Summary of the NELAP Accreditation Council Meeting December 2, 2019

1. Welcome and Introductions

The NELAP Accreditation Council (AC) met at 1:30 pm Eastern on Monday, December 2, 2019. As Vice Chair, Kristin presided over the meeting. Attendance is noted in Attachment 1. The minutes of November 12 were approved with one minor edit.

2. Nominations for Chair and Vice Chair of the NELAP AC

There were no additional nominations for these positions. Kristin Brown is the sole nominee for Chair, and Michele Potter is the sole nominee for Vice Chair. The election will occur at the January 6, 2020, meeting.

3. Recommendation for Renewal of Florida's Recognition

Ilona Taunton, the Lead Evaluator for Florida's evaluation, presented a summary of the evaluation, with its multiple delays and also explaining the two items responsible for the provisional recognition recommendation. The end date of the provisional recognition will be November 30, 2020, and FL expects to have at least one of those items fully resolved within six months or less.

Cathy moved and Bill seconded that the Evaluation Team's recommendation be accepted. Of the eleven ABs present on the call, ten voted in favor, with FL abstaining. The remaining four ABs will vote by email. NOTE: As of Monday, December 9, all four email votes were cast in favor of the recommendation.

Kristin thanked Ilona for explaining this recommendation to the Council.

4. State PFAS Regulations

Bill had requested an opportunity to discuss New Hampshire's regulations of polyfluoroalkyl substances (PFAS) with other NELAP ABs, but since making that request, he has had further conversations with the New Hampshire Department of Environmental Services, the Association of State Drinking Water Administrators (ASDWA) and the Association of Public Health Laboratories (APHL). As he found that each of those groups has the same questions about regulating and detecting PFAS in drinking water, he will work with the APHL State Assessor Forum in order to encompass all states and not just the NELAP states.

5. Resolving Proliferation of Method Codes for Lab Updates to Method SOPs

Bill invited Dan Hickman to the meeting to discuss method codes for lab-specific methods as NH is dealing with many legal issues around well testing for PFAS in particular, so that NH is scrutinizing the method SOPs in detail, and needs to be able to track updates in its database rather than having to deal with version numbers on paper copies of SOPs.

Bill explained that one aspect of the proliferation of state regulations about PFAS is that there are no EPA-promulgated methods for isotope dilution, although other published methods are available. Most labs seek accreditation for isotope dilution methods. For these PFAS methods and also for most methods from Standard Methods, labs regularly update their

method SOPs and each updated version of the SOP should have a new method code.

Dan further explained that initially, SOPs were not considered "methods" and even now, the SOP for method and analyte codes (SOP 1-109) does not address lab-specific SOPs. Some NELAP ABs do not accredit for lab-specific method SOPs, but others will. Dan has been assigning codes to these lab-specific SOPs but ABs find that there are too many method codes to keep up with, so Dan began updating the revision numbers without changing the method code itself, when requested by an AB. He noted that this is only an issue for primary ABs.

Cathy noted that if VA tracks revisions to the lab SOPs, a new TNI ID number has not been requested in the past. Kristin noted that UT advises labs that lab-specific SOP accreditations may not be recognized by other NELAP ABs, and UT has not been asking for method codes for lab-specific method SOPs. Paul indicated that KS accredits to the SOP only but its labs are only doing KS work, so that the SOPs have not been uploaded into LAMS. TX and OK do not accredit lab-specific SOPs, and MN does accredit them but under a variance to its regulations. NH noted that in accepting a secondary accreditation for a method-specific SOP from another state, he requests a copy of the accredited version of the SOP from that lab, and reviews the details.

NOTE: this request for copy of the SOP raises an issue about "extra requirements" that will be addressed in a later discussion, because particularly for PFAS, the lab-specific SOP will be the norm until there is a nationally promulgated method.

Bill noted that if other ABs object to having a new code for every update to each method SOP, then he will separately track them only in NH's database. Instead, Dan proposed that each new version of a method SOP will receive a new code, with the previous code being marked as "inactive", and that he would provide a new code only upon request from an AB (to ensure that the SOP is actually approved) and not in response to a request from a lab. There were no objections to this process from ABs present on the call, and it satisfies NH's need, so Dan will implement this process immediately. NOTE: The issue will be revisited in January to ensure that the absent ABs have an opportunity to provide input.

6. Mobile Laboratory TNI Lab ID Numbers

This topic was discussed but not fully resolved at the November 12 meeting, and Cathy was asked if she had any further information to add. Dan was invited to remain for this portion of the call, since it involves LAMS.

