TNI Board of Directors Meeting Summary
November 8, 2017

1. Roll Call

Directors	Present
Jordan Adelson	X
Aaren Alger	X
Steve Arms	X
Justin Brown	
Jack Farrell	X
Chris Gunning	
Myron Gunsalus	
Daniel Lashbrook	X
Judy Morgan	X
Cheryl Nolan	X
Lara Phelps	X
Patsy Root	X
Debbie Rosano	
Scott Siders	
Alfredo Sotomayor	X
Dave Speis	X
Past President	
Sharon Mertens	
Staff	
Lynn Bradley	X
Carol Batterton	X
Ken Jackson	X
Jerry Parr	X
Ilona Taunton	X
Janice Wlodarski	X

2. Roll Call and Approval of October Minutes

Changes: Steve was not present at the October meeting.

Motion to Approve: Dave Speis
Second: Judy Morgan
Approved: Unanimous

3. Policies and SOPs for Review

- *SOP 3-100, NELAP AC General Operations*

  This SOP was first approved by the Accreditation Council in 2007 and then was revised earlier this year. It describes the operational activities of the Council. The SOP was approved by the Policy Committee in October. This SOP does not require Board approval, but is provided for the Board's review.

  Changes: The original effective date is noted on the SOP. This should be changed to an effective date of 7/24/17. Lynn will edit the date for this revision.

- *SOP 1-104, TNI Document Control*

  Revision 1 of this SOP was approved by the Board in 2012. This latest revision contains many minor changes to reflect actual practice as well as more use on on-line (cloud) storage of documents. The most significant change is in Section 5.2.2 relating to Advocacy Committee documents.

  Changes: Lara's comments from September need to be incorporated. SOP to go back for revision.

- *POL 1-100, Creating Policies*

  Changes: We need to remove the word "Procedures" from the Program title. The Effective Date also needs to be updated.

  Motion to Endorse with Changes Noted Above: Steve Arms
  Second: Jack Farrell
  Approved: Unanimous

- *POL 1-101, Conflict of Interest*

  Changes:

  - The Effective Date and Program Title need to be changed similarly to the changes as POL 1-100 above.

  - The "CFR" reference should be spelled out.

  - The issue with the first sentence in Section 6 was to be addressed per October Minutes. Each program needs to develop their own Conflicts of Interest procedure. Do we reference this in this policy or not? Suggestion: Leave the sentence in; all programs will do their internal audits. If a deficiency is found, then they will need to develop one. Or, the Board will direct each of the programs to develop one if they don't already have one, then when the audit comes if they don't have it, it's a deficiency.

    Staff can go back to their respective committees and tell them this needs to be done. It is doubtful that these will be in place by the time the internal audit is done, which is fine – it will just be a finding. That first sentence will remain in the policy.

  Motion to Review: Jack Farrell
  Second: Patsy Root
  Approved: Unanimous

- *POL 1-103, Symbols and Marks*

  Changes: We need to remove the word "Procedures" from the Program title. The Effective Date also needs to be updated.

  Motion to Review: Judy Morgan
  Second: Daniel Lashbrook
  Approved: Unanimous

4. 2017 Financial Statement and 2018 Budget

Financial statements and reports for 2017, and 2018 Budget were reviewed during this meeting.

Motion to Approve 2018 Budget: Jack Farrell
Second: Patsy Root
Abstentions: Lara Phelps, Jordan Adelson
Approved: Motion Passes

Table 4 of the financial statement is included in the Minutes as public information **(Attachment 1).**

5. Drinking Water Memo on MDLs (Attachment 2)

EPA's Office of Groundwater and Drinking Water has released a memo to unknown groups that relate to implementation of the new Part 136 procedure for drinking water. ELAB has received a copy as well as likely many states and regions, but it does not appear to be published anywhere.

This memo has several issues in it that are likely controversial and at least one TNI Board member has asked to Board to discuss this memo.

The memo does not appear to be confidential, but it is not clear who it has gone to, who has endorsed it, and how each Region is going to enforce it. This is probably more an ELAB issue than anything for TNI to get involved in. It could also be an AB issue as it could possibly be in conflict with the TNI Standard. It would be great if the ABs could keep us informed regarding what the other Regions are saying. Aaren may have some more information by the next Board meeting.

