

TNI Board of Directors Meeting Summary

December 8, 2010

1. Roll Call and Approval of November Minutes

| Directors | Present |
|----------------------|---------|
| Joe Aiello | X |
| Aaren Alger | X |
| Steve Arms | X |
| Susan Boutros | X |
| Judith Duncan | X |
| Robert DiRienzo | X |
| Zonetta English | |
| Jack Farrell | |
| Ken Jackson | X |
| Sharon Mertens | |
| Judy Morgan | X |
| Matt Sica | X |
| Alfredo Sotomayor | X |
| Dave Speis | |
| Elizabeth Turner | X |
| Curtis Wood | X |
| Bob Wyeth | |
| Ex-Officio Directors | |
| Brenda Bettencourt | |
| Brooke Connor | |
| George Detsis | X |
| Edward Hartzog | X |
| Staff | |
| Lynn Bradley | X |
| Carol Batterton | X |
| Jerry Parr | X |
| Ilona Taunton | X |
| Jane Wilson | X |
| Janice Wlodarski | X |

Approval of November 2010 Minutes

Motion to approve November Minutes: Judy Morgan
Second: Sue Boutros
Approved: Unanimous

2. EPA Method Update Rule

On September 23, 2010 EPA proposed a number of changes to Part 136, the regulations for wastewater analyses, including a new section, 136.7, specifying minimum quality control requirements. See Attachment 1. Jerry has drafted a response for TNI and the response has been reviewed and edited by the Quality Systems committee. The TNI comments are provided as a separate document. These comments have also been provided to ELAB. Comments are due to EPA by December 22, 2010.

TNI comments are limited to Section 136.7 Quality Assurance and Quality Control. It was felt that 136.7 had good intent, but lacked so much detail that as written was unenforceable. Others are reviewing the draft and will provide comment as well (i.e., ELAB and ILI).

Motion to authorize Jerry to send comments on 40 CRF 136 on TNI's behalf. Jerry will send draft via email for review. Deadline to return comments to Jerry: December 17th.

Motion: Judy Duncan
Second: Matt Sica
Approved: Unanimous

3. Program Reports

See Attachment 2.

Attachment 1
EPA METHOD UPDATE RULE

Preamble Language

I. Proposed New Quality Assurance and Quality Control Language at 136.7

EPA is proposing to specify “essential” quality control at 136.7 for use in conducting an analysis with an approved method and when insufficient instructions are contained in an approved method. Auditors, co-regulators, laboratory personnel, and the regulated community have noted the different amounts and types of quality assurance (QA) and quality control (QC) procedures practiced by laboratories that use 40 CFR part 136 methods. Some of these methods are published by voluntary consensus standards bodies, such as the Standard Methods Committee, and ASTM International. ASTM and Standard Methods are contained in printed compendium volumes, electronic compendium volumes, or as individual online files. Each organization has its unique compendium structure. QA and QC method guidance or requirements may be listed directly in the approved consensus method, or, as is more often the case, these requirements are listed in other parts of the compendium. For example, the publisher of Standard Methods for the Examination of Water and Wastewater consolidates the general quality assurance and quality control requirements for all methods. Each specific Part and section can contain additional QA and QC requirements (for example, see part 2020, 3020, 6020, and 9020). ASTM specifies QA and QC requirements in the analyte method's Referenced Documents section and in the analyte method. Both organizations require the analyst to reference this additional information within the respective compendiums to achieve the QA and QC expected for valid results.

Regardless of the publisher, edition or source of an analytical method approved for CWA compliance monitoring, analysts must use suitable QA/QC procedures whether EPA or other method publishers have specified these procedures in a specific part 136 method, or referenced these procedures by other means. Consequently, EPA expects that an analyst using these consensus body methods for reporting under the CWA will also comply with the quality assurance and quality control requirements listed in the appropriate sections in the consensus body compendium. EPA's approval of use of these voluntary consensus standard body methods contemplated that any analysis using such methods would also meet the quality assurance and quality control requirements prescribed for the particular method. Thus, not following the applicable and appropriate quality assurance and quality control requirements of the respective method means that the analysis would not comply with the requirements in EPA's NPDES regulations to monitor in accordance with the procedures of part 136 for analysis of pollutants.

For methods that have insufficient QA/QC requirements, analysts could refer to and follow the QC published in several public sources. Examples of these sources include the instructions in an equivalent approved EPA method or standards published by the National Environmental Laboratory Accreditation Conference (cf. Chapter 5 of the compendium published in 2003.)

