

**NEFAP Executive Committee
Meeting Summary
September 20, 2017**

1. Roll call:

Kirstin Daigle, Committee Vice-Chair, called the NEFAP Executive Committee meeting to order on September 20, 2017 by teleconference at 1pm Eastern. Attendance is included in Attachment A - there were 7 committee members present. Associate Members present: Tyler Sullens and Kim Watson (1:20pm EST).

The late August meeting minutes were reviewed. A motion was made by Russell to approve the August 30, 2017 as written. The motion was seconded by Paul. Vote: For - 7 Against - 0 Abstention - 0. The vote will be completed by email.

(Additional votes by email: Michelle – For (10/5/17), Carl Kircher – For (10/4/17), Seb Gillette – For (10/4/17) and Calista Daigle – For (10/4/17).

The motion passed and the minutes will be posted on the TNI website.)

The minutes from the DC meeting were reviewed. A motion was made by Paul to approve the August 10, 2017 minutes as amended – fix acronym to NOAA and replace “needs” with “can be used” in Paul’s bullet 14 (he was talking about a procedure in administrative codes that can be used by anyone to establish requirements). The motion was seconded by Russell. Vote: For – 6 Against – 0 Abstain – 1 (Nilda – was not present). The vote will be completed by email.

(Additional votes by email: Michelle – For (10/5/17), Carl Kircher – For (10/4/17), Seb Gillette – For (10/4/17) and Calista Daigle – For (10/4/17).

The motion passed and the minutes will be posted on the TNI website.)

2. Combined Evaluation SOP

Feedback was provided on the Evaluation SOP. Kirstin asked that people review the compiled comments Ilona sent out by email (Attachment D).

Kirstin asked if there were any additional comments that have arose. None.

Kirstin will send an email to ask people to take one last review of the SOP comments. She will send any additional comments to Ilona and Shawn.

3. Charter and Strategic Plan

Kirstin asked the committee to review the Charter and see if it aligns with the discussion in Washington, DC. A summary of the discussion was included in the August 10, 2017 minutes.

Mobile Labs/Task Force

Kirstin asked about the status of the Task Force. The Task Force still needs to be formed.

Ilona noted that she will include information about the Task Force's actual charge in Attachment E – along with a few additional notes from the TNI Board to consider.

Addition: See Attachment E

The Task Force will have representatives from states that don't currently offer secondary accreditation to mobile labs. The Task Force is hoping to help them with language to make changes to rules.

Kim noted that in some cases, if a fixed lab is accredited, they are extending the accreditation to the mobile laboratory.

Paul noted that he is working with Virginia and they are accepting Louisiana's evaluation of a mobile lab.

Ilona commented that if anything needs to be added to the scope/charter of the Task Force (Attachment E), it will need to circle back to the TNI Board of Directors.

Nilda agrees with the goals of the Task Force. California has attached mobile lab accreditation to a fixed lab. Ilona asked what it would take to get NEFAP in front of the right people in California for them to consider implementing the NEFAP Standard for mobile labs and field testing/sampling. Kirstin will bring it up with the Advocacy committee.

Next steps need to be taken to develop the Task Force. Paul will reach out to Justin to start forming the Task Force and copy Kirstin and Ilona. Kirstin would like to have a list of potential candidates before the next meeting.

Morgan commented that the NELAP/NEFAP crossover is very important to organizations like hers. An umbrella of mobile labs under a fixed lab would be helpful.

General

2 bullet 4 – the work being done on the combined evaluation lends towards this. The actual wording is not a top priority, but needs to stay.

Kirstin would like to split the committee into 2 main focuses: the strategic planning and the mobile lab Task Force.

Kirstin's take away from the NEMC meeting is that it may take some time before the number of FSMOs increases. Focus is on the first couple of bullets and the last bullet will take care of itself.

Louisiana does have a regulation that stack samplers must be accredited. At the federal level it can be used to show competency, but not required. Need to show people that they can be more competitive with the accreditation.

Kirstin asked what our current grade is in the area of FSMOs accredited? Is it a C? Paul noted that we never set specific goals like how many FSMOs are accredited. Need to set goals related to how many people we need to contact instead.

How many people should the committee talk to? Ilona stated that the committee really needs to prioritize what it wants to do. What needs to come first? Kim noted that the website was a good place to start. How is our online presence? If someone Googles sampler competency – does NEFAP and FSMO accreditation pop up?

