

Statistical Methods in PQRI Interlaboratory Study Report

4th PQRI Workshop on ICH Q3D Elemental Impurities Requirements Stephen W. Erickson, PhD



PQRI Interlaboratory Study on the Determination of Elemental Impurities in Drug Products

FINAL REPORT

Client: Product Quality Research Institute (PQRI)

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By

James M. Harrington, Ph.D. RTI International 3040 Cornwallis Road Research Triangle Park, NC 27709 jharrington@rti.org

Donna S. Seibert, Ph.D. Perrigo Company 655 Hooker Road Allegan, MI 49010 donna.seibert@perrigo.com



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Inter-laboratory validation of bioaccessibility testing for metals



Regulatory Toxicology and Pharmacology

Rayetta G. Henderson^{a,*}, Violaine Verougstraete^b, Kim Anderson^c, José J. Arbildua^d, Thomas O. Brock^e, Tony Brouwers^f, Danielle Cappellini^g, Katrien Delbeke^h, Gunilla Hertingⁱ, Greg Hixon^a, Inger Odnevall Wallinderⁱ, Patricio H. Rodriguez^d, Frank Van Assche^j, Peter Wilrich^k, Adriana R. Oller¹

^a ToxStrategies, Inc., 9650 Strickland Rd., Suite 103-195, Raleigh, NC 27615, USA

^b Eurometaux, Avenue de Broqueville 12, 1150 Brussels, Belgium

^c Oregon State University, Corvallis, OR 97331, USA

^d CECM, Adolfo Ibañez University, Diagonal Las Torres 2640, Peñalolen, Santiago, Chile

^e Duke University, 2200 West Main Street, Suite 400, Durham, NC 27705, USA

f ECTX bvba, Havenstraat 46/0.01, B-3500 Hasselt, Belgium

^g Kirby Memorial Health Center, 71 North Franklin Street, Wilkes-Barre, PA 18701, USA

^h European Copper Institute, 168 Avenue de Tervueren, 1150 Brussels, Belgium

ⁱ KTH Royal Institute of Technology, Drottning Kristinas väg 51, SE-10044 Stockholm, Sweden

^j International Zinc Association, Avenue de Tervueren 168/Box 4, B-1150, Belgium

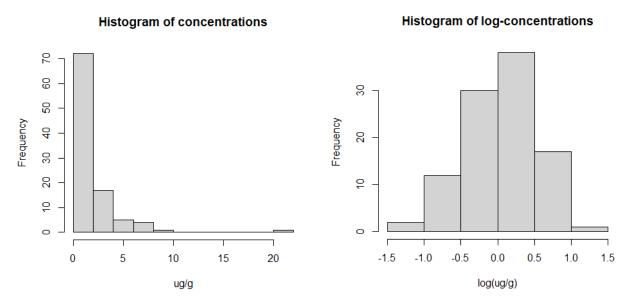
^k Freie Universität Berlin, Promenadenstr. 16 A, D-12207 Berlin, Germany

¹Nickel Producers Environmental Research Association, Inc., 2525 Meridian Parkway, Suite 240, Durham, NC 27713, USA

- Appendix E: Comparison of ICP-MS results to Reference Values
- Appendix F: Analysis of Reproducibility of Analytical Results (ICP-MS)
- Appendix G: Comparison of Digestion Methods (EE vs TG)
- Appendix H: Comparison of Microwave systems (IPV vs SRC)
- Appendix I: Summation Approach Analysis
- Appendix J: Analysis of Analytical Results (XRF)

Preliminaries

 Means, standard deviations, confidence intervals, etc, were computed using log-transformed concentrations due to right-skewness



 For display purposes, these values were transformed back to the original units (µg/g)

- Values below the limit of quantitation were including in mean calculations, set equal to the limit of quantitation
- Standard deviations were calculated only using values that were greater than the limit of quantitation
- *t*-tests and *F*-tests were used to compare means and variances, respectively

| | | | Table L1. Com | parison or rer | 115 values to | Reference val | | | |
|---------|---------------------|------------|------------------------------|--------------------------|--------------------------------------|---------------------------------|--|-------------------------------|---------|
| Analyte | Material | Method | Total Measurements (n) | Measurements >LOQ (n) | Reference concentration (ug/g) | Mean concentration (ug/g) | Geometric standard deviation (ug/g) | 95% confidence Interval | P value |
| | | Exhaustive | 42 | 3 | ND | 0.2 | 4.1 | (0.0, 0.8) | NA |
| | Lactose | Total | 18 | 0 | ND | ND | NA | NA | NA |
| | | All labs | 60 | 3 | ND | 0.2 | 4.1 | (0.0, 0.8) | NA |
| | Magnesium | Exhaustive | 42 | 15 | 1.74 | 7.4 | 8.4 | (2.5, 21.7) | 0.020 |
| | Aluminum | Total | 18 | 0 | 1.90 | ND | NA | NA | NA |
| | Silicate | All labs | 60 | 15 | 1.79 | 7.4 | 8.4 | (2.5, 21.7) | 0.022 |
| | Ded Corrie | Exhaustive | 42 | 5 | 0.442 | 1.1 | 3.8 | (0.3, 3.5) | 0.215 |
| | Red Ferric Oxide | Total | 18 | 3 | 0.473 | 40 | 1 | (40, 40) | NA |
| | Oxide | All labs | 60 | 8 | 0.451 | 4.2 | 8.4 | (1.0, 18.2) | 0.021 |
| | Silicon | Exhaustive | 41 | 41 | 1090 | 998 | 1 | (949, 1050) | 0.001 |
| | Dioxide Standard | Total | 17 | 15 | 988 | 1007 | 1 | (969, 1047) | 0.337 |
| | (As, Co, Hg) | All labs | 58 | 56 | 1060 | 1001 | 1 | (963, 1040) | 0.005 |
| As | Silicon | Exhaustive | 39 | 4 | ND | 2.3 | 1.2 | (1.8, 2.8) | NA |
| | Dioxide Standard | Total | 18 | 0 | ND | ND | NA | NA | NA |
| | (Cd, Ni, Pb) | All labs | 57 | 4 | ND | 2.3 | 1.2 | (1.8, 2.8) | NA |
| | | Exhaustive | 42 | 3 | ND | 0.6 | 1.4 | (0.4, 1.0) | NA |
| | Starch | Total | 18 | 0 | ND | ND | NA | NA | NA |
| | | All labs | 60 | 3 | ND | 0.6 | 1.4 | (0.4, 1.0) | NA |
| | | Exhaustive | 57 | 57 | 5.65 | 6.1 | 1.5 | (5.5, 6.8) | 0.157 |
| | Tablet Level 1 | Total | 21 | 21 | 6.05 | 5.5 | 1.2 | (5.1, 5.9) | 0.015 |
| | | All labs | 78 | 78 | 5.76 | 5.9 | 1.4 | (5.5, 6.4) | 0.485 |
| | | Exhaustive | 57 | 57 | 17.0 | 17 | 1 | (16, 18) | 0.530 |
| | Tablet Level 2 | Total | 21 | 21 | 17.9 | 17 | 1 | (17, 18) | 0.004 |
| | | All labs | 78 | 78 | 17.2 | 17 | 1 | (16, 17) | 0.242 |

