

TNI PT Program Executive Committee Meeting Summary

March 15, 2018

1. Roll call, approval of minutes and overview:

Chair, Maria Friedman, called the TNI PT Program Executive Committee (PTPEC) meeting to order by teleconference on March 15, 2018, at 11am Eastern. Attendance is recorded in Attachment A – there were 8 members present. Associate members present: Jennifer Best, Nicole Cairns, Susan Jackson, and Reggie Morgan.

The meeting minutes from the February 22nd meeting were reviewed. A motion was made by Fred to approve the minutes as written. The motion was seconded by Patrick and unanimously approved.

Maria confirmed that everyone received the agenda and handouts she sent on March 14, 2018.

2. Chair update

- The FoPT tables approved last month have been forwarded to the NELAP AC. The footnotes are intended for the PT Providers. Correspondence was received from Cathy Westerman and Aaren Alger regarding the update. Maria will continue to work with the NELAP AC and provide an update at the next meeting. Initial Correspondence:

Cathy Westerman, 3-13-18:

I'm quite happy to see these PCB changes to the FoPT tables! I have a question: My understanding is that these footnotes are generally directed toward the PT providers. Is the intent of this update that if a lab fails the qualitative or quantitative identification of one of the aroclors in the test, that all of the aroclors will receive a failing score?

Maria Friedman, 3-14-18:

The proposed change to Footnote #2 is intended to provide clarification to PT Providers and ABs so that it is understood that the PCBs are collectively considered to be one FoPT, even though only one Aroclor is spiked in a given PT sample. PT Providers are not being instructed to change how they score PCBs -- the evaluation of PTs by the PT Provider is done on a per-analyte basis as required by the TNI Standards. With that said, ABs are, of course, at liberty to develop their own policy related to PCBs, which could include a requirement that if a lab fails one Aroclor,

they will be considered by the AB to have failed all Aroclors. Some ABs already have such policies in place. For them, and for those ABs who would consider adopting such a policy, the proposed Footnote #2 was written to document the PT Program's position that PCBs are considered a collective FoPT.

Aaren Alger, 3-14-18:

I'm not sure that this will solve the problems that we have for ABs and accreditation. Can we instruct the PT Providers to give an overall score for the PCBs group as "Acceptable" and "Not Acceptable" if they assign the wrong aroclor or if the value is outside of the acceptable range?

- Radiochemistry data from PT Providers for Radiochemistry has not yet been received. It is expected by the end of the month.

3. SOP 4-104

SOP 4-104 is PTPEC's former PTPA Evaluation SOP. The PTP SOP Subcommittee compared it to the combined evaluation SOP and made the following recommendation on 3/5/18 by email:

Have one document, SOP 7-101 and eliminate/deactivate SOP 4-104.

Pros:

- Streamline documentation
- Redundant documents- eliminate/deactivate SOP 4-104
- Reduce possible confusion and frustration having 2 equivalent documents for the same task

Cons:

- Requiring to use 2 equivalent documents
- Will cause possible confusion and frustration
- Which document is primary?

The recommendation is to completely retire SOP 4-104.

Maria asked everyone to open the marked up version of SOP 4-104 reviewed at the Albuquerque meeting. Most of the sections were already noted as being met in SOP 7-101.

Maria expressed concerns about how changes will be made to 7-101 when they are needed. Ilona commented that the changes would be recommended to the NEFAP EC and the Combined Evaluation Workgroup would help to update the SOP. This SOP will be updated after this round of evaluations to incorporate the TNI Environmental Laboratory Standard recognition too.

Carl was concerned whether retiring SOP 4-104 means there will be no procedure until SOP 7-101 becomes effective. Ilona pointed out that SOP 7-101 is already effective. It was voted in and made effective January 1, 2018. We are only making updates in response to the Policy Committee review.

