

Summary of the NELAP Accreditation Council Meeting January 6, 2020

1. Welcome and Introductions

The NELAP Accreditation Council (AC) met at 1:30 pm Eastern on Monday, January 6, 2020. As Vice Chair, Kristin presided over the meeting. Attendance is noted in Attachment 1. The minutes of December 2 were approved and Kristin welcomed the guests, Rami Naddy and Pete De Lisle from the WET Expert Committee.

Although a discussion of Required Detection Limits for cyanide and other analytes in drinking water was on the agenda at the request of Victoria, she was unexpectedly required to be elsewhere at the time of this meeting, so that topic will be rescheduled for a future meeting, probably March 2.

2. Elections of Chair and Vice Chair of the NELAP AC

After two opportunities for nominations, Kristin Brown is the nominee for Chair, and Michele Potter the nominee for Vice Chair. The election was conducted as general business and participants agreed that a separate motion and vote should be taken for each position.

Cathy offered two motions, the first to vote on Kristin's nomination as Chair and the second, to vote on Michele's nomination as Vice Chair. David seconded both motions. All present voted in favor of Kristin as Chair, with Kristin herself abstaining. Likewise, all present voted for Michele as Vice Chair, with Michele abstaining. Congratulations to the Council's new leadership team!

3. Discussion of WET Expert Committee's Emerging Recommendation for Analyst IDOC

Rami outlined the current practices for demonstrations of competency (DOCs) in WET labs. Consensus exists about the laboratory initial and ongoing DOCs (IDOC and ODOC), as these are defined in the published WET methods and consist of five (5) standard reference toxicant tests (SRTs). After the initial lab DOC, the lab performs an SRT monthly for each method in use. There is much less clarity, and none in the methods themselves, about an analyst's DOC.

Some NELAP ABs presently require 5 SRTs for each method for an individual analyst's IDOC, before the analyst is allowed to work independently. This is immensely burdensome for the WET lab since, unlike with chemistry and microbiology tests, WET tests take anywhere from two days to six weeks, with many taking at least seven days, whereas a chemistry test may take a few hours, at most. The committee does intend for the final version of the module to encompass all types of toxicity tests – sediment, dredged material and algae as well as WET tests.

The WET committee is seeking some less burdensome way to establish analyst competency that will satisfy the NELAP ABs while being more efficient with lab resources, and is looking for some middle ground between having the standard prescribe detailed IDOC requirements for an analyst versus allowing the laboratory to define acceptable training and IDOC requirements. Because of the protracted conversations already undertaken within the WET committee to approach consensus, it is vital to know before finalizing the module, that other

NELAP ABs will not have strenuous objections to the general concepts on which the revision of the WET module (V1M7) will be based.

Discussions within the WET committee have been ongoing for several years now, and have covered the gamut of possibilities at least once. At long last, there appears to be consensus within the committee, and particularly with the NELAP ABs represented on the committee, that one or two SRTs will be acceptable for an analyst's IDOC after training is completed for all tasks and skills to be performed. In many methods, most of the tasks are the same with only a few unique portions of the method, and it is important to note that each analyst must be trained on each of the skills or tasks used in methods, with that training documented in the training record, prior to performing any IDOC activities.

Unlike chemistry or microbiology, any particular analyst may only perform some tasks and not all that are included in a given method – this happens on weekdays but is particularly important for the weekend staff who typically perform only the “maintenance” tasks of a method, with set-up and ending tasks occurring during the workweek. So, there must be some way to document IDOCs for these analysts as well, that does not require them to show proficiency in tasks they will never perform but only for those that will be assigned to them. It almost never happens that one individual performs every task needed to complete any method run in a WET lab.

The WET committee is also hoping to establish whether and how to group the various species for acceptable IDOCs, since in many cases the entire test protocol is identical except for the identity of organisms being tested (tiny invertebrates or small fish, for example). There is definitely consensus within the committee that demonstrated competency for a chronic test will satisfy the IDOC requirements for an acute test, since all steps are the same, except that the duration of the “maintenance” phase is different.

During the discussion, several AB representatives offered that their program allows the lab to establish requirements for competency of individual analysts, while a few others require either participation in 4 or 5 SRTs for analyst IDOC and want the competency requirements clearly defined in the standard itself, rather than being defined by the laboratory (and reviewed for acceptability by the assessors). To standardize the requirements used in labs for analyst IDOCs, the standard will need to be far more specific than if the labs are allowed to establish their own analyst competency requirements.

The WET committee members have observed that assessors familiar with WET testing seem far more comfortable with lab-defined competency requirements while assessors unfamiliar with WET are more likely during assessments to fall back into the chemistry and microbiology requirements with which they are familiar. One AB suggested that allowing labs to define the analyst competency requirements might present difficulties in enforcement, but the counter-argument is that competency must be demonstrated, and it's up to the assessor to determine whether the lab's procedures are adequate to do that.

