

## **TNI PT Program Executive Committee Meeting Summary**

**May 19, 2016**

### 1. Roll call and approval of minutes:

Chair, Maria Friedman, called the TNI PT Program Executive Committee (PTPEC) meeting to order on May 19, 2016, at 1:04 pm Eastern by teleconference. Attendance is recorded in Attachment A – there were 8 Executive Committee members present. Associate Members Present: John Overbey and Jennifer Mullins.

Maria confirmed that everyone received the meeting information she sent on May 17 and May 18, 2016.

A motion was made by Dixie to approve the April 21, 2016 minutes as written. The motion was seconded by Gil and unanimously approved.

### 2. Committee Chair Update

- SIRs: Maria has not yet received any responses from the NELAP AC or LASEC. They have not met.

- ARA (removal of 3,3'-Dichlorobenzidine): Maria received a note from Lynn Bradley on 5/16/16 that though the NELAP AC did not have a quorum, there was consensus to remove the analyte.

Nicole motioned to drop 3,3'-Dichlorobenzidine from the NPW FoPT table. The motion was seconded by Joe and unanimously approved. Maria will notify the Chemistry FoPT Subcommittee. The Chemistry FoPT Subcommittee will be asked to update the NPW FoPT table. The final table will receive a final vote before it is distributed to the NELAP AC for approval.

### 3. Drinking Water FoPT Table (Old Business)

- Vinyl Chloride – Footnote 1 in DW FoPT Table

Maria sent information and some possible language for the footnote (see Attachment D). The committee reviewed the information and Nicole proposed alternative language:

“Per the requirements of 40CFR §141.24(f)(17)(ii), Vinyl Chloride must always have a non-zero assigned value, except when not required for evaluation in a supplemental PT study.”

Michella motioned to accept the language proposed by Nicole and the motion was seconded by Gil.

Roll call vote:

Nicole – For

Gil – For

Patrick – For

Michella – For

Dixie – For

Joe – For

Andy – For

Maria – For

One more vote is needed. Maria will distribute the vote by email to complete it.

*(Addition: Maria distributed the vote on 6/7/16 to the remaining members of the committee.*

*Eric – For (6/7/16)*

*Matt – For (6/8/16)*

*Susan – For (6/9/16)*

*Jennifer Duhon – For (6/13/16)*

The motion passed.

- Volatiles – 80% Criteria

See Attachment D for information provided for this discussion. Maria recommended the following footnote language:

“Per the requirements of 40CFR §141.24(f)(17)(i), laboratories seeking or maintaining NELAP accreditation for Volatile regulated contaminants must meet NELAC PT requirements for at least 80% of the Volatile regulated contaminants included in a given study.”

Maria noted that it is incumbent on the laboratory to meet the 80% – it is not really a PT Provider requirement. There are other footnotes on the table that are lab specific. Is this OK? In the past, the NELAP AC has discouraged footnotes on the table that are lab specific because they said they don’t consider the table during their assessments.

Michella feels the footnotes are supposed to help PT providers manufacture appropriate PT samples. She thinks the footnotes need to be worded to do this. Maria noted that Footnote 14 could be reworded similarly to the Vinyl Chloride footnote above. Andy noted that labs do look at FoPT tables.

Michella will talk to someone in her group to see what can be stated in the footnote (consider volatiles, trihalomethanes and haloacetic acids). She will work on this and get back to the committee. Everyone is in agreement that lab requirements shouldn't be in the FoPT table.

This footnote needs to be resolved before the DW FoPT table can be forwarded to the Chemistry FoPT Subcommittee for updates.

#### 4. SOP 4-102 – Rev 2.0 – TNI Proficiency Testing Program (PTP) Dispute Resolution Procedure (Old Business)

The committee reviewed the SOP through Section 5.4 at the last meeting. The SOP was distributed to the committee on 5-17-16. Maria went through the rest of the comments in the recently distributed copy.

There was general agreement with the comments and recommended changes included in the distributed SOP. Maria will finalize the DRAFT with changes and send it to the SOP Subcommittee so they can review the comments/changes and finalize a new DRAFT for the PTPEC's consideration.

