

Summary of the NELAP Accreditation Council Meeting

August 3, 2015

The NELAP Accreditation Council (AC) met at 1:30 pm EDT on Monday, August 3, 2015, for another of its series of assessor conversations. Attendance was not taken, except to note that of the NELAP Accreditation Bodies (ABs), FL, KS, LA DEQ, LA DHH, NJ, PA, UT and VA, plus OK, had representatives present, as well as Analytical Excellence, Dade Moeller, Sims & Associates and Louis Wales.

The AC's Chair, Aaren Alger of PA, introduced Paul Bergeron of LA DEQ for his presentation about assessing mobile labs, and then Aaren moderated the discussion afterwards since Paul's evaluation was starting at that time. Paul had circulated a PowerPoint presentation for participants' use as they listened to his presentation. (See Attachment 1.)

The Formal Presentation

Paul noted that an AB's quality system documentation should address the assessment of mobile labs and the several ways in which they differ from fixed installations. It is common for a mobile unit to have different analytical instrumentation at different times, depending on the needs of a particular site, so that a reassessment may be completely different than the previous assessment. Also, in order to hold timelines for reassessments, it may be necessary to start up the mobile lab outside of deployment schedules for running PTs and for the actual assessment itself. Further, it may be necessary to conference in personnel from the mobile lab's parent organization for the opening and closing meetings. Other unusual factors are contingency plans for a broken piece of equipment, the environmental conditions inside the mobile unit, the availability of a power back-up (for operations as well as records management) and the quality of water sources available. The mobile unit's SOPs must be tailored to the specifics of the current operations. The assessor should be aware, too, that often in-plant mobile units will not have wireless internet connections available.

Paul noted that while the FSMO standard covers both sampling and analysis, and often the analytical methods used by mobile units include sampling procedures, the NELAP accreditation should be clear that only the analytical part of the method is accredited to NELAP (and not the sampling.)

Discussion

Since most of the discussion occurred in a Q&A format, that will be how this section is presented.

Q1 -- What IS a mobile lab?

A1 -- This may vary by AB, but fundamentally is any analytical operation that is not part of the fixed base, whether in a motor home chassis or mounted on the back of a pick-up truck. PA noted that each mobile unit requires a separate accreditation, but noted that some ABs recognize certain mobile units as "part of" the fixed-base lab.

Q2 -- What about PTs?

A2 -- The consensus was that PTs must be performed on schedule, regardless of the unit's location or whether it is actually "in service" at that time.

Q3 – How to handle secondary accreditations for the mobile unit when, for the primary accreditation, the mobile unit is considered to be a part of the fixed base lab (and thus does not have a separate certificate?)

A3 – in one instance, LA DEQ (which accredits mobile units as part of the fixed base) was able to review the assessment report and issue a separate certificate for the mobile unit, to enable FL to give secondary accreditation to that unit, but this is not always the case.

Q4 – What if a mobile lab from one NELAP state moves to a different NELAP state and remains? At what point does it need primary accreditation in the state where it's located? In particular, if the lab is still in its "temporary" place, when its next assessment is due, who does the assessment?

A4 – Consensus seemed to be that the mobile lab would then have a new primary AB, the state in which it is physically located at the time of its assessment. Transfer of primary accreditation prior to the assessment was less clear.

Q5 – What about a mobile lab needing primary accreditation in the state where it is located (some NELAP ABs require this)? Does the source of its samples or the state to which data are being reported influence this decision?

A5 – The only consensus was that a mobile lab must have either primary or secondary accreditation in the NELAP state in which it operates.

Q6 – At what point in time does a mobile lab become "fixed?"

A6 – Can only be determined on a case-by-case basis.

Q7 -- Does the "site visit" need to be during a time when the mobile lab is "on-the-job?"

A7 – it could be either while in production, or just running samples for the purpose of the assessment (a static review, artificially set up as is done when needed to meet the PT schedules.) The possibility of other options was discussed, but none emerged.

Q8 – How many mobile labs are there?

A8 – Some states have no accredited mobile labs. FL said <10, PA has 2. Other states were silent or absent.

Other points made included:

- PA ELAP allows an out-of-state mobile lab to set up at its site for the purpose of the "site visit."
- For some states, not all state agency labs are accredited or certified, but these units are still available for use in emergency situations, just not for compliance testing.
- Procedures for swapping out equipment must ensure that verification of the equipment's calibration(s) is documented. This is in the NEFAP standard, but not in the

NELAP standard.

- Some states' regulations define mobile labs with the presumption that the equipment included is constant, whereas in reality, the test instrumentation may be installed differently to meet the requirements of different sites/contracts/jobs. And, a corollary issue, running PTs on each piece of equipment that might possibly be installed in a mobile lab (as well as for the different methods) seems an excessive expense – should this be revisited?

Lynn noted that, eventually, NELAP is expected to harmonize or at least coordinate its treatment of mobile labs with the NEFAP program.

Next Meeting

The date for the next Assessor Call has not been set, but will likely be the first Monday in either November or December, depending on who volunteers to present for that program.

The next NELAP AC meeting will be Monday August 31, 2015, at 1:30 pm Eastern, and the following meeting on September 21, 2015, at the same time. Rescheduling the second August meeting allows us to accommodate the Labor Day holiday, which is on a normal AC meeting date. As usual, an agenda and teleconference information will be sent the week before the meeting.

Attachment 1

Accompanying PowerPoint presentation