6. 2018 Board Election

- Nominations for the 2018 Board election will begin this week according to this schedule:
    - November 7 – December 31, 2017 – Nominations accepted
    - January 1-15, 2018 – Nomination Committee will review the nominations and prepare a slate of candidates.
    - January 16 – Voting opens with the announcement of the slate of candidates on the TNI website
    - January 22 – Forum on Environmental Accreditation – Candidates Meet and Greet
    - February 12 – Voting closes
    - March 14 – Newly elected Directors assume office

- Directors whose terms expire in March 2018 are Jack Farrell, Myron Gunsalus and David Speis. The TNI bylaws allow, and in fact encourage, Directors to serve multiple terms.

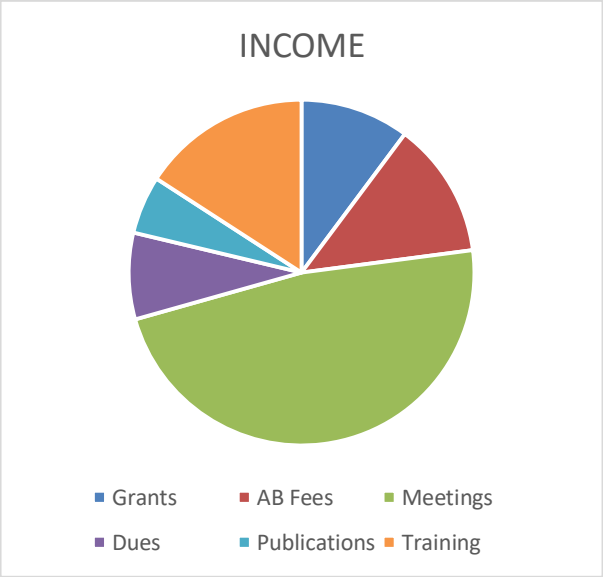
- There are 5 other open positions. The current make-up is 4 ABs, 5 labs, 4 others, and 3 ex-officios.

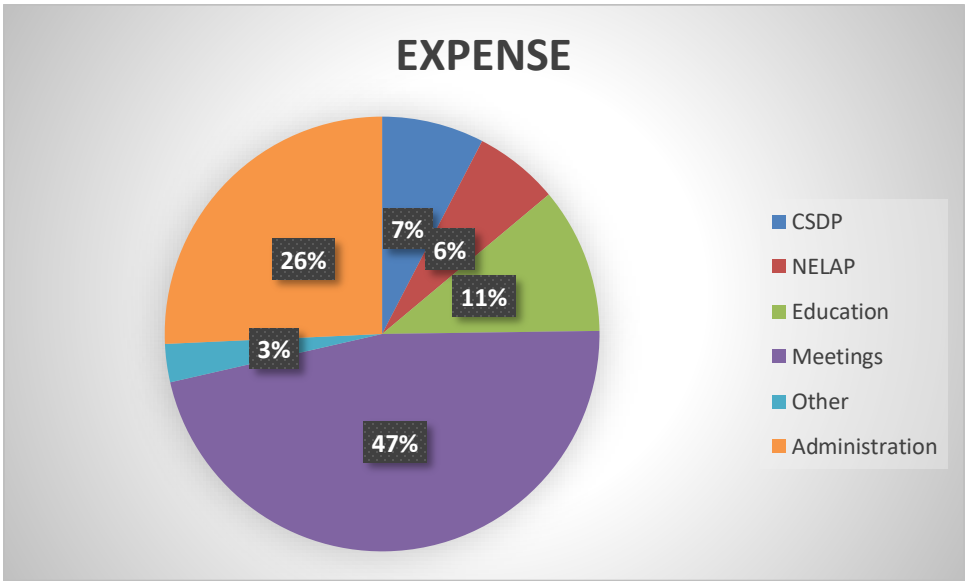
7. Program Reports (Attachment 3)

Attachment 1
2017 Financial Summary

Table 4. 2017 SUMMARY

INCOME		
Grants	$89,822	10%
AB Fees	$112,000	13%
Meetings	$420,080	48%
Dues	$71,219	8%
Publications	$47,755	5%
Training	$139,597	16%
	$880,473	
EXPENSE		
CSDP	$61,502	8%
NELAP	$50,856	6%
Education	$87,715	11%
Meetings	$376,823	47%
Other	$22,935	3%
Administration	$207,802	26%
	$807,633	





Attachment 2
Part 136 Method Update Rule
Revisions to Appendix B – MDL Procedure as Applied to Drinking Water