Carl motioned to retire SOP 4-104. Matt seconded the motion. Vote:

Maria – For
Carl – For
Matt – For
Dixie – For
Patrick – For
Michella – For
Fred - For

A 2/3 approval vote is needed, so this vote will be completed by email:

(Addition:

Email Votes:

Eric – For 4/16/2018

Andy – For 4/9/2018

Jennifer D – For 4/9/2018

Gil – For 4/8/2018

Jennifer M – no vote as of 4/16/2018

Scott – For 4/9/2018

4. Complaint #27

Maria forwarded the Complaint Subcommittee recommendations for Complaint 27:

a. The PTPEC cannot overturn the scoring of a PT Provider. Per the 2009 TNI Standard, Volume 1, Module 1, Section 7.1, “*The laboratory shall submit questions about PT samples or performance evaluations made by the PTP to the PTP. If the PTP is not able or is unwilling to resolve the question to the satisfaction of the laboratory, the laboratory shall refer those questions to the PTP’s PTPA.*” Therefore, it is recommended that the laboratory take their complaint to the PT Provider’s PTPA, if they have not already done so. However, the PT Provider appears to be following the FoPT table and Volume 3 standard as written. So, the complaint subcommittee also recommends that the laboratory contact their AB regarding this PT score. The AB can evaluate a PT score differently and possibly reverse the evaluation based on the technical merit of the laboratory’s complaint.

2. Investigate and publish a technical solution to the dilemma

a. The complaint subcommittee reviewed Solid Waste PT data from 2015-2017 for DDD, DDE, and DDT. The subcommittee specifically reviewed PT data

where DDT was spiked into a PT sample, but DDE or DDD were not spiked. Upon review of the data and fail rates, the subcommittee has concluded that the current scoring requirements cannot appropriately evaluate degradation products when they are not spiked into a PT and laboratories follow their normal reporting procedures. This will become an even greater issue when the new 2016 TNI Standard is implemented and laboratories are required to report results down to the Proficiency Testing Reporting Limit (PTRL). To prevent this issue, without having to change the PT scoring criteria or laboratory reporting procedures, the subcommittee recommends that analytes designated as chromatography degradation products always be spiked in PT samples that include them for PT evaluation/scoring.

Matt provided the following comment to the recommendation by email on 3/15/18:

I do ask that the Complaint 27 subcommittee consider removing the highlighted statement in the attached pdf.

Therefore, it is recommended that the laboratory take their complaint to the PT Provider's PTPA, if they have not already done so.

The rationale for this request is based on the following:

1. The complaint to the PTPA has been established in two different meetings of the PTPEC. The lab had complained to both the PTP and the PTPA. This complaint was thoroughly vetted during the ANAB annual report to the PTPEC. This issue was also referenced in the PTPEC discussion which led to the formation of this subcommittee.

The laboratory was already aggravated by the TNI complaint process when the complaint came to the PTPA. The laboratory staff had misinterpreted TNIs initial rejection of the complaint. The complainant was then more aggravated when I told him the resolution of the ANAB formal investigation and that he could now send a complaint to TNI. He stated this is all very circular and that it appears that the process is just passing the issue from one organization to another. It was a travesty to request he go back to the PTPA, when the PTPEC is aware that this occurred. We would only be validating his assumption of passing the issue around, but not resolving it.

2. The TNI Complaint process itself required the complaint to be considered by the PTP and the PTPA, prior to acceptance.

Nicole summarized: There was an issue with a solid waste PT. They reported a degradation product because it was detected above the PTRL. However, the degradation product was not actually spiked into the PT, so they were failed on the PT. The PTPEC cannot overturn a PT result. Nicole is ok with Matt's request. This doesn't have to be the language that goes back to the complainant. At this point only their AB can decide whether their PT result is acceptable.

Issue of the table itself, there is the potential that one of the degradation products can be detected above the PTRL. They looked at solid waste PT data from 2015 to 2017. They specifically looked at data where DDT was spiked and the degradation products were not. They found that there is an issue. The fail rates are higher when the degradation products are not spiked and DDT is. They recommend that all 3 analytes be spiked in the PTs to help with this issue. Andy pointed out that there isn't really an issue if DDT is not spiked. The concern raised in the subcommittee is that you probably wouldn't have degradation products if you don't have DDT, so this isn't really mimicking real world samples if you only spike the degradation products.

The subcommittee went with this recommendation because it doesn't require any other change than to the FoPT table. Changing how the analytes are scored would require a change to the Standard and the FoPT tables override what is in the Standard.

Input is needed from the Providers before making any decisions on what the PTPEC wants to do with the second recommendation.

Matt thinks the subcommittee's recommendation would adequately address the issue without having to change the Standards.

Actions recommended at this time are to vote on a response going back to complainant and update the FoPT table footnote and vote separately on that.

Should it be required that all 3 analytes be spiked into the PTs? More discussion is needed. PT Providers need to be involved in this discussion before any decisions can be made. This will be further discussed at the next meeting.