Ilona brought up the concept of an advocate for different organizations – similar to what Advocacy is doing with non-NELAP states. These organizations could include companies that could require NEFAP in the future or State and Federal programs that could require it. Or perhaps organizations that might want to be FSMOs, etc ...

Kirstin thinks maybe the focus should be on – It's all about the sample. If you don't have a good sample ... you won't have a good analytical result either.

Kristin will work with Ilona and Marlene on the strategic planning document and this conversation will be continued next month.

4. New Business

None.

5. Action Items

Action items can be viewed in Attachment B.

6. Next Meeting

The next meeting of the NEFAP Executive Committee will be on Wednesday, 10-18-17 at 1pm Eastern - the third Wednesday of the month. The primary agenda will be to review the combined evaluation SOP and continue work on strategic planning.

Action Items are included in Attachment B and Attachment C includes a listing of reminders.

The meeting was adjourned at 2:25 PM Eastern. (Paul - motion, Nilda - second.
Unanimous approval.)

Attachment A

**Participants - 8
TNI NEFAP Executive Committee**

Members	Affiliation	Balance	Contact Information	
Justin Brown (2018) Chair Absent	EMT	FSMO	(847)324 3350	jbrown@emt.com
Kirstin Daigle Vice-Chair Present	Stone Environmental, Inc.	Other	802-778-0423	kdaigle@stone-env.com
Doug Berg (AB) Present	PJ Laboratory Accreditation, Inc.	AB	(248)709-0096	dberg@pjlabs.com douglasberg@gmail.com
Paul Bergeron (2016*) Present	LELAP	Other	225-219-3247	Paul.bergeron@la.gov
Michelle Bradac (AB) Absent	A2LA	AB	301-644-3227	mbradac@A2LA.org
Nilda Cox (2016*) Present	Eurofins Eaton Analytical Inc	FSMO/Other	626-318-8517	nildacox@eurofinsus.com
Calista Daigle (2016) Absent	Dade Moeller	FSMO	(225)485-2007	calista.daigle@gmail.com calista.daigle@moellerinc.com
Seb Gillette (2018) Absent	DOD	Other	(210) 395-8434	john.gillette.1@us.af.mil
Morgan Greenwald Present	Cascade	FSMO	802-229-2197	mgreenwald@cascade-env.com
Shawn Kassner Absent	Neptune and Company, Inc.	Other	303-981-2780	skassner@neptuneinc.org
Carl Kircher (2016*) Absent	Florida DOH	Other	904-791-1574	Carl_kircher@doh.state.fl.us
Janis La Roux (2018*) Present	H&P Mobile Geochemistry, Inc.	FSMO	619-933-2751	janis.laroux@handpmg.com
Cheryl Morton (2018) Absent	AIHA	Other	703-846-0789	cmorton@aiha.org
Harry O'Neill (2018*) Absent	Beacon Environmental Service, Inc.	FSMO	410-688-4762	Harry.ONeill@beacon-usa.com
Zaneta Popovska (AB) Absent	ANAB	AB	(260)637-2705 c: 260-446-4807	zpopovska@anab.org
Richard Rago (2018*) Absent	Haley & Aldrich, Inc.	FSMO	617-719-6128	RRago@haleyaldrich.com
Russell Schindler (2020*) Present	SampleServe.com	FSMO	231-218-7955	schindler@sampleserve.com
Ilona Taunton (Program Administrator) Present	The NELAC Institute		(828)712-9242	tauntoni@msn.com

Attachment B
Action Items – NEFAP Executive Committee

	Action Item	Who	Expected Completion	Actual Completion
27	Forward FSMO names to Ilona.	Justin	3-15-13	
39	Give Alternate name to Ilona.	All	9/30/10	Ongoing
124	Send Presentation slides to committee members for review and comment. The slides will be used for future presentations about NEFAP.	John	10/15/13 Ilona forward by 5/2/17	4/10/15: Kim will follow-up on this. 12/11/15: Sent last week. 4/24/17 – Ilona will forward Jerry’s presentation for review to the committee.
158	Review new FSMO Tool documents for issues with “should”, “shall”, confirm that additional requirements are not being imposed and look for possible AB conflicts.	Doug Leonard	3/5/15 Tulsa Meeting	12/11/15: Ilona will resend them to Doug so he can prepare comments by Tulsa. SENT REMINDER
159	Review how new members are added to the Recognition Committee and find what the 4 year renewal date is.	Ilona	May 2016	On hold until PTP/NEFAP Evaluation Workgroup completes its work.
160	Receive additional recommendations from the Recognition Committee. Process recommendations.	Marlene All	2/19/15	4/10/15: May meeting. 12/11/15: Kim will talk to Marlene and find out when this can be expected. REMINDER SENT
164	Review White Paper.	Kim Justin	4/30/15	12/11/15: Justin will review it

