

**Summary of the NELAP Accreditation Council Meeting  
October 5, 2020**

**1. Welcome and Introductions**

Kristin welcomed everyone to the call. Attendance is noted in Attachment 1. The minutes of September 8 were approved unanimously with Carl and Celeste abstaining due to having been absent for that meeting.

**2. Conference Update**

This item was originally on the agenda for an estimate of in-person attendance but as we believe the conference will be virtual only, the plans and dates that are currently under consideration were discussed – a five-day conference, January 25-29, 2020, with the NELAP AC meeting on the morning of Thursday, January 28.

**3. Approval of Policy Committee Edits to SOP 3-103**

The previously approved document with Policy's edits was distributed with the September 8 minutes so that Council members would have an opportunity to review the document prior to this meeting. There were no additional changes recommended except to update the approval date and version number (Rev. 2.0 sent to Policy becomes Rev. 2.1 with the requested edits). Lynn Boysen moved and Myron seconded that the document be approved with those document control version changes made; approval was unanimous with Oregon abstaining. NOTE: SOP 3-103 Rev. 2.1 has been submitted to Policy Committee for final approval and it will then go to the TNI Board of Directors for endorsement.

**4. Discussion Topics Requested by California**

Christine Sotelo asked to discuss several issues with the Council, in order to learn how other ABs handle those aspects of their operation. As an introduction, she briefly explained how CA uses third party assessors (TPAs) for "sophisticated instruments" in its program, but only those who are employed or contracted to TNI-recognized Non-governmental ABs (NGABs). During the discussion, distinctions among NGABs providing accreditations to the TNI Standard and NELAP accreditations based on the TNI Standard were clarified. Again, CA was advised that some labs seem to believe that they may not seek NELAP accreditation for CA recognition from a NELAP AB that does not use TPAs, and asked to please clarify to labs in CA that if they seek NELAP accreditation, it does not matter whether contract or employee assessors are used by the NELAP state AB. Another area of clarification was that NELAP ABs grant reciprocal recognition only to labs accredited by NELAP ABs; no third party accreditations are recognized for either primary or secondary accreditation by any NELAP AB.

Checklists – What checklist(s) are used and are they shared with labs?

TNI provides a Quality System checklist for free, on the website, to anyone who certifies that they own a copy of the 2016 TNI Environmental Laboratory Sector Standard. This checklist was developed by the Expert Committees that wrote the various modules of the TNI Standard. Most but not all NELAP states use this checklist, some have their own, and several different formats exist as well, but a

state's assessors (employee or contract) must use whichever checklist the state requires and are typically required to submit them with the assessment report to the AB.

EPA Region 9 requires that CA use method checklists for all drinking water methods. This requirement is not standardized among EPA regions. Method checklists are used by some NELAP ABs but not all, and ABs that use them may not have checklists for all methods. One participant remarked that these are typically "works in progress" and that they are "straight out of the method" itself.

Reciprocity – While NELAP will not recognize CA accreditations, CA does recognize and accept NELAP accreditations. Many CA labs are not satisfied with TPAs and prefer employee assessors, so that CA believes those labs may be applying to NELAP states instead of CA. There are a number of CA-specific methods that are likely not offered by all NELAP states, and the Waterboards program requires the Department of Defense (DOD) methods for PFAS, in particular. Some labs are getting "third party" accreditations for PFAS, and there is some concern that NELAP ABs might be accepting those accreditations and thus if CA accredits a lab through its NELAP accreditation, there might be a PFAS method accepted as accredited by NELAP that is not acceptable to CA.

The misunderstanding that NELAP ABs would accept any third party accreditation for any method was quickly clarified. The NELAP AB always makes the accreditation decision, period. NELAP ABs do accredit for PFAS but as there is no EPA-promulgated method for PFAS, method requirements vary by state.

Eric Graybill, the Council's EPA Liaison, spoke up to say clearly that EPA does not recognize any third party accreditations for drinking water analysis, only accreditations or certifications granted by state agencies. He noted that several third parties have claimed to be accrediting drinking water methods, but this cannot be. Lynn asked that Eric ask within EPA that any claims for such accreditation be reported to the AB responsible (or if a third party AB, reported to TNI directly).

Christine did state that for PFAS method accreditations from NELAP states, CA would need to verify which specific method was assessed in order to accept that accreditation. NOTE: For states that accredit to a lab's SOP and not a published method, this will clearly require additional communication beyond having CA simply accept the lab's certificate.

