

TNI PT Executive Committee Meeting Summary

November 17, 2011

1) Roll call and approval of minutes:

Chairman Eric Smith called the TNI PT Executive Committee meeting to order on November 17, 2011, at 1PM EST. Attendance is recorded in Attachment A – there were 7 Executive Committee members present on the call. Additional people on the call included: Susan Butts (South Carolina), Carol Smith (South Carolina), Randy Querry (A2LA), Rob Knake (A2LA), Geneva Bowman (ACLASS), and Nicole Cairns.

Approval of Minutes:

Gary motioned to approve the following minutes:

March 17, 2011, April 21, 2011, May 19, 2011, June 16, 2011, July 21, 2011, September 15, 2011 (with the following change: Typo under Action Item 169 – Eric “will” touch base) and October 20, 2011 (with the following change: Action item 161, 162 and 164 should be deleted because they were previously completed.)

The motion was seconded by Michella and unanimously approved.

2) Membership status

Nicole and Patrick will be added to the committee effective January 2012.

Eric sent information regarding another applicant that will be discussed at the next meeting.

3) FoPT Tables

The DW and SCM tables have been posted on the website.

The Lead Table has not yet been posted. There is not a spot to put. Ilona requested suggestions on how to do this and will work with William to come up with a solution. Eric suggested that the NEFAP table could be an extra section or a different hyper link. Need clear separation/distinction of NELAP required tables from other tables such as NEFAP tables.

How do we communicate when new tables go up? Eric has been adding it as a News item to the TNI site. PT providers and PTPAs also receive email notification. It was suggested that perhaps a button could be added to the website where people can request to be put on

a mailing list when changes are made to the posted tables (RSS feed). If this is possible, people could be notified of the feature through the TNI Newsletter.

4) Radiochemistry Concern - Michella

Michella sent the following e-mail:

I would like to discuss something about the radiochemistry PT program and the implementation of the program for drinking water. It has come to my attention through reviewing radiochemistry PT data from a few NELAP accredited labs, that PT providers are accepting identical results for multiple methods. This is not appropriate for drinking water. The CFR states in 40 CFR 141.24(f)(17)(i)(A) - "Analyze PE samples... at least once a year by each method for which the laboratory desires certification." (this is also in 40 CFR 141.25(h)(19)(i)(A); 40 CFR 141.25(f)(17)(i)(A); and 40 CFR 141.25(f)(17)(ii)(A) as a few other examples) Laboratories can not combine methods nor modify for drinking water compliance without ATP approval from EPA. I think the intent is for a laboratory to actually run each PT sample with each method. I am bringing this up now, as Region 4 has sent yet another set of PT results from another radiochemistry lab, that shows exactly the same result for several methods.

On the call Michella added this is a Chemistry issue too.

Curtis commented: PT providers score PTs as acceptable or not acceptable based on comparing the value reported by the lab to the acceptance limits. The accrediting bodies then determine whether the lab passes or fails based on other criteria - meeting frequency requirements, reporting the correct methods, following the requirements to treat PTs like real samples, etc.

It would be difficult to develop auditable criteria for the PT providers to follow for them to be able to evaluate the appropriateness of how labs report their methods.

There are also situations where a lab needs to report the same set of data with different method names because, for instance, one state may require a version and another state may not want the version reported.

The group concluded that this is not really something the PT Providers should be policing. It deals with the labs since it is a question of equivalent methods. It is specific to the DW rule. Michella will take the information provided on the call back to her office and they will work on the issue.

- #### 5) Draft Agenda Topics for TNI Sarasota, FL meeting in January (Tues Jan 31st 1:30 – 5:00 pm)
- Discuss DW FoPT table update
 - Discuss S&CM FoPT table update

- Discuss FoPT Table Management SOP & Application (if finalized)
- Any PTPA presentations from A2LA and ACLASS
- Open Floor

Curtis suggested a discussion on WET. Eric asked people to e-mail any additional ideas directly to him.

6) Review Bellevue conference public comments on draft FoPT Table Management SOP 4-107

1. Language was added to section 4 of the SOP to address document control, i.e. setting revision numbers and electronic file naming convention.
2. Committee decided to take under advisement, but no action currently planned.
3. Have a section for posting tables that are not program driven. Eric added language to 7.7 to cover this.
4. Need to allow for analyte groups. Eric added language to address this.
5. Ensure consistency in FoPT tables with ISO language on assigned values. Eric will respond that it will be taken under advisement.
6. Provide a public notice to get comments on FoPT tables before they are finalized. People want the chance to ask for re-evaluation of criteria set up by the Chemistry FoPT Subcommittee. The committee's thoughts were that people who are that interested should become involved in the process of establishing the tables. A comment period could delay the process quite a bit. Michella noted that it would be nice to have the tables posted much earlier so labs have time to work on any potential issues. Eric will add something about posting it at least 1 month before the effective date. A number of committee members were opposed to a public comment period. The committee will remain sensitive to the need to post the new FoPT and change the SOP if needed.
7. The NELAP AC will be checked with before analytes are added.