Table E1. Comparison of ICP-MS values to Reference Values

| Analyte | Material | Method | Total Measurements (n) | Measurements >LOQ (n) | Reference concentration (ug/g) | Mean concentration (ug/g) | Geometric standard deviation (ug/g) | 95% confidenc Interval | P value |
|---------|--------------------------------------|--------------|------------------------------|--------------------------|--------------------------------------|---------------------------------|--|------------------------------|----------|
| | | Exhaustive | 42 | 3 | ND | 0.2 | 4.1 | (0.0, 0.8) | NA |
| | Lactose | Total | 18 | 0 | ND | ND | NA | NA | NA |
| | | All labs | 60 | 3 | ND | 0.2 | 4.1 | (0.0, 0.8) | NA |
| | Magnesium | Exhaustive | 42 | 15 | 1.74 | 7.4 | 8.4 | (2.5, 21.7) | 0.020 |
| | Aluminum | Total | 18 | 0 | 1.90 | ND | NA | NA | NA |
| - | Silicate | All labs | 60 | 15 | 1.79 | 7.4 | 8.4 | (2.5, 21.7) | 0.022 |
| | Red Ferric | Exhaustive | 42 | 5 | 0.442 | 1.1 | 3.8 | (0.3, 3.5) | 0.215 |
| | Oxide | Total | 18 | 3 | 0.473 | 40 | 1 | (40, 40) | NA |
| | Oxide | All labs | 60 | 8 | 0.451 | 4.2 | 8.4 | (1.0, 18.2) | 0.021 |
| | Silicon | Exhaustive | 41 | 41 | 1090 | 998 | 1 | (949, 1050) | 0.001 |
| | Dioxide Standard | Total | 17 | 15 | 988 | 1007 | 1 | (969, 1047) | 0.337 |
| As | (As, Co, Hg) | All labs | 58 | 56 | 1060 | 1001 | 1 | (963, 1040) | 0.005 |
| AS | Silicon | Exhaustive | 39 | 4 | ND | 2.3 | 1.2 | (1.8, 2.8) | NA |
| | I loxi e S and rd (Cd, Ni, Pb) | All labs | Sam | ple | t-te | | NA 1.2 | NA (1.8, 2.8) | NA NA |
| | (Cu, Ni, F0) | Exhaustive | | - 4 | ND | 0.6 | 1.2 | (0.4, 1.0) | NA |
| | me | T-G A C s | | | S Vis | s rê | fer | | |
| | | Exhaustive | 57 | 57 | 5.65 | 6.1 | 1.5 | (5.5, 6.8) | 0.157 |
| | Tablet Level 1 | Total | 21 | 21 | 6.05 | 5.5 | 1.2 | (5.1, 5.9) | 0.015 |
| | | All labs | 78 | 78 | 5.76 | 5.9 | 1.4 | (5.5, 6.4) | 0.485 |
| | | Exhaustive | 57 | 57 | 17.0 | . 17 | 1 | (16, 18) | 0.530 |
| | | Total | 21 | 21 | 17.9 | 17 | 1 | (17, 18) | 0.004 |
| | | All labs | 78 | 78 | 17.2 | 17 | 1 | (16, 17) | 0.242 |

