

Whole Effluent Toxicity Testing Expert Committee Meeting Summary

May 18, 2016 1 pm Eastern

1. Welcome, Roll Call, Approval of Minutes and Announcements

Rami welcomed everyone to the meeting. Minutes of the April 20, 2016, meeting were approved, with Rami abstaining due to his absence from that session. Attendance is recorded in Attachment 1, below.

Lynn noted that associate member Melinda Hooper's TNI membership expired and she has not responded to email, and asked that anyone who knows her please contact her to say that unless she rejoins, she will be dropped from the roster.

2. Assessment Forum Planning

Committee members working on the WET session for this summer's Assessment Forum shared the current status of planning for the morning session on August 9. Some of the planners participate in a planned pre-meeting call and additional people will be added in the future.

The pre-break hour will be split between an overview of WET, presented by Ginger with Katie adding in some specifics relevant to California, and then traceability, presented by a guest speaker, Laura Shealy Davis of Shealy Consulting. After the break, the focus will be on how to assess a WET lab, with John, Ginger, Elizabeth, Chris Burbage and Stacie Metzler, and will include some common audit findings as well as their corrective actions. If demand warrants, the discussion of assessing WET labs might continue into the afternoon committee session.

Teresa offered to provide some EPA-sourced slides to Ginger for possible use in the presentation.

Handouts will be the WET Glossary and an audit checklist based on Virginia's WET checklist but without any state-specific references. These two items will be distributed to the committee with these minutes. Pete obtained the checklist from his lab's assessor in the VA NELAP AB, and if it is modified, we need to remove Virginia's information from the header, although we can say that it is based on the document used in Virginia. NOTE: Lynn checked, and while VA does not wish to provide the checklist to the committee directly, its philosophy is that once Pete gets a copy, he is free to do with it what he wishes. Rami asked for a volunteer to revise the checklist, but no one stepped forward.

The planners expect to provide a draft of the presentations at the WET June meeting, for feedback and comments, and then be sent to the Forum planning committee for its review. Planners committed to providing final copy to Barbara for the Forum immediately after the July 20 meeting.

3. PTPEC Representative

At the April committee meeting, John mentioned that he had identified a technical error in a footnote to the WET FoPT table, and discussed that at the PT Program Executive Committee (PTPEC) meeting. That table is posted at <http://nelac-institute.org/content/NEPTP/fopt.php>

The error involves reporting >100% NOEC values (Footnote 6 in the WET FoPT table.) The PTPEC Chair, Maria Friedman, provided information that the ">100%" comes from an old EPA criteria document that was replaced by the currently-in-use WET FoPT table (published April 1, 2009.) Maria would like to have the error resolved prior to publishing the recently approved update to that table, scheduled for July 31, 2016, by actions taken at the June 9 PTPEC meeting.

NOTE: Since the WET committee meeting, Rami met with Pete, John and Lynn to discuss how to respond to Maria's request to resolve this error quickly. While there is no doubt that ">100%" is an error and needs to be addressed, it seems important to contact several additional people (including EPA) to gather information about how and why the error might have initially been approved and whether there may be any unintended consequences from removing that reference in the FoPT table. In the interim, Rami will respond to Maria to say that all agree the ">100%" is incorrect but that the WET Expert Committee, acting in the role of a PTPEC FoPT subcommittee, will not be able to finalize a decision by the date requested (June 9) but will hopefully have been able to glean adequate history on the issue to make some formal recommendation at the June 15 WET committee meeting.

4. Glossary

Lynn reported that the CSDEC group continues gathering terms and definitions from other committees, to be rolled into a TNI glossary. No further action is requested from WET.

5. WET as a Resource for Method Refinements and Recommendations

After the April discussion, Rami sought additional input about how to respond to the submitter of the questions discussed. The group's consensus was that we can offer best professional judgment – the method and technical issues can be addressed – with the caveat that the expert committee cannot address regulatory authorities or validity of results. Several participants cited randomization requirements and various state procedures. Participants acknowledged that consistent and thorough assessment by a TNI accreditation body seems to be the best way of finding labs that try to cut corners in their testing, since the permittee and regulator may just accept the reported results without looking at details, and emphasized their collective belief that assessor training and a good checklist, such as the upcoming Assessment Forum will provide, is the best solution available.