Office of Ground Water and Drinking Water, Technical Support Center
October 2017

In the revised Part 136, Appendix B procedure, method detection limits (MDLs) are determined by analyzing seven method blanks (i.e. laboratory reagent blanks, LRBs) along with seven low-level laboratory fortified blanks (LFBs). Laboratories then use the higher MDL calculation derived from either the LRB or LFB replicates. ***From a drinking water perspective, if a laboratory practices good hygiene by keeping their laboratory clean (i.e. sample prep areas, glassware, instrumentation, etc.), the method blanks should never indicate a recurring background as nearly all blank failures would invalidate analytical results. Consequently, the revised procedure should have little to no impact, and MDLs will be calculated in the same way as described in the original MDL procedure used over the last thirty years.*** The question then becomes whether the revised MDL procedure has any significance for the drinking water program. The short answer is "yes," with careful consideration for the following:

1. Specific citations to Part 136, Appendix B in the drinking water regulations. Such citations will require a laboratory to follow the new procedure. There are three such regulatory citations related to the analysis of VOCs and laboratory certification:

    a. For all VOCs, except vinyl chloride. 40 CFR 141.24(f)(17)(i)(E) – "Achieve a method detection limit of 0.0005 mg/L, according to the *procedures in appendix B of part 136."*

    b. For vinyl chloride. 40 CFR 141.24(f)(17)(ii)(C) – "Achieve a method detection limit of 0.0005 mg/L, according to the *procedures in appendix B of part 136."*

    c. For all VOCs. 40 CFR 141.24(f)(20) – "Each certified laboratory must determine the method detection limit (MDL), as defined in *procedures in appendix B to part 136*, at which it is capable of detecting VOCs. The detectable MDL is 0.0005 mg/L. This concentration is the detection concentration for purposes of this section."

    There is also such a citation in the lead and copper rule:

    d. 40 CFR 141.89(a)(1)(iii) – "To obtain certification to conduct analyses for lead and copper…Achieve the method detection limit for lead of 0.001 mg/L according to *procedures in appendix B of part 136* of this title." There is not a similar explicit specification for copper, but it is implied: 40 CFR 141.89(a)(3) – "All lead and copper levels measured between the PQL and MDL must be either reported as measured or they can be reported as one-half the PQL specified for lead and copper in paragraph (a)(1)(ii) of this section. All levels below the lead and copper MDLs must be reported as zero."

2. EPA methods and MDL procedure. A few of the older EPA methods (e.g. 515.1, 548.1, 555) and various methods evaluated through the alternate test procedure (ATP) program and approved for drinking water analysis (e.g. OIA-1677 OW cyanide method) specifically cite the Part 136, Appendix B MDL procedure. Labs using those methods will need to follow the new procedure. Many of the newer EPA drinking water methods, however, either describe the specific steps for the 'old' MDL procedure without

referencing Part 136, Appendix B or they reference the 1981 Glaser/Budde paper that was the basis for development of the old MDL procedure. Options for dealing with these methods are:

a. Apply the new MDL procedure across all methods. From the standpoint of consistency, this would be a logical choice. Laboratories that analyze wastewater samples will be required to follow the new procedure and it may be simpler to revise all their SOPs to specify the new procedure for both drinking water and wastewater methods. *Do not* penalize a lab if they choose to implement the new MDL procedure even if the drinking water method only describes the old procedure for determining MDLs (provided of course that their method blanks meet the method criteria).

b. Follow methods as written. If Part 136, Appendix B is not cited in a regulation and its associated methods, and a method contains the steps for determining MDL following the old procedure, it becomes a judgement call. Just be consistent in applying such judgement across the region.

3. Standard Methods. Similar issue as the EPA methods discussed above. Rather than incorporating QC within each method which would result in a massive unwieldy book, Standard Methods consolidates the common QC requirements within specific sections (e.g., Sect. 4020 contains the QC that pertains to the Part 4000 methods). ***The separate QC section is considered an intrinsic part of each method***. In the 22nd edition of *Standard Methods for the Examination of Water and Wastewater*, the QC section references the MDL Revision 1.11 in Part 136. That's the 'old' MDL determination. But the recently published 23rd edition incorporates the requirements of the 'new' MDL procedure (the editors apparently had anticipated publication of the CWA methods update rule prior to publication of the 23rd edition). We will be reviewing the methods within the 23rd edition for subsequent approval in a *Federal Register* notice at a later time. So, again, a laboratory may choose to apply the new MDL procedure across all methods or use the old procedure as described in the older editions.

The following represent some highlights from the new procedure:

1. Read the revised procedure and especially the frequently asked questions (FAQs) on the CWA webpage at: https://www.epa.gov/cwa-methods/method-detection-limit-frequent-questions.

