

TNI Advocacy and TNI Board subgroup
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Attending the call:

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The purpose of the call was for TNI to take input from AWWA members about the NELAC standard.

Mr. Jon Eaton was invited to the call to provide the subgroup input on NELAC implementation from a water utility laboratory's perspective. Mr. Eaton is Laboratory manager for the City of Bloomington, MN. His laboratory is certified by the state of MN in the areas of drinking water and non-potable water for inorganic, organic, and microbiological testing. His laboratory also conducts food testing. The laboratory has two analysts. Mr. Eaton is an active member of both state and national AWWA, he serves on several committees. He is also a member of the laboratory advisory committee to the state of MN. The laboratory is required to implement and comply with MN rules which mostly implement the NELAC standard.

Resources: Water utilities have to balance resources with production issues. LGA??? money cut backs. Utilities do not want to jump regulatory hoops if they do not see a clear benefit.

Reciprocity: This is not an issue for in house laboratories, unless doing testing in multiple states.

Technical Director Requirements: Discussion on the benefits and draw backs of having education and experience requirements for the technical director. The Drinking Water manual has analyst requirements. Meeting operator certification requirement can be an issue in some states like MN where an operator certificate can not be obtain if the individual does not do water operations. Operator certification does not educate the individuals to do analytical testing.

Quality Assurance: As a city laboratory, Jon had already implemented QA/QC measures above and beyond the DW certification requirements. Most utilities labs are already doing us much QC as necessary to ensure the quality of their data.

Water utilities as data users: Jon feels comfortable with the MN state certified commercial laboratories to do analytical testing for their facility. But certification is no guarantee for data quality.

DOC and on-going demonstration and documentation: Hard to implement given the hiring practices of city government, they may have a gap between hires. Documentation requirements are excessive.

MDLs and reporting limits: They have been conducting MDLs studies for years, now they have to make them more accessible for the assessors.

PTs: Once per year PT studies cost is about 1,500 to 2,500. Two per year will double the cost.

Certification Fees: (5,000 to 6,000 for DW and WW).

Process control testing vs. compliance testing: Process control is monitoring production, process testing is not regulatory. Compliance monitoring is to demonstrate that the finished product meets regulatory requirements. They are two different things.

NOTE TO ADVOCACY COMMITTEE: Process control testing is defined in the (96 SDWA amendments). PA definition is very broad. We need to find out if this is derived from the federal regulation. Each state may have operators' certification requirements with definitions of process control.

ISO implementation issues: Where to get the ISO documents came up. Jon will like to look at the ISO language before answering this question.

Other issues for the utilities:

Training is needed for lab personnel. Find out how operators training is provided and handled by states and do something similar. Some states approve the training materials, some states approve training providers. Ask the states to share their training materials, capability, and resources.

PA offered training by hiring the trainer, the charge to the students was up to \$80/day per person include registration CE credits, snacks, brake, lunch. The association handling the training may have taken in 50% of the fees. MN charged about \$50/days. Some states do it at no cost. AWWA training is about \$400 to \$500 per person. They do not attract a lot of laboratory personnel because of the cost.

The state of MN has implemented the NELAC 2003 standards in its entirety with the exception of the following requirements:

- MN requires only 1 PT per year
- Requires MS with each batch
- Does not have educational and experience requirements for Technical director
- On sites done every 3 years
- Has a data integrity requirement but can not use the ethics requirements in the 2003 NELAC standard
- Requirement for reporting limit verification checks standards on a more than once per year basis depending on the method.

MN process for writing regulations took about 3 years because the language of the standard had to be changed to regulatory language. Adoption by reference is not considered enforceable by the state of MN. They can reference federal regulations but not other documents.

NOTE TO THE COMMITTEE: We need to find out how MN and other states handle weight and measures regulations. Weight and measures uses ISO.

Conclusion:

AWWA develops industry standards for water utilities that are used by the industry as a reference point. A laboratory standard should be the same way, specifying the minimum requirements for data quality. The standard should be cost effective and should improve data quality.

Future plans: The subgroup needs to get more feedback from AWWA members and bring it back to TNI. Schedule other calls with other AWWA members that have implemented the standard to get their input. Develop a list of issues and have round table discussion to find solutions.