In addition to and regardless of the source of the laboratory's QA and QC instructions, EPA is proposing at 136.7 to specify twelve essential quality control checks that must be in the laboratory's documented quality system unless a written rationale is provided to explain why these controls are inappropriate for a specific analytical method or application. This written rationale will be included in the laboratory's Standard Operating Procedure (SOP) for each method to which specific controls do not apply (e.g., internal standards, surrogate standards or tracers do not apply to analyses of inorganic parameters) as well as being included with the monitoring data produced using each method. These twelve essential quality control checks must be clearly documented in the written SOP (or method) along with a performance specification or description for each of the twelve checks.

Proposed CFR Language

136.7 Quality assurance and quality control.

- (a) Twelve essential Quality Control checks and acceptable abbreviations are:
 - (1) Demonstration of Capability (DOC);
 - (2) Method Detection Limit (MDL);
 - (3) Laboratory reagent blank (LRB), also referred to as method blank;
 - (4) Laboratory fortified blank (LFB), also referred to as a spiked blank, or laboratory control sample (LCS);
 - (5) Matrix spike, matrix spike duplicate, or laboratory fortified blank duplicate (LFBD) for suspected difficult matrices;
 - (6) Internal standards, surrogate standards (for organic analysis) or tracers (for radiochemistry);
 - (7) Calibration (initial and continuing), initial and continuing performance (ICP) solution also referred to as initial calibration verification (ICV) and continuing calibration verification (CCV);
 - (8) Control charts (or other trend analyses of quality control results);
 - (9) Corrective action (root cause analyses);
 - (10) QC acceptance criteria;
 - (11) Definitions of a batch (preparation and analytical); and
 - (12) Specify a minimum frequency for conducting these QC checks.
- (b) These twelve quality control checks must be clearly documented in the written method along with a performance specification or description for each of the twelve quality control checks.

**Attachment 2
PROGRAM REPORTS**

CONSENSUS STANDARDS DEVELOPMENT

- TIAs developed by the SSAS expert committee were approved by the CSD EC and have been posted to the TNI site for public commenting. The public comment period runs until Dec 12th. The committee has also decided to develop a checklist for use by facilities/testers in developing their information for ordering audit samples – this will be added to the existing SSAS FAQs document and also be provided via the TNI site. This committee also continues to work on other elements of the TNI SSAS program, such as updates to the SSAS table and status of provider accreditation.
- Voting Draft Standards (VDS) for the Quality Systems modules have been posted for TNI member voting. All modules of the QS standards have proposed clarifications under ballot and a TIA is also being incorporated. Voting closes on Jan 19th so that comments can be considered at the Savannah meeting.
- The PT expert committee is working on development of Working Draft Standards (WDS) to address the implementation issues that have been raised for the PT modules and to incorporate existing TIAs. PT would like to have the WDS posted in time for the Savannah meeting.
- CSD EC is in the process of approving the formation of the new Environmental Measurement Methods expert committee. The CSD EC is also considering how this committee will interface with existing expert committees on issues that may overlap.
- Other committees continue to work on implementation issues and SIRs, and planning for sessions in Savannah.

NEFAP (including Field Activities Committee)

- The NEFAP Executive Committee has been receiving resumes from possible evaluators. The ABs have determined that they will cover the travel costs of the evaluators, but they have the option to book the travel and accommodations for the evaluator. At this point it looks like the evaluator training will take place in January through a webinar.
- The implementation time table will be adjusted once the evaluators are in place and ready to perform assessments.
- A2LA and PJLA are still planning to put applications in before the end of the year. AIHA is waiting to see what happens with the lead program.
- The AB Evaluation and sample FSMO checklists are near completion with the inclusion of the language changes to the standards (see below). These will be offered by request only and will only be distributed with proof of ownership of the ISO language.

Field Activities Expert Committee (FAC)

- The committee is still working on language for two Standard Interpretation Requests (SIRs).
- The standard has been updated to include the 15 changes that were approved that did not make it into the final version of the standard. The update has been sent to Jan Wilson for verification of the changes and then Jan will prepare the final copy of the standard for placement on the TNI website.

- Advocacy for NEFAP has been very active. A number of talks have been given the last few months. The group will be coordinating different conference opportunities with the NEFAP Executive Committee and FAC member's schedules so that members can give talks at conferences they were already planning to attend. No NEFAP related abstracts have been rejected for any conferences. There is a real interest in this topic.
- The NEFAP/FAC brochure is being updated.

