TNI PT Board Meeting Summary December 17, 2009

1) Roll call and approval of minutes:

Chairman Eric Smith called the TNI PT Board meeting to order on December 17, 2009, at 1:00 PM EST. Attendance is recorded in Attachment A. Associates: Jeff Lowry, Randy Querry and Chuck Wibby were also present. The meeting was adjourned at 2:29pm EST (Motion: Gary Second: Carl Unanimously approved.)

The minutes from the November 19, 2009 meeting were reviewed. Steve noted that Method 1531 on page 3 should read 1631. A motion was made by Gary to accept the minutes with the edit. It was seconded by Steve. The motion was unanimously approved and the minutes will be posted on the TNI website.

2) Experimental PT Status

The Chemistry FoPT Subcommittee will be completing the DW FoPT table in early January with the inclusion of the experimental analytes. They should have it approved and forwarded to the PT Board for a vote before the next PT Board meeting on the 21st of January.

3) Non-Potable Water (NPW) FoPT Table Update

Eric forwarded the NPW FoPT table to the NELAP Board and it is on their agenda for discussion at their next meeting on December 21st.

4) Low Level Total Residual Chlorine

Chuck Wibby had an opportunity to review his notes, the Chemistry FoPT Subcommittee minutes and the study data on low level total residual chlorine. His conclusion was that the limits originally suggested by the subcommittee are not significantly different from what he would recommend based on the data. He supports the limits originally recommended by the subcommittee.

Carl expressed his concern as to whether there are methods that will get down to those levels. Carl has been assured that there are methods.

The lower limit proposed was 50 ug/L. The PTRL is 5 ug/L. Chuck suggested that this lower limit could be raised and still work for Patrick. The group reviewed the

state information Patrick originally sent with his request. The detection limits for most of the methods are around 10 ug/L.

Gary motioned to add the low level total residual chlorine on the NPW FoPT table with a concentration of 85-250 ug/L and using the regression equation with values as noted in the table included in the November 19, 2010 PT Board minutes. The motion was seconded by Curtis and unanimously approved by the PT Board.

Eric will edit the NPW FoPT table and distribute it to NELAP Board by tomorrow morning.

5) Reorganization

Eric plans to send comments to Jerry tomorrow, so Board members should get him any final comments today.

6) TNI Chicago Agenda

Eric is proposing to do the caucus during the first part of the meeting instead of the second half.

<u>Agenda</u> PT Board Activities – Eric Chemistry FoPT Subcommittee Summary – Carl A2LA Activity Summary – Randy Querry Open Floor to Questions from Membership – Eric

Second Half will be used to continue PT Board work.

Eric asked for additional ideas for topics. Eric will e-mail RaeAnn Haynes to see if there is anything her subcommittee may want to include. Jeff noted that nothing has happened yet with the subcommittee so it is likely there will not be anything to present.

7) Review of A2LA Documents

Eric distributed the revised checklist (C315 SSAS Audit Checklist) and the R303 document to Board members. There were no additional comments on the R303 document revision. Randy commented that he will take one final look at the checklist before finalizing.

Gary moved to approve the December draft of R303 General Requirements (provided to the PT Board on 12/8/09) and the latest draft of the C315 SSAS audit

checklist (provided to the PT Board on 11/19/09). The motion was seconded by Carl and it was unanimously approved by the Board.

Eric will send an official notification of the vote to Randy.

6) Discuss Standard Interpretation Requests 72, 75, 80, 91, and 95

Notes are included within the tables in Attachment B. Final responses for #75 and #91 will be forwarded to Ilona for submission to the NELAP Board.

7) New Items

- None.

8) Open Action Items

The Action Items table was reviewed and updates were made directly into the table.

10) Next Meeting

The next meeting of the PT Board will be Thursday, January 21, 2009, at 1pm EST.