	Action Item	Who	Expected Completion	Actual Completion
				and send it to Kim working on for something in 2017. 4/24/17: Kim rewrote it and will send it to Justin for final review before sending to the committee. 9/20: Kim will look for it and send to Kirstin.
172	Talk to Loretta about setting up a meeting.	TBD	TBD	12/11/15: Justin will reach out.
191	Check-in with members who have missed a number of meetings.	Kim	10/14/16	
195	Re-do “Why NEFAP?” videos.	Kim, Justin	As soon as possible.	
200	Contact Harry about committee membership.	Kim	2/9/17	
204	Review the Internal Audit Checklist and get comments back to Ilona.	All	3/6/17	In Progress – Need final SOPs
207	Call Zaneta and Michelle about need and process for testimonials.	Kim	5/2/17	
208	Contact new committee members after voting result is complete.	Justin	5/2/17	
211	Add SOP 5-105 review to upcoming agenda.	Justin	TBD	
217	Update Jerry’s NEFAP presentation and send back to NEFAP EC for final approval as a template.	Justin	TBD	
219	Get final comments on combined Evaluation SOP to Kirstin.	All	9/11/17 Extended to 9/30/17	
220	Complete minute reviews for August by email.	Ilona	10/4/17	

	Action Item	Who	Expected Completion	Actual Completion
221	Discuss with Advocacy the possibility of California using the NEFAP Standard for field and mobile lab accreditation.	Kirstin	10/17/17	
222	Produce list of candidates for Mobile Lab Task Force.	Paul/Kirstin	10/17/17	
223	Update Strategic Plan document for review by committee.	Kirstin / Marlene / Ilona	10/17/17	

Attachment C

Backburner / Reminders – NEFAP Executive Committee

	Item	Meeting Reference	Comments
4	Review Charter.	October 2017	
6	Evaluate how to handle adding additional ABs. Impact on committee size.	8-6-12	
9	Determine need for a policy or statement regarding the assessment of sampling.	4-22-13	
11			

Attachment D: NEFAP EC Comments Received on Combined Evaluation SOP

8/30/17 – Meeting Minutes

Kirstin pointed out that the term on the TNRC was four years as is the term for the accreditation. It stays intact for the evaluation event and makes it easier if there are any scope changes that need to be evaluated during the 4 years.

What happens if a team member leaves ... how do you replace someone on the team?
Need to add this to the SOP.

6.2.3 – Application Review. Kirstin commented. Needs work. Should just be Evaluation Coordinator doing the initial completeness check. Don't need middle man.

6.2.3 – Communication – Renewal. Who is responsible for communication in Initial Application? Doesn't seem specified.

The basic checklists for PT and NEFAP will not change, but a Workgroup subcommittee is looking at what checklists will be needed during the combined evaluation and how to make it user friendly.

Ilona highlighted that in a year we will be looking at combining the TNI Environmental Standard Recognition into the SOP.

The language in 6.7 and 6.8 is a bit clunky. Is their feedback immediate? Or at the end of the evaluation? The language needs to be cleaned up to make it clear. There is a closing conference and how this relates needs to be spelled out.

Tracy wanted to be sure there were no ABs on the TNRC. This should be specific in the procedure.

8/30/17 – Carl Kircher

Since I was part of the workgroup that drafted this, most of my substantive comments were already taken care of. However, in this draft, I invite your attention and possible amendments to the following:

6.1.1.2.1 There is no subsequent section(s) numbered 6.1.1.2.2, etc., so this separate numbering is not necessary. The text could be the second paragraph of 6.1.1.2.

6.2.2.3 This section has an “ADD REFERENCE.” I presume there will be one in the future (?). Also, who will be the “lucky” person to put together this Technical Checklist?

End of 6.4.2 There is “REVIEW NOTE: Add Appendix L.” I presume that additional text will be added for this (?).

6.9.2 Additional wording is needed; I recommend the clause read as follows: “The AB is required to provide a corrective response to any cited nonconformities within thirty (30) calendar days from receipt of the report.”

6.10.4.1 There is no subsequent section(s) numbered 6.10.4.2, etc., so this separate numbering is not necessary. The text could be the second paragraph of 6.10.4.

