

Whole Effluent Toxicity Testing Expert Committee Meeting Summary

September 23, 2015 1 pm Eastern

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

Rami Naddy welcomed everyone to the meeting. Minutes of the July 15, 2015, meeting were approved; this committee did not meet in August. Attendance is recorded in Attachment 1, below.

2. Follow-Up from July Meeting's Draft Memo to EPA

Rami thanked everyone for helping finalize the recommendation about standardizing test protocols and reporting for PT testing. The final document, as sent to EPA DMRQA Program Manager, B. Krausz, is posted to the WET committee page at <http://nelac-institute.org/committee/wett>, in the "Documents and Presentations" bar.

Rami also noted that the document was also shared with Maria Friedman, Chair of the PT Program Executive Committee (PTPEC.) Maria asked if there is yet an alternative plan, in case EPA does nothing in response. Participants discussed whether there are possible alternatives, but ideally, feedback from EPA and B. Krausz will resolve the decision.

Maria stated that PTPEC still awaits feedback about the newly inserted "Footnote 3" of the WET Field of Proficiency Testing (FoPT) table that is not approved, and apparently will not be approved by the NELAP Accreditation Council (AC.) Rami noted that a positive response from Krausz would eliminate the need for that footnote, and that PTPEC does not have any authority to require PT providers to provide instructions with the samples.

After further discussion and upon learning that the PTPEC was meeting the following day, Rami agreed to contact Maria and attend the PTPEC meeting for an opportunity to once again explain the actions needed and progress made towards reaching agreements to attain data comparability with the WET PT testing.

3. Goals and Priorities

Working from the tabulated goals and priorities in the June minutes (see also Attachment 2 below, for convenience – new material is highlighted and in red text), participants agreed that work on the first Goal is already underway. The memo to Krausz (see #1, above) addresses both test conditions (PT1) and endpoints (PT2,) and since changing the status quo requires EPA participation, it's not something this committee can undertake alone.

The Education and Outreach Goal has four sub-topics (EO1-4) that together constitute a huge undertaking. Rami suggested that the existing guidance about corrective actions for laboratories to undertake may be the most practically useful topic for laboratories, and that perhaps a WET expert could look at the current guidance and revise it. [NOTE: EO5 added per discussion as described below.]

Participants discussed at length the Individual Demonstrations of Competency (IDOC1, the third goal.) Comments on the problems with currently required practices are summarized below:

- A single study lasts 1-7 days, and some last multiple weeks.
- Assessors seem to want one individual to perform all tasks of a particular study, when in fact, studies are typically performed by a team (that is, different tasks are likely to be performed by different staff) and weekend work is rotated among staff, which impacts the required "one-person-doing-everything" approach.
- Few auditors have WET experience, and chemistry/micro methods are much different.

- The tasks of most studies are identical, except that they are performed on different species.
- Suggested goal of IDOC is that the supervisor is comfortable having the designated employee alone for the weekend tasks. Clearly, the tasks are variable but employees are typically only expected to come in 1-2 weekends per month, not every single weekend.
- Is there a way to structure the IDOC to demonstrate competency in each step of a test, separately, rather than for complete studies?
- Differing expectations among assessors, and sometimes assessors contradicting prior advice from the AB staff, are ongoing issues with IDOCs, especially, because of the lengthy times that WET studies require.
- Guidance for assessors reviewing IDOCs is needed.
- Can newly hired technicians perform certain skills with certain organisms (species) and then have the supervisor translate those skills to other specific tests where the same techniques are used? (Otherwise, it can take up to 6 months to have the new employee perform all needed IDOCs, one study at a time, and during that period, the employee cannot work independently but must be supervised – an excessive burden for WET labs.)
- Method validation for the lab is entirely separate from IDOCs.

The appropriate way to handle these issues is to update the standard, not the IDOC procedure, but participants expressed hope that perhaps an interim solution could be found through the Standards Interpretation Request (SIR) process. The URL for NELAP SIR submission is <http://nelac-institute.org/content/NELAP/interpret-request.php>, and several participants indicated they would work together to craft a potential SIR for submission.

[NOTE: the 2012 version of the WET module, V1M7, is attached to these minutes for committee members' use. This is the version that will be put forward for adoption by the NELAP AC with the revision currently underway. Please be aware, this is NOT the version currently implemented by any NELAP ABs, and SIRs may not be requested for this version.]

Any resolution of IDOC problems should appropriately be included in the Education and Outreach Goal for dissemination as quickly as possible.

4. Additional Business

Rami mentioned an issue raised by Teresa but she had departed the meeting early, so this issue will be postponed until the October meeting.

