

TNI PT Program Executive Committee Meeting Summary

November 30, 2017

1. Roll call and approval of minutes:

Chair, Maria Friedman, called the TNI PT Program Executive Committee (PTPEC) meeting to order by teleconference on November 30, 2017, at 1:05 pm Eastern. Attendance is recorded in Attachment A – there were 9 members present. Associate Members present: Andy Valkenburg, Carl Kircher (until 1:40pm Eastern), Mike Blades, Stacie Crandell, Reggie Morgan, Jennifer Best (added at 1:50pm Eastern).

Maria confirmed everyone received the agenda and supporting documents on November 28th.

Maria reviewed the October minutes with the committee. Fred motioned to approve the October 19, 2017 minutes as written. Gil seconded the motion and it was unanimously approved.

2. Chair Update

- The NELAP AC reviewed the PTPEC question on consistency between LAMS and FoPT tables. It was decided that FoPT tables will follow LAMS. This was decided by the IT Committee. If there is a proposed change in LAMS the PTPEC will be notified ahead of time. There is also discussion about linking the FoPT Tables and LAMS so changes to nomenclature can be automated.

3. Old Business

ARA

Carl provided an update to the PTPEC based on the Chemistry FoPT's last meeting.

From Carl Kircher (11/21/17):

The Chemistry FoPT Subcommittee met by teleconference today (11/21/17) to address the Analyte Request Application (ARA) submitted by New Jersey DEP. The Subcommittee voted to approve the following revisions, additional language as shown in blue to Footnote 2 in each case, to the attached NPW and SCM FoPT Tables.

The important concept to grasp is that PCBs collectively would be considered as one Field of Proficiency Testing in each matrix. This concept is already hinted at since concentration ranges and acceptance limits are the same for each of the seven Aroclors that are in the tables. There would be no impositions or requirements on how the ABs should or would make accreditation decisions based on the Table revisions or if the PT Providers scoring PCBs collectively acceptable or not acceptable (thus, no interference with the Volume 2 Module 2 language).

The Subcommittee recommends that the PT Program Executive Committee approve the FoPT Tables as presented and forward them to the NELAP Accreditation Council for ratification for use in the NELAP Program. The NJ-DEP ARA is thus adequately addressed.

The email included the updated NPW and SCM tables.

NPW footnote:

2) One sample (minimum) in every study, containing one Aroclor, is selected at random from among the Aroclors listed above.

PCBs in water are collectively one Field of Proficiency Testing. Since only one Aroclor is spiked, acceptable results should be based on the correct qualitative identification of the PCB that was spiked and quantitating that result concentration within the acceptance criteria delineated in the table above.

SCM footnote:

2) One sample in every study, containing one Aroclor, is selected at random from among the Aroclors listed above.

PCBs (in soil) and PCBs in Oil are each, collectively, considered one Field of Proficiency Testing. Since only one Aroclor is spiked, acceptable results should be based on the correct qualitative identification of the PCB that was spiked and quantitating that result concentration within the acceptance criteria delineated in the table above.

Maria noted that if a PT is purchased because of a failed identification, wouldn't that give the lab an edge because the make-up PT would be that same failed PCB? Stacie noted that a PT is supposed to be handled like any other sample, so you would still have to go through the identification step.

Carl commented that NJ would like the PCBs to be graded as a whole. If the lab runs the make-up PT and gets it correct, then the PT counts for all PCBs and the lab is accredited for them.

They order a remedial PCB and it will have whatever PCB is randomly spiked in it. It will still be considered a remedial PT even though it does not have the same PCB that was originally failed. You pass as an analyte group.

Maria asked if this is something that needs to be spelled out in the Standard. Nicole asked if it could be done like the DW table. Carl did not think this would address the ARA. DW has a PCB screen and if it is detected then another method is run.

