

**SUMMARY OF THE
TNI QUALITY SYSTEMS EXPERT COMMITTEE MEETING**

FEBRUARY 15, 2015

On February 4, 2015, an e-mail was sent to the standing members of the Quality Systems Committee that was in place in August, 2012. Those committee members were asked to affirm from the summary of findings that each comment was ruled persuasive or non-persuasive, along with the response provided. The document cited is QSResponseDocument2012.xls (see table below). Results of that voting is as follows:

Member	Company	Constituency	Vote	Date
Mr. Paul Junio	Northern Lake Service	L	Y	02/04/15
Mr. Bob Shannon	Quality Radioanalytical Support	L	A	02/04/15
Mr. Scott Siders	Illinois EPA	AB	Y	02/05/15
Ms Michele Potter	New Jersey DEP	AB	Y	02/05/15
Mr. Gil Dichter	IDEXX Laboratories	L	Y	02/05/15
Ms Dorothy Love	Lancaster Lab	L	Y	02/05/15
Ms Janice Willey	NAVSEA Programs Field Office	O	Y	02/05/15
Ms. Michelle L. Wade	Kansas DHE	AB	Y	02/06/15
Ms Stephanie Drier	Minnesota DOH	AB	Y	02/10/15
Mr. Brian Boling	Oregon DEQ	AB	Y	02/11/15
Ms. Katie Adams	USEPA Region 10	O	Y	02/11/15
Mr. Gene Klesta	Underwriter's Laboratory	L	Y	02/12/15

Note that Company and Constituency are as of August, 2012. Bob Shannon was a recent addition to the committee in August, 2012, and therefore abstained from this vote as he didn't participate in the deliberation at that time. Kristina Spadafora has left the industry. The forwarding e-mail address that she provided did not reject, but returned no response.

(Addition 3/23/15: A motion was made by Michelle Wade on 2/16/15 to approve the 2/15/15 minutes as revised by Paul Junio. The motion was seconded by Gil Dichter on 2/16/15. Roll call vote:

Eugene Klesta - For (2/16)

Dorothy Love - For (2/16)

Gil Dichter - For (2/16)

Stephanie Drier - For (2/17)

Michelle Wade - For (2/17)

Michele Potter - For (2/22)

Brian Boling - For (2/21)

Scott Siders - For (2/21)

Bob Shannon - For (2/21)

Janice Willey - For (2/23)

Paul Junio – For (3/23)

Katie Adams – For (3/23)

The motion passed and the minutes from 2/15/15 were approved.)

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
Dan Tholen	Negative with Comment	V1M2	1. The document makes inconsistent use of ISO/IEC 17025 - many requirements are adopted simply by reference to the Standard (most of management requirements), some requirements are printed verbatim, some are printed, but edited with additions, some requirements are specifically excluded (5.6.1, 5.6.2) and some are completely ignored (5.4.6). All requirements and their applicability should be mentioned, and if excluded, notes should explain why.	persuasive	The committee has added all ISO language to Module 2, and have marked it as non-applicable
Dan Tholen	Negative with Comment	V1M2	2. Must include 5.4.6 if this document is to have any credibility in the metrological community. A note could explain that the uncertainty could be derived easily from the standard methods or from QC data, but still, MU is essential.	non-persuasive	The committee has added all ISO language to Module 2, and have marked it as non-applicable
Dan Tholen	Negative with Comment	V1M2	3. Edit the Introduction to state how ISO/IEC 17025 is use, once it is decided and implemented.	persuasive	The committee has added all ISO language to Module 2, and have marked it as non-applicable

Committer	Vote	Section	Comment	Disposition	Change/Reasoning
Matt Sowards	Affirmative with Comment	V1M2	In regards to the expansion of standards related to non-standard methods, I am somewhat concerned solidifying the practice of accrediting non-standard methods will decrease the impetus for new reference methods and lead to less uniformity in test procedures.	non-persuasive	This concern is not in the realm of the QS Committee to address.
Randall Query	Negative with Comment	V1M2 1.2	1.2 states: "If the requirements of this document are met, the laboratory operates a quality system in conformance with the applicable clauses of ISO/IEC 17025:2005. The ISO/IEC 17025:2005 language is incorporated verbatim into this standard, and appears as italicized text." This is important and needs to remain as written; however, some ISO/IEC 17025 clauses are absent or rewritten which is not appropriate. ISO/IEC 17025 needs to be the minimum requirements. Section 5.4.6 is not included and is relevant to environmental testing laboratories. Section 5.6 is applicable to environmental laboratories and needs to be included in this module.	persuasive	The committee has added all ISO language to Module 2, and have marked it as non-applicable
Carl Kircher	Affirmative with Comment	V1M2 3.1	COMMENT A. Clause 3.1 The proposed definition for "Analyte" implies that the sample being tested is the analyte. This particular "Medical Dictionary definition does not work. The Quality Systems Committee should use the other Medical Dictionary definition. Recommended language, after change: 3.1 ... Analyte: A substance, organism, physical parameter, property, or chemical constituent(s) for which an environmental sample is being analyzed. OR 3.1 Analyte: A substance, organism, physical parameter, property, or chemical constituent(s) that is the subject of an environmental analysis.	persuasive	The QS Committee will use the following definition of Analyte: A substance, organism, physical parameter, property, or chemical constituent(s) for which an environmental sample is being analyzed.

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
Carl Kircher	Affirmative with Comment	V1M2 3.1	COMMENT B. Clause 3.1 A mis-spelling is found in the definition of "Reference Method" in the first line of this definition. Recommended wording after correction is made: 3.1 ... Reference Method: ... extent of method validation in Modules 3-7) A reference method ...	persuasive	spelling correction
Carl Kircher	Affirmative with Comment	V1M2 3.1	COMMENT C. Clause 3.1 A mis-spelling is found in the definition of "Selectivity" in the first line of this definition. Recommended appearance after correction: 3.1 ... Selectivity: ... determine a specific analyte from another component ...	persuasive	spelling correction
Curtis Wood	Affirmative with Comment	V1M2 3.1	Reference Method: modules is misspelled.	persuasive	spelling correction

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Curtis Wood	Affirmative with Comment	V1M2 3.1	Reference Method: the last sentence ("If there is not a regulatory...") does not make sense. I would offer suggested language, but I don't understand the intention. I think it is saying that if an analyte is in a published (i.e. reference) method, but regulations do not require use of that method, any method using the same technology that the lab uses is considered a reference method.	non-persuasive	Committee feels the information is clear, and has been previously discussed
Paul Junio	Affirmative with Comment	V1M2 3.1	In the definition for Verification, "a written trace" should be changed to "documentation"	persuasive	'written trace' changed to 'record'
Paul Junio	Affirmative with Comment	V1M2 3.1	in the definition for Reference Method - "Modlules" is mis-spelled	persuasive	spelling correction

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Paul Junio	Affirmative with Comment	V1M2 3.1	in the definition for Selectivity - "rom" should be "from"	persuasive	spelling correction

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
Stephanie Drier	Affirmative with Comment	V1M2 4.1.7.1	Were items (a)- (g) intentionally omitted from the list of QA duties?	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Kenneth Jackson	Affirmative with Comment	V1M2 4.1.7.2 e)	If the technical manager is absent for more than 15 days it was originally required that he/she be temporarily replaced by another full time staff member. However, "full time" has now been deleted. I believe we originally said "full time" to be assured the replacement is a qualified individual who has a full working knowledge of the laboratory. This omission may open the door for a laboratory to temporarily employ a temporary technical manager who may meet the qualification requirements, but is less able to do the job because of lack of experience with that laboratory.	non-persuasive	tech mgr doesn't have to be full time, why should replacement?
Curtis Wood	Affirmative with Comment	V1M2 4.2.8.1	item 3: seems like there should be an "of" between data monitoring and data integrity.	non-persuasive	'data integrity' was to have been deleted.

