

Summary of the NELAP Accreditation Council Meeting

November 16, 2015

1. Roll Call and Approval of Minutes

The NELAP Accreditation Council (AC) met at 1:30 pm Eastern time on Monday, November 16, 2015. Minutes from November 2 were approved. Those members in attendance are listed in Attachment 1.

From the November 2 meeting, the vote to approve the WET FoPT table ended on November 9, 2015 with 14 votes in favor of approval. PTPEC has been notified.

2. Action Items Pending

None at present

3. Recommendation Concerning Adoption of the Final Calibration Standard

Judy Morgan, Chair of the Laboratory Accreditation Systems Executive Committee (LASEC,) joined the meeting to present LASEC's recommendation for the first of the revised standards pieces for what is referred to as the "2015 Standard." LASEC recommends adoption of the Calibration Standard (V1M4 §1.7.1-1.7.2) with the editorial revisions agreed upon and already made, contingent upon development of guidance for labs to use in implementing that portion of the standard. The recommendation presented is included in these minutes as Attachment 2.

The AC reviewed a draft outline for the guidance in October, and LASEC has since reviewed it also, and notified the Chemistry Expert Committee that the outline is satisfactory, conveying both the AC's and its additional suggestions for the development. NOTE: this guidance will also include items from the Detection and Quantitation Standard (V1M4 §1.5), since both documents will be integrated into V1M4, the Chemistry module.

The LASEC Standards Review SOP 3-106 provides that LASEC will make a recommendation to the AC for each portion of the standard (sections, module or volume) as it is approved, for the AC's use in reviewing the individual portions. Once all portions are approved and reviewed by the Standards Review Council per the Consensus Standards Development SOP 2-100, LASEC will review the entire package and provide a single comprehensive recommendation for that package.

PLEASE NOTE: The NELAP Standards Review and Acceptance SOP 3-103 provides that the AC will review each portion of the 2015 standard within 60 days after receiving LASEC's recommendation, and once any issues are resolved, the AC will vote on that portion of the standard. The same procedure is required upon receiving LASEC's recommendation on the full 2015 standard "package" and the AC will then vote on accepting the full standard, and set an implementation date.

4. Temporary Extensions of Recognition for VA, OR and LA DEQ

The Certificates of Recognition for the three ABs named will expire before their

evaluations are complete. Myron moved and Lynn Boysen seconded that the recognitions of VA, OR and LA DEQ as NELAP ABs be extended until the Council can act on the recommendations of the Evaluation Teams. Eleven ABs voted “yes” to the motion and the three absent members will be polled by email.

5. Recording Mobile Lab Accreditations in LAMS

Paul, Vice Chair of the AC, requested to discuss how mobile labs are listed in LAMS since not all ABs award separate certificates to mobile labs. Dan Hickman, who manages LAMS, was invited to join the discussion.

LA DEQ uses the lab code for the “base” facility when accrediting mobile labs, but will provide a separate scope of accreditation for any individual mobile lab, in the event one is needed for a secondary accreditation. Some ABs issue separate accreditation certificates for mobile labs.

Dan noted that the database is restricted to one lab code for any given location and that the primary AB would be responsible for the lab demographics in LAMS, including those for a mobile lab. Several possibilities were mentioned, such as using the Vehicle Identification Number (VIN) to identify a mobile lab as a subunit of a “base lab” or adding a separate code for “lab type.” There is presently no way to link a separately accredited mobile lab to its “parent lab.”

Dan also noted that there are very few mobile labs, so that a manual entry for a mobile lab accreditation might be the best solution, rather than adding a set of new fields that all ABs would need to accommodate in their uploads to LAMS. He understands that the NEFAP program will have a separate database of accredited vehicles and facilities, not connected to LAMS. Dan stated that he needed to ponder what the best solution would be, and did not give a timeframe for reporting back, but will do so after consulting with TNI’s Webmaster, too.

6. Policy 3-100 Revisions

A revision to the Mutual Recognition Policy 3-100 including all agreed-upon changes from the November 2 AC meeting was offered for approval. Paul moved and Steve seconded to approve the document presented. There were 10 “yes” votes, with four ABs being asked to vote by email. (One AB left the call after the earlier vote.)

7. New Business

Sample collection

Aaren discussed PA’s issue with sampling techniques and the lab’s responsibility for verifying, as it relates to data qualification. PA has implemented a system wherein drinking water monitoring data that would otherwise require qualification can be exempted if the reason for qualification is not expected to alter the actual result, upon review by a select team of state personnel. But in this process, PA has found that labs are often unaware that samples were improperly collected (preserved or not but different than required, or hold times not met) and has begun requiring that labs validate the sample conditions at the time of receipt. Some labs are objecting to this requirement, claiming that it is unique to PA. MN stated that it too requires checking certain conditions at time of

receipt. OK requires that labs verify residual chlorine for disinfectant ability.

Validating sample conditions might mean verifying temperature (instead of recording “received on ice”) or checking pH (which will establish whether or not preservative was added.) Another issue raised was insufficient sample quantity, although the AB reporting this issue does not accredit drinking water.

Aaren stated that she had discussed this issue with Dan Hautman of EPA’s Drinking Water Program Technical Support Center (TSC in Cincinnati,) inquiring about the preservation tables provided by that program. Hautman noted that where the table says “none required” for preservative, this is to be implemented as a requirement that no chemical preservative may be added to the sample, rather than being optional as the words would seem to state. Aaren wanted other ABs to be aware of this interpretation of the guidance. Paul requested that ABs promote the use of accredited Field Sampling and Measurement Organizations (FSMOs, accredited under NEFAP) to avoid such problems.

