

Laboratory Accreditation System Executive Committee Meeting Minutes December 22, 2015

1) Welcome and Roll Call

Judy Morgan welcomed everyone to the meeting. Those in attendance are recorded in Attachment A. Minutes from November 24 were approved.

2) Assessment Forum and Mentor Session

Barbara reported that the agendas are set for conference in Tulsa, with many OK folks presenting, too! They'll have one more conference call in December to finalize. See Attachment C for the final agendas for both Assessment Forum sessions and the Mentor Session. We asked whether these can be hyperlinked to the posted meeting agenda, but as of when these minutes are being written, that has not occurred.

3) Status of Standards Review

Request from WET Expert Committee – this group provided LASEC with a recommendation to retain the 2009 WET module (V1M7) rather than adopting the 2012 revision (see Attachment D, below.) Barbara summarized the committee's position, since she is an Associate Member of that group – they have serious concerns about the new requirements for individual demonstration of competency, which do not take into account the work team concept normally used in WET labs, and also about the requirement for compliance with the chemistry module (V1M4) being too exhaustive and unnecessary for the water quality measurements typically needed in aquatic toxicity (pH, dissolved oxygen, ammonia and conductivity.) The water quality tests are intended to ensure that the test organisms will survive, not for analyte identification or quantitation; any chemical measurements for contaminant identification or effluent composition are sent to an accredited chemistry lab. Barbara noted that the new WET Expert Committee does intend to revise the standard starting as soon as possible, once the current revision cycle is completed.

LASEC members discussed the WET committee's request and what it would mean for the final standard being adopted, if the new revision were not included. The impact would be the same as with the AB operations modules, V2M1 and V2M3 -- the current modules would carry forward to become part of the newly adopted standard package.

An earlier review of V1M7 by Carl and Christelle had deemed the 2012 version to be "auditable and implementable" although some recommendations for improvement were offered for consideration during the next revision, and at the May 26, 2015, LASEC meeting, a motion to recommend adoption of the 2012 revision was approved. At that time, the WET Expert Committee was having its initial teleconference; the 2012 revision was done by a subcommittee of Quality Systems Expert Committee. As Judy noted, the new WET Expert Committee has, in effect, pointed out that the 2012 revision does not meet the suitability criteria defined in the LASEC Standards Review SOP 3-106, so that it should be referred back to the expert committee for rework rather than being moved forward for adoption.

Barbara moved and David seconded that the LASEC approval of the 2012 WET module (V1M7) be rescinded. Approval was unanimous. Thus, LASEC will recommend that the 2009 version of V1M7 be carried forward into what is known as the “2015 standard.”

2012 Revision to the Chemistry Module – this module (V1M4) was circulated to LASEC members but no one had looked at it except the chair. Judy noted that, with the exception of what has been developed as the Calibration Standard (V1M4§1.7.1-1.7.2) and the Detection and Quantitation Standard (LOD/LOQ, V1M4§1.5.1-1.5.2), the changes are minor. “Parameter” is changed to “analyte” and §1.6.3 about ongoing demonstrations of competency (DOC) repeats the requirement to repeat the DOC if the method has not been used in twelve months. This module will be reviewed more thoroughly in the future, once the LOD/LOQ document is ready.

4) SIRs

The SIR Subcommittee did not meet. One SIR has proven problematic and will be discussed in the LASEC meeting at conference, SIR 274 which concerns quarterly calibration of non-class A measuring devices. Some confusion arose about whether there are any Class A measuring devices made of substances other than glass, and this needs to be definitively addressed.

5) On-Site Assessment and Prep Method Policies for the NELAP AC

Updated documents for these items were not available.

6) Next Meeting

LASEC will meet on Wednesday morning, January 27, 2016, at 8:00 am, and also with the joint committee meeting on Wednesday afternoon, January 27, 2016, at 1:00 pm Eastern. If teleconference capability is available, you will receive information in advance of the conference, but that may not be an option.

Action Items are included in Attachment B.

