

**Microbiology Expert Committee (MEC)
Meeting Summary**

March 20, 2018

1. Roll Call and Minutes:

Robin Cook, Chair, called the meeting to order at 1:38pm Eastern on March 20, 2018 by teleconference. Attendance is recorded in Attachment A – there were 5 members present. Associate Members and Guests: Jennifer Best, Barb Sullivan (Phenova). Mary Robinson, Deric Teasley – EPA , Greg Fabian – EPA, Michella Karapondo (joined 2:08) and Carl Kircher (joined 2:33pm).

The November 2017, December 2017 and February 2018 minutes will be distributed by email again for approval since membership on the last calls has not been enough to approve the minutes.

2. Method Codes

Deric and Greg joined the call with Jennifer Best to discuss method code issues. Deric and Greg work with EPA's drinking water database, SDWIS (Safe Drinking Water Information System). Robin noted that the committee's goal in looking at the method codes is to streamline the codes.

Prior to the call, Robin forwarded some documents to the group explaining the background of SDWIS, and the changes that were made with the new version of the SDWIS database (called SDWIS Prime), which was released in mid-2017. Jennifer noted that she only recently obtained access to the codes used in SDWIS Prime for the micro methods. However, in looking over the method codes for the first time, she found some problems with the method codes. For this reason, at this point in time, she didn't forward the codes to the committee because she would like to work with Deric and Greg first to work through some of the issues she found. Jennifer would like to have codes that will explain exactly which methods are being used by the labs.

The current system does have a set character length for the code value. Greg noted that they can make the system work for what is needed and the group should not let the system drive what would be best. The system can work with any direction the group would like to see things go in.

Jennifer saw some inconsistency in the database. Total Coliforms are regulated under a number of different rules. For example, for a Total Coliform under the Total Coliform Rule, qualitative testing is done (presence/absence). If the sample is taken under the Surface Water Treatment Rule, quantitative testing is done. A lot of the methods used for quantitative testing can also be used for qualitative testing. It's confusing when you see the method code, because the method could have been used either way. When the states

put the data into SDWIS, is the rule the data was collected under included? Labs don't always know why a sample is collected. They analyze it as told and upload the result into their LIMS. Do we need separate codes for when the method is used qualitatively vs. quantitatively?

Greg works with the Compliance Monitoring Data Portal (CMDP). It is a web-based portal that labs can use to enter data. It is then uploaded to the appropriate state. There are some states that have their own portals for labs to load data into.

Ilona noted that she was involved in a TNI meeting last week where concerns were raised that the method codes being used in the CMDP do not include the TNI method codes. Ilona asked who would be a good contact for TNI to reach out to with questions. Deric noted that only the EPA method codes are in CMDP and he was not told that having the TNI codes in the database was a requirement. He noted that New Hampshire had contacted him about the same issue. He put it on a backlog for development. Ilona explained this should be an issue for all the NELAP states. There was also a note that the EPA codes don't include edition or revision dates. Deric requested more information and Ilona will provide him with a link to LAMS (TNI Database) and a list of all the NELAP states.

Robin asked if the purpose of the SDWIS database is to note method and analyte and edition doesn't matter. Greg responded that they would like to use the industry standard to note the method so they can be sure the lab used the correct method. Deric said the edition/revision info got removed to try to cut down on confusion. Jennifer said there actually are still some in the database with the edition/revision info. It is inconsistent.

Robin asked if it is EPA's responsibility that the lab is using the right method. Or is it the ABs responsibility? Is it enough to report the edition/revision info to the ABs, but is it OK to eliminate it when it goes back to EPA. The AB is not going to grant a lab accreditation if they are not using an approved method. Jennifer said EPA has oversight responsibilities and they do care that approved methods are being used. Jennifer thinks it is critical that the edition/revision information be included to make it clear what method is being used so it can be evaluated if the correct method is being used.

EPA has had issues in the past where labs were not reporting what EPA thought should be reported. This is part of why SDWIS was revised to make sure the correct method is being recorded.