NELAP

Accreditation Council

- The NELAP AC approved the Evaluation SOP.
- The NELAP AC also approved the AB application form, administrative completeness checklist, technical checklist, and FoA table for use in the next round of renewals.
- Renewal letters for KS, LADHH, and NH are pending.
- Evaluation teams for the next set of renewals are being finalized.

Status of AB Payments

| AB | Amount | Date |
|---------------|---------------|-------------|
| California | \$ 6,000 | 17-Jun |
| Florida | \$ 6,000 | 16-Aug |
| Kansas | \$ 6,000 | 16-Aug |
| Illinois | \$ 6,000 | 30-Oct |
| Louisiana DEQ | | |
| Louisiana DHH | \$ 6,000 | 23-Jul |
| Minnesota | NA | |
| New Hampshire | \$ 6,000 | 20-Oct |
| New York | | |
| New Jersey | \$ 6,000 | 17-Jun |
| Oregon | \$ 6,000 | 28-Jul |
| Pennsylvania | \$ 6,000 | 12-Oct |
| Texas | \$ 6,000 | 15-Aug |
| Utah | \$ 6,000 | 7-Jul |
| Virginia | \$ 6,000 | 14-Jun |
| Total | \$ 72,000 | |

Technical Assistance Committee

- TAC is continuing with development of the agenda for the Mentoring Session in Savannah. This session will showcase assessment tools and PT tracking tools that work.
- There will be no Assessment Forum in Savannah due to other events and shortened schedule. Lara Autry will be doing a presentation on flexible approached to environmental measurement and the Consistency Improvement Task Force will also have a half day presentation.
- 19 regional workshops have been completed. Upcoming regional workshops include:

| Date/Location | Lead | Other Speakers | Lead organization |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|------|----------------|-------------------|
| December 9, 2010 | Jack | Diane, Scott | TNI |
| February 3, 2011: Savannah, GA | TBD | | TNI |
| Tentative workshops for 2011: | | | |
| February 2011: Las Vegas, NV Spring 2011: Nashville, TN Spring 2011: Cincinnati, OH Spring 2011: Denver, CO Spring 2011: Des Moines, IA | | | |

- Comments on the Quality Manual Template are due the end of this week. Recommended changes thus far have been minor. Silky raised the issue as to whether the details for all the modules (asbestos, microbiology, chemistry, radiochemistry and WET) need to be included within the template - the original template focused on Chemistry. The subcommittee decided that where we included the details for all ... we will leave it. Where it is missing we will include a note to direct the user to the other modules to insert similar information if it is applicable. If there are requests for more detail, we will consider adding the other modules after the February deadline for publication. The group is attempting to make sure everything is there for both Chemistry and Microbiology.
- The Handbook is being reviewed. The deadline for comments will be February and then updates will be made in March. It will then be ready for clean-up and publication in early spring. SLAG members are suggesting that the cost of this document be very reasonable so that the smaller labs will purchase it. Some have suggested that it should be a marketing tool and that there be minimal cost.

Laboratory Accreditation System Executive Committee

- LASEC is reviewing and preparing comments on the draft SOP for Provisional Recognition of ABs.
- Standards Interpretation Request (SIR) process:
 - 5 requests were received in November. Two questions were forwarded to Quality Systems and the other three were determined not to be a SIR. The inquirer was notified.
 - ABs have started using the website for voting. Nine of the ABs have been using the system and the first 14 SIRs that received Agree responses have been forwarded to the NELAP AC Program Administrator (PA) for formal vote on an upcoming NELAP AC call. There were 17 SIRs that received a vote for more discussion. These have also been forwarded to the PA for a future meeting discussion. Many of the comments on these are minor, but since an AB voted "Needs more Discussion" they need to be brought up.
 - June and Ilona are continuing to meet to review the older SIRs and get them up on the website for on-line review. There are only 6 SIRs left to review and these will be up on the site this next month.
 - Reminders were distributed to the committees that have outstanding SIRs.
- The DRAFT Implementation Project Summary was updated. It is an "Easy Link" on the NELAP home page – "2009 TNI Standard Implementation Project".

Consistency Improvement Task Force

- The CITF met to review their progress. They are planning to present draft work products at the Savannah meeting.

