	No
ER 3	No
ER 4	No
ER 5	No
ER 6	Νο

Reviewers	Reviewers	
ER 1	Dion Tsourides	
ER 2	Patricia Lucas	
ER 3	Frank J Sikora	
ER 4	Jack Schmansky	
ER 5	Scott Sabel	
ER 6	Salvatore Parisi	
ER 7	Keith Wegner	



#### **EXPERT REVIEW PANEL (ERP) FOR FERTILIZERS**



# **EXPERT REVIEW PANEL FOR FERTILIZERS - UREA**

#### Is this method recognized or adopted by another agency outside of AOAC?

- 1) Not at my knowledge
- 2) N/A
- 3) As an AOAC fertilizer method, this method is recognized and could be utilized by our laboratory for fertilizer sample analysis.
- 4) Yes

# Does your organization support the proposed modification being submitted to AOAC? Please indicate explanations.

- 1) Yes, my organisation supports the change
- 2) Yes, many of our formulas are urea based.
- 3) Yes, the proposed modification is supported. The data presented in the "Evaluation of the Determination of Free Urea in Water-Soluble Liquid Fertilizers containing Urea and Ureaforms by Urease Method and by HPLC Methods" supports the need to provide this clarification.
- 4) Yes, The authors present significant and sufficient evidence that Official Method 959.03 is not suitable for urea-formaldehyde products. In this situation, HPLC-based methods are preferred, particularly AOAC Official Method 2003-14. It is clear that with one of the major sources of variability in the Official Method 959.03 is the source of urease, which should be further specified.

#### Does your organization, have any additional suggestions regarding the modification of this method?

- 1) No
- 2) No
- 3) The following 4 typo/transcription type comments are submitted for consideration regarding the "Evaluation of the Determination of Free Urea in Water-Soluble Liquid Fertilizers containing Urea and Ureaforms by Urease Method and by HPLC Methods" document: Comment 1: Page 4, line 3 - change "...difference of the unreacted free urea subtracted from total the N, both..." to "...difference of the unreacted free urea subtracted from the total N, both..." Comment 2: Page 11, line 4 - update the Table 3 values to reflect changes described in Comment 3. Comment 3: Page 12 Table 3. The % Urea-N HPLC Method AOAC 2003.14 (Means from two Labs) entry for Fertilizer Sample 9 should be 11.73 instead of 11.37 (transcribed from Table 2). This would then make the %Urea-N Difference Urease-HPLC (Mean) become -2.84. Comment 4: Page 16, line 2 - confirm the data is in Table 5 vs. Table 6.
- 4) No



#### **EXPERT REVIEW PANEL (ERP) FOR FERTILIZERS**

#### **RECOMMENDATION OF PROPOSED MODIFICATION**

- 1) Yes I agree that the proposed changes can be implemented
- 2) No I disagree that the proposed changes can be implemented.
- 3) Yes I agree that the proposed changes can be implemented for OMA 932.14.
- 4) Yes I agree that the proposed changes can be implemented for OMA 932.14.

#### Please explain and delineate for scientific reasons

- 1) The data from the revise method is compared with AOAC Final Action Method 2003.14
- 2) These modifications do not alter the validated performance of the method.

#### Please explain the additional revisions:

- 1) The modifications to the method to validated by comparative data between the revised AOAC OMA 959.03 and 2003.14 which is final action HOLC method
- 2) On page 1476, in the second paragraph after Experimental-->Materials-->(I), the last sentence "Analytical results, means, and standard deviations are shown in Table 1" should be Table 2.

On page 1477, the last sentence of Apparatus-->(a) "Instrument operating conditions are listed in Table 2" should be Table 1.

On page 1480, the last sentence of paragraph 6 "...the Urea-triazone liquid solution containing mixed compositions of urea forms and triazone moieties (Table 1)" should be Table 2.

#### **RECOMMENDATION OF PROPOSED MODIFICATION LEVEL**

- 1) Minor Modification
- 2) Editorial Change
- 3) Minor Modification
- 4) Minor Modification