Cathy briefly reviewed the issue of needing a lab ID code for secondary accreditation for a mobile lab where the mobile's primary AB does not assign separate ID codes to mobile labs but rather includes them under the parent lab's accreditation, although the mobile lab is identified by Vehicle Identification Number on the certificate. Dan's prior recommendation was to have TX, NJ and LDEQ (the three states where mobile labs do not have separate IDs) create a LAMS entry for the demographic data of the mobile lab, as a one-time manual upload associated with the primary AB. That way, the secondary AB could easily enter the ID code and the scope for the secondary accreditation, so that the mobile lab's status is published and publicly available. However, this would have been a considerable workload for those three ABs. PA, NH and OR would issue separate certificates if they were asked to accredit any mobile labs, but have none at present.

Dan noted that LAMS is designed to have a lab code for every mobile lab. Cathy explained that she created a "workaround" by entering the mobile lab's demographic and scope

information manually, then noting in the comment field that the lab ID referred to a secondary accreditation. This assigns a lab ID code to the mobile lab and allows it so show up in VA's listing of accredited laboratories during a LAMS search. Kim expressed relief that LDEQ will not need to enter all of its more than a hundred mobile labs separately and manually into LAMS in order to create a lab ID code that LDEQ will not need to use anyway.

Dan remarked that Cathy's solution will be acceptable to him. He noted that it will show up in his QC processes as an "error", but if the comment field indicates that it is a mobile lab entered for secondary accreditation identification purposes, he'll know why.

7. New Business

Dan asked Kristin for an opportunity to ask for feedback about LAMS, what works and what is not working well, at the NELAP AC session in Newport Beach, and Cathy asked Lynn to request an off-agenda meeting space for the Council for private discussion. Of the eleven AB representatives present, seven indicated that they will be represented in Newport Beach.

8. Next Meeting

The next teleconference meeting will be Monday, January 6, 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	No
	Alternate: Dave Reed Dave.Reed@Illinois.gov	No
	For information purposes: John South John.South@illinois.gov	No
KS	Paul Harrison paul.harrison@ks.gov	Yes
	Alternate: N. Myron Gunsalus 785-291-3162 E: ngunsalus@ks.gov	No
LA DEQ	Kimberly Hamilton-Wims T: 225-219-3247 E: <u>Kimberly.Hamilton-Wims@la.gov</u>	Yes
	Altérnate: Elizabeth West elizabeth.west@la.gov	Yes
LA DOH	Grant Aucoin Grant.aucoin@la.gov	Yes
	Alternate: Scott Miles Scott.Miles@la.gov	No
MN	Lynn Boysen E: lynn.boysen <u>@state.mn.us</u>	Yes
	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:	No
	Brian Lamarsh Brian.Lamarsh@des.nh.gov	
NJ	Michele Potter T: (609) 984-3870 F: (609) 777-1774 E: michele.potter@dep.nj.gov	No
	Alternate : Rachel Ellis E: rachel.ellis@dep.nj.gov	No
NY	Victoria Pretti 518-485-5570 E: victoria.pretti@health.ny.gov	No
	Alternate: Lynn McNaughton E: lynn.mcnaughton@health.ny.gov	No
OK	David Caldwell (405) 702-1000 E: <u>David.Caldwell@deq.ok.gov</u>	Yes
	Alternate: Chris Armstrong (405) 702-1000 E: chris.armstrong@deq.ok.gov	No
OR	Lizbeth Garcia 971 865 0443 E: LIZBETH.GARCIA@dhsoha.state.or.us	No
	Alternate: Stephanie Ringsage STEPHANIE.B.RINGSAGE@dhsoha.state.or.us	No
	Included for information purposes: Ryan Pangelinan E: Ryan.pangelinan@dhsoha.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
ТХ	Ken Lancaster T: (512) 239-1990 E: Ken.Lancaster@tceq.texas.gov	Yes
	Alternate: Kristy Deaver T: (512) 239-6816 Kristy.deaver@tceq.texas.gov	Yes
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UT	Kristin Brown T: <u>(801) 965-2540</u> F: <u>(801) 965-2544</u> E: <u>kristinbrown@utah.gov</u>	Yes
	Alternate: Alia Rauf T: 801-965-2511 E: arauf@utah.gov	No
VA	Cathy Westerman T: 804-648-4480 ext.391 E: cathy.westerman@dgs.virginia.gov	Yes
	Alternate: Ed Shaw T: 804-648-4480 ext.152 E: ed.shaw@dgs.virginia.gov	No
	Lynn Bradley T: 540-885-5736 E: lynn.bradley@nelac-institute.org	Yes
EPA Liaison	Donna Ringel T: 732-321-4383 E: <u>Ringel.Donna@epa.gov</u>	No
California	Christine Sotelo Christine.Sotelo@waterboards.ca.gov	No
Guests:	Ilona Taunton, Lead Evaluator for Florida Ilona.taunton@nelac-institute.org Dan Hickman, TNI Database Administrator Dan.hickman@nelac-institute.org	