Carl summarized: PCBs are collectively considered as one field of proficiency testing. Therefore PCBs are scored based on the language of the footnote. Nicole is concerned whether this would be a conflict with Volume 3. Carl does not think this is an issue. Carl noted there will be only one assigned value for the PT and all the others will be non-detects. Nicole asked if the aroclors should be on one line instead of seven lines, but there would be issues with the NELAC codes, etc. Maria thought Dan Hickman could be consulted on this issue.

Is one result being reported or seven results? Carl said only the PCB that is in it will be reported. The labs still report all 7 and PT Providers can give a report for all 7. Nicole does not think the wording of the footnote is clear.

Section 5.7.7 of the Standard – there is language. Craig thought the footnote as worded clarified NJ's concern. He thinks this section addresses Nicole's concern, but Nicole commented that the new footnote says not passing the PT means all PCBs don't pass. This is not the case today. Only the one that was reported and didn't pass would fail. The way the scoring is written in the Standard may be in conflict with what we are asking the PT Provider to do.

Carl is asking for alternate language suggestions. Ilona noted that there were a number of PT Providers involved in developing the language submitted for the footnotes submitted. Carl sees no reason to reconvene the subcommittee to work on other language because the subcommittee has already determined the language should be that which was submitted to the PTPEC.

Craig asked if there is a way to change the table and not have to change the wording in the Standard. Nicole noted that to change it to one line on the FoPT table might require a new code. The design criteria could then be included in the footnotes on the FoPT table. Nicole would need to read Rachel Ellis's (NJ) concern again to see if something like this would address her issue.

Nicole and Maria will continue to work on this issue. Nicole will speak to Rachel about the issue and review the Standard for options. She asked that the PTPEC put this on hold until after the PT Expert Committee meets tomorrow.

(Addition (12/1/17): Note from Nicole:

The Proficiency Testing Expert Committee met today to discuss the proposed update to Footnote 2 in the NW and SCM FoPT Tables. Rachel Ellis from NJ is part of the PTEC and was on the call, as well as, all other committee members, of which there are 4 PT Providers.

Rachel provided the committee with background on the issue and why her request was submitted. There was a good discussion about the footnote, it's intent/interpretation, and whether or not it conflicted with the standard.

The conclusion was that the footnote would not change how the PT Providers score the 7

individual PCB Aroclors; this process would remain unchanged. This eliminated the need to review the standard for conflict. However, we did discover that the existing and new V3 Standard have the following clause allowing the FoPT table to trump the Standard when it comes to evaluation criteria if a situation ever arises where the FoPT table is in conflict with the Standard. I found this useful information as it is always easier to update an FoPT table than the Standard.

Existing 2009 Volume 3, Clause 10.2.2 - Analyte- or study-specific evaluation criteria defined in the TNI Fields of Proficiency Testing Tables shall supersede the criteria in this Section.

New 2016 Volume 3, Clause 5.9.2.2 - Analyte- or study-specific evaluation criteria defined in the TNI FoPT Tables shall supersede the criteria in this Section.

Rachel then confirmed that even with the scoring remaining the same, the footnote would provide NJ with the support that they need to decertify labs for PCBs when they fail two PCB PTs, regardless of the Aroclor that they fail.

In conclusion, the footnote, as written, addresses the ARA and does not conflict with the Standard. The PTPEC can move forward with voting on the approval of these proposed tables.

I would, however, recommend that if these new FoPT tables are approved by the NELAP AC, that the notification to PT Providers clearly states that this footnote does not change the way in which the Aroclors are scored; that there is no change required by the PT Providers.)

(Addition (12/14/17): A motion was made on 12/14/17 by Gil to accept the NPW and SCM FoPT tables as presented in an email from Maria on 12/13/17. The motion was seconded by Matt on 12/14/17. Questions were raised about the motion and formatting issues were discovered on the tables. The motion was amended by Gil on 12/15/17 to only accept the new footnotes on the NPW and SCM FoPT tables as presented in an email from Maria on 12/13/17. The amendment was seconded by Matt by email on 12/15/17.

