

Summary of the NELAP Accreditation Council Meeting

March 4, 2013

1. Roll call and Approval of Minutes

The NELAP Accreditation Council (AC) met at 1:30 pm EDT on Monday, March 4, 2013. Minutes of the February 25, 2013, meeting were approved. Those members in attendance are listed in Attachment 1.

2. Action Items Pending

- Susan and Stephanie O. agreed to draft a position paper on crypto accreditations.
- Lynn to revise SOP 1-102 (AC Voting) per discussion at this meeting, and distribute prior to March 18 meeting.
- Discuss w/ full AC whether and how to address different practices among ABs that came to light during the December 3, 2012, meeting
- SIR workgroup to modify remaining unapproved recommendation for SIR #81 and #125.
- Assessor calls resuming April 1. Topic will be Internal Audits.
- Final Response to Complaint from ACIL – pending completion of evaluation process for the AB (site report in final preparation)
- Policy Committee Review and request for revisions to Voting SOP (TNI SOP 3-101)

3. Update on TAC Merger into LAS EC

The TNI Board of Directors, at its February meeting, directed that the Technical Assistance Committee (TAC) merge with the Laboratory Accreditation Systems Executive Committee (LAS EC.) Both of those groups are charged with supporting the NELAP Program and have very similar charters. [NOTE: Lynn staffs LAS EC.]

Judy Morgan has taken over the role of LAS EC Chair with Kirstin Daigle's request to step down. Judy convened a teleconference of both committees on February 26, where participants revised the charter of LAS EC to incorporate the on-going functions of TAC (Assessment Forum and Mentor Sessions.)

This committee merger will definitely impact the timeline for handling the Standards Interpretation Requests (SIRs) that have been returned from the AC, and that fact will be noted to the Board in the next NELAP program report (at the beginning of April.)

4. Inquiry about Status of AC Members Addressing EPA Expectation of Adding Accreditation for *Cryptosporidium*

Cathy had inquired where the ABs are in their planning to respond to EPA's expectation that states will be available to accredit labs for the next round of crypto monitoring, due to begin in 2015.

Aaren referred to her notes from prior discussions about crypto accreditation, about the status of various ABs. What follows is an updated version of those notes, based on conversation during the meeting and later submissions from individual ABs intended for

inclusion in these minutes.

- CA – has 4 labs that were crypto-certified for prior round of monitoring, but only 1 in its NELAP program. Seeking to get a staff member into the April training course, and would accept out-of-state applicants if an assessor can obtain training.
- OR – has one crypto C.O. and will accept out-of-state labs
- FL – accredits for crypto presently. Has 7 labs, one trained assessor and has nominated another trainee for April. Will do out-of-state assessments.
- MN – had a trained assessor who accepted a new position; will send another trainee. May access original assessor by “mutual assistance agreement” and has a crypto analyst in the state laboratory who could offer technical support for primary or secondary accreditations. Questions the need for crypto accreditation based on conversations with R5 Drinking Water program office, indicating that sampling won’t begin until March 2014 at the earliest and thus, labs would be applying for crypto accreditation in fall 2013.
- TX – TCEQ has a trained assessor but does not accredit for enumeration of cryptosporidium or giardia in potable water (i.e., source water) and has no intent to do so. Two laboratories in Texas were previously certified by EPA but withdrew from that program. TCEQ does accredit for cryptosporidium and giardia in non-potable water but 2 previously accredited laboratories have dropped this field of testing.
- NJ – three laboratories have NJ Primary Accreditation for crypto. NJ has one trained assessor and no current plans to add to that. Will continue to offer primary accreditation and perform the required assessments for initial and continuing accreditation for any laboratory that is actively analyzing NJ samples or interested in analyzing NJ samples, and will also adopt the requirements of the USEPA’s Supplement 2 in the assessments of laboratories applying for or maintaining primary accreditation for the purposes of reporting regulatory data for drinking water (i.e., LT2 beginning in 2015).
- NY – has 5 labs that participated in previous round of monitoring. Considers crypto to be a “specialty criteria” with a monitoring need that appears temporary, does not intend to take action at this time.
- PA – has 3 labs from prior round, and a trained assessor writing SOPs for crypto assessments but plans to limit out-of-state lab applications for crypto accreditation. PA’s drinking water program maintains that laboratories may not perform sampling until they are accredited
- LA DEQ – has no mandate to accredit for crypto (LA DHH handles drinking water accreditations) but has laboratories requesting accreditation (for wastewater.) Asked to have one of its contract assessors participate in the EPA training and was notified that the class was full. For any in-state labs requiring crypto accreditation, would need to seek assistance from LA DHH
- VA – currently has no labs with need for primary crypto certification; no assessor being trained at this time
- UT -- UT currently has no crypto-certified laboratories, and does not plan on sending an assessor to the C.O. class.

Many ABs expressed concerns that EPA’s expectation seems to be that accreditation for crypto be handled differently than for other fields of accreditation, without basis for this in the NELAC or TNI standards. As the lead for the State Assessor Group (under APHL auspices), MN offered to inquire about whether the various EPA regions will have different

requirements for crypto accreditation or if this will be managed/directed from the Drinking Water Technical Support Center in Cincinnati.

Strong sentiment emerged that, if NELAP ABs decide to accredit for crypto, the Accreditation Council (and not EPA) is the appropriate body to decide how this new analyte ought to be added to the NELAP ABs for primary and secondary accreditations. Still, concerns exist that the Agency may decide that not all NELAP crypto accreditations are acceptable, even though presently there are no recognized non-EPA crypto accreditations.