5. Subcommittee Updates

Chemistry FoPT Subcommittee – There is no report this month. The TPH question on 1664 may be getting addressed by Dan Hickman. Maria will send some information to Carl regarding this topic.

SOP Subcommittee – There is no report this month. Maria will check in with Gil on the status of SOP 4-102.

FoPT Table Format Subcommittee – There is nothing new to add to last month's update. The IT Committee would like the PTPEC to follow LAMS when updating FoPT tables, but Maria noted that we can request changes where needed.

Microbiology FoPT Subcommittee – Jennifer Best (Chair) provided a report. The committee started drafting its recommendation, but is still checking with all committee members. They are approving the minutes of the meeting first and will then put forth a recommendation for all subcommittee members to vote on by email. Ilona will help

Jennifer with any voting issues. The recommendation will be turned into the PTPEC before the next meeting.

6. Ammonia PTRL Question

Sean Jenkins sent this request by email on 3/2/18:

We have accreditation for ammonia testing by titration (SM 4500-NH3C). This is an approved test under 40 CFR part 136.

The PTRL for ammonia is 0.6 mg/L. The sensitivity of this method is 5 mg/L which is acceptable for many of our client needs. The method is not capable of accurately determining ammonia to the 0.6 mg/L PTRL. I have often seen PT samples with values below 5 mg/L. Since accreditation requires acceptable PT performance on this test, this issue needs to be addressed.

How is the laboratory to handle samples with analyte concentrations below the sensitivity of an approved test?

Maria would like to look at this to see if this something the committee can easily help with or is it something he needs to follow the complaint process for.

Maria asked who determines the PTRL? Nicole said the PTRL is statistically generated. The PT is spiked at the lowest concentration and the scoring rules are applied. The PTRL is the lowest concentration that would be considered acceptable. Solid waste can be a little different. They are decided by the FoPT Subcommittees. The new Standard has new allowances for when Reporting Limits are above PTRLs.

Maria asked if the ABs can get involved with the labs to give them exceptions in examples such as Sean's concern. Susan commented that this could go back to the States. Her state doesn't allow the method because it doesn't go low enough. Maria will forward this note to Aaren Alger (Chair, NELAP AC). Nicole does not think this a PTPEC issue. Maria will ask if the NELAP AC can work on this question.

7. New Business.

- None.

8. Action Items

The action items can be found in Attachment B. The action items were reviewed during the meeting and updates have been placed into the table.

9. Next Meeting

The next meeting will be on 4/19/18 at 1pm Eastern by teleconference.

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

Maria adjourned the meeting at 12:10 Eastern. (Motion: Matt Second: Fred Unanimously approved.)

Attachment A

Participants

TNI

Proficiency Testing Program Executive Committee

Members	Rep	Affiliation	Contact Information
Maria Friedman (2020) Present	AB	California Water Board	Maria.Friedman@waterboards.ca.gov
Ilona Taunton, Program Administrator Present		TNI	tauntoni@msn.com
Eric Smith (2019) Absent	Lab	ALS Environmental	eric.smith@alsglobal.com
Carl Kircher (2021*) Present (11:30-12pm)	AB	Florida Department of Health	Carl.Kircher@flhealth.gov
Andy Valkenburg (2021*) Absent	LAB	Energy Laboratories	avalkenburg@energylab.com
Jennifer Duhon (2019*) Absent	Other	Millipore Sigma	jennifer.duhon@sial.com
Matt Sica (2020) Present	AB	ANAB, ANSI-ASQ National Accreditation Board	msica@anab.org
Dixie Marlin (2018*) Present (11-12pm)	Other	Marlin Quality Management, LLC	marlinquality@gmail.com
Gil Dichter (2018*) Absent	Other	IDEXX Water	gil-dichter@idexx.com
Patrick Garrity (2019*) Present	AB	Kentucky DEP	patrick.garrity@ky.gov
Michella Karapondo (2019*) Present	Other	USEPA	karapondo.michella@epa.gov
Fred Anderson (2020*) Present	Other	Advanced Analytical Solutions, LLC	Fred@advancedqc.com
Jennifer Mullins (2020*) Absent	Lab	Upper Occoquan Service Authority	jennifer.mullins@uosa.org
Scott Haas (2020*) Absent	FSMO	Environmental Testing, Inc.	shaas@etilab.com