Vote:

Susan – For (12/15/17)

Gil – For (12/15/17)

Nicole – For (12/15/17)

Dixie – For (12/15/17)

Eric – For (12/15/17)

Jennifer Duhon – For (12/15/17)

Jennifer Mullins – For (12/15/17)

Maria – For (12/19/17)

Matt – For (12/19/17)

Scott – For (12/21/17)

The motion passed.)

NEFAP/PTP Evaluation SOP

Stacie presented the updated PT Program/NEFAP Combined Evaluation SOP to the committee on Webex. She reviewed the comments PTPEC submitted and showed how the SOP was updated to address the comments. Susan and Maria agreed with how their written comments were handled in the SOP.

A subcommittee is being formed to work on Appendix E of the SOP. Paul Bergeron has volunteered to represent NEFAP and a volunteer was needed from the PT Program. Stacie and Maria volunteered to help. The subcommittee will meet before the next Executive Committee meetings to formulate a plan and begin the update of this Appendix.

The SOP will be sent by email to the NEFAP EC, PTPEC and the PT/NEFAP Combined Evaluation Workgroup for a final review. Comments will be addressed and a Final DRAFT of the SOP will be sent out with the next meeting agenda so each Executive Committee can vote to finalize the SOP. The next step after approval will be to determine an effective date and then send it to the Policy Committee for review.

The Workgroup is currently working on an application and evaluation checklist(s) that will also be shared with the PTPEC prior to finalization.

4. Subcommittee Update

Chemistry FoPT Subcommittee – The subcommittee believes their work is currently complete. The Radiochemistry data was worked up for review, but Keith McCroan and Bob Shannon from the Radiochemistry Expert Committee asked the subcommittee to consider an alternate method for updating the Radiochemistry FoPT table. The committee will not meet again until feedback is received from Keith and Bob. They will be taking the data received from the PT Providers and calculating limits using the alternate method so the subcommittee can compare results to the original method. This should be complete in February/March 2018.

SOP Subcommittee – The committee will be meeting this Friday. The committee is continuing to work on the FoPT Update SOP.

Ilona asked about the Voting SOP update. Maria will review it and send it for vote by email or at the next meeting in December.

Ilona also noted that the SOP Subcommittee will be needed to review and update the PTPEC Evaluation SOP once the combined evaluation SOP is final.

FoPT Table Format Subcommittee – The subcommittee is waiting for information from the WET Expert Committee. The FoPT Table analyte codes and names will follow LAMS.

Microbiology FoPT Subcommittee – Jennifer Best (Chair) has no report. There has been no new contact with the statisticians. Her plate has cleared and she will meet with them and provide an update in December.

5. New Business.

- None.

6. Action Items

The action items can be found in Attachment B. Updates are added as notes in the table.

7. Next Meeting

The next meeting will be on 12/21/17. Ilona will send out Webex invitations the morning of the meeting. The committee should plan to review the combined evaluation SOP prior to the meeting. Applications for 2018 membership will be discussed and sent out by email prior to the meeting also.

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

Maria adjourned the meeting at 2:34pm Eastern. (Motion to adjourn – Fred Second – Gil. Unanimous.)

Attachment A

Participants

TNI

Proficiency Testing Program Executive Committee

Members	Rep	Affiliation	Contact Information
Maria Friedman (2020) Present	AB	California Water Board	949-307-0949 Maria.Friedman@waterboards.ca.gov
Ilona Taunton, Program Administrator Present		TNI	828-712-9242 tauntoni@msn.com
Eric Smith (2019) Absent	Lab	ALS Environmental	904-394-4415 eric.smith@alsglobal.com
Susan Jackson (2018) Present	AB	South Carolina DHEC	(803)896-0978 jacksosb@dhec.sc.gov
Nicole Cairns (2018) Present	Lab	NY State DOH	(518) 473-0323 nicole.cairns@health.ny.gov
Jennifer Duhon (2019*) Present	Other	Millipore Sigma	307-3897218 jennifer.duhon@sial.com
Matt Sica (2020) Present – Missing at 1:50pm roll call.	AB	ANAB, ANSI-ASQ National Accreditation Board	msica@anab.org
Dixie Marlin (2018*) Absent	Other	Marlin Quality Management, LLC	513-309-3593 marlinquality@gmail.com
Gil Dichter (2018*) Present	Other	IDEXX Water	207-556-4687 gil-dichter@idexx.com
Patrick Garrity (2019*) Present	AB	Kentucky DEP	502-319-4040 patrick.garrity@ky.gov
Michella Karapondo (2019*) Present	Other	USEPA	513-569-7141 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.	405-401-7344 shaas@etilab.com