Table E1. Comparison of ICP-MS values to Reference Values

- <u>Repeatability</u> standard deviation (S_r) indicates the variability of measurements <u>within</u> labs
- <u>Reproducibility</u> standard deviation (S_R) indicates the variability of measurements <u>between</u> labs
- These are computed with analysis of variance (ANOVA)
- The ratio S_R:S_r indicates the relative agreement of results between labs
- S_R:S_r < 6 is considered "good" agreement between labs

| | · | | | producibility Re | Suits for ICF | | Analiged b | | _ | |
|---------|--------------------------------------|-------------|------------------------------|--------------------------|---------------------------------|--|-------------------------------|---|-----------------------------------|--------------------------------------|
| Analyte | Material | Labs (n) | Measurements reported (n) | Measurements >LOQ (n) | Mean concentration (µg/g) | Within Lab Standard deviation (s _r , μg/g) | Within lab Geometric CV | Between Lab Standard deviation (s _R , μg/g) | Between lab Geometric CV | S _R :S _r ratio |
| | Lactose | 16 | 69 | 3 | 0.2 | 4.1 | 250% | NA | NA | NA |
| | Magnesium | | | | | | | | | |
| | Aluminum Silicate | 16 | 69 | 21 | 5.1 | 1.3 | 26% | 30.5 | >300% | 13.6 |
| | Microcrystalline | | | | | | | | | |
| | Cellulose | 16 | 69 | 8 | 4.2 | 1.3 | 31% | 25.9 | >300% | 10.9 |
| | Red Ferric Oxide | 16 | 69 | 14 | 1.1 | 6.1 | 5.1% | 30.9 | >300% | 1.89 |
| | Silicon Dioxide Standard (As, Co, | | | | | | | | | |
| | Hg) | 16 | 65 | 63 | 1000 | 1 | 6.1% | 1 | 26% | 4.20 |
| As | Silicon Dioxide Standard (Cd, Ni, | | | | | | | | | |
| | Pb) | 15 | 66 | 6 | 1.3 | 1.5 | 40% | 4.3 | 272% | 3.79 |
| | Standard Liquid ^a | 18 | 38 | 35 | 4.2 | 1.1 | 5.0% | 1.8 | 63% | 11.6 |
| | Starch | 16 | 69 | 4 | 0.3 | 1.4 | 38% | 8.5 | >300% | 5.87 |
| | Stearic Acid | 10 | 57 | 3 | 0.3 | 1.9 | 73% | NA | NA | NA |
| | Tablet Level 1 | 22 | 87 | 87 | 5.9 | 1.9 | 14% | 1.9 | 70% | 4.40 |
| | Tablet Level 2 | 22 | 87 | 87 | 5.9 17 | 1.2 | 14% | 1.9 | 24% | |
| | | | | | | _ | | - | | 1.96 |
| | Tablet Level 3 | 22 | 87 | 87 | 42 | 1 | 7.6% | 1 | 40% | 5.03 |
| | Lactose | 16 | 69 | 2 | 0.05 | 12.5 | >300% | NA | NA | NA |
| | Magnesium Aluminum Silicate | 16 | 69 | 15 | 0.2 | 1.7 | 57% | 99.5 | >300% | 8.68 |
| | Microcrystalline | 10 | 09 | 15 | 0.2 | 1.7 | 5170 | 55.5 | >300% | 0.00 |
| | Cellulose | 16 | 69 | 7 | 0.9 | 1.6 | 48% | 73.6 | >300% | 9.45 |
| | Red Ferric Oxide | 16 | 69 | 7 | 0.10 | 1.20 | 19% | 508.25 | >300% | 33.2 |
| Cd | Silicon Dioxide | 10 | 05 | , | 0.10 | 1.20 | 1570 | 500.25 | >30070 | 55.2 |
| | Standard (As, Co, | | | | | | | | | |
| | Hg) | 15 | 62 | 17 | 8.0 | 2.0 | 80% | 5059.0 | >300% | 12.2 |
| | Silicon Dioxide | | | | | | | | | |
| | Standard (Cd, Ni, | | | | | | | | | |
| | Pb) | 16 | 69 | 69 | 952 | 1 | 13% | 1 | 21% | 1.56 |

Table F1.| Reproducibility Results for ICP-MS Results Arranged by Analyte

| | · | | | producibility R | | | Analigea b | | | | |
|---------|-------------------------------------|-------------|------------------------------|--------------------------|---------------------------------|--|-------------------------------|---|-----------------------------------|--------------------------------------|--------------|
| Analyte | Material | Labs (n) | Measurements reported (n) | Measurements >LOQ (n) | Mean concentration (µg/g) | Within Lab Standard deviation (s _r , μg/g) | Within lab Geometric CV | Between Lab Standard deviation (s _R , µg/g) | Between lab Geometrit CV | S _R :S _r ratio | |
| | Lactose | 16 | 69 | 3 | 0.2 | 4.1 | 250% | NA | NA | Calculat | od from |
| | Magnesium | | | | | | | | | | |
| | Aluminum Silicate | 16 | 69 | 21 | 5.1 | 1.3 | 26% | 30.5 | >300% | log-conc | centrations! |
| | Microcrystalline Cellulose | 16 | 60 | 0 | 12 | 10 | 210/ | 25.0 | > 2000/ | 10.9 | |
| | Red Ferric Oxide | 16 | 69 | 8 | 4.2 | 1.3 | 31% | 25.9 | >300% | | |
| | Silicon Dioxide | 10 | 69 | 14 | 1.1 | 6.1 | 5.1% | 30.9 | >300% | 1.89 | |
| | Standard (As, Co, | | | | | | | | | | |
| | Hg) | 16 | 65 | 63 | 1000 | 1 | 6.1% | 1 | 26% | 4.20 | |
| As | Silicon Dioxide | | | | | | | | | | |
| | Standard (Cd, Ni, | | | | | | | | | | |
| | Pb) | 15 | 66 | 6 | 1.3 | 1.5 | 40% | 4.3 | 272% | 3.79 | |
| | Standard Liquid ^a | 18 | 38 | 35 | 4.2 | 1.1 | 5.0% | 1.8 | 63% | 11.6 | |
| | Starch | 16 | 69 | 4 | 0.3 | 1.4 | 38% | 8.5 | >300% | 5.87 | |
| | Stearic Acid | 14 | 57 | 3 | 0.3 | 1.9 | 73% | NA | NA | NA | |
| | Tablet Level 1 | 22 | 87 | 87 | 5.9 | 1.2 | 14% | 1.9 | 70% | 4.40 | |
| | Tablet Level 2 | 22 | 87 | 87 | 17 | 1 | 12% | 1 | 24% | 1.96 | |
| | Tablet Level 3 | 22 | 87 | 87 | 42 | 1 | 7.6% | 1 | 40% | 5.03 | |
| | Lactose | 16 | 69 | 2 | 0.05 | 12.5 | >300% | NA | NA | NA | |
| | Magnesium | | | | | | | | | | |
| | Aluminum Silicate | 16 | 69 | 15 | 0.2 | 1.7 | 57% | 99.5 | >300% | 8.68 | |
| | Microcrystalline | 4.0 | CO | 7 | | 1.0 | 400/ | 72.6 | . 2000/ | 0.45 | |
| | Cellulose | 16 | 69 | 7 | 0.9 | 1.6 | 48% | 73.6 | >300% | 9.45 | |
| Cd | Red Ferric Oxide Silicon Dioxide | 16 | 69 | 7 | 0.10 | 1.20 | 19% | 508.25 | >300% | 33.2 | |
| | Standard (As, Co, | | | | | | | | | | |
| | Hg) | 15 | 62 | 17 | 8.0 | 2.0 | 80% | 5059.0 | >300% | 12.2 | |
| | Silicon Dioxide | 10 | 02 | 1, | 5.0 | 2.0 | 0070 | 000010 | | 12.12 | |
| | Standard (Cd, Ni, | | | | | | | | | | |
| | Pb) | 16 | 69 | 69 | 952 | 1 | 13% | 1 | 21% | 1.56 | |
| | | | | | | | | | | | |

