

**TNI PT Program Executive Committee  
Meeting Summary**

**February 25, 2016**

1. Roll call and approval of minutes:

Chair, Maria Friedman, called the TNI PT Program Executive Committee (PTPEC) meeting to order on February 25, 2016, at 1:04 pm Eastern by teleconference. Attendance is recorded in Attachment A – there were 8 Executive Committee members present. Associate Members Present: Stacie Metzler, John Overbey, Carl Kircher, Jennifer Best, Lauren Smith and Craig Huff.

A motion was made by Dixie to approve the January 26, 2016 as written. The motion was seconded by Joe and approved by those committee members (Jennifer D., Patrick, Michella, Dixie, Joe P and Maria) on the call. Maria will send the minutes out for further voting by email.

*(Addition: Email votes: Andy – For (3/2/16), Nicole – For (2/26/16), Justin – For (2/26/16), Eric – For (3/4/16). The motion has passed.)*

The voting for approval of the December 17<sup>th</sup> minutes needs one more vote for final approval. Joe Pardue voted For. The motion passed and the December 17<sup>th</sup> minutes have been approved. *(Addition: Andy voted by email on 3/2/16 to approve these minutes.)*

2. Election of Committee Chair

Joe P. made a motion to keep Maria in place as Chair of the PTPEC. The motion was seconded by Dixie.

Vote:

Jennifer D – For

Patrick - For

Michella – For

Dixie – For

Joe P – For

Maria – For

The vote will be completed by email.

*(Addition: The following votes were received by email:*

*Nicole – For (2/26/16)*

*Justin – For (2/26/16)*

*Eric – For (3/4/16)*

*The motion has passed. )*

### 3. TNI Environmental Laboratory Standard - Volume 4

Maria provide the following information by email on 2/23/16:

*The PT Expert Committee (PTEC) has requested the PTPEC to review and propose language for the TNI Standard, Volume 4, regarding the content of PTPA presentations given to the PTPEC at TNI's semi-annual forums.*

*For reference, the Voting Draft Standard (VDS) for Volume 4 included the following new language in Section 6.0:*

***PTPAs shall upon request (by PTPEC) conduct a presentation at the PTPEC meeting during one of TNI's semi-annual forums.***

*During the VDS vote, I submitted two comments related to the above language:*

**Comment #1:**

*Clarify minimum content for the presentation.*

*Possible Resolution: Add as second sentence or as clause a): "The presentation, at a minimum, shall include:*

- 1) Changes related to PT Providers - additions, withdrawals, revised scope*
- 2) Number of complaints received - status (still open, closed, in progress), complaint type or category (e.g., deliverables, TAT, responsiveness, etc.)*
- 3) Summary of pass/fail rates for PT studies - A list of PTs that have historical (past 2-3 years) pass rates of <90%"*

**Comment #2:**

*Add statement to state the presentations shall be submitted to PTPEC upon request.*

*Possible Resolution: Add as clause b) "Also upon request (by PTPEC) such presentation shall be submitted to PTPEC."*

*-End of Comments-*

*When the PTEC deliberated on these comments, they requested that the PTPEC (as a whole) review the comments and language so as to ensure stakeholder buy-in.*

*Regarding Comment #1, the reason for submitting that comment was that if the Standard were going to require PTPAs to conduct presentations, then the Standard ought also specify the minimum content of those presentations, which would promote consistency and remove any ambiguity about what kind of information was expected in the PTPA presentations.*

*Regarding Comment #2, that was submitted so that the presentations by the PTPAs would be made available to the PTPEC in a form that could be later posted on the TNI website for the public who were not able to attend the TNI Forum in person.*

*Please review Comments #1 and #2, above, and provide your own comments. This discussion will continue during our Thursday's meeting and hopefully, we can vote then so I can return the comments to PTEC for reconsideration. We have a long list of agenda items so this is a heads up to be prepared.*

Maria noted that the Expert committee will look at this again at their next meeting.

Susan commented by Email on 2/23: I agree with the comments below. I think it should be uniform and you should request the same information from each PTPA. Also, you might want to specify getting a status of the PT providers and their renewals. Something general to let us know when the PT providers are scheduled to be evaluated. Matt, Nicole and A2LA also agreed.

Nicole commented by email on 2/23: For comment #1 – 1) I agree with Susan that information regarding the accreditation/renewal status of PT Providers would be a good addition. I'm not sure we need to get details down to the scope level for PT providers though. I think just a list of the PTPA's PT Providers and their accreditation status is sufficient.

For comment #1 – 3) I think the focus should be on analyte fail rates (i.e. >10%), not passing rates.

Dixie, Michella and Maria agreed with Nicole regarding the level of detail. (Andy joined the call at 1:22pm.) Andy commented that the information should be reviewed at both TNI meetings.