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Stephanie Drier	Affirmative with Comment	V1M2 5.2	5.2 appears to be an incomplete sentence.	persuasive	Use the following wording: All references to Calibration Laboratories and Calibration Methods in these Clauses are not applicable to environmental testing.
Denise Dubois	Affirmative with Comment	V1M2 5.4.4	...methods not covered by standard methods... For consistency with §3.1, standard should be replaced by reference.	non-persuasive	ISO language can't be changed
Leslie Wentland	Negative with Comment	V1M2 5.4.4	I do not understand why this section has been added. The initial paragraph is covered in 5.4.2 and 5.4.5. The body under the note seems to be the requirements of what should be in a SOP (4.2.8.5 f). I do not see the point and find it confusing.	non-persuasive	Added to clarify that the ISO Note is a TNI requirement, since Notes aren't enforceable

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Marlene Moore	Negative with Comment	V1M2 5.4.4	standard method not defined, but defined reference method. Suggest use reference method not standard method in this line.	non-persuasive	This is ISO language and can't be changed
Marlene Moore	Negative with Comment	V1M2 5.4.4	Note: Since this is not required so please remove – no need to keep guidance information in a standard. Notes are clarifications, which this note does not clarify the information but specifies items that should be in the procedure.	non-persuasive	This is ISO language and can't be changed

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Paula Blaze	Affirmative with Comment	V1M2 5.4.4	Non-Standard Methods - the NOTE should not be a note but a requirement in the standard.	persuasive	Sections 5.4.4.1 and 5.4.4.2 were added such that TNI calls the Note a requirement

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
Lee Wolf	Negative with Comment	V1M2 5.4.5.2	"Amplifications" is undefined and the terms "outside their intended scope" and "the intended use", and "as extensive as is necessary" are subjective. Often when developing methods, all intended uses may not be known. This section has many Notes that cannot be assessed against. Suggest simplifying the wording of the entire section.	non-persuasive	This is ISO language and can't be changed
Lee Wolf	Negative with Comment	V1M2 5.4.5.3	"Limit of repeatability and/or reproducibility" and "robustness against external influences" are undefined and subjective. Also, not knowing (or being able to control) all potential external influences, it is not practical to expect method development evaluation of them. This section has many Notes that cannot be assessed against. Suggest simplifying the wording of the entire section.	non-persuasive	This is ISO language and can't be changed

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
Leslie Wentland	Negative with Comment	V1M2 5.4.5.3	5.4.5.3 I am confused why this has been added and why it extends beyond the requirements in the specific modules in section 1.5 (method validation). What is robustness of external influences and cross sensitivity? I also believe the notes are unnecessary and for the most part repetitive.	non-persuasive	This is ISO language and can't be changed
Leslie Wentland	Negative with Comment	V1M2 5.4.5.4	5.4.5.4 Also seems repetitive and confusing to the requirements above it.	non-persuasive	may be repetitive, but added for clarity to ISO
Carl Kircher	Affirmative with Comment	V1M2 5.6.1 and 5.6.2	COMMENT D. Clauses 5.6.1 and 5.6.2 The Quality Systems committee did an excellent job in restoring the ISO 17025 method validation language back to Module 2 (clauses 5.4.4 and 5.4.5). The Committee should furthermore re-instate the ISO 17025 language for clauses 5.6.1 and 5.6.2 as well. A subsequent clause 5.6.3.1 points to clause 5.6.2.1 despite the present claim of non-applicability. NOTE's can be inserted after the ISO 17025 text to say that the ISO requirements for calibration laboratories may not be applicable to environmental testing laboratories. Recommended language after changes are made: 5.6.1 General All equipment used for tests and/or calibrations, including equipment for subsidiary measurements (e.g. for environmental conditions) having a significant effect on the accuracy or validity of the result of the test, calibration or sampling shall be calibrated before being put into service. The laboratory	persuasive	all ISO language will be added into the Standard, and comment will be made as to the applicability of the ISO language

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			<p>shall have an established programme and procedure for the calibration of its equipment.</p> <p>NOTE Such a programme should include a system for selecting, using, calibrating, checking, controlling and maintaining measurement standards, reference materials used as measurement standards, and measuring and test equipment used to perform tests and calibrations.</p> <p>NOTE: Clause 5.6.1 may not be applicable to all environmental testing laboratories.</p> <p>5.6.2 Specific requirements</p> <p>5.6.2.1 Calibration</p> <p>NOTE: This section is added to provide guidance to environmental laboratories in meeting the requirements of clause 5.6.3.1.</p> <p>5.6.2.1.1 For calibration laboratories, the programme for calibration of equipment shall be designed and operated so as to ensure that calibrations and measurements made by the laboratory are traceable to the International System of Units (SI) (Système international d'unités). A calibration laboratory establishes traceability of its own measurement standards and measuring instruments to the SI by means of an unbroken chain of calibrations or comparisons linking them to relevant primary standards of the SI units of measurement. The link to SI units may be achieved by reference to national measurement standards. National measurement standards may be primary standards, which are primary realizations of the SI units or agreed representations of SI units based on fundamental physical constants, or they may be secondary standards which are standards calibrated by another national metrology institute. When using external calibration services, traceability of measurement shall be assured by the use of calibration services from laboratories that can demonstrate competence, measurement capability and traceability. The calibration certificates issued by these laboratories shall contain the measurement results, including the measurement uncertainty and/or a statement of</p>		

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			<p>compliance with an identified metrological specification (see also 5.10.4.2).</p> <p>NOTE 1 Calibration laboratories fulfilling the requirements of this International Standard are considered to be competent. A calibration certificate bearing an accreditation body logo from a calibration laboratory accredited to this International Standard, for the calibration concerned, is sufficient evidence of traceability of the calibration data reported.</p> <p>NOTE 2 Traceability to SI units of measurement may be achieved by reference to an appropriate primary standard (see VIM:1993, 6.4) or by reference to a natural constant, the value of which in terms of the relevant SI unit is known and recommended by the General Conference of Weights and Measures (CGPM) and the International Committee for Weights and Measures (CIPM).</p> <p>NOTE 3 Calibration laboratories that maintain their own primary standard or representation of SI units based on fundamental physical constants can claim traceability to the SI system only after these standards have been compared, directly or indirectly, with other similar standards of a national metrology institute.</p> <p>NOTE 4 The term “identified metrological specification” means that it must be clear from the calibration certificate which specification the measurements have been compared with, by including the specification or by giving an unambiguous reference to the specification.</p> <p>NOTE 5 When the terms “international standard” or “national standard” are used in connection with traceability, it is assumed that these standards fulfil the properties of primary standards for the realization of SI units.</p> <p>NOTE 6 Traceability to national measurement standards does not necessarily require the use of the national metrology institute of the country in which the laboratory is located.</p> <p>NOTE 7 If a calibration laboratory wishes or needs to obtain traceability from a national metrology institute other than in its own country, this laboratory should</p>		

