

Summary of the NELAP Accreditation Council Meeting

October 20, 2014

1. Roll Call and Approval of Minutes

The NELAP Accreditation Council (AC) met at 1:30 pm EST on Monday, October 20, 2014. The minutes from September 15, 2014, were approved. Those members in attendance are listed in Attachment 1.

2. Action Items Pending

- Certificates of Recognition and letters to EPA Regional staff affirming renewals for UT, LA DHH and PA (Lynn and Aaren, Paul to sign the PA certificate)
- Aaren to follow up with Donna about whether each region requires all drinking water methods to be assessed.

3. Review of NH Recommendation for Renewal

The Evaluation Team's recommendation to renew NH's Certificate of Recognition was distributed to the Council prior to the meeting. One participant questioned whether it was appropriate to approve renewal when several of the corrective actions have not yet been completed, although a commitment was made by NH to complete them in November.

Discussion focused on equitable treatment of ABs and laboratories, that accreditation or recognition ought not be awarded until corrective actions are complete and found acceptable. Action on this recommendation was postponed until this issue is better explored.

NOTE: Bill was not present at this meeting, but indicated by email, afterwards, that he is fine with waiting to approve the renewal after corrective actions are finished. While Bill did not seek sympathy, it is well known that, as a one person AB having just hired a second person, he is already making heroic efforts to maintain the NH program. Also, the Lead Evaluator for NH, Michelle Wade, has acknowledged that she prepared and forwarded the recommendation (with the team's approval) despite all corrective actions not being completed because she is being held to the timelines in the Evaluation SOP, and to delay another several months might endanger her performance evaluation. This concern is legitimate, but was not raised before sending the recommendation.

4. Review of IL Recommendation for Renewal

The IL evaluation is a hold-over from the prior round of evaluations, and so has a state person as the Lead Evaluator. The Team's recommendation to renew IL's Certificate of Recognition was also distributed to the Council prior to the meeting.

The issue of incomplete corrective actions was raised here, based on review of the first and second corrective action responses, but Aaren (who served as a team member) affirmed that all findings were corrected prior to the recommendation being put forward. She indicated that there may have been challenges in getting everything successfully accomplished but assured the AC that all corrective actions were completed satisfactorily.

However, before a motion to accept the Team's recommendation could be made, Aaren raised the issue that IL does not routinely assess all drinking water methods during its site visits to labs. While this is not a requirement of the TNI Standard, it is widely considered to be a mandate from the EPA Drinking Water Program, so there could be questions raised about state primacy if another AB grants secondary recognition to a lab with IL primary accreditation.

Paul Ellingson, former QAO for NELAP and still in that role for the IL evaluation, conducted a survey earlier this year, and determined that all ABs except IL and LA DEQ do assess each drinking water method. LA DEQ does not accredit drinking water; that is handled by LA DHH, which does assess every method.

IL had been assessing four to ~~six~~ **eight** methods total during a site visit to a lab, and as corrective action, had ~~offered~~ **agreed** to assess at least one method "per technology." Notably, a Standard Interpretation Request was filed to address what is actually required by the standard, for a representative sampling of methods; the outcome of this SIR is pending and discussion by the AC has been requested through the SIR voting site. The Team had determined that IL's proposed corrective action was acceptable, pending outcome of the SIR.

There is nothing in the Standard that defines what constitutes a "technology" even though Proficiency Testing often makes reference to use of methods "by technology."

Consensus was that further discussion and possible vote on the IL recommendation should be postponed until the AC can get a definitive answer from EPA about whether or not assessment of each drinking water method is an absolute requirement, in order to ensure that none of the other ABs' state primacy recognitions could be threatened by the disparity in AB policies about this issue. Several ABs have already discussed the requirement with their regions and been told that all methods must be assessed, but EPA staff cannot point to any documentation for this requirement.

Aaren agreed to ask our EPA Liaison, Donna Ringel (who was absent for this call), to obtain definitive information about EPA Regions' requirements and policies for assessment of drinking water methods during lab site visits. Action on the IL recommendation will be postponed until this issue can be resolved.

NOTE1: Donna is back from vacation and has indicated that there is a scheduled call of national EPA Drinking Water QA Officers on November 4, and she will raise this question then, to find a clear answer for the NELAP AC.

NOTE2: In emails dated October 21 and 22 to the AC, Scott shared IL's commitment to following up with EPA Region 5 about the requirement to assess all drinking water methods, and indicated that IL is prepared to adapt its procedures to address that requirement if warranted.

5. Upcoming Assessor Calls

The planned October 6 Assessor Call did not occur due to scheduling errors on the part of the Program Administrator. It has been rescheduled for December 1.

A call for volunteers for the 2015 Assessor Calls did bring a volunteer for the March 2015 call. Cathy is willing to lead that discussion.

Volunteers are still needed for a June or July call and then an October or November call, too. Assessor Calls occur on the first Monday of the month.

6. Updates on Pending issues

Aaren noted that the PTP Executive Committee has been asked to reconsider the proposed WETT FoPT table in light of language in V2M2 that addresses how PT providers may provide instructions about how to analyze PT samples, provided that once those instructions are complied with, the remainder of the analysis is conducted as if the PT sample were an ordinary analysis.

The language change for the Calibration Interim Standard that was agreed upon at the AC's Special Meeting on October 15 was offered to the Chemistry Expert Committee and the Chair plans to add it as a "technical edit" that will be included in the revisions being undertaken in response to comments. There are apparently no major roadblocks to this way of addressing what could otherwise have been a serious impediment.

7. SIR Discussions

A number of SIRs having "needs discussion" requests are pending, but time permitted only one, SIR #132, about quarterly checks for "volumetric dispensing devices" where the 2009 TNI Standard omits the word "mechanical" from the NELAC standard's phrase of "mechanical volumetric dispensing devices." Concerns were resolved, albeit reluctantly, and voting will proceed.

The remaining SIRs will be discussed at future meetings, at time permits. NOTE: NY has responded to the Council's request that its asbestos experts investigate SIR #171, about QC for grid sizes in asbestos transmission electron microscopy, and this will be added to the discussion list.

8. Next Meeting

The next meeting of the AC will be on Monday, November 3, 2014. 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	Scott Siders T: (217) 785-5163 F: (217) 524-6169 E: scott.siders@illinois.gov	Yes (arrived during discussion of IL renewal)
	Alternate: Janet Cruse T: 217-785-0601 E: Janet.Cruse@illinois.gov	No
KS	N. Myron Gunsalus 785-291-3162 E: ngunsalus@kdheks.gov	Yes
	Alternate: Sara Hoffman shoffman@kdheks.gov	Yes
LA DEQ	Paul Bergeron T: 225-219-3247 E: Paul.Bergeron@la.gov	Yes
	Alternate: TBD	
LA DHH	Donnell Ward T: E: donnell.ward@la.gov	Yes
	Alternate: TBD	
MN	Lynn Boysen E: lynn.boysen@state.mn.us	No
	Alternate: TBD	
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	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
	Ruthie Wedig E: Ruth.Wedig@tceq.texas.gov	No
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	Yes
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	No
California	Christine Sotelo Christine.Sotelo@waterboards.ca.gov	No
Oklahoma	David Caldwell E: David.Caldwell@deq.ok.gov	No
Guests:	none	