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

Attachment A

Participants TNI Proficiency Testing Board

Members	Affiliation	Contact Information
Eric Smith,	TestAmerica	615-726-0177 x1238
Chair (2009)		eric.smith@testamericainc.com
Present		
llona Taunton,	TNI	828-712-9242
Program Administrator		tauntoni@msn.com
Present		
Gary Dechant	Analytical Quality	970-434-4875
	Associates, Inc.	gldechant@aol.com
Present		747.050.0000 4040
Amy Doupe	Lancaster Laboratories,	/17-656-2300 x1812
Dressut	Inc.	aldoupe@lancasterlabs.com
Present		540.000.4540
Steve Gibson	Texas Comm. on Env.	512-239-1518
Bracant	Quality	Jgibson@iceq.state.tx.us
Svotlana Isozamova		407 425 6700
Svellana isozamova	Southoast Division	407-423-0700
Abcont	Southeast Division	sveliani@acculesi.com
Michella Karapondo		513-560-71/1
	USEFA	karapondo michella@epa.gov
Absent		karapondo.michelia@epa.gov
Carl Kircher	Elorida DOH	904-791-1574
		carl_kircher@doh_state_fl.us
Present		
Stacie Metzler	HRSD	757-460-4217
		smetzler@hrsd.com
Absent		
Matt Sica	State of Maine	207-287-1929
		matthew.sica@maine.gov
Absent		
Curtis Wood	Environmental Resource	303-431-8454
	Associates	cwood@eraqc.com
Present		

Attachment B

Standard Interpretation Request Reviews

#72	
Section (eg. C.4.1.7.4)	SCM FoPT (7/1/07) ; NELAC Analyte 1935, footnote 13
Describe the problem:	The SCM PT standard for TPH references HEM/SGT on the FoPT. HEM/SGT is a method defined analyte for method to 1664A. The scope and application section of 1664A says that it is for "surface and saline waters and industrial and domestic aqueous wastes". Therefore, the method has to be modified to be performed on solid and chemical materials. Is it appropriate to have a required PT for a non-standard method?
	Gary comment 10/21/09 : It is appropriate to have a PT for any analyte/method where the method is used with sufficient frequency and in support of environmental decision making regardless of the source of the method.
Comments	Eric comment 11/16/09 : Upon consideration, I have to agree to some extent with this SIR #72. HEM on a solid is performed by 9071B. 9071B does not discuss SGT. SGT is only discussed in 9070A/1664A, which was written for water. The units on the Soil FoPT table are in mg/kg. Scanning the list of approved SW-846 methods, I could not a gravimetric analysis that would apply to this PT, without, technically, modifying the method (9071B) to accommodate for Silica Gel Treatment. Therefore, I think the commenter is correct in that we should not be applying a requirement for this PT to HEM methods. Method 8440, TPH by IR, would appear to possibly still apply to this PT?? If so, at this point, I would suggest that the PT Board consider revising the footnote of this PT to indicate that this PT is only to be required where used in conjunction with supercritical carbon dioxide extraction and subsequent IR analysis. 12/17/09: Will be discussed at Chicago meeting.
Response	

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Describe the problem:	The result for EDB of <0.500ug/L was scored "not acceptable", against the true value of 0.299ug/L and limits of 0.179-0.419ug/L. This result is not identified as consideration for unacceptable criteria. We disagree, and feel that this result should be scored acceptable. 0.299ug/L is less than 0.500ug/L.
Comments	<u>Gary Comment 10/21/09</u> : EDB has an MCL of 0.05 ug/L. I believe that if the laboratory is supporting any regulatory work or if they ever report a value to a client at a concentration below 0.500 ug/L then their score is unacceptable. I would also argue that if the laboratory cannot meet the MCL or generally accepted MDL then the method is a modified method and should not reference the regulatory method without noting that it is modified.
	Eric Comment 11/16/09: Here is my suggestion for a possible response to this one – Based upon current acceptance criteria, the lab result for the analyte provided in the problem statement was correctly scored as not acceptable. Acceptance criteria for this analyte are currently based on the PT acceptance requirements outlined in Chapter 2 and Appendix C of the 2003 NELAC Standard. In addition, the FoPT tables currently include a footnote that states, "NELAC Proficiency Testing Reporting Limits (PTRLs) are provided as guidance to laboratories analyzing NELAC PT samples. These levels are the lowest acceptable results that could be obtained from the lowest spike level for each analyte. The laboratory should report any positive result down to the PTRL. It is recognized that in some cases (especially for analytes that typically exhibit low recover) that PTRL may be below the standard laboratory reporting limit. However, the laboratory should use a method that is sensitive enough to generate results at the PTRL shown" The laboratory should be aware of and take into account the corresponding PTRL for each analyte before reporting any PT results.
Response	<u>Current Draft</u> – Based upon current acceptance criteria, the lab result for the analyte provided in the problem statement was correctly scored as not acceptable. Acceptance criteria for this analyte are currently based on the PT acceptance requirements outlined in Chapter 2 and Appendix C of the 2003 NELAC Standard. In addition, the FoPT tables currently include a footnote that states, "NELAC

Proficiency Testing Reporting Limits (PTRLs) are provided as guidance to laboratories analyzing NELAC PT samples. These levels are the lowest acceptable results that could be obtained from the lowest spike level for each analyte. The laboratory should report any positive result down to the PTRL. It is recognized that in some cases (especially for analytes that typically exhibit low recover) that PTRL may be below the standard laboratory reporting limit. However, the laboratory should use a method that is sensitive enough to generate results at the PTRL shown" The laboratory should be aware of and take into account the corresponding PTRL for each analyte before reporting any PT results.
12/17/09: Curtis motioned to accept the response above and Gary seconded this motion. It was unanimously approved by the PT Board.