#### 5. WETT FoPT Table – Footnote 6 and 7 (New Business)

Maria sent a copy of the WETT FoPT table for today's discussion. She also provided information to be used in today's discussion (Attachment E). John Overbey noted that there is a technical error in Footnotes 6 and 7.

Michella sent a message to someone within EPA regarding the issue. She will forward the response as soon as she receives it.

Maria will send this information to Rami and request that the WETT FoPT Subcommittee to consider the information in Attachment E and submit a formal recommendation/report to Maria to be discussed in an upcoming meeting. Should the information be changed? If the information is changed it will need to go back to the NELAP AC for approval and a new effective date.

Andy asked if we have to use the EPA Criteria Requirement. Maria noted that the information in the EPA Criteria Requirement can be overwritten as per Carl's comments.

Ilona noted that right now there is some confusion on whether the WETT FoPT Subcommittee still exists. It may have gotten absorbed into the new WET Expert Committee. This still needs to be resolved. Maria will send a message to Rami and discuss with Bob Wyeth.

## 6. Subcommittee Report

### WETT FoPT Subcommittee

See above.

### FoPT Format Subcommittee

Craig provided the new tables with CAS numbers. They also compared FoPT tables to the LAMS table. There are differences in analyte names. Naming conventions are not being followed. They will be recommending that analyte names be exact matches.

Ilona noted that something similar has been on the back-burner for Chemistry FoPT Subcommittee.

The committee would like these inconsistencies to be solved. This will be discussed at the next PTPEC meeting.

### SOP Subcommittee

The subcommittee will meet tomorrow. Gil asked if Maria could send the changes discussed today so the group can work on them.

### Chemistry FoPT Subcommittee

The subcommittee is not currently meeting. Ilona will work with Carl to set-up a subcommittee meeting to work on the more recent issues that have surfaced during the PTPEC meetings. There are some updates still on hold as discussed above.

### Microbiology FoPT Subcommittee

The subcommittee still plans to meet with the PT Providers and then send out the request for data. The Doodle is now being finalized and the group will be meeting in the next week.

## 7. Action Items

The action items can be found in Attachment B. They will be reviewed at the next meeting.

## 8. Next Meeting

The next PTPEC teleconference will be June 16, 2016.

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

Maria adjourned the meeting at 2:23pm Eastern. (Motion: Nicole, Second: Andy Unanimously approved.)

## Attachment A

### Participants TNI

#### Proficiency Testing Program Executive Committee

Members	Affiliation	Contact Information
Maria Friedman (2014) <b>Present</b>	n/a	949-307-0949 <a href="mailto:gamfriedman@gmail.com">gamfriedman@gmail.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 Jackson (2012) <b>Absent</b>	South Carolina DHEC	(803)896-0978 <a href="mailto:jacksosb@dhec.sc.gov">jacksosb@dhec.sc.gov</a>
Nicole Cairns (2012) <b>Present</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</b>	Energy Laboratories, Inc.	406-869-6254 <a href="mailto:avalkenburg@energylab.com">avalkenburg@energylab.com</a>
Jennifer Duhon (2019) <b>Absent</b>	Millipore Sigma	<a href="tel:307-3897218">307-3897218</a> <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>Present</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.
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	TBD	TBD	Waiting for

	<b>Action Item</b>	<b>Who</b>	<b>Expected Completion</b>	<b>Actual Completion</b>
	Standard requirement that PTPA be contacted.			input - #233.
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	August 2016	In Progress (Likely complete by 8/2016)
305	Send response to EDB/DBCP ARA submitter to request more information.	Maria	1/25/16	3/24/16: Shawn contacted Jeff. Maria will check again with Jeff.)
310	Coordinate the update of the SCM FoPT table with Carl and send to NELAP AC for approval.	Maria	3/24/16	3/24: Working through Cyanide issue first.
311	Contact Lem Walker about new ARA to remove an analyte.	Maria	3/24/16	3/24/16: Waiting for response from NELAP AC.
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	Maria needs an email from John to review issues he noted during meeting.
314	- Prepare a draft Footnote requiring spiking of vinyl	Maria	5/18/16	Complete

