

TNI Advocacy and TNI Board subgroup  
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Attending the call:

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Kim Kunihiro: Orange County

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

Orange county lab certified potable, non potable and biosolids under NELAP data for themselves and other utilities.

**Where any improvements noticed by the laboratory because of NELAC Implementation?** The quality of data not improved but documentation is very improved to show how they arrive at that number. Data of known quality because of the documentation.

**Defensibility of the data?** Generally the public does not necessarily want to know the details of the data. Surcharge is sometimes in question and the documentation helped answer the questions but under the old process they already had the QC in place to answer the questions.

**Drinking water manual, is it easier to implement?** Did not know. Limit the NELAP standards to the things you really need.

**Resources:** Because of NELAP they had to add staff in the QA area because the quantity of the review process, PTs and meeting the timing for the 2 out of 3. Adding new methods is also more extensive 1 ½ QA people and a lot more involvement in QC for the analysts. They have to check for the availability of PTs because they are required to test for those that are available. New method development requires (DOC) a lot of work upfront. For example EPA 1623 in non potable was non NELAP accredited and auditors were not approved for those methods. 1. SM do a DOC: 2. New method has a special fee and assessments, special audits. New technologies will require new assessments.

**For small utilities?** Orange county started with 25 people with a lot of experience with technology, QA, and certification practices. It will be difficult for smaller facilities with no people resources and the background to do the work. NELAP implementation closed down many mom and pop labs. Many are sending things out.

**Reciprocity:**

Does not care.

**Technical Director Requirements:**

No issues because they have a large staff with education and experience. But for small utilities could be an issue.

**Quality Assurance: Which procedures are not necessary?** QA manual in the form required is not better, less detailed than what it used to be. Very time consuming document. The laboratory does not want to include additional elements because it makes it difficult for the auditors during the audit process. SOP format is a moving target each time they are audited so a lot of time is spent to meet the NELAP format. It is a valuable process because they have to review the SOPs frequently. NELAC should not make changes to the requirements unless it is necessary.

**Water utilities as data users:**

No radiochemistry so uses a commercial lab for rad and other things. NELAP put out of business several labs in Orlando so the choices are fewer in Orlando but the ones left are of very good quality in terms of documentation. Site visits are very extensive and time consuming process.

**DOC and on-going demonstration and documentation:**

It is a good process. The LIMMs keeps track of the on going so makes it easy. It has become very routine, good to refresh people on methodology especially if not done frequently.

**PTs:** Tracking PT samples and multiple levels of QA review required. Very expensive, about \$12,000/year

**Certification Fees:**

\$7500/year

**Process control testing vs. compliance testing:**

All samples including process control testing are done the same way than compliance samples, only difference is the reporting stage for data qualifications and QC issues. Flagging not allowed for DW. Done this way because they want to.

**ISO implementation issues:** Does not know too much about it.

**Other issues for the utilities:**

- Input in the process? Lots of opportunity for regulations in Florida. For NELAC the QA officer used to participate but not done any longer but if they wanted to they will do it. Good relationship with Fl state and are good in exchanging information.
- Frequency of PTs to annually of biannually do we need for every matrix or every method? The 2 out of 3 rule is hard to get back on track.
- Frequency of audits as is.
- The accreditation process is harder now.

- Would like to find out what the Federal government is going to do about the additional certification requirements, like UCMR2. If NELAP was national, then it would make it. LT2 is another process which is over and above. They also have additional PTs, the requirements are inconsistent with NELAC. EPA uses different terminology.
- It took the lab more than a year in preparation to make all the changes and get prepared and 3 years to be comfortable with the NELAP process.
- The state is very responsive to their accreditation needs.