Jennifer noted that in a perfect world, the method codes on the lab's certificate would match what the method code to indicate what method was used to generate the data that is put into SDWIS, so there would be no questions as to what the how the lab generated the data.. Jennifer noted that while the states do have the responsibility to ensure only approved methods are used, there are cases where states are accredited to versions of methods that aren't approved.

There was an applications workgroup on how to tie certification and method to the labs. Interfacing applications. EPA was trying to tie into the state databases so they can make sure the correct methods are being used.

Robin noted that she saw something recently where the 18th and 19th editions of Standard Methods have been removed as acceptable for Total Coliform monitoring. Jennifer noted that she thought Robin might have been referring to the revisions to the Total Coliform Rule. The Rule was revised in 2012, and in the revised rule, the 18th and 19th editions of SM were removed. Jennifer noted, that the 18th and 19th editions are still approved under the Surface Water Treatment Rule (141.74). Robin commented that she has not seen much change in the DW program in many years, while WW has had a few changes in recent years. Jennifer noted that the drinking water program does have an expedited process to update methods, but it is through notices that appear in the federal register. The frequency of these approvals has been about one every year or every other year. The methods are approved, and they appear in Appendix A to Subpart C to Part 141. Those methods will ultimately become part of a method update rule, after which they will be moved to the individual rules where they are approved. Jennifer noted that a Method Update Rule (MUR) takes a long time – 3 to 5 years and it is resource intensive.

Michella Karapondo joined the call. Michella noted that the list of method codes is only good until your next approval action. Such lists need to be maintained and new codes must be made each time there are new approvals/rule revisions.

Robin asked if there is some way to remove the older methods that people aren't using anymore. Jennifer noted that the drinking water chemistry team was interested in cleaning up the methods approved and possibly eliminating some of the older methods that they thought were not being used any longer. In order to find out which methods were being used, one of the team members reached out to all of the states to determine which methods were being used by labs/which methods the states were still certifying for. What they found was that there were still labs using all of the methods, even the older methods (most likely labs use older methods due to financial reasons). Given that EPA has to take public comment when making any revisions to the regulations, it was determined that the withdrawal of the older methods would have to happen through a regulatory action (rather than through an Expedited notification), and EPA will likely propose to remove older methods through the next MUR.

Robin noted that in the 2012 MUR, some methods were removed. This was an issue with wastewater permits. As such, the community needs to help the permit writers to become aware of the changes/updates and help the permit writers to be as accurate as possible. The permittees need to be more aware of this concern as well. Permit writers are just copying old permits without reviewing updates. In other cases, there are labs that can't afford to use the new technology.

Jennifer explained that if there are a substantial number of people still using a method, EPA would likely not propose withdrawing the method, as EPA takes public comment on all regulatory revisions. However, if EPA has substantial cause to remove a method,

EPA can propose its withdrawal. Having data about how many labs are actually using a method (or not) could provide support for the withdrawal of a method. This is why they want the methods codes in SDWIS to be correct, as it could provide specific information as to the use of the approved methods.

Deric asked who manages the National Environmental Methods Index (NEMI). Jennifer replied that she is not sure who is maintaining it or even if it is still being maintained right now. Deric commented that he used this database for some of his work when he couldn't find some of the method codes. He wondered if this database could be the authoritative source, but Jennifer pointed out that there are methods/versions of methods in NEMI that EPA did not approve. She is not sure how much it is policed or maintained. Jennifer commented that it might be helpful to look at the TNI database to see if their database could help. TNI closely tracks updates. Michella commented that there are PDFs on EPA's DW website that show the approved methods by rule. It is sorted by analyte. Robin asked if Jennifer could forward the link to the committee. The tables were just updated in 2017.

Trying to work through this issue is a noble cause and it is worth working on. Chemistry needs to do the same thing we are doing with microbiology.

Jennifer asked Deric and Greg if they want the State to enter in the rule the data is relevant to or would they prefer to see the method code make this obvious? Greg noted that when they get the results in, the data input person puts in the lab results and the method that was run. Reporting results and analytical method used. They have analyte codes and method codes. In SDWIS they look to see if the reported method is correct for the analyte.