Attachment B

Action Items – TNI PT Executive Committee

	Action Item	Who	Date Added	Expected Completion	Actual Completion
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. 4/20/17: Ilona will look back in minutes to find the original issue and send to Maria.
295	Moved from Backburner: PTPA Evaluation Checklist needs to be updated prior to next round of evaluations. (Originally discussed 8/6/13)	Shawn Ilona		9/15/17	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	In Progress WET is still being reviewed.
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	All	2/20/14	TBD (see #350)	In Progress – Update of SOP 4-101

	Action Item	Who	Date Added	Expected Completion	Actual Completion
	effective. This possible 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.
361	Analyte Code changes needed in LAMS. (TKN)	Maria Dan Hickman	7/20/17	9/30/17	Still need to look into TKN issue.
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.				Will talk to IT about getting this in an SOP.
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	
371	Follow-up on ARA footnote issue and report back to committee.	Maria Nicole	11/30/17	12/21/17	
372	Send out PT/NEFAP Combined Evaluation SOP for final Review to committee.	Ilona	11/30/17	12/9/17	

	Action Item	Who	Date Added	Expected Completion	Actual Completion

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	

Description of Issue

[Our laboratory's final report for a PT study] shows an unacceptable result for 4,4'-DDD.

We reported a value of 7.2 ug/Kg and PTP true value was zero.

[The lab's] reported value comes from the breakdown of DDT to 4,4'-DDD which typically occurs in the chromatographic column.

Up to 15% breakdown is allowed before it becomes necessary to take corrective action (instrument maintenance) and we routinely narrate DDT breakdown in our reports to clients when this occurs, as is required by the Standard.

In the case of PT studies, the TNI 2009 Standard EL-V1M1, Section 5.2.1(a),(i) states "A result for any FoPT at a concentration above or equal to the lowest calibration standard shall be reported as the resultant value". We followed this rule and reported the 4,4'-DDD value resulting from DDT breakdown (since our low calibration standard for 4,4'-DDD is 5.0 ug/Kg).

It may be that other labs who submitted data either ignored the breakdown product and reported zero, or used a low calibration standard value (x) for 4,4'-DDD which was higher than their breakdown amount, thus enabling them to report "< x", thereby getting a passing result.

However, since we followed the Standard, we appealed the unacceptable result to the PTP and requested that the finding be reversed

[Our lab's] technical department agree that DDD is a breakdown product of DDT and also that [our lab's] reported value is less than the acceptable breakdown criteria for the analysis method based on the gravimetric value of DDT in the sample.

However, they [the PTP] state that the TNI Standard does not permit them to reverse the failing grade.

If this is the case, what happens next time a PTP provides a PT study sample with a significant amount of DDT in it and no 4,4'-DDD present? Labs will be in the same position of having to report a value for 4,4'- DDD because of DDT breakdown when the assigned value is zero, which means labs who follow the rules will fail the study again.

I might also add that there may be other analytes with similar problems:

Endrin breakdown to Endrin Aldehyde and Endrin Ketone DDT breakdown to DDE, as well as DDD Endosulfan breakdown to Endosulfan sulfate

Description of Actions

The PTP advised us to approach TNI for resolution of this issue, which I am now doing. Just got PaDEP's new regulations and spotted the following:

- § 252.304—Personnel Requirements: All DOCs (initial and continuing) must be at a concentration in the lower half of the calibration curve.....