	<b>Action Item</b>	<b>Who</b>	<b>Expected Completion</b>	<b>Actual Completion</b>
	chloride at all times. - Prepare a draft Footnote that the 80% acceptance criteria applied to Volatiles is only for the regulated analytes.			
315	Summarize changes needed to SOP 4-102 and distribute to the committee before the next meeting.	Maria	5/18/16	Complete
316	Make contacts to prepare a DRAFT footnote for volatiles, trihalomethanes and haloacetic acids on the DW table.	Michella	6/15/16	
317	Provide Carl/Chem FoPT Subcommittee with information to make updates to the DW table.	Maria	6/15/16	
318	Provide a marked up copy of SOP 4-102 to the PTP SOP Subcommittee so updates can be made.	Maria	5/20/16	

**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.

## Attachment D. Volatiles and Vinyl Chloride

### Current Footnote 1:

1) For volatile and pesticide standards, providers must include a minimum number of analytes using the criteria described below:

PT samples that are to be scored for one to ten analytes must include all of these analytes. PT sample that are to be scored for ten to twenty analytes must include at least ten of these analytes or 80% of the total, whichever number is greater. PT sample that are to be scored for more than twenty analytes must include at least sixteen of these analytes or 60% of the total, whichever number is greater. If the calculated percentage of the total number of analytes in the PT sample is a fraction, the fraction shall be rounded up to the next whole number.

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### Additional Footnote for Volatiles:

On the 4-9-2016 PTPEC teleconference, I committed to preparing a draft footnote for the DW FoPT Table, requiring spiking of Vinyl Chloride at all times. Here, then, is the draft footnote:

Per the requirements of 40CFR §141.24(f)(17)(ii), Vinyl Chloride must always have a non-zero assigned value.

It occurred to me that there may be situations, perhaps with supplemental or make-up PTs, where a result for Vinyl Chloride would not be relevant. Rather than compel PT Providers to always spike Vinyl Chloride into Volatiles DW PT samples, an alternative would be to require that whenever Vinyl Chloride is to be included in a PT analyte list (thereby affording the laboratory the opportunity of receiving an evaluation for Vinyl Chloride of “Acceptable” or “Not Acceptable”), then the PT Provider must spike Vinyl Chloride. This would preclude the possibility of a laboratory receiving a passing PT score for Vinyl Chloride when that analyte had not been spiked. Here is a draft footnote that reflects this alternative:

Per the requirements of 40CFR §141.24(f)(17)(ii), when Vinyl Chloride is to be evaluated in a PT study, that is, when Vinyl Chloride is included in the list

of analytes that may be reported by a laboratory for a given PT sample, then Vinyl Chloride must have a non-zero assigned value in that PT sample.

Additionally, I was requested to prepare a draft footnote that the 80% acceptance criteria applied to Volatiles is only for the regulated analytes. In considering how to draft such a footnote, I concluded that this footnote would not be appropriate to add, as it pertains to a certification requirement that applies to Laboratories, whereas the FoPT Table footnotes specify requirements that apply to PT Providers. As the NELAP AC argued when they rejected last year's initial WETT FoPT Table "Footnote #3" proposal, footnotes in FoPT tables are not evaluated by assessors and should not contain instructions for Laboratories to follow.

However, before finalizing these notes, I reviewed the other footnotes of the DW FoPT Table, and the contents of Footnote #14 stood out:

14) Laboratories seeking or maintaining NELAP accreditation for Total Trihalomethanes must meet NELAC PT requirements for all 4 Trihalomethane Fields of Proficiency Testing in the given study, by technology/method (Chloroform, Bromoform, Bromodichloromethane, Chlorodibromomethane). Laboratories seeking or maintaining NELAP accreditation for Total Haloacetic Acids must meet NELAC PT requirements for 4 out of 5 regulated Haloacetic Acid Fields of Proficiency Testing in the given PT study, by technology/method (Monochloroacetic Acid, Monobromoacetic Acid, Dichloroacetic Acid, Dibromoacetic Acid, Trichloroacetic Acid).