Table F1.| Reproducibility Results for ICP-MS Results Arranged by Analyte

Appendix G: Comparison of Digestion Methods (EE vs TG)

| Analyte | Material | Method | Labs (n) | Measurements Reported (n) | Measurements >LOQ (n) | Mean concentration (ug/g) | P value | Within lab standard deviation (ug/g) | P value | Between lab standard deviation (ug/g) | P value |
|---------|--------------------------------------|------------|-------------|------------------------------|--------------------------|---------------------------------|---------|---|---------|--|---------|
| | Lactose | Exhaustive | 13 | 42 | 3 | 0.158 | NA | NA | NA | NA | NA |
| | | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| | Magnesium | Exhaustive | 13 | 42 | 15 | 7.4 | NA | 1.3 | NA | 52.3 | NA |
| | Aluminum Silicate | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| | Microcrystalline | Exhaustive | 13 | 42 | 8 | 4.2 | NA | 1.3 | NA | 25.9 | NA |
| | Cellulose | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| | Red Ferric Oxide | Exhaustive | 13 | 42 | 5 | 1.1 | 0.004 | 1.1 | NA | 14.7 | NA |
| | | Total | 6 | 18 | 3 | 40 | | NA | | NA | |
| | Silicon Dioxide Standard (As, Co, | Exhaustive | 13 | 41 | 41 | 998 | 0.776 | 1 | 0.056 | 1 | 0.142 |
| | Hg) | Total | 6 | 17 | 15 | 1010 | | 0 | | 0 | |
| As | Silicon Dioxide Standard (As, Co, | Exhaustive | 12 | 39 | 4 | 2.3 | NA | 1.3 | NA | 1.2 | NA |
| | Hg) | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| | | Exhaustive | 13 | 42 | 3 | 0.648 | NA | NA | NA | NA | NA |
| | Starch | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| | | Exhaustive | 11 | 36 | 3 | 0.332 | NA | NA | NA | NA | NA |
| | Stearic Acid | Total | 4 | 12 | 0 | ND | | NA | | NA | |
| | T 11 | Exhaustive | 19 | 57 | 57 | 6.1 | 0.098 | 1.2 | 0.001 | 1.9 | 0.06 |
| | Tablet Level 1 | Total | 7 | 21 | 21 | 5.5 | | 1.1 | | 1.4 | |
| | T 11 11 12 | Exhaustive | 19 | 57 | 57 | 17 | 0.308 | 1 | < 0.001 | 1 | 0.018 |
| | Tablet Level 2 | Total | 7 | 21 | 21 | 17 | | 1 | | 1 | |
| | T 11 | Exhaustive | 19 | 57 | 57 | 41 | 0.03 | 1 | < 0.001 | 2 | 0.004 |
| | Tablet Level 3 | Total | 7 | 21 | 21 | 44 | | 1 | | 1 | |
| | | Exhaustive | 13 | 42 | 2 | 0.048 | NA | NA | NA | NA | NA |
| | Lactose | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| Cd | Magnesium | Exhaustive | 13 | 42 | 9 | 0.4 | NA | 2.0 | NA | 244.1 | NA |
| | Aluminum Silicate | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| | Aluminum sincurc | Exhaustive | 13 | 42 | 7 | 0.9 | NA | 1.6 | NA | 73.6 | NA |