#80	
Section (eg. C.4.1.7.4)	List of analytes that required Proficiency Testing
Describe the problem:	 We are currently accredited for method SW 846 8151, but we want to add Pentachlorophenol by 8151 to our scope. Pentachlorophenol is not listed as requiring PT with the other Herbicides that are analyzed by 8151 that are listed. Therefore, I interpret that as Pentachlorophenol by method 8151 does not require PT. Our Accrediting Body says otherwise. They contend that because Pentachlorophenol is listed under the Acid Extractables (Method 625 or 8270) that require PT, it also requires PT if we want to add it to our 8151 scope. Please advise. Thank you.
Comments	Gary Comment 10/21/09: Pentachlorophenol is listed as an analyte for 8151 and is included in the PT sample for herbicides. While the tables have classified pentachlorophenol as an acid this is a general classification and does not imply an analytical method. The acceptance criteria are not method specific at this time so I would say there is a valid PT sample available and the lab is required to report it if wants accreditation.

Eric Comment 11/16/09 : I have written a response below that I would suggest. It is consistent with our previous SIR response #26, but updated based on the documented position of the previous NELAC PT Board. In our previous response #26 we felt that group headers must hold significance. Acceptance ranges and spiking concentrations have been previously determined in part based on how they are grouped, so I don't think we can ignore those group headers.
I also think we are limited to only offering our position, not telling the NELAP Board what they have to do. If the NELAP Board chooses to not follow our recommendation, then they choose to operate and accredit outside of our guidance. Here's my suggested response -
The Accrediting Body's interpretation is consistent with guidance provided a number of years ago by the previous Board overseeing the FOPT tables, the NELAC PT Board.
However, the TNI PT Board's current consensus is that group headers in those FOPT tables hold important significance, and group headers are to be utilized to classify when an analyte is required to be processed and analyzed.
The TNI PT Board would agree that there has been a general lack of consistency within all sectors of the community on how the group headers in the FOPT tables are being interpreted. The TNI PT Board is currently working to address this by adding some clarification on this matter to the FOPT tables.
Until such time as the revised FOPT tables become available, the TNI PT Board recommends that the current FOPT table group headers be taken into consideration and used as guidelines for classifying when a PT is required. The final decision on whether the AB grants accreditation based on TNI PT Board guidance lies with the AB and the consensus of the NELAP Board.

	<u>Current Draft</u> –
	The Accrediting Body's interpretation is consistent with guidance provided a number of years ago by the previous Board overseeing the FOPT tables, the NELAC PT Board.
	However, the TNI PT Board's current consensus is that group headers in those FOPT tables hold important significance, and group headers are to be utilized to classify when an analyte is required to be processed and analyzed.
Response	The TNI PT Board would agree that there has been a general lack of consistency within all sectors of the community on how the group headers in the FOPT tables are being interpreted. The TNI PT Board is currently working to address this by adding some clarification on this matter to the FOPT tables.
	Until such time as the revised FOPT tables become available, the TNI PT Board recommends that the current FOPT table group headers be taken into consideration and used as guidelines for classifying when a PT is required. The final decision on whether the AB grants accreditation based on TNI PT Board guidance lies with the AB and the consensus of the NELAP Board.
	12/17/09: Carl and Curtis will be providing comments on this response via e-mail. The Board is not ready to vote on this response.

#9	1

Section (eg. C.4.1.7.4)	C.1.1.1 and C.1.1.2 retrieved from: http://www.a2la.org/checklists/NELAC_CH_2_Pt_Provider_Checklist.pdf
Describe the problem:	My question stems from the recent DMR-QA 29 Study that my laboratory participated in, specifically the settleable solids parameter (SM2540F, volumetric). I am looking for clarification as to why a test that does not produce answers to three significant figures can be held to such a standard when it comes to PT acceptance ranges.