Renumbered 6.10.4, third bullet: change to “Completed Technical Checklist with objective evidence observed of conformance or non-conformance to the TNI ELS and FSMO sector requirements as applicable.”

Renumbered 6.10.4, fourth bullet: change to “Report on the Evaluation Team’s observation of an AB assessment.”

6.11.3 I presume that revised language will be provided for the comments in parentheses (?).

7.3 change to “An example technical checklist can be provided ...”

7.4 change to “Current editions of the example technical evaluation and assessment observation checklists are available from the EC.”

10.0 change the second reference to “TNI ELS Standards Volume 3 and 4, latest edition”

Appendix C Has the language “Need letter for PT Program Executive Committee” and a Review Note. I assume these will be taken care of (?).

Appendix C In Application Completeness Review and Conclusions, the SOP now be changed to TNI SOP 7-101 (?).

Appendix D Has the language “Maybe create Appendix E for PT Program EC,” some underlined comments, and a Review Note. I assume these will be taken care of (?).

Appendix D In three places, the SOP should now be changed to TNI SOP 7-101 (?)

Are there any Appendices E-K?

William Batschelet – 8/29/17

I had a similar comment as Kirstin regarding consistency in language. Sometimes it is the “Recognition Committee” e.g. Section 5.2.2.7 (P 6) and sometimes it is “The NELAC Recognition Committee (TNRC)” e.g. Section 5.5 (p7). What, if anything, is the difference?

Second comment: It seems to me that the recognition report should go to the executive committee of the respective program, not both. E.g. Section 5.5.1.8.b (p 8): “Provide a report on the recognition of the AB for conformance to the TNI NEFAP Executive

Committee ~~and~~ or PT Program Executive Committee.” The same comment applies to Section 6.11.4 (p 16).

Kirstin Daigle – 8/29/17

Editorial:

[if !supportLists]· [endif]After the first introduction of a phrase by which there is an acronym (NEFAP EC, PTEC, EC, LE, TNRC, ET) replace all references to the phrase with the acronym. Follow this same editorial style throughout the document for consistency and easier reading. For example, in Section 5.1, Sections 5.1.1, 5.1.2 and 5.1.3 “evaluation team” is written each time even though the acronym for evaluation team (ET) was defined in Section 5.1. In clauses 5.1.4 and 5.1.5, the acronym is used so even within a section, the style is inconsistent. Another example, the on-going use of NEFAP Executive Committee and PT Program Executive Committee in almost every clause of the SOP is tiring to read over and over again. I recommend replacing the phrases with the acronyms NEFAP EC and PTEC. These acronyms are the common language we use when referring to these groups.

[if !supportLists]· [endif]Align the language of the SOP with the process. For example, Section 1.0 refers to “NEFAP evaluators” and “PTPAs” as those that conduct the evaluation but these groups are never referred to again in the SOP. Collectively these groups have been replaced in the SOP with an evaluation team (ET) so replace these terms in this section with “evaluation team”. An example suggestion for re-write of this paragraph is below. The rewrite aligns the language of the SOP with the procedure in the SOP. This editorial evaluation should be done every section of the SOP - when the final procedure is hammered out.

Section 1.0: This Standard Operating Procedure is applicable to initial or continuing evaluations of ABs conducted in accordance with ~~TNI-NEFAP EC policies Executive Committee policies~~, TNI Field Sampling and Measurement Organizations (FSMO) Standards, ~~and the TNI PTEC policies Program Executive Committee policies~~ and TNI (PT) Standards by TNI staff and an evaluation team appointed by the NEFAP EC and the PTEC. ~~NEFAP Evaluators and PTPAs conducted by PT Program Executive Committee members and TNI Staff. It is based on the TNI NEFAP Executive Committee policies, TNI Field Sampling and Measurement Organizations (FSMO) Standards, and the TNI PT Program Executive Committee policies and TNI (PT) Standards.~~

Procedural Comments/Concerns/Questions:

[if !supportLists]· [endif]Section 6.1: Need to define the purpose of the evaluation. For example rewrite 6.1.1 to include the language in red text:

6.1.1 ABs are required to be evaluated initially and at a minimum of once every four (4) years thereafter **to demonstrate compliance to ISO/IEC 17011 and the TNI standards.**

This evaluation must include, unless noted below:

[if !supportLists]· [endif]6.1.1.2: I am unclear when an on-site is required. These sections imply that this decision is at the discretion of the LE and is not necessary when an AB has been assessed to ISO/IEC 17011. Does this mean that demonstration of compliance to TNI standards can be achieved via document review alone? Also, instead of the LE being the sole discretionary, I suggest that a recommendation for or against an on-site be made by the LE and their recommendation sanctioned by the ET and the EC. The LE should provide rationale for his/her recommendation to the ET and EC.