Maria will distribute information by email for an email vote.

*(Addition: Maria sent the following request by email on 2/29/16:*

*All those who responded to the request for comment to the subject proposed language to Vol 4 stated that they agree with the cleaned language, as presented below.*

*1) Remove "revised scope" and add renewal status from list of changes related to PT Providers*

*2) Request fail rates >10% instead of pass/fail rates, and include discussion of possible biases*

*3) Require presentations at "TNI forums" instead of "one of TNI's semi-annual forums." This is so that it is clear that presentations are expected at all TNI forums, whether held semi-annually (as is done currently) or annually (if the frequency should change in the future).*

*The following "clean" language reflects the above changes:*

## **6.0 REQUIREMENTS FOR ACCREDITATION OF PT PROVIDERS**

...

*PTPAs shall, upon request by PTPEC, conduct a presentation at the PTPEC meeting during TNI forums.*

- a) The presentation, at a minimum, shall include:*
  - i) List of PT Providers - additions, withdrawals, renewal status*
  - ii) Number of complaints received - status (still open, closed, in progress), complaint type or category (e.g., deliverables, TAT, responsiveness, etc.)*
  - iii) Summary of fail rates for PT studies - a list of PTs that have historical (past 2-3 years) fail rates of >10%, including a discussion of possible biases to fail rates such as PT studies with low numbers of participants*
  
- b) Upon request by PTPEC, such presentation shall be submitted to PTPEC.*

*End of Proposed Language*

*The proposal is now back to PTPEC. I, therefore, now entertain a motion to approve. A motion to approve was made by Joe P. on 2/29/16 and seconded by Matt Sica on 2/29/16.*

*Vote:*

*Gil - For 2/29*

*Dixie - For 2/29*

*Susan - For 2/29*

*Nicole - For 2/29*

*Jennifer D - For 2/29*

*Eric - For 2/29*

*Patrick - For 2/29*

*Justin - For 2/29*

*Michella - For 3/2*

*Andy - For 3/2*

*The motion passed and Maria will forward the information to the PT Expert Committee.)*

#### 4. Charter

Maria asked that everyone review the Charter for finalization. Jennifer asked that her organization reference be changed to reflect a name change. (Nicole joined the call at 1:32pm) Dixie's organization was also updated. Her representation was changed from Lab to Other.

A motion was made by Michella to approve the Charter. The motion was seconded by Dixie and unanimously approved.

*(Addition: After the meeting, Maria changed Nicole's representation from Other to Lab, to be consistent with her representation on the PT Expert Committee and also to assist PTPEC with maintaining balance due to the shifting of two other PTPEC members (Dixie and Maria) from Lab to Other at the same time. Nicole agreed to the change.)* Maria will send the finalized Charter to Ilona to send to the Board of Directors. See also Attachment D.

## 5. Standard Interpretation Requests (SIRs)

Maria provided the information in Attachment E. She thanked Carl Kircher for his assistance in preparing the responses.

Nicole motioned to accept the responses as written in Attachment E. The motion was seconded by Patrick and unanimously approved.

Maria will provide the responses to Lynn Bradley for review by the LASEC.

## 6. SCM FoPT Table

The SCM FoPT table was presented to the PTPEC in December 2015 by the Chemistry FoPT Subcommittee for review and approval. At that time it was decided to hold the table until the ARA for cis- and trans-Dichloropropene could be completed and the analytes could be added to the table. It was also realized that the ARA for the three Aroclors in Oil was never formally completed, but they were also added to the table.

Maria suggested that cis- and trans-Dichloropropene be deleted from the table until the ARA is completed. She has completed a request for data and the ARA will be addressed once the data is received. Maria provided a copy of the email from the Chemistry FoPT Subcommittee recommending addition of the Aroclors in Oil.

Dated 2/3/16:

*At the Chemistry FoPT Subcommittee teleconference on Tuesday, February 2, 2016, the Subcommittee recommends the addition of PCB-1221, PCB-1232, and PCB 1248 to the PCBs in Oil grouping on the SCM FoPT Table. Our action represents the Subcommittee's positive response to the ARA that was presented. Please feel free to contact me if you have any questions. Thanks!*

*Sincerely yours,  
Carl Kircher, Chair  
Chem FoPT Subcommittee  
904-791-1574*

Andy made the motion that ARA results for Aroclors in Oil that are included in the SCM FoPT table provided by the Chemistry FoPT Subcommittee in December (and resent by Maria to prepare for this meeting) be approved. The motion was seconded by Joe and it was unanimously approved. *(Addition: Additional email votes were received: Justin – For (2/26/16), Eric – For (3/4/16).)*

A motion was made by Nicole to close the ARA for Aroclors in Oil. The motion was seconded by Dixie and unanimously approved. *(Addition: Additional email votes were received: Justin – For (2/26/16), Eric – For (3/4/16).)*

Carl suggested that the low level cis- and trans-dichloropropene could be added now. Nicole suggested doing it all at one time to make it easier for PT Providers. There was agreement.