P-values compare methods (F-test)

| Analyte | Material | Method | Labs (n) | Measurements Reported (n) | Measurements >LOQ (n) | Mean concentration (ug/g) | P value | Within lab standard deviation (ug/g) | P value | Between lab standard deviation (ug/g) | P value |
|---------|--------------------------------------|------------|-------------|------------------------------|--------------------------|---------------------------------|---------|---|---------|--|---------|
| | Lactose | Exhaustive | 13 | 42 | 3 | 0.158 | NA | NA | NA | NA | NA |
| | | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| | Magnesium | Exhaustive | 13 | 42 | 15 | 7.4 | NA | 1.3 | NA | 52.3 | NA |
| | Aluminum Silicate | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| | Microcrystalline | Exhaustive | 13 | 42 | 8 | 4.2 | NA | 1.3 | NA | 25.9 | NA |
| | Cellulose | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| | Red Ferric Oxide | Exhaustive | 13 | 42 | 5 | 1.1 | 0.004 | 1.1 | NA | 14.7 | NA |
| | | Total | 6 | 18 | 3 | 40 | | NA | | NA | |
| | Silicon Dioxide Standard (As, Co, | Exhaustive | 13 | 41 | 41 | 998 | 0.776 | 1 | 0.056 | 1 | 0.142 |
| | Hg) | Total | 6 | 17 | 15 | 1010 | | 0 | | 0 | |
| As | Silicon Dioxide | Exhaustive | 12 | 39 | 4 | 2.3 | NA | 1.3 | NA | 1.2 | NA |
| AS | Standard (As, Co, Hg) | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| | <u>.</u> | Exhaustive | 13 | 42 | 3 | 0.648 | NA | NA | NA | NA | NA |
| | Starch | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| | Ci. 1. A.1. | Exhaustive | 11 | 36 | 3 | 0.332 | NA | NA | NA | NA | NA |
| | Stearic Acid | Total | 4 | 12 | 0 | ND | | NA | | NA | |
| | T 11 11 14 | Exhaustive | 19 | 57 | 57 | 6.1 | 0.098 | 1.2 | 0.001 | 1.9 | 0.06 |
| | Tablet Level 1 | Total | 7 | 21 | 21 | 5.5 | | 1.1 | | 1.4 | |
| | Tablet Level 2 | Exhaustive | 19 | 57 | 57 | 17 | 0.308 | 1 | < 0.001 | 1 | 0.018 |
| | Tablet Level 2 | Total | 7 | 21 | 21 | 17 | | 1 | | 1 | |
| | T 11 11 12 | Exhaustive | 19 | 57 | 57 | 41 | 0.03 | 1 | < 0.001 | 2 | 0.004 |
| | Tablet Level 3 | Total | 7 | 21 | 21 | 44 | | 1 | | 1 | |
| | Lastas | Exhaustive | 13 | 42 | 2 | 0.048 | NA | NA | NA | NA | NA |
| | Lactose | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| Cd | Magnesium | Exhaustive | 13 | 42 | 9 | 0.4 | NA | 2.0 | NA | 244.1 | NA |
| | Aluminum Silicate | Total | 6 | 18 | 0 | ND | | NA | | NA | |
| | | Exhaustive | 13 | 42 | 7 | 0.9 | NA | 1.6 | NA | 73.6 | NA |

Appendix H: Comparison of Microwave systems (IPV vs SRC)

| Analyte | Material | Microwave Type | Labs (n) | Total Measurements (n) | Measurements >LOQ (n) | Mean concentration (ug/g) | P value | Within lab standard deviation (ug/g) | P value | Between lab standard deviation (ug/g) | P value |
|---------|--------------------------------------|-------------------|-------------|------------------------------|--------------------------|---------------------------------|---------|---|---------|--|---------|
| | | IPV | 4 | 15 | 0 | ND | NA | (46/6/ NA | NA | NA | NA |
| | Lactose | SRC | 12 | 54 | 3 | 0.158 | | NA | | NA | |
| | Magnesium | IPV | 4 | 15 | 6 | 33 | 0.07 | 2 | < 0.001 | 489 | 0.002 |
| | Aluminum Silicate | SRC | 12 | 54 | 15 | 2.4 | | 1.1 | | 2.1 | |
| | Microcrystalline | IPV | 4 | 15 | 3 | 52 | 0.007 | NA | NA | NA | NA |
| | Cellulose | SRC | 12 | 54 | 5 | 0.9 | | 1.7 | | 7.3 | |
| | Ded Ferrie Orde | IPV | 4 | 15 | 2 | 0.246 | 0.029 | NA | NA | NA | NA |
| | Red Ferric Oxide | SRC | 12 | 54 | 12 | 1.4 | | 6.8 | | 48.4 | |
| | Silicon Dioxide Standard (As, Co, | IPV | 4 | 15 | 15 | 1032 | 0.171 | 1 | 0.98 | 1 | 0.189 |
| | Hg) | SRC | 12 | 50 | 48 | 991 | | 1 | | 1 | |
| | Silicon Dioxide Standard (As, Co, | IPV | 4 | 15 | 1 | 2.0 | NA | NA | NA | NA | NA |
| As | Hg) | SRC | 11 | 51 | 5 | 1.1 | | 1.5 | | 7.4 | |
| | Standard Liquid | IPV | 6 | 14 | 14 | 3.6 | 0.049 | 1.1 | 0.002 | 1.5 | 0.308 |
| | Standard Eigeld | SRC | 12 | 24 | 21 | 4.6 | | 1.0 | | 1.9 | |
| | Starch | IPV | 4 | 15 | 0 | ND | NA | NA | NA | NA | NA |
| | Staren | SRC | 12 | 54 | 4 | 0.3 | | 1.4 | | 8.5 | |
| | Stearic Acid | IPV | 4 | 15 | 0 | ND | NA | NA | NA | NA | NA |
| | Steamerica | SRC | 10 | 42 | 3 | 0.332 | | NA | | NA | |
| | Tablet Level 1 | IPV | 8 | 27 | 27 | 6.7 | 0.1 | 1.3 | < 0.001 | 2.5 | 0.009 |
| | | SRC | . 14 | . 60 | 60 | 5.6 | | 1.1 | | 1.5 | |
| | Tablet Level 2 | IPV | 8 | 27 | 27 | 17 | 0.361 | 1 | 0.018 | 1 | 0.24 |
| | | SRC | 14 | 60 | 60 | 17 | | 1 | | 1 | |
| | Tablet Level 3 | IPV | 8 | 27 | 27 | 41 | 0.54 | 1 | < 0.001 | 2 | 0.004 |
| | | SRC | 14 | 60 | 60 | 43 | | 1 | | 1 | |
| | Lactose | IPV | 4 | 15 | 0 | ND | NA | NA | NA | NA | NA |
| Cd | Luciose | SRC | 12 | . 54 | 2 | 0.048 | | NA | | NA | |
| | | IPV | 4 | 15 | 3 | 21 | 0.085 | 1 | 0.073 | 95 | 0.013 |

