

TNI PT Board Meeting Summary January 16, 2008

1. Roll call and approval of minutes.

Chairman Carl Kircher called the TNI PT Board to order on January 16, 2008, at 1:30 PM PST in Newport Beach, CA. The following members were present: Curtis Woods, Eric Smith, Raeann Haynes, Kirstin McCracken, Richard Sheibley, Matt Sica, and Gary Dechant. Program administrator Carol Batterton was also present.

Minutes from the December 20, 2007 meeting were approved for posting on the TNI website.

2. Agenda

Carl Kircher suggested the following agenda for the meeting:

- Roll call and approval of minutes
- Election of chair
- Micro PT subcommittee report
- Approval of PT Caucus SOP
- Discussion of new TNI PT standard
- PTOB renewal process report
- Changes to PTOB SOPs
- PT Caucus

3. Election of Chair

Gary Dechant moved that Carl Kircher continue to serve as chair of the PT Board. Motion was seconded by Richard Sheibley. All present voted in favor. Motion passed.

3. Report from Microbiology FoPT Subcommittee

Courtney Williamson reported on the progress of the Micro PT subcommittee. Significant recommendations included:

- Separation of *E. coli* and fecal coliform methods for qualitative studies
- Addition of footnote 11:
 - The ten-sample set which are provided to the laboratories shall contain bacteria that produces the following results when analyzed:
 - Positive results for total coliforms, fecal coliforms and *E. coli*.

- Positive results for total coliforms and negative results for fecal coliforms and *E. coli*.
 - Negative results for total coliforms, fecal coliforms and *E. coli*.
- Concentration range and acceptance criteria remain identical for both *E. coli* and fecal coliform.
- The acceptance criteria for qualitative proficiency test studies be changed
 - Current acceptance criteria of 9 out of 10 standards with no false negatives.
 - Subcommittee proposes changing acceptance criteria to 10 out of 10 correct analytes.
- Straw poll conducted of certifying officers/accrediting authorities to determine impact of changing acceptance criteria and common reasons for failure.
- It was estimated that this would affect failure rate by approximately 2-3% overall.
- Propose a randomization of the ten samples used for presence/absence tests:
- Addition of footnote 12:
 - The ten-sample set shall be assigned lot numbers and randomly composed of samples as follows:
 - Two to four samples containing an aerogenic strain of *Escherichia* which will ensure positive results for total coliforms, fecal coliforms and *E.coli* when analyzed by any of the USEPA approved methods.
 - Two to four samples containing an aerogenic strain of *Enterobacter* species and/or other microorganism which will ensure positive results for total coliforms and negative result for fecal coliforms and *E.coli*. when analyzed by any of the USEPA approved methods.
 - One to two samples containing *Pseudomonas* species and/or other microorganism which will ensure negative results for total coliforms, fecal coliforms and *E.coli* when analyzed by any of the USEPA approved methods.
 - One to two samples which do not contain any microorganism which ensure negative results for total coliforms, fecal coliforms and *E.coli* when analyzed by any of the USEPA approved methods.
- Propose different composition of standards for presence/absence tests if more than one set is ordered by the same laboratory.
 - This would be applicable only if the laboratory is processing each set using a different method.
- Addition of footnote 13:

- Laboratories analyzing qualitative sample sets for more than one method in a particular study shall obtain a unique ten-sample set for each method reported as specified in Footnote 12.
- New Proposed Fields of Proficiency Tests:
 - Heterotrophic plate count for MPN added with same concentration range as previous heterotrophic plate count.
 - Range of 5 to 500 and log +/- 2 SD acceptance criteria
 - Enumerative *E. coli* added to matrices for both membrane filter (MF) and most probable number (MPN).
 - Ranges of 20 to 200 and log +/- 2 SD acceptance criteria
- Distinction between *E. coli* and fecal coliform for both membrane filtration (MF) and most probable number (MPN).
- Propose that *Enterococci* for MF and MPN concentration range to be decreased.
 - Previous range : 20 to 1000
 - New proposed range: 10 to 500

The PT Board indicated that they would like to have to have a formal report with the rationale for the recommendations when the committee has completed its work. The process should follow the PT Board SOP for acceptance criteria.

Comments received on the preliminary recommendations include:

- Why are we making the requirements more stringent? The current system is sufficient. Why aren't false positives allowed?
- False positives cause public concern. We need to eliminate confusion.
- Do not see the advantage in requiring 10 out of 10. Cannot attain perfection.
- It is hard to fail under the current criteria (9 out of 10).
- 10 out of 10 is achievable.
- This decision needs to be based on objectives, not feelings. Set objectives first, and then change criteria to meet objectives.
- Report from subcommittee will contain a justification for all recommendations.
- Need to consider the impact of any recommended changes on EPA.
- PT board's role is to recommend technically appropriate criteria.