Andy noted that the Chemistry FoPT Subcommittee was happy with the data Carl provided for the cis- and trans-dichloropropene ARA and that is why these analytes were added to the table. Maria reminded everyone that the PTPEC decided to follow standard protocol and request all data from all PT Providers before the ARA be closed.

Nicole motioned to hold on addition of cis- and trans-dichloropropene addition to the SCM FoPT table until the ARA can be closed. The motion was seconded by Michella and unanimously approved by roll call ~~voice~~ vote of all members on the call (Michella, Dixie, Joe, Patrick, Andy, Maria, Nicole and Jennifer).

Nicole made a motion to accept the SCM FoPT table (excluding cis- and trans-dichloropropene) as distributed in December and redistributed by Maria in preparation of today's meeting. The motion was seconded by Andy. It was approved by all in the conference call (Michella, Dixie, Joe, Patrick, Andy, Maria, Nicole and Jennifer). *(Addition: Additional email votes were received: Justin – For (2/26/16), Eric – Abstain (3/4/16). The motion passed with more than 2/3 of the committee approving this motion.)*

The table will be updated to reflect the vote and Maria will send it to the NELAP AC for approval. Carl Kircher will provide this update. The effective date will not be determined until after NELAP AC approval.

## 7. New ARA

An ARA was received for removal of 3,3'-Dichlorobenzidine in Non-Potable water (Attachment F). Additional information about 3,3'-Dichlorobenzidine was also provided to all committee members by email to support the request.

Maria reviewed the items to be considered as listed in SOP 4-107:

- *The ARA and supplied documentation.* Provided.
- *Regulatory need:*

- *Confirmation of AB sponsorship.* Provided – NY is an AB.

- *Confirmation that the applicable Program (NELAP Accreditation Council, NEFAP, etc) will consider the request.* This will be sent to the NELAP AC by Maria.

· *Availability of historical PT data.* Carl noted that this analyte is not often spiked in testing rounds – perhaps due to stability concerns. Maria decided the PT Providers should be consulted to answer this question. Michella and Carl suggested talking to Lem Walker about this analyte. Andy noted that he has lab PT data for this analyte. It has poor recovery. Nicole noted that she hasn't received it in one of her PTs in the last 5 years. Craig confirmed there are stability problems.

· *Feasibility of producing a PT for the requested FoPT.* PTs do exist, but there are stability issues. There are studies that show decomposition issues.

· *Cost impact assessment to ABs, PT Providers and laboratories.* Failure costs to laboratories if PT is left in existence – corrective action costs. PT Providers have to deal with decomposition issues and preparation of the PT is more complicated.

· *PT concentration range and initial acceptance criteria.* The PTPEC may elect to postpone a review of this information until after the FoPT subcommittee has submitted their recommendation. Carl noted that recovery is possible for this analyte. He is not sure if the data supported updating the analyte back in 2010 or whether the previous limits were maintained. It is a priority pollutant, so Lem Walker's feedback is important in considering this ARA.

· *Technical feasibility – this must include one or more method validation study showing that the analyte(s) can be measured throughout the proposed concentration range by at least one published method.* There are issues with the behavior of this analyte.

· *Existence of a NELAC (TNI) Analyte Code.* A code is available.

Maria will contact Lem Walker to confirm there would not be an issue dropping this analyte.

## 8. Subcommittee Report

### WETT FoPT Subcommittee

John Overbey is the new representative from this subcommittee to participate on PTPEC calls. He noted that the subcommittee worked with EPA and instructions for DMR QA have now been changed. Maria noted that it should be determined whether this change affects the WETT FoPT table.

### FoPT Format Subcommittee

The subcommittee has populated the tables with the CAS numbers and they are now being reviewed. They have reviewed about 2/3 of the table.

#### SOP Subcommittee

Update provided by Ilona. The subcommittee did not meet this last month. They are currently working on the PTPA Evaluation Checklist.

#### Chemistry FoPT Subcommittee

The committee has discussed the issue of the Langlier Index. There were 4 people on the call during the discussion and the vote was completed by email. Carl will forward this information for the next conference call.

#### Microbiology FoPT Subcommittee

Jennifer has been out on leave, but the committee will begin meeting again next week. They will start by reviewing the update provided by the PTPEC before she went out on leave.

### 9. Action Items

The action items were reviewed and notes and updates can be found in Attachment B.

### 10. New Business

- None.