| Analyte | | Quantitation Approach | Number of labs | Total Measurements (n) | Measurements >LOD (n) | Mean concentration (ug/g) | P value | Within lab standard deviation (ug/g) | P value | Between lab standard deviation (ug/g) | P value |
|---------|---------|--------------------------|-------------------|------------------------------|--------------------------|---------------------------------|---------|---|---------|--|---------|
| | Tablet | Standard | 13 | 50 | 50 | 5.9 | 0.208 | 1.2 | 0.322 | 2.2 | 0.616 |
| | Level 1 | Summation | 13 | 50 | 50 | 6.6 | | 1.2 | | 2.6 | |
| As | Tablet | Standard | 13 | 50 | 50 | 16 | 0.188 | 1 | < 0.001 | 1 | < 0.001 |
| A5 | Level 2 | Summation | 13 | 50 | 50 | 18 | | 1 | | 3 | |
| | Tablet | Standard | 13 | 50 | 50 | 41 | 0.001 | 1 | 0.648 | 2 | 0.45 |
| | Level 3 | Summation | 13 | 50 | 48 | 48 | | 1 | | 1 | |
| | Tablet | Standard | 13 | 50 | 50 | 1.9 | 0.663 | 1.4 | 0.028 | 1.3 | < 0.001 |
| | Level 1 | Summation | 13 | 50 | 50 | 1.9 | | 1.2 | | 3.7 | |
| Cd | Tablet | Standard | 13 | 50 | 47 | 4.4 | 0.001 | 1.1 | 0.015 | 1.3 | < 0.001 |
| cu | Level 2 | Summation | 13 | 50 | 50 | 6.2 | | 1.2 | | 3.3 | |
| | Tablet | Standard | 13 | 50 | 48 | 13 | 0.002 | 1 | < 0.001 | 2 | 0.197 |
| | Level 3 | Summation | 13 | 50 | 50 | 18 | | 1 | | 3 | |
| | Tablet | Standard | 13 | 50 | 50 | 8.6 | 0.783 | 1.2 | 0.03 | 1.4 | 0.006 |
| | Level 1 | Summation | 13 | 50 | 50 | 8.4 | | 1.2 | | 2.3 | |
| Со | Tablet | Standard | 13 | 50 | 47 | 18 | 0.843 | 1 | 0.756 | 1 | < 0.001 |
| 0 | Level 2 | Summation | 13 | 50 | 50 | 18 | | 1 | | 3 | |
| | Tablet | Standard | 13 | 50 | 48 | 38 | 0.269 | 1 | < 0.001 | 2 | < 0.001 |
| | Level 3 | Summation | 13 | 50 | 50 | 33 | | 1 | | . 5 | |
| | Tablet | Standard | 12 | 44 | 10 | 0.9 | < 0.001 | 1.2 | 0.003 | 1.6 | 0.047 |
| | Level 1 | Summation | 12 | 44 | 38 | 6.0 | | 1.1 | | 1.2 | |
| Hg | Tablet | Standard | 12 | 44 | 33 | 1.3 | < 0.001 | 1.1 | 0.138 | 1.2 | 0.967 |
| 118 | Level 2 | Summation | 12 | 44 | 38 | 18 | | 1 | | 1 | |
| | Tablet | Standard | 12 | 44 | 41 | 2.0 | < 0.001 | 1.2 | 0.003 | 1.7 | 0.002 |
| | Level 3 | Summation | 12 | 44 | 38 | 45 | | 1 | | 1 | |
| | Tablet | Standard | 13 | 50 | 50 | 8.7 | 0.717 | 1.2 | 0.184 | 1.4 | 0.058 |
| Ni | Level 1 | Summation | 13 | 50 | 50 | 8.5 | | 1.2 | | 1.7 | |
| | Tablet | Standard | 13 | 50 | 50 | 9.9 | 0.128 | 1.8 | < 0.001 | 2.9 | 0.108 |
| | Level 2 | Summation | 13 | 50 | 50 | 12 | | 1 | | 2 | |

Table I1. Comparison of Direct analysis of tablets with summation approach for all labs