On a related note, there was a brief discussion about the role of the WET FoPT table and the role WET PTs might play in showing competency, but reality is that there are few labs participating in some of the WET PTs (too few for meaningful statistical evaluation) and for many WET methods, there are no PTs available.

Rami agreed to circulate a concept paper following this meeting's discussion, so that AB representatives would have something definitive to review and provide feedback about. He also encouraged AB representatives to attend the WET session on Tuesday morning at

conference, where Michele will lead the discussion of proposed changes to the WET module as well as progress on WET PT issues. With that, Kristin thanked Rami and Pete, and they departed the call.

4. Follow-up on Method Codes

There was agreement at the December meeting to revisit the proposed solution of assigning a new method code to each SOP modification for PFAS methods (particularly with non-potable water), to ensure that absent ABs had a chance to be heard. Since that meeting, there has been an email conversation with Bill about whether the method code assignment process might remain unchanged and just NH would track the method SOP revisions in-state only. Kristin committed to clarifying this status with Bill.

UPDATE from Bill, 1/21/10:

Concerning item #4, TNI assigned Method Codes for each revision of a laboratory-developed method SOP.

NH ELAP grants primary accreditation for laboratory-developed method SOPs for PFAS (LC-MS-MS and Isotope Dilution). We grant secondary accreditation when the laboratory-developed method SOP matrix / method / analyte combinations from the PAB matches our FoA exactly. Our FoA is based on TNI codes and descriptions. We don't accept synonyms (too much additional work).

The NHDES DWGB will probably require the use of EPA 533 for PFAS analysis over the current laboratory-developed method SOPs. The problem with laboratory-developed method SOPs may go away once we have performed the switch over sometime in the next few months.

5. New Business

Dan had requested that Lynn distribute a list of inactive method codes that apparently still appear in LAMS updates. Kristin noted that if anyone has questions, they should check with Dan Hickman.

6. Next Meeting

The next meeting of the Council will be at conference in Newport Beach, Wednesday, February 5, 2020, at 10:30 am PST. Teleconference capability should be available, and information will be sent prior to the meeting.

The next teleconference meeting will be Monday, March 2, 2020, at 1:30 pm Eastern. An agenda and documents will be provided in advance.

Attachment 1

STATE	REPRESENTATIVE	PRESENT
FL	Carl Kircher E: carl.kircher@flhealth.gov	Yes
	Alternate: Vanessa Soto E: Vanessa.sotocontreras@flhealth.gov	No
IL	Celeste Crowley T: 217-557-0274 F: 217-524-6169 E: celeste.crowley@illinois.gov	Yes (also Jewel Brant listening in)
	Alternate: Dave Reed Dave.Reed@Illinois.gov	Yes
	For information purposes: John South John.South@illinois.gov	No
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	Alternate: N. Myron Gunsalus 785-291-3162 E: ngunsalus@ks.gov	No
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	Alternate: Elizabeth West elizabeth.west@la.gov	Yes
LA DOH	Grant Aucoin Grant.aucoin@la.gov	Yes
	Alternate: Scott Miles Scott.Miles@la.gov	No
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	Alternate: Stephanie Drier 651-201-5326 E: stephanie.drier@state.mn.us	No
NH	Bill Hall T: (603) 271-2998 F: (603) 271-5171 E: george.hall@des.nh.gov	No

	Alternate: Brian Lamarsh Brian.Lamarsh@des.nh.gov	No
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	Alternate : Rachel Ellis E: rachel.ellis@dep.nj.gov	No
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OR	Lizbeth Garcia 971 865 0443 E: LIZBETH.GARCIA@dhsosha.state.or.us	Yes
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	Included for information purposes: Ryan Pangelinan E: Ryan.pangelinan@dhsosha.state.or.us	Yes
	Included for information purposes: Sara Krepps Oregon Department of Environmental Quality (503) 693-5704 E: sara.krepps@state.or.us	Yes
PA	Dana Marshall E: dmarshall@pa.gov	Yes (also Amy Hackman listening in)
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UT	Kristin Brown T: (801) 965-2540 F: (801) 965-2544 E: kristinbrown@utah.gov	Yes
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	Alternate: Ed Shaw T: 804-648-4480 ext.152 E: ed.shaw@dgs.virginia.gov	No
NELAP AC PA and EC	Lynn Bradley T: 540-885-5736 E: lynn.bradley@nelac-institute.org	Yes
EPA Liaison	Donna Ringel T: 732-321-4383 E: Ringel.Donna@epa.gov	No
California	Christine Sotelo Christine.Sotelo@waterboards.ca.gov	No
Guests:	Rami Naddy, Chair, TNI WET Expert Committee naddyrb.tre@gmail.com Pete De Lisle, Vice Chair, TNI WET Expert Committee pdf@coastalbio.com	