### 11. Next Meeting

The next PTPEC teleconference will be March 24, 2016. Maria asked for the meeting to be delayed by one week.

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

Maria adjourned the meeting at 2:33pm Eastern. (Motion: Andy, Second: Dixie. Unanimously approved.)



## Attachment A

### Participants TNI

#### Proficiency Testing Program Executive Committee

Members	Affiliation	Contact Information
Maria Friedman (2014) <b>Present</b>	TestAmerica	949-260-3201 <a href="mailto:maria.friedman@testamericainc.com">maria.friedman@testamericainc.com</a>
Ilona Taunton, Program Administrator <b>Present</b>	TNI	828-712-9242 <a href="mailto:tauntoni@msn.com">tauntoni@msn.com</a>
Eric Smith (2010) <b>Absent</b>	ALS Environmental	904-394-4415 <a href="mailto:eric.smith@alsglobal.com">eric.smith@alsglobal.com</a>
Justin Brown (2011) <b>Absent</b>	Environmental Monitoring and Technologies, Inc.	847-875-2271 <a href="mailto:jbrown@emt.com">jbrown@emt.com</a>
Susan Butts (2012) <b>Absent</b>	South Carolina DHEC	(803)896-0978 <a href="mailto:buttsse@dhec.sc.gov">buttsse@dhec.sc.gov</a>
Nicole Cairns (2012) <b>Present (Added in at 1:32pm)</b>	NY State DOH	(518) 473-0323 <a href="mailto:nicole.cairns@health.ny.gov">nicole.cairns@health.ny.gov</a>
Joe Pardue (2011) <b>Present</b>	Pro2Serve, Inc.	423-337-3121 <a href="mailto:joe_pardue@charter.net">joe_pardue@charter.net</a>
Dr. Andy Valkenburg_(2011) <b>Present (Added in at 1:22pm)</b>	Energy Laboratories, Inc.	406-869-6254 <a href="mailto:avalkenburg@energylab.com">avalkenburg@energylab.com</a>
Jennifer Duhon (2019) <b>Present</b>	<b>Millipore Sigma</b>	<b>307-3897218</b> <a href="mailto:jennifer.duhon@sial.com">jennifer.duhon@sial.com</a>
Matt Sica <b>Absent</b>	ANAB, ANSI-ASQ National Accreditation Board	<a href="mailto:msica@anab.org">msica@anab.org</a>
Dixie Marlin (2015) <b>Present</b>	Marlin Quality Management, LLC	513-309-3593 <a href="mailto:marlinquality@gmail.com">marlinquality@gmail.com</a>
Gil Dichter (2015) <b>Absent</b>	IDEXX Water	207-556-4687 <a href="mailto:gil-dichter@idexx.com">gil-dichter@idexx.com</a>
Patrick Garrity (2019) <b>Present</b>	Kentucky DEP	502-319-4040 <a href="mailto:patrick.garrity@ky.gov">patrick.garrity@ky.gov</a>
Michella Karapondo (2019) <b>Present</b>	USEPA	<b>513-569-7141</b> <a href="mailto:karapondo.michella@epa.gov">karapondo.michella@epa.gov</a>

## Attachment B

### Action Items – TNI PT Executive Committee

	<b>Action Item</b>	<b>Who</b>	<b>Expected Completion</b>	<b>Actual Completion</b>
185	Send updated DW table with Footnote 15 to NELAP AC for approval.	Stacie  Maria	4/1/12	Stacie submitted this. Need to confirm approval. Action: Look to see if this got done. 8/20/15: Maria will follow-up.
214	Update Tin, Total Xylene and Total Cyanide on FoPT tables and submit for approval.	Carl Stacie	Next Meeting	In Progress Ilona will look for this stuff. 8/20/15: Maria thinks Cyanide is done, but need to find status on Xylene and Tin. 11/19/15: Ilona reviewed minutes and provided notes to Carl and Maria.
233	Review complaint process.	Maria Ilona	5/14/14	In Progress
249	Meet with PTPAs to discuss issues surrounding receiving data for FoPT Limit Updates and complaints. Determine if issue exists and whether subcommittee is needed to address this issue.	Maria	11/13/14	In progress.  11/19/15: A group met to review this today.
251	Follow-up with Rami to provide support to solve footnote issue on WET FoPT Table.	Maria	10/30/14	Still in Progress
253	Check with EPA attorney on requirement that Vinyl Chloride	Michella	12/15/14	In progress. 8/20: Maria