The PT Board requested that the subcommittee continue its work and provide the PT Board with a formal report on its recommendations.

4. SOP for PT Caucus

Some confusion exists in the records of the PT Board as to whether the PT Caucus SOP was ever formally adopted. Carl requested that this matter be put on the next agenda to allow members time to review the SOP and prepare for discussion and voting.

5. New Business

Carl reported that Kirstin McCracken has been elected chair of the PT expert committee. Kirstin reported that the committee had responded to over 200 comments on the interim standard and the PT standard would soon be final. The PT frequency issue is on hold until the next revision of the standard.

Carl requested that the issue of acceptance and implementation of the new PT chapters be put on the PT Board agenda for discussion at the next meeting.

The following comments were received on this item:

- Are there any plans to add air PTs? There is a provision in the standards to petition the PT Board to add PTs.
- There is a practical reason to move ahead with adoption and implementation of v.3 and v.4 of the new TNI standard. We should prioritize the decision on the volume dealing with PT oversight.
- There could be a ripple effect if we do this. We should look at state regulations before we do this.
- PT providers will be reviewed against the 2003 standard. Conformance with 2008 standard would be a satisfactory response to a non-conformance to 2003 standard.
- Is there any cost difference involved in accreditation to 2003 vs. 2008 standard?

6. Toxicity Testing

WET testing is not in the current PT program. Carl indicated that if TNI can adopt EPA's criteria document, the EPA document can be retired. He suggested that the PT Board appoint a subcommittee to handle this issue. Curtis Wood moved that the PT Board form a whole effluent toxicity committee. Motion seconded by Kirstin McCracken. Richard Sheibley offered an amendment stating that the PT Board chair will develop the charge and recommend possible members. All present voted in favor. Jim Pletl and Jeff Lowry volunteered to be on the subcommittee.

7. PT Caucus

- **PTOB/PTPA**
Randy Query of A2LA provided this report. Randy stated that there had been no complaints against PT providers, although he had received an inquiry on the mechanism to lodge a complaint. Instructions are on the A2LA website.
A2LA has contracted with Neptune, Inc. to build a PT database. The PT providers were invited to meet with the database vendor to get their input on the database. Six of the eight providers attended. Action items from this meeting included: Dan Tholen will re-draft the SOP for continuing

oversight of PT providers and fields for the database need to be defined. A2LA hopes the database will be operational by June. Assessments of the PT providers will begin in July.

Carl pointed out that the oversight of A2LA is concurrent with assessments of the PT providers. Evaluation teams for the A2LA observation will be discussed at the February PT Board meeting. Gary Dechant suggested that there should be a link to A2LA's website from the TNI website for filing a complaint. It was noted however, that most complaints against PT providers are resolved informally between the provider and the lab.

Database overview: the contractor for A2LA presented an overview of the proposed PT provider database. The database is designed to require only summary information and not individual lab data from PT studies.

Questions/comments included:

If EPA intends to use this system, is it compatible with CROMER?

Are you coordinating with Dan Hickman and the National Database committee so that it is consistent with NELAC method codes?

- **Accredited labs**

Eric Smith with assistance from Kirstin McCracken provided a report on behalf of accredited labs. Eric proposed the following topics for discussion:

- Drinking Water FOPT table acceptance limits
- PT formulation inconsistency between providers
- The complaint process
- Experimental PTs
- PT frequency

Comments/questions following this presentation included:

There needs to be a process other than an administrative hearing for resolving issues with ABs. Need a process within TNI.

The PT Board is not the best place to resolve issues between a lab and an AB.

States are not requiring experimental PTs uniformly. The PT Board should evaluate the data available and then make them mandatory. This should be on the next PT Board agenda.

Provider consistency is an issue. Biggest inconsistency is soil PTs. Hard to get good information unless we know the true value along with the study mean.

What does the PT Board think of 1 PT vs. 2? There is insufficient data, but ultimately it is a PT Expert committee decision.

- **Accreditation bodies** – There was no formal report from accreditation bodies.
- **PT providers** – There was no formal report from the PT providers.

8. Next meeting

The next meeting of the TNI PT Board will be held on February 21, 2008 at 12 noon CST. Agenda items include:

- Approval of PT Caucus SOP
- Evaluation teams for A2LA oversight
- Experimental PTs
- WET subcommittee charge and members