A corollary issue arose, about NVLAP and AIHA accreditations. Somehow, CA was under the impression that, while those accreditations were accepted by the previous CA program (in the Health department, apparently), those ABs are somehow not as good as NELAP. Several NELAP representatives stated clearly that the AIHA program is either used by a different agency in their state or is known to be as good as or better than the state program for asbestos (not drinking water) and lead/Pb in paint.

Lynn explained that she worked with the AIHA program for several years in the past. AIHA creates and implements customized versions of ISO 17025 for each of its fields of accreditation, in the same way that TNI customizes ISO 17025 for environmental labs and also for FSMOs. AIHA is an ILAC signatory, and accredits industrial hygiene, asbestos, environmental microbiology, food, environmental lead (Pb) and "unique scopes" (<https://www.aihaaccreditedlabs.org/>) plus it provides

proficiency testing samples for all of those programs except food (<https://www.aihapat.org>).

Detection Limit for Reporting (DLR) – Christine asked Jacob to explain this issue. CA's drinking water program uses a DLR that is 3 times the MDL, and asked whether NELAP states have similar multipliers in place.

Lynn explained that the Chemistry module of the 2016 Standard (V1M4) had such a multiplier in it, with the DLR referred to as the Limit of Quantitation (LOQ) (LOQ=3xMDL), and that was not acceptable to several NELAP states so that the module had to be revised prior to adoption by the Accreditation Council.

Several states noted that the acceptable reporting limits are set by advisory groups or programs outside of the AB itself. Carl requested that Jacob send email to the Council, explaining in more detail the CA requirement, in order to get more complete feedback about each individual state's procedures.

Christine thanked the group for its time and advice, and Kristin praised Christine and her staff for the progress and improvements they have made in California's program.

## **5. New Business**

Travis requested feedback on a situation where a lab has both DoD and ORELAP accreditations, and the DoD requirement for daily calibrations has the effect of making PT samples (as reported to ORELAP) be treated differently than routine samples (which for NELAP samples would not have daily calibration). The lab chooses to run the PTs for the program with the more stringent requirements (the DOD daily calibration). This is an issue for analytes/methods that are accredited under both programs, and he is seeking some suitable resolution to the situation. Carl requested an email with the details spelled out, so that he can deliberate on the concept. Options discussed were run the PT sample twice or to order two PTs (one for each program) or else to perform daily calibration for all samples of those analytes/methods. One participant noted that any more specific response would involve knowing the specific scopes of accreditation and the client needs.

## **6. Next Meeting**

The regularly scheduled date of the next teleconference meeting is Monday, November 2, 2020. The agenda and documents will be provided in advance.

**Attachment 1**

<b>STATE</b>	<b>REPRESENTATIVE</b>	<b>PRESENT</b>
FL	Carl Kircher E: <a href="mailto:carl.kircher@flhealth.gov">carl.kircher@flhealth.gov</a>	Yes
	Alternate: Vanessa Soto E: <a href="mailto:Vanessa.sotocontreras@flhealth.gov">Vanessa.sotocontreras@flhealth.gov</a>	No
IL	Celeste Crowley T: 217-557-0274 F: 217-524-6169 E: <a href="mailto:celeste.crowley@illinois.gov">celeste.crowley@illinois.gov</a>	Yes
	Alternate: Dave Reed E: <a href="mailto:Dave.Reed@Illinois.gov">Dave.Reed@Illinois.gov</a>	No
	For information purposes: John South E: <a href="mailto:john.South@illinois.gov">john.South@illinois.gov</a>	No
KS	Jennifer Evans E: <a href="mailto:jennifer.evans@ks.gov">jennifer.evans@ks.gov</a>	No
	Alternate: N. Myron Gunsalus T: <a href="tel:785-291-3162">785-291-3162</a> E: <a href="mailto:ngunsalus@ks.gov">ngunsalus@ks.gov</a>	Yes
LA DEQ	Kimberly Hamilton-Wims T: 225-219-3247 E: <a href="mailto:Kimberly.Hamilton-Wims@la.gov">Kimberly.Hamilton-Wims@la.gov</a>	Yes
	Altérnate: Elizabeth West E: <a href="mailto:elizabeth.west@la.gov">elizabeth.west@la.gov</a>	yes
MN	Lynn Boysen E: <a href="mailto:lynn.boysen@state.mn.us">lynn.boysen@state.mn.us</a>	Yes
	Alternate: Stephanie Drier T: 651-201-5326 E: <a href="mailto:stephanie.drier@state.mn.us">stephanie.drier@state.mn.us</a>	No
NH	Bill Hall T: (603) 271-2998 F: (603) 271-5171 E: <a href="mailto:george.hall@des.nh.gov">george.hall@des.nh.gov</a>	No
	Alternate: Brian Lamarsh <a href="mailto:Brian.Lamarsh@des.nh.gov">Brian.Lamarsh@des.nh.gov</a>	Yes