2. The value calculated from the seven low-level LFBs is called the MDL_s. The MDL_s is the same as the 'old' MDL. The seven method blanks are used to calculate the MDL_b, which involves a similar evaluation of contamination/noise associated with the measurement. The final MDL is the higher of the two values. ***From the standpoint of conducting drinking water analyses, the MDL_b should not be the higher value***. If it is, that's a sure sign the lab needs to take corrective action.

3. The new procedure requires that the LFBs used to calculate the MDL are representative of laboratory performance throughout the year, rather than determined from a single analysis batch. Thus, the laboratory needs to analyze at least seven low-level LFBs and seven LRBs for an instrument in a two-year period (spread over at least three batches), but there is also a requirement to analyze two LFBs per quarter in separate batches for any quarter in which samples are analyzed. There are several nuances to this; read the FAQs.

Under Part 136, laboratories have the option to pool data from multiple instruments to calculate one MDL that represents multiple similar instruments. That is not considered a reasonable option for drinking water:

1. Chapter IV, Sect. 7.2.9 (Initial Demonstration of Capability) in the Laboratory Certification Manual states: "Before beginning the analysis of compliance samples, an initial demonstration of capability (IDC) must be performed for each method as required by the method. The IDC includes a demonstration of the ability to achieve a low background, the precision and accuracy required by the method, and determination of the method detection limit (MDL). ***An IDC should be performed for each instrument***." This specification of determining the MDL per method and per instrument precludes the option of determining a multi-instrument MDL for instruments that will be used to analyze drinking water compliance samples.

2. For some drinking water contaminants, e.g. the SOCs identified in 40 CFR 141.24(h)(18), qualification for reduced monitoring is based on specified low threshold levels. In order for a laboratory to meet those low levels, they will need to optimize *lower* detection levels. Pooling data from multiple instruments will have the net effect of increasing variability, resulting in *higher* calculated MDL values.

As discussed in the FAQs on the CWA web page, while the rule becomes effective 30 days after publication in the *Federal Register*, "EPA recognizes that it is not possible for any laboratory to make this change instantaneously. The laboratory should comply with the requirements of its control authority or permitting authority to implement Revision 2 of the MDL procedure." No one needs to start from scratch, cease operations and conduct new MDL studies. The revised procedure is structured to allow labs to use existing batch LRBs and low-level LFBs to calculate their initial MDL under the new procedure.

Attachment 3
PROGRAM REPORTS

CONSENSUS STANDARDS DEVELOPMENT

- Voting on the Chemistry Expert Committee's Voting Draft Standard for sections of Volume 1 Module 4 (Quality Systems for Chemical Testing) was completed on October 15. The vote breakdown was: 107 affirmative; 8 affirmative with comment; 5 negative with comment; and 5 abstentions. Pursuant to SOP 2-100, the committee held a public meeting by teleconference on November 1, when all voters' comments were discussed. It was determined that the comments that would merit action could all be handled through editorial changes, so no further voting would be required, and the standard was voted out of committee as a Final TNI Standard. Following its formatting, it will be substituted into the 2016 Environmental Sector Standard. Meanwhile, a response-to-comments document will be published on the website and all commenters will be notified individually of the disposition of their comments.

- The Chemistry Expert Committee, having completed all standard development for the short term, will now devote its time to finalizing guidance documents for the calibration and detection/ quantitation sections of the 2016 standard.

- The Consensus Standards Development Executive Committee is updating SOP 2 – 101 (Procedures for Expert Committee Operations), to bring it more in tune with SOP 1 – 101 (Operation of TNI Committees) that applies to all non-expert committees.

- The Laboratory Proficiency Testing (PT) Expert Committee is working with the Whole Effluent Toxicity Expert Committee on proposed standard development that will address the difficulty of proficiency testing small numbers of laboratories.

- A Stationary Source Audit Sample (SSAS) provider had a sample integrity issue, causing invalidation of some audit samples. The SSAS Expert Committee held a closed meeting to decide on appropriate action and this would be conveyed to the providers. The committee would bring the Proficiency Testing Provider Accreditor (PTPA) on board with this issue.

- The WET committee is preparing a response clarifying some technical issues raised by EPA's Office of Wastewater Management, following the ELAB/EPA/TNI meeting at conference in DC. Committee members are beginning to draft revisions to the WET module of the standard. The major revisions are expected to be in requirements for initial and ongoing demonstrations of competency and appropriate QA/QC requirements for the water quality chemistry measurements used in WET testing.