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			<p>select a national metrology institute that actively participates in the activities of BIPM either directly or through regional groups.</p> <p>NOTE 8 The unbroken chain of calibrations or comparisons may be achieved in several steps carried out by different laboratories that can demonstrate traceability.</p> <p>5.6.2.1.2 There are certain calibrations that currently cannot be strictly made in SI units. In these cases calibration shall provide confidence in measurements by establishing traceability to appropriate measurement standards such as: - the use of certified reference materials provided by a competent supplier to give a reliable physical or chemical characterization of a material; - the use of specified methods and/or consensus standards that are clearly described and agreed by all parties concerned. Participation in a suitable programme of interlaboratory comparisons is required where possible.</p> <p>5.6.2.2 Testing</p> <p>5.6.2.2.1 For testing laboratories, the requirements given in 5.6.2.1 apply for measuring and test equipment with measuring functions used, unless it has been established that the associated contribution from the calibration contributes little to the total uncertainty of the test result. When this situation arises, the laboratory shall ensure that the equipment used can provide the uncertainty of measurement needed.</p> <p>NOTE The extent to which the requirements in 5.6.2.1 should be followed depends on the relative contribution of the calibration uncertainty to the total uncertainty. If calibration is the dominant factor, the requirements should be strictly followed.</p> <p>5.6.2.2.2 Where traceability of measurements to SI units is not possible and/or not relevant, the same requirements for traceability to, for example, certified reference materials, agreed methods and/or consensus standards, are required as for calibration laboratories (see 5.6.2.1.2).</p> <p>NOTE: Some elements of clause 5.6.2.2 may not be</p>		

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			<p>applicable to environmental testing laboratories.</p> <p>COMMENT E. Clause 5.8.5(a) For clarity, a space needs to be added to separate two words in the first line. Recommended appearance after the change is made: 5.8.5 ... (a) "... for uniquely identifying the sample containers that hold samples ..."</p>		
Carl Kircher	Affirmative with Comment	V1M2 5.8.5 a)	<p>COMMENT E. Clause 5.8.5(a) For clarity, a space needs to be added to separate two words in the first line. Recommended appearance after the change is made: 5.8.5 ... (a) "... for uniquely identifying the sample containers that hold samples ..."</p>	persuasive	<p>Changed to the following: The laboratory shall have a documented system for uniquely identifying the samples to be tested, to ensure that there can be no confusion regarding the identity of such samples at any time. This system shall include identification for all samples, sub-samples, preservations, sample containers, tests, and subsequent extracts and/or digestates.</p>
Paul Junio	Affirmative with Comment	V1M2 5.8.5 a)	<p>"the sample containers that hold samples to be tested" should be changed to "each sample container"</p>	persuasive	<p>Changed to the following: The laboratory shall have a documented system for uniquely identifying the samples to be tested, to ensure that there can be no confusion regarding the identity of such samples at any time. This system shall include identification for all samples, sub-samples, preservations, sample containers, tests, and subsequent extracts and/or digestates.</p>

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Robert Di Rienzo	Negative with Comment	V1M2 5.8.5 a)	For what purpose are we adding the words "container" to this clause. We are asking the lab to put an arbitrary identification on each container that will mean absolutely nothing to data quality. This was discussed in length during the last revision cycle and was eliminated due to the meaninglessness. If a client samples in three containers and the sample is uniquely identified then what purpose would a unique identification on each container provide. Have you ever seen a COC? It usually has the Field Sample ID, date and time, and the number of containers. Should container "a" be the first one pulled out of the cooler or the last one and what impact on data would this have?	persuasive	Changed to the following: The laboratory shall have a documented system for uniquely identifying the samples to be tested, to ensure that there can be no confusion regarding the identity of such samples at any time. This system shall include identification for all samples, sub-samples, preservations, sample containers, tests, and subsequent extracts and/or digestates.
Steve Gibson	Affirmative with Comment	V1M2 5.8.5 a)	I agree with the proposed changes, although V1M2-5.8.5.a is unclear. Is the goal to differentiate between containers (VOAs, container preserved with nitric acid, etc.)submitted for a sample or simply between samples? That is, is a unique identification be assigned to each container received, like was required by NELAC 5.5.8.2.a?	persuasive	Changed to the following: The laboratory shall have a documented system for uniquely identifying the samples to be tested, to ensure that there can be no confusion regarding the identity of such samples at any time. This system shall include identification for all samples, sub-samples, preservations, sample containers, tests, and subsequent extracts and/or digestates.
Carl Kircher	Affirmative with Comment	V1M3 1.5	A mis-spelling is found in the first word of the proposed new last paragraph. Recommended appearance after correction is made: 1.5 ... "Non-standard methods must comply with ..."	persuasive	spelling correction

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Denise Dubois	Affirmative with Comment	V1M3 1.5	None standard methods must comply... Should this be Non-standard?	persuasive	spelling correction
Paul Junio	Affirmative with Comment	V1M3 1.5	"None" should be "Non"	persuasive	spelling correction
Susan Butts	Affirmative with Comment	V1M3 1.5	"none standard" should be non-standard	persuasive	spelling correction

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Denise Dubois	Affirmative with Comment	V1M3 1.6.1 a)	..until a satisfactory initial DOC is required. This could be interpreted to mean that satisfactory initial DOC's are not required. Should required be replaced with produced?	persuasive	'required' changed to 'completed'
Paul Junio	Affirmative with Comment	V1M3 1.6.1 a)	"DOC is required" should be changed to "DOC is completed"	persuasive	'required' changed to 'completed'
Robert Di Rienzo	Negative with Comment	V1M3 1.6.2.1 c)	Have you ever heard of fiber counting. The is not an analyte but a parameter	non-persuasive	definition of analyte covers this comment
Denise Dubois	Affirmative with Comment	V1M3 1.6.3.1	.how the laboratory intends to identify data associated with ongoing DOCs. Clarify meaning?	persuasive	changed to (and made consistent between Modules): The laboratory shall have a documented procedure describing ongoing DOC that includes procedures for how the laboratory will identify data associated with ongoing DOCs.
Susan Butts	Affirmative with Comment	V1M3 1.6.3.2 a)	The example is not applicable to asbestos testing and should be removed and replaced with a different example. Suggested language for change would be, e.g. EPA Methods 100.1 and 100.2.	persuasive	change
Denise Dubois	Affirmative with Comment	V1M3 1.6.3.2 c)	1.6.3.2.c ...laboratory control samples (LCS)... This is not a term used in asbestos analysis.	non-persuasive	open to suggested changes, if any are provided
Denise Dubois	Affirmative with Comment	V1M3 1.7.7.1.1	1.7.7.1.1. ADD - or Method 100.1, Section 7	tabled	not up for comment in this voting session

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Susan Butts	Affirmative with Comment	V1M3 1.7.7.1.1 a)	If methods are to be listed, then the other approved EPA Method should be listed as well: EPA/600/4-83-043, Method 100.1,	tabled	not up for comment in this voting session
Denise Dubois	Affirmative with Comment	V1M3 1.7.7.2.2	1.7.7.2.2 Although Section 22 of the NIOSH 7400 method does require reporting interlaboratory relative standard deviation, it cites from Step 11. However, Step 11 does not mention interlaboratory relative standard deviation. Thus we would recommend removing and interlaboratory from 1.7.7.2.2 and adding , Section 22 after 1994.	tabled	not up for comment in this voting session
Susan Butts	Affirmative with Comment	V1M3 1.7.8.1	is temperature not considered a method of preservation? Drinking water requires temperature preservation of samples.	tabled	not up for comment in this voting session
Denise Dubois	Affirmative with Comment	V1M3 1.7.8.2	1.7.8.2 Add "Air samples for asbestos analysis may not be shipped in the same container as bulk samples for asbestos analysis." This is a requirement of the EPA AHERA TEM method for air samples.	tabled	not up for comment in this voting session
Susan Butts	Affirmative with Comment	V1M3 1.7.8.3	the methods are not always correct in regards to holding time and preservation requirements. This section should be changed to also reference regulations. Suggested language would be: Refer to the specific method of analysis and/or specific regulations for additional requirements.	tabled	not up for comment in this voting session
Timothy Fitzpatrick	Affirmative with Comment	V1M4	Presumably there are no changes in the missing sections. For example, 1.7.2 (e) ends abruptly.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Stephanie Drier	Affirmative with Comment	V1M4 1.4	1.4 may benefit by adding EPA to 'Method 624'	persuasive	'Method 624' changed to 'EPA Method 624'