If the method code is tied into the rule, it really limits what can be done. Sometimes rules are added or changed.

Deb Waller described how NJ keeps track of the correct methods their labs are supposed to use. They track in the code if it is enumerated or qualitative. That tells them which rule it belongs to.

Jennifer and her group needs to review all they have learned recently and work with Deric and Greg to update obvious issues in the database. Deric thinks they need to address the TNI code issue since it involves multiple states.

Carl Kircher joined.

Jennifer can continue to provide updates to the committee as updates are available. She will provide an update at the next meeting.

There was a discussion on how TNI's codes are managed. There is a requirement that the states use LAMS.

Deb noted that they are also working on a database for their Wastewater codes.

Carl summed up all the different options for microbiology testing and understands why there are so many method codes. Carl noted that Florida is still having issues connecting to LAMS. Carl also noted that he reviewed the PPT presentations Robin forwarded from Jennifer and he is not sure how he can make the information work in his state. Greg noted that Florida uses their own system and Deric commented that they have not been in contact with Florida regarding CMDP.

3. Action Items

A summary of action items can be found in Attachment B. The action items were reviewed and updated in the table.

4. New Business

None.

5. Next Meeting and Close

The next meeting will be held by teleconference on April 10, 2018 at 1:30pm Eastern.

A summary of action items and backburner/reminder items can be found in Attachment B and C.

Robin adjourned the meeting at 2:53 pm Eastern.

**Attachment A
Participants
Microbiology Expert Committee (MEC)**

Members	Affiliation	Balance	Contact Information
Robin Cook (Chair) (2019) Present	City of Daytona Beach EML	Lab	cookr@codb.us
Patsy Root (2019) Absent	IDEXX Laboratories, Inc	Other	patsy-root@idexx.com
Lew Denny (2021*) Absent	Flowers Chemical Laboratories – North	Lab	lewdenny@comcast.net
Jessica Hoch (2019*) Present	TCEQ	AB	Jessica.hoch@tceq.texas.gov
Deb Waller (2019) Present (joined 2:28)	NJ DEP	AB	debra.waller@dep.nj.gov
Dwayne Burkholder (2019) Absent	Pennsylvania DEP	AB	dburkholde@pa.gov
Michael Blades (2021*) Absent	ERA	Other	mblades@eraqc.com
Brad Stawick (2019*) Absent	Microbac Laboratories	Lab	brad.stawick@microbac.com
Kasey Raley (Vice-chair) (2020*) Present	Eurofins Eaton Analytical, Inc.	Lab	KaseyRaley@eurofinsUS.com
Vanessa Soto Contreras (2020*) Absent	Florida DOH	AB	Vanessa.SotoContreras@flhealth.gov
Gary Yakub (2020) Absent	Environmental Standards, Inc.	Other	gyakub@envstd.com
Enoma Omoregie (2021*) Absent	NYCDEP	Other	eomoregie@dep.nyc.gov
Christabel Monteiro (2021*) Present	ESC	Lab	cmonteiro@esclabsciences.com
Ilona Taunton (Program Administrator) Present	The NELAC Institute	n/a	Ilona.taunton@nelac-institute.org

Attachment B

Action Items – MEC

	Action Item	Who	Expected Completion	Actual Completion
1	Review Method Codes and send comments to Robin for Dan Hickman.	Deb	TBD	
19	Provide EPA interpretation on temperature readings to Ilona. She will have it posted on the website.	Robin	1/31/14	
74	Send questions for ABs regarding method codes to Robin.	ALL	3/15/18	
75	Discuss space for a luncheon meeting in New Orleans with Jerry.	Ilona	3/15/18	Complete
76	Provide an update on what has been done with the databases after Jennifer's review and internal EPA meetings.	Jennifer	4/10/18	
77	TNI send LAMS information and list of NELAP ABs to Deric.	Ilona	3/31/18	
78	Forward link to PDFs on DW website with rule, method and analyte information.	Jennifer	3/31/18	