Rami also noted that there remains a need for a WET FoPT subcommittee, and asked if this expert committee could fill that role as well? The response from participants was "if not us, then who could it be?" so this committee (or a subgroup of it) will likely continue to function in that role as well.

5. Next Meeting

The WET Expert Committee will meet again on Wednesday, October 21, 2015, at 1 pm Eastern. Teleconference information and an agenda will be circulated in advance of the meeting. Committee goals and priorities will be on the agenda, along with Teresa's issue and any additional issues that arise in the meanwhile.

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	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@hrsdc.com	757-355-5013	Lab	Feb. 2018	No
Chris Pasch	Alan Plummer Associates, Inc.	cpasch@apainv.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	No
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	Yes
Michael Pfeil	Texas Comm. Environ. Quality	Michael.pfeil@tceq.texas.gov	512-239-4592	AB	Feb. 2018	No
Affiliate Member						
Kari Fleming	WI DNR	kari.fleming@wisconsin.gov	608-267-7663	AB	Dec. 2015	No
Associate Members						
Kevin Dischler	Element Materials Technology	Kevin.dischler@element.com	337-443-4010	Lab (Assoc.)	---	No
Monica Eues	CK Associates	Monica.eues@c-ka.com	225-923-6946	Lab (Assoc.)		No

Barbara Escobar	Pima County RWRD, CRAO Laboratory	Barbara.escobar@pima.gov		Lab (Assoc.)	---	No
Melinda Hooper	Englewood Water District, Florida	hoopermelinda@gmail.com		Lab (Assoc.)		No
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@hrsdc.com	757-460-4220	Lab (Assoc.)	---	No
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
Joe Pardue	Pro2Serve	Parduegjr@oro.doe.gov	423-404-4117	Other	---	Yes
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	803-808-3113	Lab (Assoc.)		Yes
Program Administrator						
Lynn Bradley	TNI	Lynn.Bradley@nelac-institute.org	540-885-5736			Yes

Attachment 2

	First Cut at WET Expert Committee Goals and Priorities	Short/Long Term & Priority	Suggested Timeline	Comments
PT Goals Two broad categories—standardizing test conditions and standardizing test endpoints				
PT1	Standardize test conditions			
	Standardize test conditions required for PT/DMRQA WET studies. Current practice of conducting multiple tests using different NPDES permit test conditions creates ambiguity in assessing any participating laboratory's performance with a WET method.			Recommendation submitted to B. Krausz, EPA/OECA DMRQA Coordinator
	Review the PT/DMRQA data to determine whether DMW should be combined with MHSF data	Short term	Get data by summer 2015	
	Clearly define the data objectives and purposes for WET PT/DMRQA studies for all stakeholders involved.	High priority		Seems like this is dependent on EPA's response?
PT2	Standardize test endpoints			
	Choose one statistical method to calculate the test endpoint, such as IC25 point estimate, for Whole Effluent Toxicity (WET) PT/DMRQA studies	Short term		Recommendation submitted to B. Krausz, EPA/OECA DMRQA Coordinator
	Improve the statistical assessment and evaluation of WET data sets and results in PT/DMRQA studies.	Long term		
	Complete the work started by the WETT PT group by improving the testing and reporting requirements of the PT/DMRQA study.			Recommendation submitted to B. Krausz, EPA/OECA DMRQA Coordinator
	Increase the competition among PT/DMRQA Providers for WET laboratories so that small statistical data sets and the current associated problems assessing WET statistical results in PT/DMRQA studies can be improved			

Education and Outreach				
EO1	To offer expert assistance to TNI on WETT testing methods, quality control and data interpretation.			Probably need to consider how to offer this – individual members working with requestors, or are there consultants to add to the TNI roster for doing so?
EO2	To offer expert assistance to TNI, auditors and laboratories on interpretation of the Standard as it pertains to WETT.			[NOTE from P.A.: the training for assessors is something for which TNI can contract and administer as part of its Educational Delivery System, if the committee so decides.]
EO3	Educate assessors on IC25 vs. NOEC for PT/DMRQA endpoints	Short term	EOY 2015	
EO4	Compile, unify, clarify, and improve the guidance on the acceptable and unacceptable corrective actions for laboratories when a PT/DMRQA study result is outside of the acceptance limits.	Long term		
EO5	Once IDOC is modified, disseminate upgraded practices ASAP	Short term once accomplished		
IDOC				
IDOC1	Improve the way initial demonstration of capability is handled for WET testing. Since the tests aren't usually run from start to finish by an individual, it makes more sense to demonstrate capability as a lab group. Also to have one new analyst run five 7-day chronic tests means 2 or 3 months before that individual can do any actual testing.	Long term		Requires updating the Standard. (Distributing Module 7 of the 2009 standard w/ minutes)