[if !supportLists]· [endif]6.2.1 and 6.2.2: If an application has been deemed incomplete by the EC, why give the application to the LE for review? The SOP states in multiple sections that it is the responsibility of the EC to determine the application is complete. The process as current written is: EC gets application and reviews application. Application is incomplete. The EC gives the application to the LE for review and instructs the LE to notify the AB that the application is not complete. Presumably, (SOP does not specify) the AB provides the missing application materials to the LE who then gives it back to the EC for completeness review. When the EC determines the application is complete he/she notifies the LE to proceed with document review. The process as written is onerous and makes for confusing lines of communication. I recommend dropping the LE from this process and have the communication regarding the completeness of the application handled by the EC.

[if !supportLists]· [endif]6.2.2.3: Does this process also apply to initial applications? If so, recommend making this section 6.2.3 instead of a sub clause under renewal applications.

[if !supportLists]· [endif]6.7.2: Is this the LE's checklist or the checklist of the observation evaluator?

Tracy Szerszen – 8-25-17

Here are some of my comments on this SOP. Overall, it's merged well. Nice Job!

Recommended changes:

-5.1.5.1 Certification as a ~~management systems~~ lead assessor from an internationally recognized ~~certification body~~ accreditation body-Currently the terms we are using are not interchangeable and don't mesh well with definitions in ISO 17011. I am assuming we want experienced AB assessors not certification body assessors. This statement appears a few times. throughout this document.

-5.5.1.6 TNRC must be made up of at least five (5) members and no more than eight (8).-I made a comment that we may want to expand on this section to ensure we have a good balance of TNRC voting members. We can't have all PT qualified members voting on a NEFAP evaluation report.

-6.1.3.1 A copy of ~~ISO/IEC~~ the evaluation reports and corrective action reports must be

submitted to the EC within two weeks of receipt or submission of the final decision on the evaluation. – In the international community (ILAC, APLAC etc.) there's an approval process that takes place that may be months after the AB receives their report and CA submission takes place. APLAC recommends that we wait until the MRA council makes their final decision on our status before releasing the report.

-6.6.3 The number and type of organization assessments scheduled is based on the ~~key activities~~ volume of activity conducted by of the AB. – Key activities are not really defined and I believe the evaluators base the number of witness assessments to attend by the number of accredited CABs the AB has.

-Appendix D-Conclusion, Section item 3) is complete (demonstrates that all elements of TNI FMSO Volume 2 are performed by [AB] ~~A2LA~~ for assurance of the CAB's implementation of TNI FMSO Volume 1). –Remove reference to the A2LA and replace with (AB) since this is to be used as template.

Attachment E: Information about Task Force

Additional Notes from TNI Board of Directors:

Discussion points included (TNI Board Meeting – 4/12/17):

- Task force membership should include one or more representatives from the mobile laboratory community as well as representatives of NELAP Accreditation Bodies having different approaches to mobile lab accreditation.
- the possible need for a separate standard or new material to be included in Volume 2 addressing mobile labs,
- a strong recommendation that mobile labs continue to be required to meet the same stringency of requirements as NELAP and NEFAP, so that the data from mobile labs will be of the same known and documented quality as that of fixed base labs now, and
- the Task Force consider developing guidance materials for mobile laboratories, depending on the decisions made and processes implemented.

Proposed Charter for a Field Activities Accreditation Task Force

Mission

Develop an organizational approach to field activities accreditation throughout all TNI programs including NELAP, TNI Environmental Laboratory Standard Recognition and NEFAP.

Under the direction of the TNI Board of Directors, the Field Activities Task Force will:

1. Develop and recommend consistent policies for the accreditation of field activities; including the standardization of the approach to listing scopes of accreditation.
2. Develop an organizational approach to field activities including mobile laboratories under multiple TNI programs and identify or clarify when each program is appropriate for accreditation.
3. Recommend standard definition of mobile laboratories and field activities (e.g.; sampling, testing).