Follow-Up on Asbestos PTs

Donna reported that Hautman is “still working” on this issue, with some optimism that a second PT provider (PTP) will become available, although possibly not ~~accreditable~~ **accredited by a TNI approved PTPA**. EPA insists the PTs are required by the CFR in order for drinking water labs to report test results for asbestos in drinking water, even though the only available PTP is NY State (which is accredited) and the only way a lab can use NY’s PT samples is to obtain ~~primary~~ accreditation from NY.

~~The EPA requirement does not specify that an accredited PTP must be used, but the TNI Standard does, so that a new un-accredited PTP will not be helpful for NELAP labs.~~ **The TNI Standard requires that PT samples be obtained from a PTPA accredited PTP unless there are no any PTPA-accredited PTP for the FoPT in which case the PT sample may be purchased from any PTP. If NELAP AC were to make a determination that the NYSDOH PTs were not available to non-NY accredited labs then a non-PTPA accredited PTP may be an option for non-NY accredited laboratories.**

Donna reported that EPA suggests using “interim” accreditation as a way to certify labs that cannot obtain asbestos PTs or else that the individual NELAP states offering that accreditation negotiate state-to-state agreements with NY in order to obtain PT samples for use by labs they accredit for asbestos in drinking water. Interim accreditations are not available in most ABs although that designation was once intended to permit a lab to operate until the AB could conduct a site visit.

Donna has elevated this issue to Lara Phelps, TNI’s Liaison with EPA and TNI Board Member, in hopes of getting help with resolution. Time is running out, the labs accredited by states other than NY are nearly at the one year mark, when they would have to successfully complete the PT sample (having missed completely the previous one, 6 months previous), but samples are not available. **Many believe that** requiring them to seek accreditation from NY is not reasonable, nor is it reasonable to have only NY labs required to perform PTs, or only NY labs accredited for this analysis. No one seems to know what the non-NELAP states are doing, but OK has an exemption granted by EPA Region 6 from requiring testing for asbestos in drinking water.

Evaluation SOP Revision

Lynn Bradley inquired whether the small group that agreed to work on revising the SOP has made any progress, since we now have less than one year to complete revision and attain all approvals. The group has not met to discuss revisions.

Dropping the Second AC Meeting of Each Month

Aaren has mentioned several times that she wants to have only one AC meeting per month, unless there is a need to discuss SIRs for the second meeting. She declined to schedule a mid-December call, so the next business meeting of the NELAP AC will be on January 4, 2016.

Paul adjourned the meeting shortly after 3 pm Eastern.

8. Next Meeting

The next meeting will be a NELAP Assessor Call on Monday, December 7, at 1:30 pm Eastern. Paul will sponsor a presentation and then lead discussion about remote analysis. Please remind all NELAP assessors of this schedule.

The next teleconference business meeting of the AC will take place on Monday, January, 2016, 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	no
IL	Celeste Crowley T: 217-557-0274 F: 217-524-6169 E: celeste.crowley@illinois.gov	No
	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	no
	Included for information purposes: Nick Reams nreams@kdheks.gov	No
LA DEQ	Paul Bergeron T: 225-219-3185 E: Paul.Bergeron@la.gov	Yes
	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	No
	Alternate: Tyler Croteau Tyler.Croteau@des.nh.gov	

NJ	Michele Potter T: (609) 984-3870 F: (609) 777-1774 E: michele.potter@dep.nj.gov	Yes
	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@deg.ok.gov	No
Guests:	Judy Morgan, Chair, LASEC judy.morgan@pacelabs.com Dan Hickman, TNI Database Administrator, dan.hickman@nelac-institute.org	

Attachment 2

Recommendation of LASEC to NELAP AC TNI Standard V1M4 Sections 1.7.1-1.7.2, September 2015 (aka the Calibration Standard)

APPROVED BY LASEC SEPTEMBER 29, 2015

The LASEC has reviewed the Calibration Standard (V1M4 §1.7.1-1.7.2) and in accordance with the LASEC Standards Review for Suitability SOP 3-106, is providing the recommendation to adopt this new version of the subject standard, with the following condition:

Guidance on the use of Relative Standard Error is needed, so that the ABs can share it with their laboratories to aid in consistent implementation of this standard. We understand that the Chemistry Expert Committee will provide this guidance in the form of both a written document and a publicly available video presentation (such as YouTube) describing use of RSE. We will ask that these will be provided to the NELAP AC for review prior to being finalized.

As agreed during the Joint Committee meeting at conference in Chicago (July 16, 2015), the subject version (now posted to the website) includes two editorial changes made after the final vote of approval, as follows:

- 1) The term “Statistical Degrees of Freedom” was removed from the standard in §1.7.1.1.e, since it is confusing and susceptible to a variety of interpretations. The Chemistry Expert Committee replaced the language with the following edit:

for regression or average response/calibration factor calibrations the minimum number of non-zero calibration standards shall be as specified in the table below. ~~For calibrations not listed below, the number of initial calibration standards must result in at least three statistical degrees of freedom.~~

Type of Calibration Curve	Minimum number of calibration standards ^b
Threshold Testing ^a	1
Average Response	4
Linear Fit	5
Quadratic Fit	6

^a The initial one point calibration must be at the project specified threshold level.

^b Fewer calibration standards ~~and degrees of freedom~~ may be used only if equipment firmware or software cannot accommodate the specified number of standards. Documentation detailing that limitation must be maintained by the laboratory.

- 2) The word “may” in 1.7.2.f.iii was replaced with language to make the handling of unacceptable calibration verifications mandatory instead of optional, as follows:

Data associated with an unacceptable calibration verification ~~may~~ shall be ~~reported with qualification~~ qualified if reported, and shall not be reported if prohibited by the client, a regulatory program or regulation.