Rami asked for a volunteer to draft a written response to the submitter of those questions but no one offered. See Attachment 3 for the questions submitted.

6. Revising V1M7

Rami asked if there were any additional volunteers to champion revisions of the WET module. Steve has volunteered to take on the DOC section and John offered to work on the chemistry aspects. Several individuals stated they would be able to help after the end of summer, including Linda and Beth. Rami asked that volunteers notify Lynn since additional people are still needed to address improved specificity for the test methods. NOTE: only Beth has formally contacted Lynn about this.

There was no new business. Ginger moved and Chris Pasch seconded that the meeting be adjourned. There were no objections.

7. Next Meeting

The WET Expert Committee will meet again on Wednesday, June 15, 2016, at 1 pm Eastern. Teleconference information and an agenda will be circulated in advance of the meeting.

In addition to on-going items, the agenda will include developing a somewhat detailed agenda for the WET committee session at conference, which will go from 1 pm to 3 pm on Tuesday afternoon, August 9, immediately following the WET Assessment Forum. NOTE: this is a correction from what was said in the meeting – it is a two-hour session only.

Attachment 1

Committee Membership

Member	Affiliation	Email	Phone	Category	Term Expiration	Present
Rami Naddy (Chair)	TRE Env. Strat. LLC	naddyrb.tre@gmail.com	970-416-0916	Lab	Feb. 2018	Yes
Ginger Briggs	Bio-Analytical Laboratories	bioanalytical@wildblue.net	318-745-2772	Lab	Feb. 2018	Yes
Pete De Lisle (Vice Chair)	Coastal Bioanalysts Inc.	pfd@coastalbio.com	804-694-8285	Lab	Feb. 2018	Yes
Steven Rewa	Environmental Resources Management	steven.rewa@erm.com	616-738-7324	Lab	Feb. 2018	Yes
Chris Burbage	Hampton Roads Sanitation District	cburbage@hrsd.com	757-355-5013	Lab	Feb. 2018	Yes
Chris Pasch	Alan Plummer Associates, Inc.	cpasch@apaienv.com	512-687-2162	Other	Feb. 2018	Yes
Teresa Norberg-King	USEPA	norberg-king.teresa@epa.gov	218-529-5163	Other	Feb. 2018	Yes
Elizabeth West	LA DEQ LELAP	elizabeth.west@la.gov	318-676-7457	AB	Feb. 2018	Yes
Amy Hackman	Penn. Dept. Environ. Protection	ahackman@pa.gov	717-346-8209	AB	Feb. 2018	Yes
Michele Potter	New Jersey Dept of Environ Protect.	Michele.Potter@dep.nj.gov	609 984-3870	AB	Feb. 2018	No
Michael Pfeil	Texas Comm. Environ. Quality	Michael.pfeil@tceq.texas.gov	512-239-4592	AB	Feb. 2018	Yes
Kari Fleming	WI DNR	kari.fleming@wisconsin.gov	608-267-7663	AB	Dec. 2017	Yes
Associate Members						
Kevin Dischler	Element Materials Technology	Kevin.dischler@element.com	337-443-4010	Lab (Assoc.)	---	Yes
Monica Eues	CK Associates	Monica.eues@c-ka.com	225-923-6946	Lab (Assoc.)		Yes
Barbara Escobar	Pima County RWRD, CRAO Laboratory	Barbara.escobar@pima.gov	520-724-6052	Lab (Assoc.)	---	Yes