| Analyte | Material | Quantitation Approach | Number of labs | Total Measurements (n) | Measurements >LOD (n) | Mean | P value | Within lab standard deviation (ug/g) | P value | Between lab standard deviation (ug/g) | P value |
|---------|----------|--------------------------|-------------------|------------------------------|--------------------------|------|---------|---|---------|--|---------|
| | Tablet | Standard | 13 | 50 | 50 | 5.9 | 0.208 | 1.2 | 0.322 | 2.2 | 0.616 |
| | Level 1 | Summation | 13 | 50 | 50 | 6.6 | | 1.2 | | 2.6 | |
| As | Tablet | Standard | 13 | 50 | 50 | | 0.00 | 1 | < 0.001 | 1 | < 0.001 |
| AS | Level 2 | Summation | 13 | 50 | 50 | 18 | | 1 | | 3 | |
| | Tablet | Standard | 13 | 50 | 50 | 41 | 0.001 | 1 | 0.648 | 2 | 0.45 |
| | Level 3 | Summation | 13 | 50 | 48 | 48 | | 1 | | 1 | |
| | Tablet | Standard | 13 | 50 | 50 | 1.9 | 0.663 | 1.4 | 0.028 | 1.3 | < 0.001 |
| | Level 1 | Summation | 13 | 50 | 50 | 1.9 | | 1.2 | | 3.7 | |
| Cd | Tablet | Standard | 13 | 50 | 47 | 4.4 | 0.001 | 1.1 | 0.015 | 1.3 | < 0.001 |
| cu | Level 2 | Summation | 13 | 50 | 50 | 6.2 | | 1.2 | | 3.3 | |
| | Tablet | Standard | 13 | 50 | 48 | 13 | 0.002 | 1 | < 0.001 | 2 | 0.197 |
| | Level 3 | Summation | 13 | 50 | 50 | 18 | | 1 | | 3 | |
| | Tablet | Standard | 13 | 50 | 50 | 8.6 | 0.783 | 1.2 | 0.03 | 1.4 | 0.006 |
| | Level 1 | Summation | 13 | 50 | 50 | 8.4 | | 1.2 | | 2.3 | |
| Со | Tablet | Standard | 13 | 50 | 47 | 18 | 0.843 | 1 | 0.756 | | 100- |
| 0 | Level 2 | Summation | 13 | 50 | 50 | 18 | | 1 | | 3 | |
| | Tablet | Standard | 13 | 50 | 48 | 38 | 0.269 | 1 | < 0.001 | 2 | < 0.001 |
| | Level 3 | Summation | 13 | 50 | 50 | 33 | | 1 | | 5 | |
| | Tablet | Standard | 12 | 44 | 10 | 0.9 | < 0.001 | 1.2 | 0.003 | 1.6 | 0.047 |
| | Level 1 | Summation | 12 | 44 | 38 | 6.0 | | 1.1 | | 1.2 | |
| Hg | Tablet | Standard | 12 | 44 | 33 | 1.3 | < 0.001 | 1.1 | 0.138 | 1.2 | 0.967 |
| | Level 2 | Summation | 12 | 44 | 38 | 18 | | 1 | | 1 | |
| | Tablet | Standard | 12 | 44 | 41 | 2.0 | < 0.001 | 1.2 | 0.003 | 1.7 | 0.002 |
| | Level 3 | Summation | 12 | 44 | 38 | 45 | | | | 1 | |
| | Tablet | Standard | 13 | 50 | 50 | 8.7 | 0.717 | 1.2 | 0.184 | 1.4 | 0.058 |
| Ni | Level 1 | Summation | 13 | 50 | 50 | 8.5 | | 1.2 | | 1.7 | |
| | Tablet | Standard | 13 | 50 | 50 | 9.9 | 0.128 | 1.0 | < 0.00 | 2.9 | 0.108 |
| | Level 2 | Summation | 13 | 50 | 50 | 12 | | 1 | | 2 | |

Table I1. Comparison of Direct analysis of tablets with summation approach for all labs

| 0 | | Total | Measurements | Reference | Mean | Geometric | 05% 01 | D l | Expected | % of |
|---------|----------------|---------------------|--------------|-------------------------|---------------|------------|----------------|---------|---------------|-------------------|
| Analyte | Material | Measurements (n) | >LOQ (n) | concentration (ug/g) | concentration | standard | 95% CI | P value | concentration | expected value |
| | Tablet Level 1 | 9 | | | (ug/g) | dev (ug/g) | (5 5 5 7) | < 0.001 | (µg/g) | |
| | Tablet Level 1 | _ | 9 | 6.05 | 5.6 | 1.0 | (5.5, 5.7) | < 0.001 | 6.65 | 84.7 |
| As | Tablet Level 2 | 9 | 9 | 17.9 | 19 | 1 | (18, 19) | 0.078 | 19.8 | 93.8 |
| | Tablet Level 3 | 9 | 9 | 43.6 | 48 | 1 | (47, 50) | < 0.001 | 49.2 | 98.5 |
| | Tablet Level 1 | 9 | 9 | 1.97 | 2.5 | 1.2 | (2.2, 2.9) | 0.007 | 1.58 | 160.9 |
| Cd | Tablet Level 2 | 9 | 9 | 4.61 | 7.2 | 1.3 | (6.1, 8.5) | < 0.001 | 5.26 | 136.1 |
| | Tablet Level 3 | 9 | 9 | 13.5 | 18 | 1 | (15, 22) | 0.019 | 15.755 | 113.9 |
| | Tablet Level 1 | 9 | 9 | 9.02 | 8.1 | 1.7 | (5.8, 11.4) | 0.568 | 8.68 | 93.7 |
| Со | Tablet Level 2 | 9 | 9 | 20.3 | 22 | 1 | (18, 27) | 0.545 | 22.08 | 98.5 |
| | Tablet Level 3 | 9 | 9 | 40.4 | 41 | 1 | (38, 45) | 0.534 | 50.12 | 82.7 |
| | Tablet Level 1 | 7 | 4 | 3.80 | 2.6 | 1.2 | (2.2, 3.1) | 0.026 | 6.48 | 40.0 |
| Hg | Tablet Level 2 | 7 | 4 | 14.2 | 3.4 | 1.2 | (2.8, 4.2) | < 0.001 | 19.45 | 17.6 |
| | Tablet Level 3 | 7 | 7 | 41.2 | 3.6 | 2.2 | (2.1, 6.4) | < 0.001 | 48.609 | 7.5 |
| | Tablet Level 1 | 9 | 9 | 8.63 | 7.3 | 1.8 | (5.0, 10.8) | 0.435 | 6.58 | 111.6 |
| Ni | Tablet Level 2 | 9 | 9 | 12.0 | 11 | 2 | (8, 15) | 0.641 | 10.55 | 106.2 |
| | Tablet Level 3 | 9 | 9 | 15.3 | 18 | 1 | (16, 20) | 0.025 | 16.75 | 108.0 |
| | Tablet Level 1 | 9 | 9 | 2.53 | 2.3 | 1.2 | (2.0, 2.6) | 0.175 | 2.27 | 100.2 |
| Pb | Tablet Level 2 | 9 | 9 | 5.68 | 5.2 | 1.6 | (3.9, 7.0) | 0.598 | 6.67 | 78.4 |
| | Tablet Level 3 | 9 | 9 | 14.8 | 15 | 1 | (12, 19) | 0.985 | 17.35 | 85.5 |
| | Tablet Level 1 | 9 | 9 | 22.6 | 17 | 2 | (10, 29) | 0.343 | 22.25 | 77.4 |
| V | Tablet Level 2 | 9 | 9 | 23.9 | 20 | 2 | (12, 31) | 0.426 | 22.7 | 86.4 |
| | Tablet Level 3 | 9 | 9 | 1.31 | 1.9 | 2.3 | (1.1, 3.3) | 0.224 | 0.9 | 210.5 |

