Field Activities Expert Committee (FAC)

Meeting Summary February 5, 2020

1. Roll call:

Chair, Scott Haas, called the FAC meeting to order on February 5, 2020 at 8:05am Pacific in Newport Beach, CA. Scott chaired the meeting from a distance using Webex and Committee member, Marlene Moore, assisted onsite in Newport Beach, CA. Voting members Kira Stokes, Marlene Moore and Bill Ray attended in Newport Beach, CA and Scott Haas, Shannon Swantek and Keith Klemm were present by phone. Associate member Justin Brown and guest, Tamara Griffin, attended by phone.

Twenty-four people were in attendance at the meeting. There were 4 ABs, 4 FSMO's and the remainder were labs that are involved in sampling.

Larisa Leonova (Chemist, Technical Advisor, QA) from EPA introduced herself. She part of National Response and is a response leader. She is interested in understanding how NEFAP may be able to help develop common field procedures like in Europe. She is interested in how samples are collected, best practices, sample ID, etc ... She would like to see a field standard with pick and choose options. She needs a checklist for emergency response and for planned sampling. She was invited to consider joining the committee.

She noted that she reviewed the TNI database with Dan Hickman. She suggested that field be added to the database.

2. Introduction

Scott reviewed information about the Committee work using the slides that can be found in Attachment A.

The slides in Attachment A provide information for the discussion below.

3. Importance of Sampling

Scott did a presentation about the importance of sampling (see Attachment A).

It was suggested to add Sample Transportation, Chain of Custody and Safety to slide 11.

It was noted that things are more out of control in the field and its harder to think of using quality systems. Scott noted something as simple as weather is an unknown. Causes resistance. Marlene commented that procedures are developed for what you do when the procedure can't be followed. Need to document what you actually do. This type of thing needs to be managed and the quality system helps you manage it.

Kirstin Daigle (Chair, NEFAP EC) reminded people that the resistance is not to QS, it is that many people build the quality into the sampling plan ... so they don't think they need NEFAP.

It was recommended that procedures for sampling plans be added to the Standard. Many people think the Standard is weak.

Change Summary Table addition: Sampling Plans

4. FSMO CONCEPT DEVELOPMENT

Marlene reviewed the definitions developed by the Field Task Force.

An accredited lab asked how they fit into the definitions. They are an FSMO, but not an accredited FSMO. They are doing process control for treatment plants. In the other wing of the building is a fixed based accredited lab.

Around the world most labs take samples. In the US it is done by some labs, but sometimes the lab has nothing to do with the sampling. Only some ABs accredit for sampling.

Marlene – What's the difference between NELAP and NEFAP? NELAP is regulatory. NEFAP is everything else. This is her opinion. NEFAP is voluntary – so it has created issues for it to take off.

NELAP has to decide how it will address sampling in its standard. ISO/IEC 17025:2017 uses the term testing and calibration and it means measurement.

Larissa noted that EPA has a definition for measurement. They are open for comment.

An attendee calibrates the equipment in her fixed building and then takes it into the field to use. How does this work with the Field Activities definition? Marlene commented that this would need to be covered and defined in her organization's quality manual/management system.

It was commented that the definition is worded around the facility. Maybe re-do the definition around the accreditation scope. NELAP cares where it is done and NEFAP doesn't.

DW does not certify for field methods. In TNI you can be certified. Some states don't accredit for this because it is outside of their scope. This is up in the air for CA. Under their current rules they do accredit for it. CA has already exempted these field tests – ph,

DO, temperature, etc ... Marlene noted her comment is that they have to see what their new regulations require.

Kirstin – The term calibration causes confusion – NEFAP EC provided some feedback about using the term calibration. The proposed definition for mobile labs lacks clarity with the use of the term quality management system. The reference to ISO/IEC 17025:2017 in the parenthetical contributes to the confusion. Ideally, a mobile lab would be defined as a temporary satellite of the fixed laboratory that operates under the same management system as the fixed laboratory (and the fixed lab's management system is compliant to TNI, ISO,...)

Change Summary Table addition: Look at definitions.

5. ACCREDITATION SCOPE

Twenty-six people returned after break.

An attendee asked if there have been problems with organization accreditations. Marlene mentioned that there has been interest in accrediting individuals. Remote assessments are allowed with the new ISO/IEC 17011:2017. This change is happening now. Not fully implemented – implemented by November 2020.

Marlene noted that NEFAP ABs can accredit whatever locations you want in your organization.

An attendee asked about what location means? She would prefer to see organization.

Marlene asked if the samplers should have their own certificates or be part of an organization. Kirstin would prefer to see this stay as accrediting an organization.

It was asked if this would work for an organization like Eurofins. Would they still have only one accreditation? Only if they have one management system.

Some would want each location to have its own accreditation. The key is that the management system is the same. If it isn't ... you would need separate accreditation.

How do you handle the scope for each location? Marlene noted if you have multiple disciplines within the same management system ... it would work.

An AB noted that the AB decides how many field sampling sites they are going to visit for each FSMO organization they are accrediting.

6. SAMPLING PLANS

Shannon commented you need evaluate the work to ensure they are able to meet the objectives, the sampling plan can help them do so if there is information in there such as

homogeneity of the matrix that may affect their ability to analytically achieve precision, etc ...