Composition of the Committee

1. The Task Force will be chaired by a volunteer serving on the task force.
2. The Task Force will be composed of 6-8 members.
3. At a minimum, the committee will include at least one member of the following stakeholder categories; NELAP AB, NEFAP AB, TNI Environmental Laboratory Standard Recognition AB, and Mobile Laboratory.
4. It is preferable that NELAP AB representative include those with differing requirements/approaches to field activities or mobile labs accreditation within the state regulation/legislation.
5. There is no requirement for balance of membership.

Objectives

1. Develop consistent process for accreditation of field activities (e.g.; field testing, mobile laboratories) in NELAP
 - **Success Measure:**
 - The State ABs in NELAP and TNI Environmental Laboratory Standard Recognized ABs in TNI harmonize approach to field activities (e.g.; field testing, sample and mobile laboratory) accreditation so the process is consistent throughout program.

2. Develop organizational approach to field activities accreditation within TNI to clarify which program is appropriate for field activities seeking accreditation.
 - **Success Measures:**
 - Develop consensus on approach to accrediting field activities between NELAP, TNI Environmental Laboratory Standard Recognition, and NEFAP.
 - Develop guidance, flow chart, etc. to clarify which program/recognition is appropriate in different circumstances for field activities to understand their options and select the appropriate accreditation.
3. Standardize definition of field activities and mobile laboratories (or testing/sampling not performed at permanent facility).
 - **Success Measure:**
 - Develop a TNI organization endorsed definition of field activities (including field sampling/testing, mobile labs) for use in all TNI Standards and throughout the organization.
4. Review and recommend language in Standard revision(s) relating to field activities, if necessary.
 - **Success Measure:**
 - All TNI Standards have clear language addressing field activities that do not conflict with other Standards.

Decision Making (*specify default option from Decision Making SOP 1-102*)

- **Decision on review of any TNI procedure, policy or guide changes made by Majority Vote and in the presence of, or by electronic voting of, a committee quorum; voting options are: Yeah, Nay or Abstain.**

Available Resources:

- Volunteer task force members
- Teleconference and A/V services
- Program Administrator support
- On-line storage, maintenance and archiving of applicable documents
- Stakeholder groups within TNI (i.e. NELAP AC, NEFAP EC, TNI Environmental Laboratory Standard Recognition, LASEC, CSDEC, etc.)

Anticipated Meeting Schedule:

- Teleconferences: regular schedule of monthly calls to be published on the TNI website.
- Additional teleconference calls as needed.
- Face-to-face meetings as needed at TNI conferences.

Examples of current overlap resulting in differences in application.

- A. The TNI EL standard includes the definition of mobile labs. The TNI FSMO standard states the management system work is carried out in or away from the permanent facilities or is associated in temporary or mobile facilities. The major difference is the FSMO standard allows for umbrella accreditation and not a facility-by-facility or mobile lab-by-mobile lab accreditation.
- B. The FSMO standard addresses the requirement for measurement and sampling using discrete, continuously or intermittent techniques using unattended equipment. The laboratory sector was not written specifically for environmental sampling.
- C. The FSMO does not prescribe a specific frequency for proficiency testing and allows the AB to define the frequency. Only limited PTs are available for field measurements and no proficiency tests are available for sampling at this time. All ABs have a policy to address when a PT is not available; the FSMO sector must define how it plans to meet the requirements of 5.9 of ISO/IEC 17025. PTs are mandated and available for most laboratory testing so the need for addressing the requirements of 5.9 are not needed in the environmental laboratory standard.
- D. The mobile lab definition is not consistent through the industry. The question of what is a mobile lab depends on state, federal or local jurisdiction. Most jurisdictions only address measurements and not sampling. Tracking mobile labs by VIN number is not helpful if the mobile lab is not part of an enclosure at a specified address.

- E. A mobile lab is:
- A person/body performing...
 - Sample Collection (no physical structure yet in the field),
 - Sample Collection in a van or enclosure (e.g. non-permanent building or shed),
 - Sample Testing (no physical structure yet in the field),
 - Robot/ Person / Body performing sample testing in a trailer or other mobile enclosure,
 - Person / Body performing sample collection and sample testing (no physical structure yet in the field),
 - Person / Body performing sample collection, sample preparation and sample testing in a van or enclosure (e.g. non-permanent building or shed), or
 - Robot / Person/ Body performing sample collection, sample preparation and sample testing in a trailer or other mobile enclosure.
- F. There is a need for secondary accreditation for the TNI Environmental Laboratory program since these sampling and testing operations are mobile and sometimes set-up at a given site for a day or a week and then move to another location outside the primary state.