Table J1. Comparison of XRF values to Reference values

| Table J1. Comparison of XRF values to Reference values | | | | | | | | | | | | |
|--|----------------|------------------------------|--------------------------|--------------------------------------|---------------------------------|-------------------------------------|------------------------|---------|-------------------------------------|---------------------------|--|--|
| Analyte | Material | Total Measurements (n) | Measurements >LOQ (n) | Reference concentration (ug/g) | Mean concentration (ug/g) | Geometric standard dev (ug/g) | 95% C | P value | Expected concentration (µg/g) | % of expected value | | |
| | Tablet Level 1 | 9 | 9 | 6.05 | 5.6 | 1.0 | (5.5, 5.7) | < 0.001 | 6.65 | 84.7 | | |
| As | Tablet Level 2 | 9 | 9 | 17.9 | 19 | 1 | (18, 19) | 0.078 | 19.8 | 93.8 | | |
| | Tablet Level 3 | 9 | 9 | 43.6 | 48 | 1 | (47, 50) | < 0.001 | 49.2 | 98.5 | | |
| | Tablet Level 1 | 9 | 9 | 1.97 | 2.5 | 1.2 | (2.2, 2.9) | 0.007 | 1.58 | 160.9 | | |
| Cd | Tablet Level 2 | 9 | 9 | 4 <mark>6</mark> 1 | 7.2 | 1.3 | (6.1, 8.5) | < 0.001 | 5.26 | 136.1 | | |
| | Tablet Level 3 | Dhe- | sam | | t_tos | 1 | (15, 22) | 0.019 | 15.755 | 113.9 | | |
| 6 | Tablet Level 1 | 9 | 9 | 9.02 | 8.1 | 1.7 | (5.8 <i>,</i> 11.4) | 0.568 | 8.68 | 93.7 | | |
| Со | Tablet Level 2 | mági | | 20.3 | | oro | (18, 25) | 0.545 | 22.08 | 98.5 | | |
| | Tablet Level 3 | meal | | 40.4 | | | (3, 5) | 0.534 | 50.12 | 82.7 | | |
| | Tablet Level 1 | 7 | 4 | 3.80 | 2.6 | 1.2 | (2.2, 3.1) | 0.026 | 6.48 | 40.0 | | |
| Hg | Tablet Level 2 | 7 | 4 | 14.2 | 3.4 | 1.2 | (2.8, 4.2) | < 0.001 | 19.45 | 17.6 | | |
| | Tablet Level 3 | 7 | 7 | 41.2 | 3.6 | 2.2 | (2.1, 6.4) | < 0.001 | 48.609 | 7.5 | | |
| NI | Tablet Level 1 | 9 | 9 | 8.63 | 7.3 | 1.8 | (5.0, 10.8) | 0.435 | 6.58 | 111.6 | | |
| Ni | Tablet Level 2 | 9 | 9 | 12.0 | 11 | 2 | (8, 15) | 0.641 | 10.55 | 106.2 | | |
| | Tablet Level 3 | 9 | 9 | 15.3 | 18 | 1 | (16, 20) | 0.025 | 16.75 | 108.0 | | |
| | Tablet Level 1 | 9 | 9 | 2.53 | 2.3 | 1.2 | (2.0, 2.6) | 0.175 | 2.27 | 100.2 | | |
| Pb | Tablet Level 2 | 9 | 9 | 5.68 | 5.2 | 1.6 | (3.9, 7.0) | 0.598 | 6.67 | 78.4 | | |
| | Tablet Level 3 | 9 | 9 | 14.8 | 15 | 1 | (12, 19) | 0.985 | 17.35 | 85.5 | | |
| | Tablet Level 1 | 9 | 9 | 22.6 | 17 | 2 | (10, 29) | 0.343 | 22.25 | 77.4 | | |
| V | Tablet Level 2 | 9 | 9 | 23.9 | 20 | 2 | (12, 31) | 0.426 | 22.7 | 86.4 | | |
| | Tablet Level 3 | 9 | 9 | 1.31 | 1.9 | 2.3 | (1.1, 3.3) | 0.224 | 0.9 | 210.5 | | |

Stephen W. Erickson, PhD

Senior Research Statistician RTI International serickson@rti.org