Attachment A

PARTICIPANTS --TNI LABORATORY ACCREDITATION SYSTEMS EXECUTIVE COMMITTEE

	NAME	EMAIL	TERM, End Date	INTEREST	AFFILIATION	S/H CATEGORY	PRESENT
1	Judy Morgan, Chair	Judy.Morgan@pacelabs.com	3 years, 12/18	Chair (all)	Environmental Science Corp.	Lab/FSMO	Yes
2	JoAnn Boyd	jboyd@swri.org	3 years, 12/16	StdsRev	Southwest Research Inst.	Lab/FSMO	No
3	Kristin Brown, Vice Chair	kristinbrown@utah.gov	2 years, 2/17	SIRs/Assmt Forum/FAQ	UT Bur. of Lab Improvement	NELAP AB	No
4	David Caldwell	david.caldwell@deq.ok.gov	2 years, 12/17	Assmt Forum	OK DEQ	Non-NELAP AB	Yes
5	Karen Costa	Costa.Karen@epa.gov	3 years, 12/17		US EPA	Other	No
6	George Detsis	george.detsis@eh.doe.gov	3 years, 12/17	Assmt Forum	US DOE	Other	Yes
7	Barbara Escobar	Barbara.Escobar@pima.gov	3 years, 12/18	Mentor, AssmtFrm, FAQ	Pima County, AZ	Lab/FSMO	Yes
8	Jack Farrell	aex@ix.netcom.com	3 years, 12/16	Assmt Forum, StdsRev	Analytical Excellence	Other	Yes
9	Myron Gunsalus	ngunsalus@kdheks.gov	3 years, 12/18	KS DHE	KS Lab Director	NELAP AB	No
10	Bill Hall	George.Hall@des.nh.gov	3 years, 12/16	SIRs,FAQs	NH ELAP	NELAP AB	Yes
11	Carl Kircher	carl.kircher@doh.state.fl.us	3 years, 12/18	SIRs, FAQs	FL DOH	NELAP AB	Yes
12	Dorothy Love	dorothylove@eurofinsus.com	3 years, 12/18		Eurofins Env't'l	Lab	Yes
13	Mitzi Miller	mitzi.miller@moellerinc.com	2 years, 12/17	FAQs	Dade Moeller, Inc	Other	No
14	William Ray	Bill_Ray@williamrayllc.com	3 years, 12/17		Wm Ray Consultants	Other	No
Ex Officio							
	Elizabeth Turner	eturner@ntmwd.com		Ex Officio	Small Lab Issues	North TX Mun. Water District	No

Associate Members							
	Aaren Alger	aaalger@pa.gov			PA DEP	NELAP AB	No
	Carol Barrick	cabarrick@msn.com , Carol.Barrick@mosaicco.com			FCC Environmental	Lab/FSMO	No
	Kirstin Daigle	Kirstin.daigle@testamericainc.com			TestAmerica	Lab	Yes
	Carol Haines	bio.haines@gmail.com		Stds Rev, ad hocs	Retired from EPA as of 5/1/15	Other	No
	Harold Longbaugh				Houston Lab	Lab	Yes
	Christelle Newsome	cnewsome@c2nassociates.com			C2N Associates, Inc.	Other	No
	Carol Schrenkel	CSchrenkel@suburbantestinglabs.com	3 years, 12/16	Mentor, Ass. Forum SIRs		Other	No
	Gale Warren	ggw01@health.state.ny.us			NY ELAP	NELAP AB	Yes
	Program Admin. Lynn Bradley	Lynn.bradley@nelac-institute.org					Yes
	Guests – Steve Arms	Steve.Arms@flhealth.gov					

Attachment B

Action Items – LAS EC

	Action Item	Who	Expected Completion	Actual Completion / Comments
42	Craft wording for recommendation about PT modules	Judy/Mitzi	After comments from IS voting are reviewed and addressed?	
54	Send sample pre-audit letters to Kirstin	Barbara, Judy, Jack	ASAP	?
55	Draft recommendation for Rad module, for November meeting	Lynn/Judy	November 18	Rad and asbestos recommendations presented and approved, 11/24/15
56				
57				
58				

**Assessment Forum Outline
Tulsa, OK
January 2016**

Monday 1/25/16 Afternoon – Preparing to be TNI Compliant

1:00-1:10pm	Intro/Objectives/Agenda/Ground Rules (Barbara Escobar)
1:10-2:15pm	<i>Oklahoma TNI Laboratory Accreditation Status and Regulatory Updates Affecting Laboratories</i> – David Caldwell
2:15 -3pm	Presentations followed by panel discussion- <i>How to Comply & What are the Pitfalls in Accreditation</i> Panelists: David from OK, Connie Demoret from the City of Tulsa Water & Sewer Department & Jack Farrell from AEX, Inc.
3-3:30 pm	Break
3:30-4:30pm	Continue Panel Discussion
4:30-5:00pm	Wrap-up, Evaluations and Future Topics Discussed (Jack Farrell)

Tuesday 1/26/16 Morning - Preparing for TNI Assessments

8:00-8:10am	Intro/Objectives/Agenda/Ground Rules (Barbara Escobar)
8:10- 9:00 am	Presentations - <i>How to Perform Effective Internal Audits</i> Presenters: Star Yuan from Green Country Testing, Inc., Tiffini Adams from Central Valley Water Reclamation Facility, Barbara Escobar from Pima County WW Lab
9:00-10:00am	<i>Assessment Interviews</i> – Patty Snyder/Jack Farrell from AEX, Inc.
10:00-10:30am	Break
10:30-11:50am	Presentations followed by panel discussion <i>Common Assessment Findings for Initial and Seasoned Labs</i> Panelist: David from OK, Michael Shepherd from Shepherd Technical Services, George Detsis from USDOE, Carl Kircher from FL
11:50-12pm	Wrap-up, Evaluations and Future Topics Discussed (Jack Farrell)