	<b>Action Item</b>	<b>Who</b>	<b>Expected Completion</b>	<b>Actual Completion</b>
	cannot be "0".			emailed Michella for status update. 9/24: Waiting for response from Michella. 11/19/15: Michella expects an update next month.
257	Email to SOP Subcommittee regarding clarification on how limit updates due to issues should be addressed.	Maria	12/12/14	Maria prepared it, but is waiting for a chair for this subcommittee.
264	Update Complaint SOP to reflect Standard requirement that PTPA be contacted.	TBD	TBD	Waiting for input - #233.
269	Prepare DRAFT response to SIRs after meeting with NELAP AC.	Maria	TBD	
271	Provide list of replicates and volumes from WET Subcommittee to PT Providers.	Maria	3/19/15	It gives them information about the methods that PT Provider's don't have. 8/20: Jeff asked that this be distributed to the PT Providers. Maria will take care of this.
295	Moved from Backburner: PTPA Evaluation Checklist needs to be updated prior to next round of evaluations. (Originally discussed 8/6/13)	Gil	April 2016	
296	Moved from Backburner: Charter needs to be updated in	All	November 2015	In Progress

	<b>Action Item</b>	<b>Who</b>	<b>Expected Completion</b>	<b>Actual Completion</b>
	November.			
303	Send email to associates to see if they still want to receive meeting invitations.	Maria	1/25/16	
304	Prepare DRAFT response to SIRs and send to committee for review and discussion in Tulsa.	Maria	1/25/16	Complete
305	Send response to EDB/DBCP ARA submitter to request more information.	Maria	1/25/16	
306	Prepare request for PT data for cis- and trans-Dichloropropene ARA. Request details from Carl.	Maria	1/25/16	Complete
307	Update 2016 Charter and send out for email vote.	Maria	1/25/16	
308	Update Charter and send to Ilona.	Maria	3/24/16	
309	Send SIR responses to Lynn Bradley.	Maria	3/24/16	
310	Coordinate the update of the SCM FoPT table with Carl and send to NELAP AC for approval.	Maria	3/24/16	
311	Contact Lem Walker about new ARA to remove an analyte.	Maria	3/24/16	
312	Review new language in DMR QA and determine if there is any impact on the FoPT table. Does it need to be updated?	John Overbey	3/24/16	

**Attachment C**

**Backburner / Reminders – TNI PT Executive Committee**

	<b>Item</b>	<b>Meeting Reference</b>	<b>Comments</b>
7	Add the Field PT Subcommittee to the limit update SOP during its next update.	3/4/10	In Progress
11	Evaluate how labs are accredited for analytes that co-elute.	5-19-11	
13	Charter needs to be updated in November.	Ongoing 2016	
16	<p>Moved back to Backburner (originally discussed 2/20/14) :</p> <p>When new limits are established for the FoPTs, what is considered to be a statistically significant change to the old rates? At what point is it appropriate to question new limits? This lends to the TSS discussion a few months ago.</p> <p>Patrick commented that it would make sense to look at changes to pass/fail rates 6 months after new limits are effective. This possible addition to procedures should be evaluated when updating the limit acceptance SOP.</p>	2/20/14	
17	Discuss possible procedural changes to how limits are updated. Maria talk to SOP Subcommittee.		Need to look at PT database implications.

## Proficiency Testing Program Executive Committee

2016 Charter

(Revised: 2-25-16-v0)

### **Mission:**

The purpose of the Proficiency Testing Program Executive Committee (PTPEC) is to establish and maintain certain elements of a national PT Program to support TNI's Accreditation Programs and other TNI activities. Those elements include:

- Fields of Proficiency Testing (FoPT), consisting of analytes, concentrations, matrices, and acceptance limits, that are appropriate for the scope of environmental monitoring performed in the United States
- A listing of PT Provider Accreditors (PTPAs) that are TNI approved
- A listing of organizations that are recognized by TNI's approved PTPAs as competent to provide PT samples to laboratories

### **Strategic Goals and Objectives:**

- Implement all policies and procedures necessary for the operation and continual improvement of a national PT Program – including FoPTs for various matrices and accreditation programs
  - Periodically evaluate the effectiveness of the PT Program and the FoPTs
  - Continually evaluate and establish success measures and goals to target opportunities for improvement
- Implement an oversight program that ensures PT Providers are competent to operate environmental PT programs
  - Receive and evaluate PTPA applications
  - Approve organizations that meet the requirements of the TNI Standards to be designated as PTPAs
- Ensure that FoPTs are appropriate for their intended use
  - Collect and review PT data for the purpose of creating and maintaining FoPT tables for various matrices and programs
- Implement a process to periodically evaluate the effectiveness of the PT Provider oversight program and the FoPTs
  - Appoint and approve a well-trained team to perform PTPA onsite evaluations that include reviews of PT summary data
  - Perform PTPA evaluations in a timely manner
  - Design evaluation checklists that thoroughly cover every aspect of TNI's PTPA standards
  - Conduct ad hoc evaluations as necessary, when multiple complaints against any PTPA are received
- Develop a better process for getting data for setting PT acceptance limits and to handle complaints
  - Coordinate with TNI to develop an electronic database where PT Providers can upload PT data without breach of confidential information
  - Define procedures on how PTPEC will notify PT Providers to upload PT data to TNI
  - Ensure that any TNI staff with access to TNI's database sign a Confidentiality Agreement
- Provide periodic updates on the PTPEC activities and PT Program to the TNI Board of Directors