As you see, Footnote #14 explicitly tells labs what they must do to be certified for a particular set of analytes. If it would be inappropriate to add a footnote telling Laboratories that they must pass 80% of regulated analytes, then it should also be inappropriate to tell Laboratories that they must pass 100% of Total Trihalomethanes, or 80% of Haloacetic Acids, but as you can see, the current DW FoPT Table does precisely that.

If I had to write a draft 80% footnote, in the style of Footnote #14, it would look like this:

Per the requirements of 40CFR §141.24(f)(17)(i), laboratories seeking or maintaining NELAP accreditation for Volatile regulated contaminants must

meet NELAC PT requirements for at least 80% of the Volatile regulated contaminants included in a given study.

In considering this draft footnote, I would ask the PTPEC to also consider the following questions:

1) Is it appropriate to include Laboratory certification requirements in FoPT footnotes? 2) If the answer to #1 is no, should Footnote #14 be changed or removed?

Attachment E: WETT FoPT Table

Email from Maria, 5/17/16:

To all:

In response to PTPEC's Action Item 312, John Overbey reviewed the WETT FoPT Table and found a technical error in Footnotes 6 and 7. Very little could be found regarding any previous discussions as to why this presumptive technical error remained undetected until now; see findings below. In case any of you remembers anything more, please e-mail or bring forth during our PTPEC call on Thursday, 5-19-2016. This topic will be in the agenda.

Regarding John's question:

*Additional review of the table's footnotes 6 and 7 regarding NOEC evaluation contain a technical error. Specifically, it is not possible to have >100% NOEC for PT samples. Members of the WET committee would like to know how this information originated.*

My findings:

- 1) I cannot find any information in any PTPEC minutes (posted on the TNI website) about the rationale (if any) for the mention of >100% NOEC in the FoPT Table footnotes.
- 2) The current WETT FoPT Table, effective 4-1-2009, appears to be the first version of the Table. In other words, there are no prior revisions to use for comparison to see if something had changed. We have an upcoming version with effective date of 7-31-2016 and this one includes the same footnotes in question.
- 3) The WETT FoPT Subcommittee that worked on the 4-1-2009 Table was chaired by RaeAnn Haynes. There were just three sets of minutes from the subcommittee from 2008, and none from 2009. None of those minutes mention the footnotes.
- 4) The PTPEC reviewed and approved the WETT FoPT Table on 2-19-2009. The minutes from that meeting show that RaeAnn asked the PTPEC to "look carefully at footnotes." This was apparently done to some extent, since a motion was then made to correct a spelling error in Footnote #6. This suggests that the members

of the PTPEC (and the WETT FoPT Subcommittee) did review the footnotes, and that the “>100%” was either overlooked, or noticed but considered acceptable.

Email from Carl Kircher, May 18, 2016:

All of the requirements and acceptance limits in the initial NPW WETT table came from the US EPA “National Standards for Water Proficiency Studies – Criteria Document.” I have attached it to this e-mail, but in hopes it does not overwhelm your respective inboxes. The Toxicity PTs are in Part 3 DMRQA. The initial WETT table served to allow US EPA to retire the Criteria Document and thus allow TNI to implement the PT Program fully to meet US EPA’s needs. The Criteria Document clearly documents “>100%” as one of the test endpoint values, even though it may be an artifact of the computer programs used to make dose-response curves. For NOEC, there are 7 possible reportable values in the PTs: <6.25%, 6.25%, 12.5%, 25%, 50%, 100%, and >100%. If all the organisms survive, then the NOEC can be >100% effluent as well as 100% effluent, for example. Therefore, I might disagree that there is a technical error as presented.

I was the NELAC PT Board Chair (this is prior to TNI) when the Table was initially presented. I will plead guilty as charged that I made the Table in its present format since that was the most organized way to present the information from the Criteria Document in its various formulations of Reference Toxicants. No attempt was made to revise the acceptance limits based on participant means and medians at the time, and apparently the 2009 Subcommittee did not see fit to do so, either. Whether the present Subcommittee with its technical expertise wants to make revisions, I will read those with keen interest. As for minutes taken during NELAC meetings --- (!).

Email from Michella, 5/18/16:

Carl is correct, that language is from the EPA Criteria Document. I will see if I can find someone from EPA OECA to comment on this.