Page 1 of 2

Since we use PT study results for Ongoing DOCs, might not the PTP's be justified in limiting the analyte level in a study accordingly? This would help in the DDD breakdown situation?

Description of Remedy Sought

In summary, since we followed the TNI Standard, we wish to appeal the unacceptable result and request that TNI rule in our favor. Recommend that TNI should investigate and publish a technical solution to this dilemma

E-Mail Discussion among PTPEC Members regarding Complaint #27, Oct 11-17, 2017

1) Maria Friedman, 10-11-2017:

Hello everyone,

In our last PTPEC meeting, I mentioned that there is a complaint that we need to review and address. Attached is a redacted version of the complaint; I took out info that identified the lab or PT Provider. Please review and send comments. This topic will be in our next meeting's (10-19-2017) agenda.

Thank you.

2) Gil Dichter, 10-12-2017:

Good Morning Maria: I cannot comment specifically on this analyte. However, I assume we will try to obtain from the PTP results of this study and if other labs had similar issues. Is their claim valid about the breakdown of the chemical and their lowest detection level? I realize I am looking at this from afar and others with experience and expertise will be able to look at this more in depth than I. I look forward to the expert's responses.

Thanks Gil

3) Eric Smith, 10-12-2017:

Two bits of information I didn't see referenced in the complaint– 1) What was the gravimetrically assigned value for DDT in the PT sample?

2) Information on the breakdown check standard on the instrument on the day the PT was analyzed.

Are we to assume their instrument was meeting breakdown criteria at the time the PT was analyzed? I may have overlooked this information, but I read through the complaint twice and didn't see it.

I don't know how much weight that additional information would ultimately

have on the overall discussion. However, I did want to mention my observations just in case the committee thought it might be good to obtain that information prior to discussion.

Eric Smith

4) Maria Friedman, 10-12-2017:

I will make a list (in case others would like to see other supporting docs) and notify lab.

5) Susan Jackson, 10-12-2017:

I agree with Eric on those questions. And I was a little confused about the request. Are they saying that they think DDT in the sample itself had broken down to DDD? Typically this breakdown occurs at higher temps with the instrument in the inlet and the column. I assume the PT provider would have tested the sample and seen if there was any breakdown prior to the study? Like Eric suggested, more information on the results of the breakdown standard would help.

Thanks, Susan

6) Dixie Marlin, 10-12-2017:

Good Morning! I'm sorry that I won't be able to attend the upcoming conference call as I will be on an assessment at that time. I apologize for my absence!

I will say, that the complaint from this laboratory does bring up an interesting point and it may be necessary for the committee to review the PTRLs for all the degradation products (4,4'-DDE, 4,4'-DDD, endrin aldehyde and endrin ketone) for acceptability on the FoPT tables.

Please bear with me here and consider the following:

It appears that the PTRL from the FoPT tables for 4,4-DDD in soils is set at 5ug/kg with a spiking concentration range of 5-500ug/kg, but, for example, if the DDT is spiked at the upper extreme of the expected spiking

concentration range from the FoPT table, which is also 5-500ug/kg, then allowing for the 15% breakdown (per the reference method) to be solely attributed to DDD, would yield a DDD concentration of 75ug/kg, even if the analyte was not spiked. A concentration of 75 ug/kg is well within the expected spiking concentration range for DDD (5-500ug/kg) and well above the DDD PTRL (5ug/kg) and would be perfectly reportable in the study.

I think another good question for the lab would be what was the total breakdown in their degradation check? In other words, what was the percentage of both DDD and DDE from the breakdown of DDT in the check standard. Their complaint only attributes breakdown of 15% to DDD, from what I read, and if the laboratory's breakdown for DDD was 15%, they could not have seen any breakdown to DDE, or they wouldn't meet reference method requirements. Allowable breakdown in the reference method is a combination of both DDD and DDE at 15%.

You might also want to ask the lab if they had a measurable DDE concentration in the PT sample (but then it may have been spiked in the PT and if so, should have shown a high bias in the recovery in the PT, if breakdown in their analytical system was an issue)?