### **Success Measures:**

- The effective implementation, oversight, and ongoing development of TNI's PT Program in a manner that fosters input from and is accepted by stakeholders
- Timely completion of PTPA accreditation process
- Timely complaint resolution

**Goals for 2016:**

- Complete update of committee SOPs and incorporate Policy Committee comments to finalize
- Continue development and update of FoPT Tables
- Implement FoPT Management Procedures (SOP 4-107)
- Update PTPA Evaluation Checklist
- Develop and implement a process for evaluating the effectiveness of the PT Program
- Develop a long-term plan for the self-sufficiency of the TNI PT Program not dependent on EPA funding

**Considerations:**

- Exploring the need for additional IT services that could be employed to streamline FoPT review and update, as well as compile information for evaluating the effectiveness of the PT Program

**Available Resources:**

- TNI staff support is provided for the committee and two subcommittees
- Committee and Associate member volunteers, including volunteers for PTPA evaluations
- Freeconference.com service is used for conference calls
- Website support is provided by the TNI Webmaster
- TNI conferences and scheduling
- Travel expenses for PTPA assessments
- WebEx service and support for training and other purposes

**Anticipated Meeting Schedule:**

The PTPEC will conduct most business by monthly teleconferences as scheduled by its members (third Thursday of each month at 1pm ET). Face-to-face meetings occur during semi-annual TNI conferences where audience participation is encouraged. Special meetings are scheduled as needed to handle urgent business.

### Committee Membership

Members	Organization	Term Expiration (January)	Representation	Subgroup
Maria Friedman - Chair	Independent Assessor	2017*	Other	
Justin Brown	Environmental Monitoring and Technologies, Inc.	2017	FSMO	
Susan Butts	South Carolina DHEC	2018	AB	Non-NELAP
Nicole Cairns	NY State DOH	2018	Lab	
Gil Dichter	IDEXX Water	2018*	Other	
Jennifer Duhon	Sigma Aldrich	2019	Other	
Patrick Garrity	KY EEC	2019	AB	Non-NELAP
Michella Karapondo	US EPA	2019	Other	
Dixie Marlin	Marlin Quality Management, LLC	2018*	Other	
Joe Pardue	Pro2Serve, Inc.	2017	Other	
Matt Sica	ANAB, ANSI-ASQ National Accreditation Board	2017*	AB	PTPA
Eric Smith	ALS Environmental	2019	Lab	
Andy Valkenburg	Energy Laboratories, Inc.	2017	Lab	

\* - Renewable for 3 years.

**Balance:**

- 4 Lab or FSMO
- 6 Other
- 3 AB

**Subcommittees:**

- Chemistry
- Microbiology
- WET Testing
- SOP
- FoPT Table Format

**Program Administrator:** Ilona Verrips Taunton



## Attachment E. SIR Information

Maria provided the following information by email in January:

To all:

To refresh everyone's memory, both of the subject SIRs concerned analytes that were listed in FoPT Tables under analyte groups that were inappropriate for the methods the requestors were wanting for accreditation. The analytes were available from PT Providers in forms appropriate for the FoPT listings, but inappropriate for the lab's desired method. Over time, the situation has changed and, in large part, already been resolved.

In the case of SIR #26, the requestor had wanted accreditation for 1,2,4-Trichlorobenzene by EPA 8260. In the time since the SIR was submitted, the NPW and SCM FoPT Tables have been updated to include that analyte in different analyte groups and concentrations, and a cursory search of current PT Provider offerings shows that the analyte is now available in PT samples appropriate for EPA 8260.

In the case of SIR #80, the requestor had wanted accreditation for Pentachlorophenol by EPA 8151. In the time since the SIR was submitted, the SCM FoPT Table has been updated to include that analyte under the Herbicides analyte group, but not for NPW (due to insufficient PT data). A cursory search of current PT Provider offerings shows that the analyte is now available in PT samples appropriate for EPA 8151 in both matrices.

Early in 2015, I wrote a draft response for both SIRs, which was subsequently revised in large part by Carl to include relevant information about the FoPTs that had been updated.

In an effort to bring these SIRs to closure, I have made additional edits to the draft responses. The attached Word doc includes the original SIRs and the latest version of the draft responses. As a reminder of the SIR process, once the PTPEC completes its review and approves the SIR responses, the responses will be sent to the NELAP AC, which is responsible for the final review and approval.

