

Summary of the NELAP Accreditation Council Meeting

October 19, 2015

1. Roll Call and Approval of Minutes

The NELAP Accreditation Council (AC) met at 1:30 pm Eastern time on Tuesday, October 19, 2015. Revised minutes from September 21 and minutes from October 5 were approved, with a change to the October 5 minutes to note Myron's presence at the meeting. Those members in attendance are listed in Attachment 1.

2. Action Items Pending

None at present

3. Discussion of SIR 108 with Quality Systems Expert Committee Chair, Paul Junio

SIR 108 was returned to Quality Systems for reconsideration, and after that committee discussed it several times without reaching a satisfactory interpretation, the Chair asked for feedback from the Council about what actual practices are. SIR 108 is based on the 2003 NELAC Standard section 5.4.13.1, asks whether every method must be audited every year as part of the laboratory's internal audit process.

Paul noted that the standard requires all "elements" of the quality system to be examined, (for example with "elements" being records, document control, environmental testing activities) but individual methods are not "elements" of the quality system. He noted that a lab "should" have a schedule for reviewing all methods over a set time period and this is where the QSEC finds internal disagreement. Some participants feel that every method should be reviewed annually, and others do not. Paul also noted that a review of methods is not part of the different but required annual management systems review.

Aaren asked for a state-by-state summary of actual practices that NELAP ABs require for internal audits. Florida requires that the lab's internal audit examine each method every year, while all other ABs permit a documented plan to spread out the method reviews over two or more years although some indicated a preference for annual method reviews. All agreed that if the internal audits find problems with methods, then the lab would be expected to audit all methods annually until problems are resolved. Aaren suggested that an appropriate interpretation would be for a defined timeline with expectations for what labs should do about examining methods.

One AB noted that SIR interpretations are not enforceable since they are not included in the codified language of the standard, in that state, even though the expectation is that all interpretations become part of the standard, once issued.

Another participant suggested that SIR 108 could become a "clarification" as some other SIRs have, where guidelines for complying with the standard are offered but not required, or else the QSEC could offer its explanation in the "committee comments" portion of the SIR response. Yet another suggestion was to add a definition for "testing activities" to help clarify the intent of the standard. Donna noted that the EPA Drinking Water

Certification Manual requires that auditors review analytical methods at every site visit but does not have a requirement that the lab review them annually, only that the lab have a documented plan for reviewing its methods.

At this point, Paul and Ilona departed the call, having gathered the information they sought.

3. Policy 3-100 Revisions

Since a two-thirds quorum was not present, the Chair postponed review of this revised policy statement until a future meeting with a quorum available.

4. Further Discussion of PTs for Asbestos in Drinking Water

Aaren reviewed the response received from Dan Hautman of EPA's Technical Support Center that EPA is aware of the situation and thinks that laboratories should be able to obtain PTs for asbestos in drinking water from NY State. These PTs are required by EPA regulation, which according to Donna means that they must be obtained even if only one sole provider (a monopoly) is available. Several AB representatives noted that if the PT is not available, then in accordance with the TNI Standards, the PT cannot be required by an AB.

Most labs performing asbestos in drinking water analyses have primary accreditation in NY, with two in TX and four in FL. MN and VA have sent labs to NY to obtain this accreditation. Other states were silent. Donna indicated that she will seek to further engage the Technical Support Center in this issue, since it has been almost a year that labs performed PTs, for those formerly obtaining their PT samples from the provider that has ceased to offer them (about a year ago,) and thus these labs are close to being out of compliance with the PT requirements of the standard.

We do not know what the 36 non-NELAP state certification bodies are doing about these PTs. Rumors of a survey exist, but no one has actually seen any results of such a survey.

General consensus was that there are three options:

1. Force all labs to obtain accreditation from NY for asbestos in drinking water methods, so that they can obtain PTs;
2. Drop the PT requirement, since PT samples are not available to all labs for purchase (but only to NY-accredited labs); or
3. Have EPA distribute PT samples from NY State.

5. Proposed Outline for Guidance for the Calibration Standard

No further comments were provided. The LASEC will take this up at its October meeting and relay the AC's comments from October 5 along with its comments back to the Chemistry Committee.

6. Remote Analysis

No further discussion occurred on this topic, except to note that a NELAP Assessor Call is now scheduled for December 7, to address the topic.