Nicole had a few editorial finds in Section 1, Section 3 (acceptance criteria), and Section 4.1 (that).

7) Review Open Action Items

Updated in table.

8) New Business

- Eric received a call from Dan Hickman and wanted to know if there should be method codes established for SIM methods. Eric's initial thoughts were that codes are not necessary – it is the same technology run in a different mode. Amy noted that she does report PTs with SIMs and notes it on her PT results where that level of detail is requested. Carl agrees that additional codes are not needed. No one disagreed, so Eric will get back to Dan and let him know they are not needed.
- Maria Friedman indicated that they need two PT providers by the end of the year. Eric asked the PTPAs on the call if there will be providers available by the end of the year. Randy noted that an assessment is scheduled, but any additional information is confidential. It is possible there may be one. Eric will provide Maria with this information.

9) Next Meeting

The next meeting of the PT Executive Committee will be 12-15-11. A PTPA database call will be planned by e-mail in December.

Action Items are included in Attachment C and Attachment D includes a listing of reminders.

The meeting was adjourned at 2:32 EST. (Motion: Carl Second: Gary Unanimously approved.)

Attachment A

Participants TNI Proficiency Testing Executive Committee

Members	Affiliation	Contact Information
Eric Smith, Chair (2010) Present	TestAmerica Laboratories, Inc.	615-726-0177 x1238 eric.smith@testamericainc.com
Ilona Taunton, Program Administrator Present	TNI	828-712-9242 tauntoni@msn.com
Justin Brown (2011) Absent	Environmental Monitoring and Technologies, Inc.	847-875-2271 jbrown@emt.com
Gary Dechant (2009) Present	Analytical Quality Associates, Inc.	970-434-4875 gldechant@aol.com
Amy Doupe (2009) Present	Lancaster Laboratories, Inc.	717-656-2300 x1812 aldoupe@lancasterlabs.com
Steve Gibson (2011) Present	Texas Comm. on Env. Quality	512-239-1518 jgibson@tceq.state.tx.us
Open	Open	Open
Michella Karapondo (2011) Present	USEPA	513-569-7141 karapondo.michella@epa.gov
Carl Kircher (2010) Present	Florida DOH	904-791-1574 carl_kircher@doh.state.fl.us
Stacie Metzler (2009) Absent	HRSD	757-460-4217 smetzler@hrsd.com
Joe Pardue (2011) Absent	Pro2Serve, Inc.	423-337-3121 joe_pardue@charter.net
Dr. Andy Valkenburg (2011) Absent	Energy Laboratories, Inc.	avalkenburg@energylab.com 406-869-6254
Curtis Wood (2010) Present	Environmental Resource Associates	303-431-8454 cwood@eraqc.com

Attachment B

Comments from NELAP AC on draft PTEC FOPT Table Management SOP 4-107 R0.0

Date: 12-14-11

#	Commentor	Comment	PTEC decision
1	Art Clark - EPA Region 1	General - I believe that the official title for ABs is "accreditation bodies". The SOP and application switch between this term and "accrediting bodies". The official titles should be used.	10/20/11 - Will make change.
2	Art Clark - EPA Region 1	General - The words "data" and "criteria" are plural. The SOP typically uses both terms as though they were singular.	10/20/11 - According to Webster, may be plural or singular in construction.
3	Art Clark - EPA Region 1	Application - I think it is important to add the following question to Sec. III B of the ARA. (This is the section dealing with removals.) "Does AB or regulatory agency currently collect/use data resulting from the analysis of this PT?" If an AB or certification program accredits labs for this analyte or if EPA or another state or federal agency uses PT data for this analyte, they should have the opportunity to respond to a request for removal. At the very least they should be made aware that removal is being considered. A good example is the "unregulated" organic analytes. For years EPA required labs to analyze PTs for the unregulated analytes even though they never required labs to be certified for them. EPA has stopped collecting these data, but many state programs still require their labs to analyze these PTs.	10/20/11 - This is covered during the review of the request. Clarify SOP section 6.
4	Steve Stubbs - TCEQ	Application - Concerning the (ARA) form, my only comment concerns the PT Provider information - Re the availability of PTs - I would suggest having check boxes "Yes", "No", or "Not Known". I would also suggest deleting questions about providers, product numbers, etc. The answers don't really affect the merits of the request. Also, the PT executive committee would probably verify any info in the form with PT providers and check with the other providers about current or potential availability, anyway. For ex, "Do you have or could you produce...".	10/20/11 - Note as optional/if known.
5	Dan Hickman - TNI (via Art Clark -EPA Region 1)	General - I'm not sure what's on the analyte addition request form for the PT table but it should include the TNI analyte code. They might want a statement in the SOP that says they will only add analytes to the FoPT tables that are already listed on the TNI analyte table.	10/20/11 - Note to verify if code exists & ensure addition if needed.