NJ	Michele Potter T: (609) 984-3870 F: (609) 777-1774 E: <a href="mailto:michele.potter@dep.nj.gov">michele.potter@dep.nj.gov</a>	No
	Alternate : Rachel Ellis E: <a href="mailto:rachel.ellis@dep.nj.gov">rachel.ellis@dep.nj.gov</a>	No
NY	Victoria Pretti 518-485-5570 E: <a href="mailto:victoria.pretti@health.ny.gov">victoria.pretti@health.ny.gov</a>	Yes
	Alternate: Lynn McNaughton E: <a href="mailto:lynn.mcnaughton@health.ny.gov">lynn.mcnaughton@health.ny.gov</a>	No
OK	David Caldwell (405) 702-1000 E: <a href="mailto:David.Caldwell@deq.ok.gov">David.Caldwell@deq.ok.gov</a>	Yes
	Alternate: Chris Armstrong (405) 702-1000 E: <a href="mailto:chris.armstrong@deq.ok.gov">chris.armstrong@deq.ok.gov</a>	No
OR	Travis Bartholomew T: 503-693-4122 E: <a href="mailto:travis.j.bartholomew@dhsosha.state.or.us">travis.j.bartholomew@dhsosha.state.or.us</a>	Yes
	Alternate: Lizbeth Garcia 971 865 0443 E: <a href="mailto:LIZBETH.GARCIA@dhsosha.state.or.us">LIZBETH.GARCIA@dhsosha.state.or.us</a>	No
	Included for information purposes: Ryan Pangelinan E: <a href="mailto:Ryan.pangelinan@dhsosha.state.or.us">Ryan.pangelinan@dhsosha.state.or.us</a>	No
	Included for information purposes: Sara Krepps Oregon Department of Environmental Quality (503) 693-5704 E: <a href="mailto:sara.krepps@state.or.us">sara.krepps@state.or.us</a>	No
PA	Annamarie Beach E: <a href="mailto:anbeach@pa.gov">anbeach@pa.gov</a> T: 717-346-8212	No
TX	Ken Lancaster T: (512) 239-1990 E: <a href="mailto:Ken.Lancaster@tceq.texas.gov">Ken.Lancaster@tceq.texas.gov</a>	Yes
	Alternate: Kristy Deaver T: (512) 239-6816 <a href="mailto:Kristy.deaver@tceq.texas.gov">Kristy.deaver@tceq.texas.gov</a>	Yes
UT	Kristin Brown T: (801) 965-2540 F: (801) 965-2544 E: <a href="mailto:kristinbrown@utah.gov">kristinbrown@utah.gov</a>	Yes

	Alternate: Alia Rauf T: 801-965-2511 E: <a href="mailto:arauf@utah.gov">arauf@utah.gov</a>	No
VA	Cathy Westerman T: 804-648-4480 ext.391 E: <a href="mailto:cathy.westerman@dgs.virginia.gov">cathy.westerman@dgs.virginia.gov</a>	Yes
	Alternate: Ed Shaw T: 804-648-4480 ext.152 E: <a href="mailto:ed.shaw@dgs.virginia.gov">ed.shaw@dgs.virginia.gov</a>	No
NELAP AC PA and EC	Lynn Bradley T: 540-885-5736 E: <a href="mailto:lynn.bradley@nelac-institute.org">lynn.bradley@nelac-institute.org</a>	Yes
EPA Liaison	Eric Graybill <a href="mailto:Graybill.eric@epa.gov">Graybill.eric@epa.gov</a>	Yes
California	Christine Sotelo <a href="mailto:Christine.Sotelo@waterboards.ca.gov">Christine.Sotelo@waterboards.ca.gov</a>	Yes
Guests:	Eric Yee, <a href="mailto:Eric.Yee@waterboards.ca.gov">Eric.Yee@waterboards.ca.gov</a> Jacob Oaxaca, <a href="mailto:Jacob.Oaxaca@waterboards.ca.gov">Jacob.Oaxaca@waterboards.ca.gov</a>	