7. Generic Application

The software as described in the approved Database Development Plan has now been delivered to the LAB Expert Committee, but the needed User Manual is not yet available. LAB members will be looking at the software over the coming months and plan to work with NELAP AC representatives to find out what specific “report” needs exist, to provide information from the database to the individual ABs in forms they can utilize. Kansas has already discussed with TNI’s Database Administrator the possibility of using this software soon. Other ABs that have expressed interest (VA, MN) cannot presently contribute any resources to adapting to its use but perhaps later in 2016 will be able to do so.

NOTE: Any AB interested in exploring the software can visit the website, <http://genapp.nelac-institute.org> Just be aware that the software is not exactly intuitive, but you cannot hurt it by poking around, pretending to be a lab or possibly signing in as an AB (if that’s possible – I don’t actually know.)

8. Next Meeting

The next teleconference meeting of the AC will take place on Monday, November 2, 2015, at 1:30 pm Eastern. An agenda and teleconference information will be sent out before the meeting.

Attachment 1

STATE	REPRESENTATIVE	PRESENT
FL	Stephen Arms T: (904) 791-1502 F: (904) 791-1591 E: steve.arms@flhealth.gov	Yes
	Alternate: Carl Kircher E: carl.kircher@flhealth.gov	Yes
IL	Celeste Crowley T: 217-557-0274 F: 217-524-6169 E: celeste.crowley@illinois.gov	Yes
	Alternate: Janet Cruse T: 217-785-0601 E: Janet.Cruse@illinois.gov	Yes
KS	N. Myron Gunsalus 785-291-3162 E: ngunsalus@kdheks.gov	Yes
	Alternate: Sara Hoffman shoffman@kdheks.gov	Yes
	Included for information purposes: Nick Reams nreams@kdheks.gov	Yes
LA DEQ	Paul Bergeron T: 225-219-3185 E: Paul.Bergeron@la.gov	No
	Altérnate: TBD	
LA DHH	Donnell Ward T: E: donnell.ward@la.gov	No
	Alternate: TBD	
MN	Lynn Boysen E: lynn.boysen@state.mn.us	Yes
	Alternate: TBD	
NH	Bill Hall T: (603) 271-2998 F: (603) 271-5171 E: george.hall@des.nh.gov	Yes
	Alternate: Tyler Croteau Tyler.Croteau@des.nh.gov	No

NJ	Michele Potter T: (609) 984-3870 F: (609) 777-1774 E: michele.potter@dep.nj.gov	No
	Alternate : Rachel Ellis E: rachel.ellis@dep.nj.gov	No
NY	Mike Ryan T: (518) 473-3424 F: (518) 485-5568 E: michael.ryan@health.ny.gov	No
	Alternate: Victoria Pretti victoria.pretti@health.ny.gov	Yes
	Included for information purposes: Lynn McNaughton lynn.mcnaughton@health.ny.gov	No
OR	Gary Ward T: 503-693-4122 F: 503-693-5602 E: gary.k.ward@state.or.us	No
	Shannon Swantek T: 503-693-5784 E: Shannon.swantek@state.or.us	No
	Included for information purposes: Scott Hoatson T: (503) 693-5786 E: hoatson.scott@deq.state.or.us	No
PA	Aaren Alger T: (717) 346-8212 F: (717) 346-8590 E: aaalger@pa.gov	Yes
	Alternate: Yumi Creason E: ycreason@pa.gov	No
TX	Ken Lancaster T: (512) 239-1990 E: Ken.Lancaster@tceq.texas.gov	Yes
	Julie Eldredge E: Julie.Eldredge@tceq.texas.gov	Yes
UT	Kristin Brown T: (801) 965-2540 F: (801) 965-2544 E: kristinbrown@utah.gov	Yes
	Alternate: Jill Jones T: (801) 965-3899 E: jilljones@utah.gov	No

VA	Cathy Westerman T: 804-648-4480 ext.391 E: cathy.westerman@dgs.virginia.gov	Yes
	Alternate: Ed Shaw T: 804-648-4480 ext.152 E: ed.shaw@dgs.virginia.gov	No
NELAP AC PA and EC	Lynn Bradley T: 540-885-5736 E: lynn.bradley@nelac-institute.org	Yes
EPA Liaison	Donna Ringel T: 732-321-4383 E: Ringel.Donna@epa.gov	Yes
California	Christine Sotelo Christine.Sotelo@waterboards.ca.gov	No
Oklahoma	David Caldwell E: David.Caldwell@deq.ok.gov	No
Guests:	For SIR 108 Discussion: Paul Junio, Chair, QS Expert Committee, and Ilona Taunton, Program Administrator for QSEC Vanessa Soto, FL DOH (present with Carl Kircher)	