Robert Kelley	ETT Environmental Inc	bobkelley@ettenvironmental.com	864-877-6942	Lab (Assoc.)	---	No
Brian Krausz	USEPA	krausz.brian@epa.gov	202-564-3069	Other (EPA)	--	No
Jennifer Loudon	Raritan Township Municipal Utilities Authority	JLoudon@rtmua.com	908-787-7453 x 19	Lab (Assoc.)	---	No
Vel Rey Lozano	USEPA Region 8	Lozano.VelRey@epa.gov	303-312-6128	Other (EPA)	--	No
Robert Martino	QC Laboratories	rmartino@qclaboratories.com	267-699-0103	Lab (Assoc.)	---	No
Jamie Mitchell	Hampton Roads Sanitation District	jmitchell@hrsd.com	757-460-4220	Lab (Assoc.)	---	No
Linda Nemeth	Northwestern Aquatic Sciences	lnemeth@tds.net	541-265-7225	Lab (Assoc.)		Yes
Mark O'Neil	Environmental Enterprises USA, Inc.	moneil@eeusa.com	800-966-2788	Lab (Assoc.)	---	No
Marilyn O'Neill	Nautilus Environmental	Marilyn@nautilusenvironmental.com	858-587-7333	Lab (Assoc.)		No
John Overbey	American Interplex Corp.	joverbey@americaninterplex.com	501-224-5060, ext. 209	Lab (Assoc.)		Yes
Joe Pardue	Pro2Serve	Parduegjr@oro.doe.gov	423-404-4117	Other	---	No
Peter M Paulos	Atkins Environmental Toxicology Lab	Peter.Paulos@atkinsglobal.com	713-292-9023	Lab (Assoc.)	---	No
Katie Payne	Nautilus Environmental	katie@nautilusenvironmental.com	858-587-7333 ext. 212	Lab (Assoc.)		Yes
Beth Thompson	Shealy Consulting	bthompson@shealyconsulting.net	803-582-7996	Lab (Assoc.)		Yes
Tom Widera	ERA	twidera@eraqc.com	303-463-3536	Other		No
Program Administrator						
Lynn Bradley	TNI	Lynn.Bradley@nelac-institute.org	540-885-5736			Yes

Attachment 2

Action Items

	Action/Activity	Responsible Person(s)	Anticipated Completion	Comments
1	WET session for Assessment Forum – determine content and presentation format for one 60-minute & one 90-minute block	Ginger/Elizabeth w/ Rami, Teresa & Katie/Marilyn to work w/ Barbara & LASEC	August 2016 conference in Orange County, CA	
2	Review questions distributed with minutes, for discussion at April 20 meeting	All members	April 20 meeting	See discussion summarized in April 20 and May 18 minutes
3	Review V1M7 for needed revisions	Steve – DOC John – chemistry issues Beth, Linda,	Ongoing	Formal revision cannot yet begin, likely until fall.
4	Develop checklist for WET assessors, possibly for use with Assessment Forum	TBD	May 18, 2016	Pete provided Virginia WET-specific checklist.
5	Review discussion of questions, Item 6 in April 20 minutes	All members	May 18 meeting	Revision complete, minutes approved May 18, 2016
6				
7				

Attachment 3

Question submitted to the WET Expert Committee chair, prompting the discussion about whether WET should take on the role of providing advice about method refinements and recommendations

Problem:

A lab used to include in the report language stating that a WET test was conducted as follows:

7-day *Ceriodaphnia dubia* survival and reproduction test (EPA Method 1002.0). Test organisms, procedures and quality assurance requirements were in accordance with the EPA manual, "Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving.

Lab reports do NOT specify test chambers are randomized and it appears (based on in-lab observation) they are not.

Questions

- 1) Is randomization necessary or can the lab justify conducting the test without randomization?
- 2) Should passing or failing tests be considered invalid without demonstration of randomization or if they are not adhering to other items in the Method?
- 3) Should passing or failing tests be considered invalid without demonstration adherence to the specific items identified in the Summary of Test Conditions tables in the Method? [Randomization is not included the Summary of Test Conditions tables]
- 4) The average reproduction in all passing tests in all dilutions and control water is always (observation in over 20 tests in over 3 years) between 22 neonates/adult and 25 neonates/adult. Is that a concern and if so how should it be addressed?
- 5) Should an official audit identify either 1) or 4) as a concern?

The lab reports are otherwise complete and comparable to other reports. A lab visit was conducted and it appears to be well maintained, organized, and professionally run lab. It has been NELAC certified for years. The lab does report occasional WET test failures, however, it appears that is less frequent than other labs.