An attendee noted that the QAPP covers the same aspects. Marlene commented that QAPPs are different between States, regions, etc ... Marlene likes DoD's "How to write a sampling plan guide". She uses it as a checklist to remember what should be covered in all sampling plan. ISO/IEC says you have to have a sampling plan. Shannon thinks this sort of thing should be included in the Standard. Marlene's concern is that you could require something that may not make sense for all clients.

Kirstin thinks sampling plan information should include how to get a representative sample.

Larissa asked what type of sampling plans should be there? Sampling plan for individual events? Sampling plan for ongoing monitoring? Sampling plans for studies? She also thinks DQO's need to be included in sampling plans. Marlene asked Larissa to email her ideas to the committee. She also commented that she does not understand why individual certification is not offered too.

Completeness should be another parameter. What if you collected 80 instead of 100 samples? Marlene noted that is part of the DQOs.

Project objectives instead of data quality objectives.

It was questioned why you would want to add sampling plan requirements to the Standard. A lab wouldn't be writing sampling plans.

If you are an engineering firm you may be writing sampling plans. The Standard can provide minimum requirements. (Larissa noted that it could be a tool box.)

Kirstin pointed out that right now sampling is not affecting most labs in NELAP. It is good that we are talking about some of this because we are starting to look at impact on labs that do sampling.

Shannon asked if the Standard can say these are requirements when a sampling plan (however named) is not provided. Marlene noted that a permit could be a sampling plan.

Scott – He gets samples in a coke bottle. They have to note in their report that it was not properly put in a correct sampling container. Or someone asks for a modified method ... need to clearly mark on report it is not TNI compliant and it is a modified version of the method.

7. FIELD ACTIVITY MANAGEMENT

Do we want to do something more like NELAP or move towards risk management?

Do we need to require an FSMO to have a Quality Manual, Technical Manager and Quality Manager? Management shall identify who has the responsibility for these activities.

Consensus in room is that these things should still be there.

Many think things like the Quality Manual sets an accredited FSMO apart from other FSMOs. Some people call it a Management Plan.

Marlene commented that how does the current definition of Quality Manager or Technical Manager relate to all those sites. Do they have to be at every site? This needs to be defined.

Scott thinks you need the independence in the Quality Manager and Technical Manager roles to get advice when something doesn't happen the way it was supposed to. It is great having the objective advice.

Larissa- Organization Manual defines policy and procedures for technical and quality implementation. Maybe consider calling Quality Manual something different.

Need to make sure that we have ways to ensure FSMO competency.

8. Work on Combined FSMO Standard

Progress Update:

Section 8 - Marlene started Section 8. Additional edits were lost, but she has them on her computer. Ilona will help. Marlene noted it is important that your internet connection is not lost during the interface in DMS. She suggested making sure it is working before you get too far. Bill and Keith are invited to look at Section 8 at it at the end of the week.

Section 5 - Kira started working with Section 5. She is working on suggestions and should be done in the next 2 weeks.

Scott brought up DMS on the screen and shared what is currently on the site.

9. New Business

None.

10. Next Meeting

The next meeting will be March 2, 2020 by teleconference at 11am Eastern. Webex invitation will be distributed the morning of the meeting.

The meeting was adjourned at 2:58pm Pacific. (Motion – Marlene. Second – Kira. Unanimously approved.)





Field Activities Committee

1









6

The NELAC Institute www.nelac-institute.org



8

7





The Question Is the organization (FSMO) competent to Design the sampling plan Collect the sample(s) Make field measurements?



11

The NELAC Institute www.nelac-institute.org

NEFAP Mission

The purpose of the National Environmental Field Activities Program is to establish and implement a program for the accreditation of field sampling and measurement organizations (FSMOs).



13







14



The TNI FSMO Standard

- > Developed by consensus by FSMOs, regulators and other stakeholders
- > Different than the laboratory standard
- Written for any type of field sampling and testing organization
- All types of environmental field activities are addressed

16







Resistance to QS
"No time"
"No Resources"
"Do not see the value"
"I trust my Technicians"
With this mindset you're waiting for failure to tell you the process is out of control











Definitions Definitions Field Activities Task Force Current FSMO definitions Sampling Field Activities + Note 1: Sampling is a defined procedure whereby a part of a + Testing, calibration, or sampling performed outside substance, material or product is taken to provide for testing or of the confines of the conformity assessment body's calibration of a representative sample of the whole. Sampling (CAB) environmentally and legally controlled fixed may also be required by the appropriate specification for which facility. the substance, material or product is to be tested or calibrated. In certain cases (e.g. forensic analysis), the sample may not be Mobile Laboratory representative but is determined by availability. + A defined space that is not fixed at one location, operating under the control of a defined Field Sampling management system (e.g., ISO/IEC 17025:2017 or current version). The environmental conditions of + The process of obtaining a representative portion of the space must be suitable to meet the objectives of an environmental matrix suitable for laboratory or the sampling, testing, or calibration. field measurement or analysis.

28

27





The NELAC Institute www.nelac-institute.org





3



33



34