Attachment B

Action Items – TNI PT Executive Committee

	Action Item	Who	Date Added	Expected Completion	Actual Completion
295	Moved from Backburner: PTPA Evaluation Checklist needs to be updated prior to next round of evaluations. (Originally discussed 8/6/13)	Shawn Ilona		New Date: 3/31/18	In Progress (will use 2009 TNI Standards and current SSAS Standards)
349	Review LAMS/FoPT Table Differences document. Provide comments by email and next meeting.	ALL	4/20/17	4/25/17 2/28/18 – For WET? June 2018 for all tables.	In Progress WET is still being reviewed. Update 1/23/18: Subcommittee expects to have updated FoPT tables with CAS #'s and LAMS changes by 3/15/18. 2/22/19: Still in progress.
352	Moved from Backburner (originally discussed 2/20/14) : 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. Patrick commented that it would make sense to look at changes to pass/fail rates 6 months after new limits are effective. This possible	All	2/20/14	TBD (see #350) <i>350: Prepare formal request to SOP Subcommittee regarding updating FoPT tables and applicable backburner items just moved to the Action Items table (#352, 353)</i>	In Progress – Update of SOP 4-101

	Action Item	Who	Date Added	Expected Completion	Actual Completion
	addition to procedures should be evaluated when updating the limit acceptance SOP.				
353	Discuss possible procedural changes to how limits are updated. Maria talk to SOP Subcommittee. (Need to look at PT database implications.)	All		TBD	In Progress – Update of SOP 4-101
358	Send request to SOP subcommittee to consider what happens when ARA's are rescinded. There is no formal process.	Maria	6-29-17	7/19/17	Maria will resend to Gil and this item will be closed. 3/15/18: Still in progress.
361	Analyte Code changes needed in LAMS. (TKN)	Maria Dan Hickman	7/20/17	9/30/17	Still need to look into TKN issue. 2/22/18 – Maria will confirm.
363	Discuss procedural change in how changes are made to LAMS. Consider notifying PTPEC before relevant changes are made and provide a summary of changes at some frequency.			1/31/17	Will talk to IT about getting this in an SOP. 12/21/17: Maria will follow-up on this. 3/20/18: Maria will check this week.
368	Forward Jerry's question to Chemistry FoPT Subcommittee. (Analyte code change for the non-polar extractable materials.)	Maria	8/24/17	9/1/17	Maria will resend to Carl.
373	Carl will notify the PTPEC when Bob and Keith complete their comparison table to the Radiochemistry FoPT work the Chemistry	Carl	12-21-17	3-31-18	

	Action Item	Who	Date Added	Expected Completion	Actual Completion
	FoPT Subcommittee has already prepared.				
377	Update NPW and SCM table with formatting agreements discussed 1/18/18. Send to NELAP AC.	Maria	1/18/18	TBD	2/22/18: Maria will send to NELAP AC Complete
379	Send approved FoPT Tables to NELAP AC for approval.	Maria	2/22/18	3/1/18	Complete
380	Provide comment on possible language addition to the Combined Evaluation SOP.	All	2/22/18	2/28/18	Complete
381	Complete vote on deletion of SOP 4-104 by email.	Ilona	3/15/18	4/18/18	
382	Forward Sean Jenkins email to the NELAP AC (Aaren Alger and Lynn Bradley).	Maria	3/15/18	4/18/18	

Attachment C

Backburner / Reminders – TNI PT Executive Committee

	Item	Meeting Reference	Comments
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 2017	
18	Shawn noted that PTPEC should have some specific measurements. This should be passed along to the PTP SOP Subcommittee. Nicole noted that we need to determine which items to measure.	6-29-17	

1. Overturn the unacceptable PT result

a. The PTPEC cannot overturn the scoring of a PT Provider. Per the 2009 TNI Standard, Volume 1, Module 1, Section 7.1, *“The laboratory shall submit questions about PT samples or performance evaluations made by the PTP to the PTP. If the PTP is not able or is unwilling to resolve the question to the satisfaction of the laboratory, the laboratory shall refer those questions to the PTP’s PTPA.”* Therefore, it is recommended that the laboratory take their complaint to the PT Provider’s PTPA, if they have not already done so. However, the the PT Provider appears to be following the FoPT table and Volume 3 standard as written. So, the complaint subcommittee also recommends that the laboratory contact their AB regarding this PT score. The AB can evaluate a PT score differently and possible reverse the evaluation based on the technical merit of the laboratory’s complaint.

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