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Stephanie Drier	Affirmative with Comment	V1M4 1.5.1	1.5.1 refers to sections 1.5.2 and 1.5.3; however, it is difficult to determine if it is an internal document/module reference or if it is reference to a different volume and module.	non-persuasive	if referencing another module, that module would be stated
Paul Junio	Affirmative with Comment	V1M4 1.5.1 c)	The language used in the Asbestos Module regarding PTs as part of Method Validation should be included (as was discussed at the meeting in Chicago in January, 2010): 1.5.1 c) For both reference and non-standard methods, laboratories shall participate in proficiency testing programs. The results of these analyses shall be used to evaluate the ability of the laboratory to produce acceptable data.	persuasive	include proposed language
Carl Kircher	Affirmative with Comment	V1M4 1.5.2.1	COMMENT A: Clause 1.5.2.1 Two examples given as "e.g." in the second paragraph are poor examples because there are instances of Specific Conductance and Chlorophylls that DO use a calibration curve. Recommended wording after change is made: 1.5.2.1 "... method that does not use a calibration curve (e.g., residues, titrimetric determinations)...."	non-persuasive	sufficient examples are listed, and need not be exclusive

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Stephanie Drier	Affirmative with Comment	V1M4 1.5.2.1	1.5.2.1- the use of 3x and 4X is inconsistent and may cause confusion. Might suggest spelling out the number and meaning of X (i.e. three times. In addition, the use of the QC acronym may also benefit from being defined (i.e. Quality Control (QC)) because the definition in V1M2 does not include the acronym.	persuasive	editorial
Steve Gibson	Affirmative with Comment	V1M4 1.5.2.1 b)	I agree with the proposed changes, although V1M4-1.5.2.1.b is unclear. If doing an LOD determination for major elements (e.g., Ca, Mg, Na, Fe) in S&CM, can deionized water be used as an alternate quality system matrix instead of the quality system matrix of interest, since these elements are ubiquitous in S&CM? A note may be required.	non-persuasive	appropriate levels of background are possible for determining an LOQ/LOD. If an LOD can't be determined, it may not be needed

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Matt Sowards	Negative with Comment	V1M4 1.5.2.1 c)	I do not support the proposed change to section 1.5.2.1.c. By changing the LOD requirement from when there is "a change in instrumentation that affects the sensitivity" to "a change in instrument", it appears labs would be prohibited from exercising any judgment as to what instrument changes require an LOD. This could be interpreted as requiring an LOD when any part of an instrument is replaced, regardless of the potential impact on sensitivity. Additionally, I disagree with the new language requiring an LOD when there is "a change in instrument sensitivity". Given that sensitivity continually fluctuates, I do not feel this is reasonable language. I would also suggest the standards could be improved by addressing instrument qualification vs method validation. There are various sections that contain illogical requirements when considering instrument qualification.	tabled	EMMEC will be re-writing LOD/LOQ requirements. As the committee is happy with the proposal as written, additional changes will be left to EMMEC
John Phillips	Negative with Comment	V1M4 1.5.2.1 e)	1.5.2.1, e) This is not a valid test for verifying the LOD. Measuring and analyte at 3-4x the LOD does not guarantee that it can be measured at the LOD. Measuring at least three or four replicates spiked at the LOD would be a valid measure.	non-persuasive	EMMEC will be re-writing LOD/LOQ requirements. As the committee is happy with the proposal as written, additional changes will be left to EMMEC
Paula Blaze	Affirmative with Comment	V1M4 1.5.2.1 e)	Limit of Detection (LOD) - this section states that LOD verification is confirmed by i) detection of an instrument signal greater than 3x the instrument noise level - If the LOD is analyzed at a concentration 3-4X the LOD it would expect the laboratory to recover at least 30-50%, not just detect the analyte, and ii) a response that is distinguishable from the blank - what type of blank is this section referencing, instrument blank, calibration blank - again, you would expect the laboratory to recover more than just a value greater than the blank.	tabled	EMMEC will be re-writing LOD/LOQ requirements. As the committee is happy with the proposal as written, additional changes will be left to EMMEC

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Carl Kircher	Affirmative with Comment	V1M4 1.5.2.2	COMMENT B: Clause 1.5.2.2 Two examples given as "e.g." in the proposed new first paragraph are poor examples because there are instances of Specific Conductance and Chlorophylls that DO use a calibration curve. Recommended wording after change is made: 1.5.2.1 "... test that does not use a calibration curve (e.g., residues, titrimetric determinations). While ..."	non-persuasive	EMMEC will be re-writing LOD/LOQ requirements. As the committee is happy with the proposal as written, additional changes will be left to EMMEC
Leslie Wentland	Affirmative with Comment	V1M4 1.5.2.2	Although this section seems to be more informative about the LOQ, it is dictating that an actual performance be made to determine the LOQ. Believe it or not some labs still use the LOD for local limits in wastewater. I think there should still be a way for labs to just calculate a LOQ. I still don't find much information on ways to analyze the LOQ.	non-persuasive	can still calc an LOQ
Stephanie Drier	Affirmative with Comment	V1M4 1.5.2.2	1.5.2.2 appears to be a conflicting message regarding the LOQ requirements. The first portion of the statement requires that an LOQ MUST be established; however, the remainder of the statement lists exceptions. The sentence/requirement may be best restructured to state that is required where available/scientifically possible.	non-persuasive	The exceptions are added as clarification
Virginia Hunsberger	Negative with Comment	V1M4 1.5.2.2	1.5.2.2 – Is the new language with the 2 bulleted methods for establishing LOQ a requirement, or is this guidance?	non-persuasive	yes, required

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
John Phillips	Negative with Comment	V1M4 1.5.2.2 b)	1.5.2.2 b) The LOD verification does not guarantee that the LOQ requirements can be met.	non-persuasive	EMMEC will be re-writing LOD/LOQ requirements. As the committee is happy with the proposal as written, additional changes will be left to EMMEC
John Phillips	Negative with Comment	V1M4 1.5.2.2 c)	1.5.2.2 c) Precision at the LOQ must also be verified through replicate analysis.	non-persuasive	EMMEC will be re-writing LOD/LOQ requirements. As the committee is happy with the proposal as written, additional changes will be left to EMMEC
Virginia Hunsberger	Negative with Comment	V1M4 1.6.1 a)	1.6.1.a – What is meant by the added word “constant” with regard to supervision?	persuasive	constant, close supervision as defined in the laboratory's training procedure

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Amy Whittier	Negative with Comment	V1M4 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Carl Craig	Negative with Comment	V1M4 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Curtis Wood	Negative with Comment	V1M4 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

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Heidi White	Negative with Comment	V1M4 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Lisa Berry	Negative with Comment	V1M4 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Melissa McNamara	Negative with Comment	V1M4 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

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Melissa Wright	Negative with Comment	V1M4 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Mike Blades	Negative with Comment	V1M4 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Rick Persichitte	Negative with Comment	V1M4 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

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Shawn Kassner	Negative with Comment	V1M4 1.6.1 c)	<p>This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application.</p> <p>Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.</p>	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Tanya Rahn	Negative with Comment	V1M4 1.6.1 c)	<p>This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application.</p> <p>Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method,</p>	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