Accreditation Body Assistance Task Force

- The AB task force reviewed survey results from the first AB survey to help in determining what services would be most helpful to ABs.
- The task force has circulated a second survey directed at quantifying the degree to which ABs may be late with 2 year lab assessments and PT data review. The survey also asks for information about ABs' plans to provide assessor training under the new standard.
- The AB task force will review their findings and make recommendations in Savannah.

PROFICIENCY TESTING

- The Chem FoPT Subcommittee is holding on submitting revised NPW and SCM FoPT tables until the issue of Experimental PTs is concluded. They are continuing to review NPW analytes and are now meeting every other week instead of every week.
- The Field PT Subcommittee is in the process of finalizing footnotes for their FoPT table recommendation to the PT Executive Committee. The DRAFT FoPT table has been forwarded by e-mail to the subcommittee for a vote.
- PTPA Assessments:
 - ACCLASS has been recommended for accreditation by the Evaluation Team. The PT Executive Committee is reviewing the evaluation reports and recommendation and is planning to vote on December 16th. If everything is in order, the TNI Board will receive a recommendation within the next two weeks. A Statement of Work will need to be prepared and agreed on between TNI and ACCLASS.
 - A2LA's on-site audit is this week.
- A subcommittee has been formed to recommend a solution to the PTPA database issue. The first task is to review what each PTPA is requesting and evaluate whether they are requesting the same information.
- TNI/EPA Joint Cryptosporidium Work Group. The group has determined that they would like to work with TNI and pursue the development of a Protozoa FoPT table. Becky Hoffman (currently makes these PTs for EPA) will be a part of the subcommittee that will work on this effort. They will consider EPA specifications and review the TNI standard to ensure that no updates are needed. The PT Executive Committee approved the development of the Protozoa FoPT Subcommittee. Matt Sica will help to develop this group. Carrie noted that EPA will provide one more round of this PT and then it will be opened up to other providers. These PTs are run twice a year.
- The committee is looking for new members.

ADMINISTRATION

Advocacy Committee

- The draft newsletter will be published on 12/7.
- The last Advocacy Committee meeting was cancelled due to illness and lack of a quorum.

Policy Committee

- The Policy Committee is continuing to refine the working draft of the global TNI Complaint SOP. A Complaint Policy is in final draft form, but the committee has decided to wait and send both documents forward at the same time.
- The Policy Committee is now focusing on the Complaints and Voting SOPs from the PT Executive Committee, along with the NELAP AC's Mutual Recognition Policy.

Conference Planning

Savannah

- Reminders for the Savannah Exhibition went out last week. Special invitations were also sent to new vendors that may have an interest in NEFAP. We currently have 8 vendors signed up.

NEMC

- The new website is up and can now accept abstracts for submission. There are still a few website details that need to be cleaned-up now that the site is in its permanent location.
- Keynote speakers are being finalized and their information will be going up on the website this month.
- The DRAFT Exhibitor prospectus has been completed and will be reviewed by the NEMC Board of Trustees this Thursday. After finalization, artwork will be added and it will be up on the website December 21st. Registration for vendors will also open on the 21st.

FEM Cooperative Agreement

- The Environmental Measurement Methods Steering Committee has held its second conference call to discuss its general approach to development of measurement tools for LOD, LOQ, and calibration. Six applications have been received for the proposed Environmental Measurement Methods Expert Committee (EMMEC), and these were reviewed by the steering committee members. Initially, two of these people will be invited to join the EMMEC, with decision being temporarily deferred on the remainder. No application has yet been received from a state AB, and Ken will try and find someone to apply.

The proposal to embark on new standards development by the EMMEC was posted on the TNI website for 30 days to allow members to comment (an ANSI requirement), and this time has now expired with no comments received. We are waiting for approval from the Consensus Standards Development Program to form the EMMEC, and it is hoped it can be formed within the next month, and will have its first conference call on January 7.

- Ken is continuing to monitor to activities of the APHL subcommittee on development of an acceptable approach to accreditation of state primacy labs.

Training

- The DRAFT TNI Training – Educational Delivery System SOP. DRAFTs of the application and confidentiality statement have been circulated for comments. A final DRAFT will be sent to Policy for review and finalization within the next week.
- A number of vendors that offer webinar services have been contacted to determine services offered and pricing. A summary table is being prepared with this information and then a service will be selected. This will be complete by end of December to possibly accommodate some webinars being planned in January.
- The training needs survey will go out next week.

Membership Report: November 2010

Active Members: 748