**Mentor Session Outline
Tulsa, OK
January 2016**

Tuesday 1/26/16 Afternoon – How to do a Corrective Action/Root Cause Analysis

1-1:10pm	Intro/Objectives/Agenda/Ground Rules (Jack Farrell)
1:10-3pm	Presentations followed by panel discussion <i>How to Initiate Effective Corrective Action Reports</i> Panelists- Michael Shepherd from Shepherd Technical Services, David from OK, Kristen from UT
3-3:30pm	Break
3:30-4:30pm	Work through Root Cause Analysis on some of the Common Findings found in the earlier Assessment Forum Panelists listed above lead the work group
4:30 pm-5pm	Close-out, Evaluations and Future topics (Barbara Escobar)

Attachment D

Recommendation to LASEC from WET Expert Committee Concerning V1M7 (WET Testing) Approved by WET Expert Committee December 17, 2015

The Whole Effluent Toxicity (WET) Expert Committee would like to postpone adoption of the 2012 revision of module 7 of the TNI standard, because it believes that the 2009 version of Module 7 better meets the criteria and requirements of WET testing. The WET committee intends to provide an upgraded Module 7 within the next 18-24 months, beginning as soon as the current revision cycle is completed. The committee has two principal objections to the revision as it is currently written. First, the initial demonstration of capability for each individual analyst, as required in §1.6.2 of the 2012 version, is not representative of the way toxicity labs operate and is therefore inappropriate. Second, requiring toxicity labs to comply with the requirements of the chemistry module, §1.7.1.6.e.i of the 2012 version, for its support measurements is excessive, since the purpose of WET testing is not to identify the individual components of the effluent mixture, but rather to establish whether that effluent is sufficiently toxic that it warrants further investigation.

Initial Demonstration of Capability

In the 2012 version, §1.6.2 states that an individual must successfully perform an initial demonstration of capability (IDOC) prior to using any method. However, §1.6.1.d of the 2012 version states that an initial DOC may be completed by a group of analysts and is for situations in which several individuals perform part of a set of activities that would produce a testing result. These statements appear to be contradictory, and the requirement that an individual perform an IDOC is outside of the normal practices of a WET laboratory. The committee is confident that capability will be adequately demonstrated by compliance with the requirements of the 2009 TNI Module 7, which refers only to testing conducted by a group of analysts, as is normal practice.

Additional details: Individual analysts rarely perform an entire test independently. Test durations are often in excess of a week making it difficult and impractical for an individual analyst to conduct an actual effluent test or reference toxicant test from start to finish unlike in analytical laboratories. The demonstration of capability described in the test methods requires five successful tests using a standard reference toxicant which is necessary for an IDOC for a laboratory but is unreasonable as an analyst requirement for an IDOC. Again, the concern is the amount of time and resources this would take as WET tests are typically 2-7 days in length and sediment tests may go up to 50 days, so they are typically completed in a team approach. Additionally, organisms that are not raised in the lab would have to be purchased from an outside supplier for five tests per analyst with significant costs and little to no recompense. The sections on DOCs and IDOCs need to be more straightforward and concise when discussing laboratory approaches versus analyst approaches.

The committee believes that it is sufficient for the laboratory to develop a training procedure for its analysts to determine when they are qualified to handle actual test samples and the laboratory as a whole should perform the demonstrations of capability with specific training measures for individuals.

Support Measurements of Chemical and Physical Parameters

In the 2012 version, V1M7 1.7.1.6.e.i states that all chemical measurements used in the course of monitoring toxicity shall meet the requirements of V1M4, §§ 1.4, 1.5, 1.6 and 1.7. Complying with these requirements is considered to be unnecessary for the purpose for which these support measurements are intended, and such rigorous requirements will likely be beyond the resources of many WET labs. Chemistry measurements during WET testing provide general information on the characteristics of the test conditions, but are not generally intended to be used as definitive analysis of the chemical makeup of an effluent. The purpose and intent of chemical measurements for WET testing is to determine if the test conditions are within the suggested water quality parameter ranges (which are specified so as to be acceptable conditions for the particular organisms).

Some WET labs prefer simple, portable analytical equipment suitable for determining general chemical characteristics that may or may not be sufficient to meet the QA/QC requirements of VIM4. The committee feels that such equipment calibrated according to the language of the 2009 V1M7 §1.7.1.6.e is adequate to ensure the accuracy required for WET testing.

Any specific quantitative chemical analyses required for regulatory compliance would be contracted out to a laboratory accredited for that parameter.