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			the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.		
Will McHale	Negative with Comment	V1M4 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Virginia Hunsberger	Negative with Comment	V1M4 1.6.3.1	1.6.3.1 – The ongoing DOC requirement never states how often this is to be completed. Every 5 years? Longer? Also, the words "intends to" in the added sentence are too vague and open for argument.	non-persuasive	changed to (and made consistent between Modules): The laboratory shall have a documented procedure describing ongoing DOC that includes procedures for how the laboratory will identify data associated with ongoing DOCs.
Virginia Hunsberger	Negative with Comment	V1M4 1.6.3.2 d)	1.6.3.2.d – This section was confusing in the original language, and this changed language is not an improvement. How would this process of QC review work in practice for ongoing DOC? How often must it be completed?	non-persuasive	ongoing QC is the day to day operations of the analyst - this is a change from past expectations
Carl Kircher	Affirmative with Comment	V1M4 1.7.2 e)	COMMENT C: Clause 1.7.2(e) For clarity, a comma needs to be inserted between the dependent clause and the independent clause in the second-to-the-last sentence. Proposed wording after the correction is made: 1.7.5 ... (e) "... on which the calibration has not yet been verified, the results shall be flagged...."	persuasive	editorial

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Lee Wolf	Affirmative with Comment	V1M4 1.7.2 e)	PLEASE, please change the language to be clearly understood by lab staff and assessors. If the first CCV failed, the one after corrective action can't possibly be a "second consecutive (immediate)" passing CCV - because the first one failed. This combination of words has never made sense and confuses the issue. Suggest wording such as: "If documented routine corrective action procedures are followed immediately with a calibration verification that is within acceptance criteria, analysis may proceed. If that calibration verification analysis is not within acceptance criteria the laboratory shall demonstrate acceptable performance, after additional corrective action measures, with two consecutive calibration verifications, or a new initial instrument calibration."	persuasive	clarifies
Bill Gase	Affirmative with Comment	V1M5	I would like for the committee to review the requirement for checking for chlorine residual in the bacteria sample bottle if the field chlorine residual was measured. The testing for chlorine residual is a potential source of contamination and may lead to false positive samples.	non-persuasive	already been discussed
Patsy Root	Negative with Comment	V1M5 1.5	COMMENT: a) states that any method will be validated but part b) is specific to reference methods. If part a) states any method, that is inclusive of reference methods. Reference methods should be required to be validated before use or acceptance like any other method. • Suggestion: Remove part b).	non-persuasive	QS Committee intended that reference methods not be required to go through the same validation steps as non-reference methods

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Patsy Root	Negative with Comment	V1M5 1.5	<ul style="list-style-type: none"> • Suggestion: Change wording in part c) From this: For all methods, except reference methods, the validation must... To this: For all methods, except reference methods, the validation must... 	non-persuasive	no change is proposed, so unsure what to do
Stephanie Drier	Affirmative with Comment	V1M5 1.5	1.5 difficult to determine if the references to standard sections or internal to that specific volume and module or to a different volume and module.	non-persuasive	consistent format is coming via a TNI formatting document; intent seems clear
Amy Whittier	Negative with Comment	V1M5 1.6.1 c)	<p>This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application.</p> <p>Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.</p>	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

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Carl Craig	Negative with Comment	V1M5 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Curtis Wood	Negative with Comment	V1M5 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Heidi White	Negative with Comment	V1M5 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Lisa Berry	Negative with Comment	V1M5 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's

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			Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.		perspective.
Melissa McNamara	Negative with Comment	V1M5 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Melissa Wright	Negative with Comment	V1M5 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

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Mike Blades	Negative with Comment	V1M5 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Rick Persichitte	Negative with Comment	V1M5 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Shawn Kassner	Negative with Comment	V1M5 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Tanya Rahn	Negative with Comment	V1M5 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's

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			Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.		perspective.
Will McHale	Negative with Comment	V1M5 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Patsy Root	Negative with Comment	V1M5 1.6.2.2	• Suggestion: Correct numbering, goes from "a)" to "g)" without b) – f); change g) to b)	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Patsy Root	Negative with Comment	V1M5 1.6.2.2	• Suggestion: reword g) from this: organisms of interest beginning with b). To this:organisms of interest beginning with a). (If you mean to have users go back to 1.6.2.2 a), that is)	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Patsy Root	Negative with Comment	V1M5 1.6.3.2	• Suggestion: change e) to a) and remove the ": or" at the end of the paragraph	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Patsy Root	Negative with Comment	V1M5 1.7.3	• Suggestion: This section should be labeled "1.7 Quality Control" and be in bold type.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
					perspective.
Carl Kircher	Affirmative with Comment	V1M5 1.7.3 1.7.4	COMMENT A: Clause 1.7.3 or 1.7.4 The NELAC Standards had a crucial requirement that Microbiology media, solutions, and reagents are to be prepared, stored, and used according to a documented procedure that follows the manufacturer's instructions or the test method. For some unknown reason, this requirement was left out of The NELAC Institute's standards. The requirement needs to be added back in to ensure constant, consistent test conditions and to ensure fulfillment of US EPA expectations for the Safe Drinking Water Act and the Clean Water Act. Proposed language to be added as Clause 1.7.3.5(e), or added to Clause 1.7.4: "Media, solutions, and reagents shall be prepared, used, and stored according to a documented procedure that follows the manufacturer's instructions or the test method's requirements."	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Patsy Root	Negative with Comment	V1M5 1.7.3.1	• Suggestion: 1.7.3.1 should be labeled 1.7.1; additionally, the title should be "Sterility Checks" and leave out the "and Method Blanks" as there is no information on method blanks in this section.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Patsy Root	Negative with Comment	V1M5 1.7.3.1	• Suggestion: b) Sterility Checks should be labeled as a), not b)	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Patsy Root	Negative with Comment	V1M5 1.7.3.5	• Suggestion: Change 1.7.3.5 to 1.7.2	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

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Patsy Root	Negative with Comment	V1M5 1.7.3.5	• Suggestion: Remove ii) on page #11.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Patsy Root	Negative with Comment	V1M5 1.7.3.5	• Suggestion: On page #11 ii) Ready-to-use media, change # 2 to 1 and suggest re-wording to this: Ready-to-use media shall be used within the manufacturer's expiration date. If media will be used past the manufacturer's expiration date; is greater than those noted in Section 1.7.3.5a) i) 2. above, the laboratory shall request, and have available documentation from the manufacturer demonstrating media quality for the extended time period.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Carl Kircher	Affirmative with Comment	V1M5 1.7.3.5 c) ii	COMMENT B: Clause 1.7.3.5(c)(ii) I need clarification on the intent of this change. If the laboratory is accredited for SM 9222 B, SM 9222 D, SM 9221 B, SM 9221 E, SM 9223 B, etc., the laboratory must still fulfill the requirement in SM 9020 B to test its reagent water for ammonia / Organic Nitrogen test monthly, right? This would be a method-specific requirement under Clause 1.2. All US-EPA promulgated versions of SM Microbiology methods have the requirement for the ammonia / Organic Nitrogen to be performed on the reagent water monthly and do not specify any exemption as proposed in this voting draft. No changes or recommendations may be needed to the proposed standard if the requested clarification can be provided.	non-persuasive	this addresses methods other than SM which may not have this requirement
Paul Junio	Affirmative with Comment	V1M5 1.7.3.5 c) ii	I would request the deletion of the added text in 1.7.3.5 c) ii. The text refers to a method requirement that must be followed if Method 9020 is being followed, but need not otherwise be followed.	non-persuasive	this addresses methods other than SM which may not have this requirement