It was noted that at least two EPA Regions have told their NELAP ABs that all that's needed to accredit for crypto is "trained assessors," implying that the processes and SOPs for that analyte/method are subject to no more/different scrutiny than other drinking water microbial analytes. EPA was explicit (in the meeting in Denver, January 15, 2013) that assessors are expected to observe the ENTIRE crypto analytical procedure (a day and a half) should be witnessed, and this is an extremely onerous requirement that the NELAP AC considers inconsistent with other NELAP accreditation reviews. The AC members approached consensus that the mechanics of a laboratory assessment for crypto are best left up to the AB, the same as all other analytes and methods.

Susan Wyatt volunteered to draft a position paper for the AC about crypto accreditations. Stephanie Ostrowski offered to work with her. Susan noted that she needs this for the MN drinking water program office, also.

5. NELAP Voting SOP 3-102 – Addressing Comments from Policy Committee Review

Before the AC began review of this SOP, Susan explained that she has committed to reviewing Chapter 6 of the 2003 NELAC Standard to see what policies and SOPs might be needed, overall, for the NELAP AC. This review was triggered by the Policy Committee's unease with the Provisional Recognition SOP 3-108 being a stand-alone document; they prefer that it be part of a larger package addressing all aspects of recognition of NELAP ABs. Lynn agreed to try to locate the spreadsheet prepared by the Lab Expert Committee, identifying missing policies that were omitted from the 2009 TNI Standard, but had been in the 2003 NELAC Standard.

Whether those policies should be developed by LAS EC or the AC itself, there was agreement that such policies ought to be documented for institutional memory. Assessor qualifications were also mentioned as a necessary item in this regard. LA DEQ noted that the now set-aside Mutual Recognition Policy ought to address the different practices of NELAP ABs concerning mobile laboratories, but perhaps silence is better in such instances, where state laws determine the AB practices.

After some discussion of how to handle abstentions, possibly different with "general business" and "accreditation matters," Lynn was asked to prepare a draft of the voting SOP with revisions to address the Policy Committee's comments from its review. This will be available prior to the next AC meeting.

6. Next Meeting

The next AC meeting will be Monday, March 18, 2013. The agenda will be to review the

revised AC Voting SOP and possibly the draft crypto position statement, and any other issues that may arise in the interim.

The April 1, 2013, AC meeting will be devoted to assessor interactions. PA will lead the discussion, and the topic will be internal audits and corrective actions.

Attachment 1

STATE	REPRESENTATIVE	PRESENT
CA	Fred Choske 510-620-31745 F: 510-620-3471 E: fred.choske@cdph.ca.gov	yes
	Alternate: Dave Mazzera T: 510-449-5600 E: david.mazzera@cdph.ca.gov .	no
FL	Stephen Arms T: (904) 791-1502 F: (904) 791-1591 E: steve_arms@doh.state.fl.us	Yes
	Alternate: Carl Kircher E: carl_kircher@doh.state.fl.us	No
IL	Scott Siders T: (217) 785-5163 F: (217) 524-6169 E: scott.siders@illinois.gov	No
	Alternate: Janet Cruse T: 217-785-0601 E: Janet.Cruse@illinois.gov	No
KS	Michelle Wade E: MWade@kdheks.gov Ph: (785) 296-6198 Fax: (785) 296-1638	Yes
	Alternate: N. Myron Gunsalus ngunsalus@kdheks.gov 785-291-3162	no
LA DEQ	Paul Bergeron T: 225-219-3247 F: 225-325-8244 E: Paul.Bergeron@la.gov	Yes
	Altérnate: TBD	
LA DHH	Donnell Ward T: E: donnell.ward@la.gov	Yes
	Alternate: TBD	
MN	Susan Wyatt T: 651.201.5323 F: E: susan.wyatt@state.mn.us	Yes

	Alternate: Stephanie Drier E: stephanie.drier@state.mn.us	No
NH	Bill Hall T: (603) 271-2998 F: (603) 271-5171 E: george.hall@des.nh.gov	No
	Alternate: TBD	
NJ	Joe Aiello T: (609) 633-3840 F: (609) 777-1774 E: joseph.aiello@dep.state.nj.us	no
	Alternate : Rachel Ellis E: rachel.ellis@dep.state.nj.us	no
NY	Stephanie Ostrowski T: (518) 485-5570 F: (518) 485-5568 E: seo01@health.state.ny.us	yes
	Alternate: TBD	
OR	Gary Ward T: 503-693-4122 F: 503-693-5602 E: gary.k.ward@state.or.us	yes
	Shannon Swantek T: 503-693-5784 E: Shannon.swantek@state.or.us	yes
	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@state.pa.us	Yes
	Alternate: Dwayne Burkholder E: dburkholde@state.pa.us	No
TX	Steve Gibson E: sgibson@tceq.state.tx.us	no
	Alternate: (temporary) Melissa Peters-Kelly E; Melissa.Peters-Kelly@tceq.texas.gov	
UT	Kristin Brown T: (801) 965-2540 F: (801) 965-2544 E: kristinbrown@utah.gov	Yes

	Alternate: Robert Aullman T: 801-965-2541 F: 801-965-2544 E: raullman@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	Marvelyn Humphrey T: (281) 983-2140 E: Humphrey.Marvelyn@epa.gov	No
NELAP QAO	Paul Ellingson T: 801-201-8166 E: altasnow@gmail.com	yes
Oklahoma	David Caldwell	Yes
Guests:	Alice Colt, TX sitting in for information purposes for Steve Gibson, TX	