- The Radiochemistry Committee is continuing work on review of the procedures used to update Radiochemistry FoPT limits. The committee is developing the course being offered to assessors, ABs and labs at the Albuquerque meeting in January. The committee is working on new membership.

- The Microbiology Committee will begin review of the procedures used to update Microbiology FoPT limits and will begin working with Dan Hickman to review method codes.

- The Quality Systems Committee is continuing work on the Small Laboratory Handbook (SLH). The technical sections should all to Jan in the next week for final clean-up and formatting. The introduction will need to be reviewed by the committee in November and then it will be passed on to Jan for formatting. The committee will need to do a final review after the formatting is complete. This document is planned for completion by the end of the year. The committee will be working with the CSDP Executive Committee to extend Paul Junio's term on the committee through 2018. The

committee is also looking at new membership. The committee has begun review of the new ISO 17025 Standard and its impact on the TNI Standard. The committee is using Carl Kircher's information.

- The LAB Expert committee's homework assignment from the last meeting was to review the draft updated final ISO 17011 and the TNI language, and the previously approved draft combined module so they can start to see how it's all going to come together.

NEFAP Executive Committee

- The committee continued to discuss the formation of the Mobile Laboratory Task Force. A list of possible candidates was reviewed. Paul Bergeron will reach out to candidates to confirm their willingness to serve on the committee and it is expected that Task Force will be formed by the end of the month to begin work in December.

- The committee plans to update the Strategic Plan in November.

- The review of an old FAQ document still needs to be added to an agenda, but other priorities have taken precedence,

Field Activities Expert Committee (FAC)

- The Scope Guidance Subcommittee: Kevin submitted a DRAFT guidance document to the ABs to review. Comments will be incorporated into a final copy that will be reviewed during the November FAC meeting. If no changes are needed, the document will be forwarded to the Policy Committee for final review.

- A mailing list of 500 people has been developed to involve stakeholders in the review and update of the 2014 Field Standard. The notice will go out this week with a webinar date of December 1, 2017 for the public meeting.

NELAP

Accreditation Council

- For the current round of evaluations, nine renewal letters have been issued thus far. One renewal recommendation was presented to the NELAP AC this week, and the other eight applications are in various stages of review, with three site visits completed and more scheduled.

- The General Operations SOP 3-100 was approved the revisions proposed by TNI's Policy Committee, and will be presented for Board endorsement this month. The Council will initiate its first cycle of Chair/Vice Chair elections (or re-elections) in February 2018.

- At its meeting this week, the Council discussed a few database issues with TNI's Database Administrator, Dan Hickman, discussed implementing the new drinking water methods, and began considering a draft policy to decouple the NELAP certificate renewals from the evaluation process.

Laboratory Accreditation System Executive Committee (LASEC)

- LASEC awaits receipt of the drafts of implementation guidance created at conference in DC, for final formatting and reviews prior to posting on the SIR web page.

- LASEC is finalizing its "lessons learned" as goals and recommended actions, going forward. These will be shared with the NELAP AC, CSDEC, and possibly the TNI Board where those groups are impacted, and where appropriate, incorporated into LASEC's Standards Review SOP 3-106.

PROFICIENCY TESTING

- FoPT Table Format Subcommittee: The NELAP AC reviewed the PTPEC question on consistency between LAMS and FoPT tables. They agreed that it should be consistent and that the preference is to use the naming associated with the CAS number. Dan Hickman noted that this may be a problem in some cases (pesticides and some organics), but Dan and the PTPEC will work together on these special issues and propose a solution to the NELAP AC.

- Analyte Request Application (ARA) – NPW/SCM Qualitative PCB Analysis: The Chemistry FoPT Subcommittee met and more information will be needed to complete this ARA. Carl will work with the PTPEC.

- Radiochemistry FoPT Table Update: During their first meeting, Carl shared the process for calculating these updates with the Chemistry FoPT Subcommittee. Two members of the Radiochemistry Expert Committee will be working with the subcommittee on these updates and discussing possible updates to procedures as they get started the end of November.

- Microbiology FoPT Table Update: The committee hopes to have information by the end of November and provide an update during the next PTPEC meeting.

- The PTP/NEFAP Evaluation Workgroup: Each of the Executive Committees has completed their comments to the Workgroup. The Combine Evaluation SOP Subcommittee still needs to meet to compile all the comments and present an updated SOP at the November meetings of the Executive Committees. Each of these committees is meeting the last week of November.