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
Patsy Root	Negative with Comment	V1M5 1.7.3.6	• Suggestion: change 1.7.3.6 to 1.7.3	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Patsy Root	Negative with Comment	V1M5 1.7.3.6	• Suggestion: Change this: c) In order to ensure identity and traceability, reference cultures used for positive and negative To this: c) In order to ensure identity and traceability, positive and negative reference cultures must be used.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Patsy Root	Negative with Comment	V1M5 1.7.3.6	• Suggestion: Change 1.7.3.6 b) and c) to a) and b), respectively	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Carl Kircher	Affirmative with Comment	V1M5 1.7.3.6 c)	COMMENT C: Clause 1.7.3.6(c) The sentence is incomplete; the subject is not clear and no verb is present. Recommended language (retain the current TNI Standard): 1.7.3.6(c) In order to ensure identity and traceability, reference cultures used for positive and negative controls shall be obtained from a recognized national collection, organization, or manufacturer recognized by the accreditation body. Microorganisms may be single use preparations or cultures maintained for their intended use by documented procedures that demonstrate the continued purity and viability of the organism. i) Reference cultures may be revived (if freeze-dried) or transferred from slants and sub-cultured once to provide reference stocks. The reference stocks shall be preserved by a technique that maintains the characteristics of the strains. Reference stocks shall be used to prepare working stocks for routine work. If reference stocks have been thawed, they shall not be refrozen and re-used. ii) Working stocks shall not be sequentially cultured more than five (5) times and shall	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
			not be sub-cultured to replace reference stocks.		
Richard Swartz	Affirmative with Comment	V1M5 1.7.3.6 c)	I'm not familiar with this type of analysis, however, section 1.7.3.6 c) appears to be a fragment or incomplete.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Carl Kircher	Affirmative with Comment	V1M5 1.7.3.7 b) v 1	COMMENT E: Clause 1.7.3.7(b)(v)(1) The ancient, carried-over EPA Microbiology requirements of requiring twice-daily incubator and waterbath temperature readings 4 hours apart on each day of use may be causing hardship on some laboratories that remove samples from the incubators and waterbaths on Saturday mornings and read the results. As currently written, the standard forces the analysts to stick around (and get paid?) for 4 more hours just to get the second incubator / waterbath temperature measurement. Maybe in the interest of reasonableness and accommodation to laboratories in tough economic times, and the lack of definitive requirement in Standard Methods or EPA ("should" in the latest DW Cert. manual), we can loosen the requirement for Saturday morning conclusions of Microbiology sample tests. Recommendation: Add a last sentence to Clause 1.7.3.7(b)(v)(1), to read as follows: "An exception to the twice-daily temperature measurement documentation is permitted for the last day of the incubation period when samples are removed from the incubator or waterbath, the morning temperature(s) is subsequently measured and documented, and no other samples are present in the incubators and waterbaths that calendar day."	tabled	not up for comment in this voting session - language is good
Patsy Root	Negative with Comment	V1M5 1.7.5	• Suggestion: Change 1.7.5 label to 1.7.4	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
Carl Kircher	Affirmative with Comment	V1M5 1.7.5 b)	COMMENT D: Clause 1.7.5(b) If the proposed change to this standard is to accommodate the complaints by laboratories who do not want to check Microbiology samples for the absence of chlorine, the proposed language DOES NOT accomplish this task. My reading of this standard is that I (as a laboratory) should suspect that ALL Microbiology samples from unknown clients or new sources are presumed to have chlorine in them until I demonstrate appropriate history of acceptable preservation from the client or that new water source. Then I still have to check one sample per month from that client or source for the absence of chlorine. Is my interpretation correct? No proposed changes or recommendations needed if the Quality Systems Committee agrees with my interpretation. If it does not agree, the language in this clause needs to be changed further.	persuasive	commenter understood the change as written
Paul Junio	Affirmative with Comment	V1M6 1.5.1 d)	The language used in the Asbestos Module regarding PTs as part of Method Validation should be included (as was discussed at the meeting in Chicago in January, 2010): 1.5.1 d) For both reference and non-standard methods, laboratories shall participate in proficiency testing programs. The results of these analyses shall be used to evaluate the ability of the laboratory to produce acceptable data.	persuasive	editorial
Daniel Dickinson	Negative with Comment	V1M6 1.5.2	Disagree with removing recommendation for Minimum Detectable Activity (MDA) based on Althsuller-Pasternack-Currie (APC) formalism. The revision suggest relaxing the MDA requirements to the point of no recommendation, yet in the next section 1.5.2.2 (not under review) NELAC describes SDWA requirements. It implies that SDWA is the preferred MDA for NELAC, yet almost nobody is using it in radiochemistry, and most people are using versions of	non-persuasive	MDA is used in SDWA, and not elsewhere

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
			APC.		
Denise Dubois	Negative with Comment	V1M6 1.5.2	Disagree with removing recommendation for Minimum Detectable Activity (MDA) based on Althsuller-Pasternack-Currie (APC) formalism. The revision suggest relaxing the MDA requirements to the point of no recommendation, yet in the next section 1.5.2.2 (not under review) NELAC describes SDWA requirements. It implies that SDWA is the preferred MDA for NELAC, yet almost nobody is using it in radiochemistry, and most people are using versions of APC.	non-persuasive	MDA is used in SDWA, and not elsewhere
Nicole Cairns	Negative with Comment	V1M6 1.5.2	Disagree with removing recommendation for Minimum Detectable Activity (MDA) based on Althsuller-Pasternack-Currie (APC) formalism. The revision suggest relaxing the MDA requirements to the point of no recommendation, yet in the next section 1.5.2.2 (not under review) NELAC describes SDWA requirements. It implies that SDWA is the preferred MDA for NELAC, yet almost nobody is using it in radiochemistry, and most people are using versions of APC.	non-persuasive	MDA is used in SDWA, and not elsewhere
Paul Junio	Affirmative with Comment	V1M6 1.5.2	"Thus" should be changed to "This"	persuasive	editorial
Thomas Semkow	Negative with Comment	V1M6 1.5.2	Disagree with removing recommendation for Minimum Detectable Activity (MDA) based on Althsuller-Pasternack-Currie (APC) formalism. The revision suggest relaxing the MDA requirements to the point of no recommendation, yet in the next section 1.5.2.2 (not under review) NELAC describes SDWA requirements. It implies that SDWA is the preferred MDA for NELAC, yet almost nobody is using it in radiochemistry, and most people are using versions of APC.	non-persuasive	MDA is used in SDWA, and not elsewhere
Carl Kircher	Affirmative with Comment	V1M6 1.5.2.1	COMMENT A: Clause 1.5.2.1 Why was it deleted to include ALL sample processing steps in the determination of the Minimum Detectable Activity (MDA)? If this requirement is analogously important	persuasive	editorial