	David Caldwell - OK	<p>General - I hope this will help clarify my statements, the IT committee already has an on-line analyte request form on-line and working. Now the IT department must develop a new on line analyte request form with different information and different submittals and submit to the PT committee, which in turn will need to notify the IT department (again) when an analyte application comes in so that it can be check against the LAMS for duplication (redundant work), otherwise the LAMS database used for accreditation will not work for accredited analytes because the standard clearly state all analytes must have PTs. So duplication of work for IT committee plus communication issues between committees and then the AB must match two different codes (if not three or more depending on state system) when an analyte is requested for accreditation.</p>	<p>7/25/11 - Thanks David.</p> <p>You've raised some good points on the process of interaction with the IT committee which the PT Executive Committee will discuss. However, whether or not something needs to be added or removed from a FoPT table are separate evaluations from the review/development of a TNI analyte or Technology code. The two systems/processes & SOPs need to remain separate.</p> <p>The IT committee doesn't need to be involved in this FoPT analyte process unless a new analyte code is needed. If/when a new analyte code is needed at some point, the current IT analyte request process should work fine, so no duplication of work by IT or ABs is anticipated at this point.</p> <p>I'll be sure to add your feedback as a topic of discussion for the committee in order to be sure we've got our bases covered sufficiently and effectively.</p> <p>Sincerely, -Eric</p>
6	David Caldwell - OK (cont.)	<p>My approach would be to utilize the form now in use with addition formation the PT committee needs and then add additional addressee to the automatic notification (PT committee) then change the SOP to reflect notification process to the PT committee that a new analyte code has been generated so that the PT committee then can make their decisions in there processes. Thus eliminating additional forms and additional steps in communication and hopefully less confusion.</p>	
7	Paul Bergeron - LELAP	<p>Section 2 - First sentence - Change to "This SOP includes procedures for the PT Executive Committee to review requests to add new analytes to and remove analytes from to the TNI FoPT Tables."</p>	<p>9/15/11 - Will make change.</p>
8	Steve Stubbs - TCEQ	<p>Section 2 - Is there a need to include potential changes to analytes on the list , e.g., changes in concentration, method code?</p>	<p>9/15/11 - Will revise Section 2 language to include.</p>