- PTP SOP Subcommittee: The subcommittee is still working on SOP 4-101 – FoPT Table Updates. SOP 4- 102 (Complaints) has been forwarded to the Policy Committee for review and comment.

- The Cyanide Footnote issue was discussed in depth at the October meeting. A request was received to make it clear that the Cyanide PT is appropriate for all forms of Cyanide. The current PTs are simple Cyanide – un-complexed. There was discussion of the need for an ARA to request that criteria for Cyanide be separated for Total and Free. A complex PT would be needed. Michella Karapondo will be looking into preparing an ARA. In the meantime, "All forms" will be added to the footnote.

- The PTPEC has started working on the formal complaint received regarding 4,4'-DDD PTs. A complaint subcommittee has been formed following the PTPEC complaint procedures with Andy Valkenberg, Susan Jackson and Nicole Cairns selected as members. The subcommittee has requested data to review this issue and Maria will be working with PT Providers to get this information. They will be looking a fail rates for DDT, DDD, DDE and Endrin Aldehyde. The complainant has been notified of progress.

ADMINISTRATION

Advocacy Committee

- Jerry reviewed the finalists' proposals for the 2019 winter meeting with the Advocacy Committee. After discussion, it was agreed that Jerry will pursue final negotiations with Milwaukee for winter 2019.

- Jerry and Carol will participate in a conference call with APHL on Thursday to discuss the method validation project and APHL's participation in NEMC 2018.

- Trinity O'Neal has set up a Face Book group to organize extracurricular activities at the Albuquerque meeting. As attendees register, they will be given a link or invitation to join to the group. On FB search for TNI Albuquerque Meeting 2018 or use this URL https://www.facebook.com/groups/280774209107555/

- Jerry will be meeting with a delegation from the China Certification and Inspection Group in Houston on November 7. This meeting was set up with Robert Benz. All that is known is that the group is very interested in TNI. You can go to ccic.com for more information, but it is all in Chinese.

Policy Committee

- Policy Committee presents a number of documents for Board review, and one for endorsement, this week. The TNI Document Control SOP 1-104, the Creating Policies POL 1-100, the Conflict of Interest POL 1-101, and the Symbols and Marks POL 1-103. For now, the five-year reviews of the various administrative SOPs and policies originating with Policy Committee are suspended until current new and revised policies and SOPs can be reviewed.

Training

- A number of new training courses are being worked on and DRAFT contracts have been issued for review and training dates are being developed:

    - Sample Collection (Silky Labie – The course will emphasize the importance of collecting samples that represent the source matrix and maintaining the integrity of the sample until delivery to the laboratory. This will be an 8-hour course being planned around March 2018.)
    - Technical Training Series (Marlene Moore – 6 classes including General Chemistry Methods, Microbiology Methods, Drinking Water Methods, Wastewater Methods and Soil Method. Classes will be 4 hours.)
    - Good Laboratory Practice – Glassware (Marlene Moore – 2-hour course.)
    - Good Laboratory Practice – Internal Audits (Matt Sica – Self-paced course. Planned for January 2018.)

- Registration is open for "What Does QC Data Tell Me ... and Why Should I Care?" The course will be held on November 14, 2017. This course will identify the basic QC measures or concepts, discuss how each should be prepared and the rationale behind the frequency of analysis, and finally, how the results should be evaluated and the significance and impact of the results on the related sample set. This course is being taught by Silky Labie. There are 32 individual registrations and 9 group registrations to date.

- Registration is open for "Understanding Radiochemistry: Ra-228 and Gas Proportional Counting". The course will be held onsite at the Albuquerque meeting and presented as a Webcast afterwards. It will be a 6-hour course taught by members of the Radiochemistry Expert Committee. It is intended for assessors, ABs and laboratories. The committee will review response after the class and decide whether to prepare additional courses using other technologies.

Forum on Laboratory Accreditation

- The site visit occurred on 10/9/17.
- Attendee registration is now open.

NEMC

- The email call for abstracts has been finalized and will be sent out soon. Abstract due date is January 29, 2018.

- The exhibitor prospectus and Technology Showcase announcement have also been finalized. Exhibitor registration will open November 14.

- Jerry has received proposals for NEMC 2019. Jacksonville, FL is the leading contender at the moment.

Active Members

- 1165

Committee Updates

- There were two new committee applications received, one for the Radiochemistry Expert Committee and the other for SASS.