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
			for Chemistry LOD's, then it is also important for Radiochemistry MDA's. Re-insert the following sentence back into Clause 1.5.2.1(a) back in as shown below, and re-number (a) as (b): "Unless specified otherwise in the mandated method protocols, all sample-processing steps of the analytical method shall be included in the determination of the MDA."		
Carl Kircher	Affirmative with Comment	V1M6 1.5.2.1	COMMENT B: Clause 1.5.2.1 Why was it deleted to repeat the MDA determination each time that there is a test method change that affects how the test is performed or affects detection capability? If this requirement is analogously important for Chemistry LOD's, then it is also important for Radiochemistry MDA's. Re-insert the following sentence back into Clause 1.5.2.1(c) back in as shown below, and re-number (c) as (d): "The MDA shall be determined each time there is a change in the test method that affects how the test is performed, or when a change in instrumentation occurs that affects the analytical detection capability."	persuasive	editorial
Carl Kircher	Affirmative with Comment	V1M6 1.5.2.1	COMMENT C: Clause 1.5.2.1 The sentence in the voting draft standard as (c) (see above, which should be renumbered as (d)) is incomplete. The complete description of MDA should be re-inserted. Clause 1.5.2.1(c) (which should be re-numbered as 1.5.2.1(d)) should read as follows: "The MDA is an estimate of the smallest true activity (or activity concentration) of analyte in a sample that ensures a 95% probability of detection, given a detection criterion that ensures only a 5% probability of detection in analyte-free samples."	persuasive	editorial - end at "in a sample."
Daniel Dickinson	Negative with Comment	V1M6 1.5.2.1 c	The requirement is currently open ended with an incomplete sentence. "At a minimum, the MDA must be an estimate of the smallest true activity (or activity concentration) of analyte in a sample that ensures....."	persuasive	editorial - strike after analyte
Denise Dubois	Negative with Comment	V1M6 1.5.2.1 c	The requirement is currently open ended with an incomplete sentence. "At a minimum, the MDA must be an estimate of the smallest true activity (or activity concentration) of analyte in a sample that ensures....."	persuasive	editorial - strike after analyte

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
Michelle Wade	Affirmative with Comment	V1M6 1.5.2.1 c	In section 1.5.2.1.c I believe the words "a 95% probability of detection" were removed from the standard unintentionally. Ending section c at "ensures" leaves it with an incomplete sentence.	non-persuasive	see above comment
Nicole Cairns	Negative with Comment	V1M6 1.5.2.1 c	The requirement is currently open ended with an incomplete sentence. "At a minimum, the MDA must be an estimate of the smallest true activity (or activity concentration) of analyte in a sample that ensures....."	persuasive	editorial - strike after analyte
Paul Junio	Affirmative with Comment	V1M6 1.5.2.1 c	delete the phrase "At a minimum", since the entire Standard is considered the minimum.	persuasive	stop before that ensures

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Richard Swartz	Affirmative with Comment	V1M6 1.5.2.1 c	1.5.2.1 c) appears to be a fragment or incomplete.	persuasive	editorial - end at "in a sample."

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
Thomas Semkow	Negative with Comment	V1M6 1.5.2.1 c	The requirement is currently open ended with an incomplete sentence. "At a minimum, the MDA must be an estimate of the smallest true activity (or activity concentration) of analyte in a sample that ensures....."	persuasive	editorial - strike after analyte
Michelle Wade	Affirmative with Comment	V1M6 1.5.2.2	It appears that section 1.5.2.2 was removed completely from the standard - was this the intention of the Expert Committee???	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Amy Whittier	Negative with Comment	V1M6 1.6.1	3rd paragraph): This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Carl Craig	Negative with Comment	V1M6 1.6.1	3rd paragraph: This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
			fine.		
Curtis Wood	Negative with Comment	V1M6 1.6.1	3rd paragraph): This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Heidi White	Negative with Comment	V1M6 1.6.1	3rd paragraph: This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

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Lisa Berry	Negative with Comment	V1M6 1.6.1	3rd paragraph): This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Melissa McNamara	Negative with Comment	V1M6 1.6.1	3rd paragraph): This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Melissa Wright	Negative with Comment	V1M6 1.6.1	3rd paragraph): This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

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Mike Blades	Negative with Comment	V1M6 1.6.1	3rd paragraph): This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Rick Persichitte	Negative with Comment	V1M6 1.6.1	3rd paragraph: This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Shawn Kassner	Negative with Comment	V1M6 1.6.1	3rd paragraph): This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

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Tanya Rahn	Negative with Comment	V1M6 1.6.1	3rd paragraph: This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Will McHale	Negative with Comment	V1M6 1.6.1	3rd paragraph): This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Susan Butts	Affirmative with Comment	V1M6 1.6.3.2 a)	All other modules removed "Note", should it be removed here as well?	persuasive	use same formatting as other modules
Daniel Dickinson	Negative with Comment	V1M6 1.7.1 iii	One measurement per quarter is insufficient for sampling the dispersion of background on gas proportional detector. There are several background types for different programs, each requires a different geometry on a gas proportional detector.	non-persuasive	long term counts, not short term
Denise Dubois	Negative with Comment	V1M6 1.7.1 iii	One measurement per quarter is insufficient for sampling the dispersion of background on gas proportional detector. There are several background types for different programs, each requires a different	non-persuasive	long term counts, not short term

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
			geometry on a gas proportional detector.		
Nicole Cairns	Negative with Comment	V1M6 1.7.1 iii	One measurement per quarter is insufficient for sampling the dispersion of background on gas proportional detector. There are several background types for different programs, each requires a different geometry on a gas proportional detector.	non-persuasive	long term counts, not short term
Thomas Semkow	Negative with Comment	V1M6 1.7.1 iii	The document is difficult to read with all the corrections and shadings in color. It should be just corrected without the history of changes. In addition, the whole radiochemistry section should be reviewed by a committee of radiochemists. Nevertheless, there are several specific points of concern, as follows: - EL-V1M6-2009, section 1.7.1(iii) Disagree with relaxing a requirement for background measurement to a minimum of one per quarter for gas proportional detectors.	non-persuasive	long term counts, not short term
Carl Kircher	Affirmative with Comment	V1M6 1.7.2.6	COMMENT D: Clause 1.7.2.6 Why did the Committee consider that Selectivity is no longer applicable to Radiochemistry? If this requirement is analogously important for Chemistry, then it is also important for Radiochemistry. Re-insert the following as Clause 1.7.2.6 and re-number Clause 1.7.2.6 in the voting draft standard as 1.7.2.7: "The laboratory shall evaluate selectivity by following the checks established within the method."	non-persuasive	Selectivity is covered by 1.5.5
Richard Swartz	Affirmative with Comment	V1M6 1.7.2.6	1.7.2.6 appears to be incomplete.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
Faust Parker	Negative with Comment	V1M7	You have not addressed PT specifically for WET. The general language for Chemistry PT's is not appropriate for WET. Basically PT's for WET serve no purpose. Since the DMRQA studies this should suffice without concenquences for a failed PT method. There is too much variability in WET to basically close a lab based on failed PT's.	non-persuasive	this is not in the realm of the QS Committee
Paul Junio	Affirmative with Comment	V1M7 1.5	The language used in the Asbestos Module regarding PTs as part of Method Validation should be included (as was discussed at the meeting in Chicago in January, 2010): 1.5 For both reference and non-standard methods, laboratories shall participate in proficiency testing programs. The results of these analyses shall be used to evaluate the ability of the laboratory to produce acceptable data.	persuasive	language inserted
Amy Whittier	Negative with Comment	V1M7 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Carl Craig	Negative with Comment	V1M7 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
			at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.		
Curtis Wood	Negative with Comment	V1M7 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Heidi White	Negative with Comment	V1M7 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Lisa Berry	Negative with Comment	V1M7 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
			acceptable as their initial DOC." The last sentence is fine.		
Melissa McNamara	Negative with Comment	V1M7 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Melissa Wright	Negative with Comment	V1M7 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

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Mike Blades	Negative with Comment	V1M7 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Rick Persichitte	Negative with Comment	V1M7 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Shawn Kassner	Negative with Comment	V1M7 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.