Please review and provide comments. As discussed during our last PTPEC meeting, the draft responses to the SIRs will be part of the agenda in Tulsa, but we can begin discussions now. Thank you.

### SIR RESPONSES:

#### **SIR #26**

I have been recently inspected by the State of Florida DOH. The inspection was very well done and along NELAC standards.

The auditor indicated that if we were certified for compound 1,2,4-trichlorobenzene for 8260 we would be required to perform the PT if 1,2,4-trichlorobenzene was offered for any group. It is not currently in the 8260/624 volatile grouping as offered by WIBBY or NIS. It is however listed in the base neutral grouping. We were advised that we would have to perform the volatile analysis using the base neutral sample. We are not currently certified for 8270.

If we put this base neutral PT on the volatile instrument we would ruin the column with the very first PT.

I emailed Steve Arms the program director at the State of Florida and got a similar response.

This is just an example of one parameter there are others that fall into this issue  
Thank you for your time.

**PTPEC Response Rejected by NELAP AC:**

In the absence of a written policy from the previous NELAC PT Board regarding proper interpretation of the FOPT table analyte analysis requirements, the TNI PT Board cannot comment on what may or may not have been the intent of the NELAC PT Board in this regard. Without previous PT Board policy, interpretation to date of analyte analysis requirements for the FOPT tables has been left to an AB's (Accrediting Body's) discretion.

The TNI PT Board believes that there has been a general lack of clarity within the community on how the FOPT tables should be interpreted. The TNI PT Board consensus is that group headers in those FOPT tables must hold significance, and group headers must be utilized to classify when an organic analyte is required to be processed and analyzed using extractable and/or purgeable technologies. The TNI PT Board is currently working to add this clarification to the FOPT tables. Until such time as the revised FOPT tables become available, the requirement for a PT by the AB must take into consideration current FOPT table group headers and whether TNI approved PT providers offer that analyte in their routinely offered products for volatile analysis. It must not be required by an AB that a PT product specifically designed and packaged by a PT vendor for extraction (semivolatile) methods be analyzed by purgeable (volatile) analysis. If volatile analysis of an analyte listed under a FOPT Base/Neutral grouping is required by an AB, the analyte must be readily available (from at least the majority of TNI approved PT providers) in PT vendor products that have been designed and marketed to be used for volatile method analysis.

**New Draft Response for SIR #26:**

The ABs are correct in requesting the analysis of PTs where available by analyte/matrix. While the 2003 NELAC Standard defined an FoPT as having all three elements of matrix, method/technology, and analyte/analyte groups, PT data was not available to establish separate FoPTs according to method/technology. The 2003 Standard also specified that sufficient PT data had to be available, specified as at least 10 valid PT studies with at least 20 participant laboratories in each study, in order to establish concentration ranges and acceptance limits for FoPTs.

When this SIR was initially submitted for consideration, the TNI PT Program worked to establish additional FoPTs for so-called "dual-purpose" and "overlapping" analytes. The NPW FoPT Table that went into effect on 10/3/2011 added an additional listing for 1,2,4-Trichlorobenzene (and Naphthalene) in the grouping with other Volatile Aromatic analytes for possible use with methods such as EPA 624 and 8260. The same addition was made in the SCM FoPT Table that took effect on 1/3/2012.

The TNI PT Program has no control over the business practices of PT Providers on how they package, market, and distribute their PT samples. Therefore, the only recourse within the auspices of TNI are to petition the PTPEC to add the analyte in question as a separate entry with separate concentration range and acceptance limits. This could be done by submitting an Analyte Request Application to the PTPEC, with a TNI NELAP AB sponsor and supporting PT data justifying the addition of the requested analyte.

## **SIR #80**

We are currently accredited for method SW 846 8151, but we want to add Pentachlorophenol by 8151 to our scope. Pentachlorophenol is not listed as requiring PT with the other Herbicides that are analyzed by 8151 that are listed. Therefore, I interpret that as Pentachlorophenol by method 8151 does not require PT.

Our Accrediting Body says otherwise. They contend that because Pentachlorophenol is listed under the Acid Extractables (Method 625 or 8270) that require PT, it also requires PT if we want to add it to our 8151 scope.

Please advise. Thank you.

### **PTPEC Response Rejected by NELAP AC:**

The Accrediting Body's interpretation is consistent with guidance provided a number of years ago by a different committee overseeing the FOPT tables at that time.

The TNI PT Board would agree that there has been a general lack of consistency within all sectors of the community on how the group headers in the FOPT tables are being interpreted. The TNI PT Board is looking to address this by adding some clarification on this matter to the FOPT tables.