Even so though, if as in my above scenario shows, if the DDD and DDE combined breakdown was evenly distributed at 7.5% for each analyte and allowed at 15% total, considering the concentration at the uppermost spiking concentration for DDT at 500ug/kg, the DDD percentage would still be 37.5 ug/kg, which would still be within the expected concentration range for DDD and would be above the current PTRL for DDD so again, it's reportable in the study.

It seems like an easy fix for the committee to consider would be to raise the PTRL for all the degradation products to something like 75 ug/kg or similar.

Now, having said all that, I don't know of a laboratory that would allow for that much of a breakdown when analyzing samples, standards, PTs, etc., but the reference method does allow it and evidently, this lab does as well so more may. I would think their check standards and LCSs would fail, but maybe not in a "perfect storm" scenario.

Just my thoughts, take them for what they're worth (a penny maybe!?!) ;) I hope this helps and sorry again for my upcoming absence.

Kindest Regards, Dixie Marlin

7) Nicole Cairns, 10-12-2017:

I too may not be able to make the call next week. I have grand jury duty every Thursday and never know if there will be cases to hear...good times.

Anyway, with regard to the complaint that we received. The lab is requesting two outcomes: 1. Overturn the unacceptable PT result

We as a committee cannot overturn the scoring of a PT Provider even if we agreed with the lab. The PT Provider was following the FoPT table and Volume 3 standard as written. And even if they were not, we still cannot overturn the PT Provider's score as the lab is wishing us to do. The lab should be advised to take their complaint to the PT Provider's PTPA, where unfortunately I don't think they are going to see a different outcome as the PT Provider was following the standard. But, I would also recommend that the lab be advised to take this matter up with their AB, as the AB does have the ability to evaluate a PT score differently. Unfortunately, while it appears that the lab was reporting the PT result as instructed by the standard and within the confines of the method, I don't believe that there is a whole lot we can do to help them with their score in this particular study. It is an unfortunate disconnect between the FoPT tables, Standard, how the labs are instructed to report the PT results, and how the PT Providers are instructed to score them. Looks like both parties were following the rules, but the lab is being penalized as a result. Not a good thing.

2. Investigate and publish a technical solution to the dilemma

The committee should definitely investigate this issue and consider modifications to the FoPT tables and/or Standards to address this disconnect. I actually already had this on the PTEC to-do list for the next round of standards as Matt Sica brought this issue up during his PTPA presentation in DC, but it may be more appropriately addressed on the FoPT

tables as it is an issue in scoring for specific analytes, not a general scoring rule.

Some 1. 2.

3.

4.

of the things to consider when reviewing this issue: What are the expectations of the ABs? They need to be brought into the conversation.

What methods are being used and what breakdown allowances are involved? Percent breakdown is not the same in all methods. This issue affects both nonpotable water and solid waste.

How do labs handle breakdown in reporting of sample data? Is it reported with or without qualification?

What are PT Providers doing/seeing with regard to these groups of analytes? How are they handling it? How extensive is this issue?

This is are part of the conversation.

definitely an issue that needs to be discussed and we need to ensure that all of the stakeholders

Thank you. Nicole

8) Maria Friedman, 10-17-2017:

The PTPA investigated the issue earlier this year, as reported in Matt's presentation to the PTPEC at our public meeting in DC. The PTPA concluded that both the lab and the PT Provider had complied with the requirements of the TNI Standard. The lab still wanted to pursue the matter, and so they filed a complaint in accordance with TNI's complaint resolution process.

Now that the ball is in our court, it is incumbent upon us to follow our procedures per our SOP on Complaints (4-102). The next step will be to

notify the lab that their complaint is under consideration by the PTPEC, and then form a three-member subcommittee from the PTPEC to investigate the matter and formulate a recommendation. I will take care of the notification, and we will further discuss the complaint and establish a subcommittee at Thursday's PTPEC meeting.

Thank you. Maria Friedman