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Tanya Rahn	Negative with Comment	V1M7 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Will McHale	Negative with Comment	V1M7 1.6.1 c)	This language is not clear and could be interpreted to allow a new analyst to not perform an initial DOC if they are using a method that has been in use by the lab for at least one year prior to application. Suggested language "In cases where an individual has prepared and/or analyzed samples using a method for at least one year prior to the laboratory applying for accreditation for that method, and there have been no significant changes in the instrument type or method, the analyst's ongoing DOC for that method shall be acceptable as their initial DOC." The last sentence is fine.	non-persuasive	since the entire Standard is not reproduced in the published Voting section, there can be confusion from the reader's perspective.
Carl Kircher	Affirmative with Comment	V1M7 1.6.2	I read an awful lot of fluff that Initial Demonstrations of Capability (DOC's) are needed, but there is no language as to one potentially acceptable procedure for DOC. All the other Technical Modules specify possible acceptable procedures (even the Asbestos module). Insert the following text into Clause 1.6.2.2 as the second paragraph: "The laboratory can demonstrate its ability to obtain consistent results with at least four standard reference toxicant tests (SRT's), each with appropriate negative controls, for the test method, species, & endpoint, with different batches of test organisms. The laboratory should achieve control performance and statistical endpoints (e.g., NOEC or ECp) and precision (e.g., CV or SMSD) within the control chart criteria established through the method validation process."	non-persuasive	this is a method requirement

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Peter De Lisle	Negative with Comment	V1M7 1.6.2	Many methods are essentially the same, differing only in the species used. For example, the acute rainbow trout test (EPA 2019.0) and acute fathead minnow test (EPA 2000.0) are essentially the same method except different species and temperature. I believe that most toxicologists would agree that if a technician can perform the more difficult fathead minnow test they can perform the trout test. Suggest rewording to “any time that a method using the same technology has not been performed by the analyst in a twelve month period”	non-persuasive	method/species/endpoint, not method
Peter De Lisle	Negative with Comment	V1M7 1.6.3	1.6.3. Similarly, suggested wording is “If the method or a similar technology has not been performed by the analyst in a twelve month period.....”	non-persuasive	method/species/endpoint, not method
Monica Eues	Negative with Comment	V1M7 1.7.1.6	The requirements of 1.7.1.6 imply that batch size of 20 samples would be applied to toxicity testing water quality measurements. The batch size restriction is not practical or warranted in toxicity test water quality measurements.	non-persuasive	analytical batches are not limited to 20 samples, as it pertains to the chemical portion of testing
Marlene Moore	Negative with Comment	V1M7 1.7.1.6 e)	Need DOC from V1M4 1.6 – In this section please refer to V1M4 for chemical methods. These results are reported in the final report and therefor the data must be of known and documented quality that is equivalent to any monitoring data.	persuasive	typo missing 1.6 in list
Erin Ginger Briggs	Negative with Comment	V1M7 1.7.1.6 e) i	“The requirement in section 1.7.1.6.e).i as it is so worded could be interpreted as requiring toxicity laboratories to limit their supporting water quality measurements to an analytical batch of 20 measurements or less. This interpretation would be very onerous and not practicable for toxicity laboratories to meet because up to hundreds of chemistry measurements are made daily to monitor the test conditions of toxicity tests. Toxicity laboratories typically limit analytical batches of the supporting water quality measurements to specific phases of the toxicity test such as initial water quality measurements equal one analytical batch, final water quality measurements equal another analytical batch, etc. I suggest	non-persuasive	analytical batches are not limited to 20 samples, as it pertains to the chemical portion of testing

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
			<p>adding an exception clause to section 1.7.1.6.e).i to say something like this: "All chemical measurements used in the course of monitoring toxicity shall meet the requirements of V1M4, section 1.4, 1.5, 1.6, and 1.7. Analytical batches may exceed 20 measurements so long as the chemical measurements still meet the verification requirements of V1M4." Keep in mind that the chemistry measurements in toxicity testing are supporting measurements, equivalent to monitoring temperatures in a sample storage refrigerator. The chemistry measurements are not the primary analyte of concern that is being reported, which is the toxicity of the environmental sample. Unless it is clear that an analytical batch of chemistry measurements in toxicity testing are allowed to exceed the limit of 20 chemistry measurements in analytical batch then I cannot vote to approve this part of the standard with an affirmative vote. "</p>		
Mark O'Neil	Negative with Comment	V1M7 1.7.1.6 e) i	<p>The requirement in section 1.7.1.6.e).i as it is so worded could be interpreted as requiring toxicity laboratories to limit their supporting water quality measurements to an analytical batch of 20 measurements or less. This interpretation would be very onerous and not practicable for toxicity laboratories to meet because up to hundreds of chemistry measurements are made daily to monitor the test conditions of toxicity tests. Toxicity laboratories typically limit analytical batches of the supporting water quality measurements to specific phases of the toxicity test such as initial water quality measurements equal one analytical batch, final water quality measurements equal another analytical batch, etc. I suggest adding an exception clause to section 1.7.1.6.e).i to say something like this: "All chemical measurements used in the course of monitoring toxicity shall meet the requirements of V1M4, section 1.4, 1.5, 1.6, and 1.7. Analytical batches may exceed 20 measurements so long as the chemical measurements still meet the verification requirements of V1M4." Keep in mind that the chemistry measurements in toxicity testing are supporting measurements, equivalent to monitoring</p>	non-persuasive	Analytical batches are not limited to 20 samples, as it pertains to the chemical portion of testing

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
			temperatures in a sample storage refrigerator. The chemistry measurements are not the primary analyte of concern that is being reported, which is the toxicity of the environmental sample. Unless it is clear that an analytical batch of chemistry measurements in toxicity testing are allowed to exceed the limit of 20 chemistry measurements in analytical batch then I cannot vote to approve this part of the standard with an affirmative vote.		
Mark O\Neil	Negative with Comment	V1M7 1.7.1.6 e) i	Also, I believe there is a typo in section 1.7.1.6.e).i. Section 1.7 is referenced twice and section 1.6 is not referenced at all. I believe the correct wording should be, "All chemical measurements used in the course of monitoring toxicity shall meet the requirements of V1M4, section 1.4, 1.5, 1.6, and 1.7."	persuasive	typo missing 1.6 in list
Paul Junio	Affirmative with Comment	V1M7 1.7.1.6 e) i	Section 1.7 is listed twice. I assume one of those references should be Section 1.6	persuasive	editorial

Commenter	Vote	Section	Comment	Disposition	Change/Reasoning
Peter De Lisle	Negative with Comment	V1M7 1.7.1.6 e) i	<p>1.7.1.6.e).i. This would require toxicity laboratories to limit their supporting water quality measurements to an analytical batch of 20 measurements or less. This is not practicable for toxicity laboratories because hundreds of chemistry measurements are often made daily only to monitor the conditions of toxicity tests. These measurements are supporting measurements, equivalent to monitoring temperatures in a water bath. The measurements are not being reported for compliance purposes; it is the toxicity of the environmental sample that the lab is reporting and for which it is being accredited. Another point is that when water quality measurements are performed for WET tests, a "known" sample is measured every six measurements (or so), i.e. the lab control. The values for the lab control sample typically lie within a range not much greater than that for some PT samples! Unusual lab control values readily alert the operator something is astray. Also, sections V1M4 sections 1.7.3 and 1.7.4 refer to blanks, LCS, MS, MSD and data reduction which are not applicable to WET test water quality measurements (i.e. temperature, dissolved oxygen, pH, conductivity/salinity). Inclusion is unnecessary and confusing. Suggested wording for 1.7.1.6.e).i. are: "All chemical measurements used in the course of monitoring toxicity shall meet the requirements of V1M4, section 1.4, 1.5, 1.6, 1.7.1 and 1.7.2. Analytical batches may exceed 20 measurements so long as the other requirements of these sections are met.</p>	non-persuasive	analytical batches are not limited to 20 samples, as it pertains to the chemical portion of testing