### **New Draft Response for SIR #80:**

The ABs are correct in requesting the analysis of PTs where available by analyte/matrix. While the 2003 NELAC Standard defined an FoPT as having all three elements of matrix, method/technology, and analyte/analyte groups, PT data was not available to establish separate FoPTs according to method/technology. The 2003 Standard also specified that sufficient PT data had to be available, specified as at least 10 valid PT studies with at least 20 participant laboratories in each study, in order to establish concentration ranges and acceptance limits for FoPTs.

When this SIR was initially submitted for consideration, the TNI PT Program worked to establish additional FoPTs for so-called "dual-purpose" and "overlapping" analytes. The SCM FoPT Table that went into effect on 1/3/2012 added an additional listing for Pentachlorophenol in the grouping with other Herbicides analytes for possible use with methods such as EPA 8151. At that time, insufficient PT data was available to support the addition of Pentachlorophenol to the NPW FoPT Table.

The TNI PT Program has no control over the business practices of PT Providers on how they package, market, and distribute their PT samples. Therefore, the only recourse within the auspices of TNI are to petition the PTPEC to add the analyte in question as a separate entry with separate concentration range and acceptance limits. This could be done by submitting an Analyte Request Application to the PTPEC, with a TNI NELAP AB sponsor and supporting PT data justifying the addition of the requested analyte.



**TNI Fields of Proficiency Testing (FoPT) Analyte Request Application**

SUBMISSION DATE: \_\_\_\_\_

**SECTION I – REQUESTOR/ORGANIZATION INFORMATION**

Requestor: \_\_\_\_\_

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_ Facsimile: \_\_\_\_\_

Email: \_\_\_\_\_

**SECTION II – Sponsor (if applicable)**

**Required for applications submitted by individuals or on behalf of laboratories or Proficiency Testing Providers**

Sponsor Accreditation Body: \_\_\_\_\_

Official Contact: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_ Facsimile: \_\_\_\_\_

Email: \_\_\_\_\_

**Note here if reference to any additional AB sponsors is being provided.**

**Additional sponsors? No**   
**Yes**  Other Sponsor ABs: \_\_\_\_\_  
\_\_\_\_\_

If yes, provide contact information on additional AB sponsors as an attachment to the application.

**Section III – Analyte Request**

Instructions: If requesting addition of a new FoPT table or analyte(s) to an existing FoPT table, please complete section IIIA. If requesting removal of a FoPT table or analyte(s) from an existing FoPT table, please complete section IIIB. Requests for additions and removals cannot be submitted on the same application; separate applications are required.

**Section IIIA – Addition of New FoPT Table or Analyte(s)**

FoPT table and/or analyte(s) to be added (please specify program and matrix for new FoPT table):

---

---

---

For analyte(s) additions only, FoPT table(s) on which the analyte(s) should be added (if more than one analyte, clearly annotate which analytes to add to which existing FoPT tables):

---

---

---

Reason(s) for adding the FoPT table and/or analyte(s) (attach additional pages if necessary):

---

---

---

---

---

---

Do any TNI approved PT Providers currently offer the analyte(s) in a PT product?

No  Yes  Unknown

If yes, attach a list of PT products currently available (specify each PT Provider, PT Provider’s product name, and PT Provider’s catalog reference).

The following documentation must also be provided as attachments to this application when requesting addition of new analyte(s):

- 1) Proposed spiking concentration range and initial acceptance criteria.
- 2) Information on technical feasibility – this must include one or more method validation study showing that the analyte(s) can be measured throughout the proposed concentration range by at least one published method.

**Section IIIB – Removal of FoPT Table or Analyte(s)**

FoPT table and/or analyte(s) to be removed:

---



---



---

For analyte removals only, FoPT table(s) from which the analyte(s) should be removed (if more than one analyte, clearly annotate which analytes to remove from which FoPT tables):

---



---



---

Reason(s) for removing the FoPT table and/or analyte(s) (attach additional pages if necessary):

---



---



---



---



---

The following documentation must also be provided as attachments to this application when requesting removal of analyte(s):

- 1) Copies of any supporting documents that were referenced above in the reason(s) provided for removing the analyte(s).

**Section IV – Submittal of Application**

All applications (including attachments) must be submitted electronically via email to the PT Program Executive Committee Chairperson. No paper copies will be accepted.

Please complete the application and provide the supporting documentation as instructed. Incomplete applications will delay the review process and may be returned to the requestor.

***For PTPEC use only***

Date ARA Received:	
Date ARA Review Initiated:	
Date ARA Review Completed:	
Date Requestor notified of PTPEC’s decision to pursue or dismiss the request:	
If pursued, Date Request submitted to FoPT Subcommittee:	
Date Request Completed:	