9	Steve Stubbs - TCEQ	Section 2 - Second sentence - Change to read as - "The procedures address for FoPT table modifications, setting effective dates, and fixing typos [typographical and other errors] in the tables, as well as how to add FOPT analytes when PT data does not exist are addressed ."	9/15/11 - Will make change (minus the bracket language).
10	Paul Bergeron - LELAP	Section 3 -Please clarify if the definition of Sponsor means no sponsor is required to request the removal of an analyte from the FoPT table. If so, it contradicts Section 6. I recommend revising the definition of sponsor so that it does not appear to conflict with Section 6.0—sponsors should be able to request additions and removal of analytes from the tables. The application looks okay.	9/15/11 - Appears to be a misunderstanding of intent. A sponsor is not needed to remove an analyte. Will review and compare language between sections to see if a wording change/addition is needed to make intent more clear.
11	Paul Bergeron - LELAP	Section 4.1& 4.2 - Date should be capitalized each time when saying "Effective Date"	9/15/11 - Will make change.
12	Steve Stubbs - TCEQ	Section 4.2 - Header - Remove "Typos" and replace with "Errors"	9/15/11 - No change. This would change the procedure in a way not preferred by the committee.
13	Paul Bergeron - LELAP	Section 5 & 6 - Reference to "Federal" should be lower case	9/15/11 - Will make change.
14	Steve Stubbs - TCEQ	Section 5 - First sentence - no one else?	9/15/11 - Will add language something to the effect of "or other individual".
15	Steve Stubbs - TCEQ	Section 5 - Second sentence - Change to "A request submitted by an individual or on behalf of a laboratory or PT Provider must be sponsored by at least one Accrediting Body."	9/15/11 - Will make change.
16	Steve Stubbs - TCEQ	Section 6 - First sentence - No one else?	9/15/11 - Will add language something to the effect of "or other individual".
17	Steve Stubbs - TCEQ	Section 6 - Fourth paragraph - delete "request" from "request review".	9/15/11 - Will make change.
18	Paul Bergeron - LELAP	Section 7 - First sentence - Change to "The minimum timeframe that the PT Executive Committee must be allowed to take to process an approved request is one year."	9/15/11 - Will make change.
19	Steve Stubbs - TCEQ	Section 8 - This could be changed to a note and added to section 1.	9/15/11 - No change. The committee prefers to keep this as a separate section for emphasis.
20	8/11 public comment (from minutes)	Language should be added on document control of FoPT tables, including Revision history.	11/14/11 - See proposed language addition.
21	8/11 public comment (from minutes)	Ensure consistency in FoPT tables with ISO 17043 language on Assigned Values	11/17/11 - Taken under advisement.
22	8/11 public comment (from minutes)	Submit a pubic notice request for comment on proposed FoPT table updates	11/17/11 - Not planning to implement at this time.

23	8/11 public comment (from minutes)	In Section 7.6, post on TNI website when table finalized, do not wait until two weeks before effective date. Indicate the implementation is pending.	11/14/11 - See proposed language change.
24	8/11 public comment (from minutes)	Have a separate system for implementing tables needed for regulatory purposes, but not for accreditation purposes.	11/14/11 - See proposed language addition.
25	8/11 public comment (from minutes)	What published methods can be used to trigger the need for a PT?	11/17/11 - No change. Determined when application submitted.
26	8/11 public comment (from minutes)	Need to discuss/allow for analyte group requests using the SOP.	11/14/11 - See proposed language addition.

Attachment C

Action Items – TNI PT Executive Committee

	Action Item	Who	Expected Completion	Actual Completion
165	Follow-up on need for NEFAP EC approval of the FSMO FoPT Table.	Eric	Next Meeting	
168	Update FoPT Management SOP, distribute to EC and then distribute to NEFAP EC and NELAP AC for comment.	Eric	Next Meeting	Received from NELAP AC. Need to follow-up with NEFAP.
169	Contact Chem FoPT Subcommittee to look at the PCB data again and make sure that it supports the limits TNI has set.	Eric	Next Meeting	Eric will touch base with Carl.
170	Ask NEFAP EC and NELAP AC if they are aware of any analytes that need to be added to the table.	Eric	8/16/11	Need to follow-up with NEFAP.
173	Make editorial changes to FoPT table.	Eric	11/17/11	Complete
174	Talk to William to invite him to participate in database committee.	Eric	11/17/11	Complete
175	Send completed charter to TNI Board and CSDP.	Eric	11/17/11	Complete
176	Update summary in Attachment B as updates are made to the SOP. Distribute updated SOP.	Eric	11/17/11	Complete
177	Contact Dan Hickman regarding method codes.	Eric	12-15-11	
178	Contact Maria Friedman with update on PT Provider accreditation status for SSAS.	Eric	12-15-11	
179	Work with William on changes to FoPT table postings.	Ilona	12-31-11	

Attachment D

Backburner / Reminders – TNI PT Executive Committee

	Item	Meeting Reference	Comments
6	DW Table Micro Total Coliform Rule Request	10/15/09	9 out of 10 vs. 10 out of 10
7	Add the Field PT Subcommittee to the limit update SOP during its next update.	3/4/10	
8	Implement all policies and procedures necessary for operation and continual improvement of a national PT program – including FoPTs for various matrices, stakeholders and accreditation programs. (Need to update SOPs – including an appeals process) – Complete by 7/1/11.	10/21/10	From 2010 Strategic Plan Review
9	Implement a process to periodically evaluate the effectiveness of the PT provider oversight program and the Fields of Proficiency Testing. Complete by 6/1/11.	10/21/10	From 2010 Strategic Plan Review
10	Define a process for addition or removal of analytes from FoPT tables. Complete by 7/1/11.	10/21/10	From 2010 Strategic Plan Review
11	Evaluate how labs are accredited for analytes that co-elute.	5-19-11	
12			