	 When calculating an answer, SM 1050B instructs to round off an answer to "as few significant figures as are present in the factor with the fewest significant figures". For Settleable Solids, it is not possible to report to three significant figures. Therefore, as in our case, an assigned value of 25.6 ml/l for the PT sample is not even a realistic/obtainable result. To then take such data and use it to calculate acceptance ranges ends up limiting the labs further than they should be. Meaning, the assigned acceptance range of 20.0-32.9 ml/l for our sample is really saying 20.0-32.0 because the test doesn't allow detection at a third significant figure. For this particular test, calculating limits this way will always result in the labs having a narrower range than intended, 0.9 ml/l in this case. I appreciate all feedback on this matter. Thank you,
Comments	Carl comment 11/12/09- CCK DRAFT: The requirement for 3 significant figures does not pertain to a laboratory requirement for reporting PT test results, but to a requirement of the PT Provider to express the assigned value and its acceptance limits. For Settleable Residue, it is technically possible for laboratories to report 3 significant figures, particularly if the gravimetric option is employed for the test instead of the volumetric option. Nevertheless, depending on how the Settleable Residue PT is packaged, it may be possible for PT Providers to verify the Assigned Value to 3 significant figures, even if some laboratories cannot do so in the reconstituted PT. It should be noted that Settleable Residue is currently an Experimental FoPT, meaning that NELAP accreditation status for Settleable Residue should be based on participating in the PT study and not on passing or failing the PT at this time. However, since the PT acceptance limits are currently under review, the Subcommittee handling this will take note to see if possible significant figures concerns would factor into any PT acceptance criteria being recommended. It should also be noted that the original requirement for 3 significant figures came from EPA's "National Standards for Water Proficiency Testing Studies Criteria Document," which was issued at the time that US EPA no longer supplied WS and WP proficiency samples. Changing the significant figure requirement thus may not meet with EPA endorsement.

<u>Eric comment 11/12/09</u> –I like what you wrote. If we proceed with approving this response, I would make two suggestions for consideration. How about we move paragraph 4 up to the end of paragraph 1? Also, since the concern raised was in reference to DMRQA and not Accreditation, I would suggest removing the statement regarding Experimental FoPT vs. Accreditation FoPT status. Here's what I'm suggesting -
The requirement for 3 significant figures does not pertain to a laboratory requirement for reporting PT test results, but to a requirement of the PT Provider to express the assigned value and its acceptance limits. It should also be noted that the <u>The</u> original requirement for 3 significant figures came from EPA's "National Standards for Water Proficiency Testing Studies Criteria Document," which was issued at the time that US EPA no longer supplied WS and WP proficiency samples. Changing the significant figure requirement thus may not meet with EPA endorsement.
For Settleable Residue, it is technically possible for laboratories to report 3 significant figures, particularly if the gravimetric option is employed for the test instead of the volumetric option. Nevertheless, depending on how the Settleable Residue PT is packaged, it may be possible for PT Providers to verify the Assigned Value to 3 significant figures, even if some laboratories cannot do so in the reconstituted PT.
It should be noted that Settleable Residue is currently an Experimental FoPT, meaning that NELAP accreditation status for Settleable Residue should be based on participating in the PT study and not on passing or failing the PT at this time. However, since the PT acceptance limits are currently under review, and the Subcommittee handling this will take note to see if possible significant figure concerns would factor into any PT acceptance criteria being recommended.
I would like to make one additional suggestion for the PT Board's consideration. Since we are moving Experimental PTs over to the Accreditation table right now and Settleable Solids is one of those Experimental PTs being technically reviewed this month, maybe we should hold off on finalizing the response to SIR #91 until after the subcommittee has completed it's technical review of this analyte and had a chance to discuss the concern being presented here? I realize we won't have a

	combined Non-Potable water table ready by our Nov. 19 th PT Board meeting, but hopefully we will by our December 17 th meeting. Maybe then we could put some final touches on the last paragraph of the response you have prepared based on that technical review by the subcommittee? Just a thought for the Board's consideration.		
Response	Current Draft –The requirement for 3 significant figures does not pertain to a laboratory requirementfor reporting PT test results, but to a requirement of the PT Provider to express theassigned value and its acceptance limits. The original requirement for 3 significantfigures came from EPA's "National Standards for Water Proficiency Testing StudiesCriteria Document," which was issued at the time that US EPA no longer supplied WSand WP proficiency samples. Changing the significant figure requirement thus maynot meet with EPA endorsement.For Settleable Residue, it is technically possible for laboratories to report 3 significantfigures, particularly if the gravimetric option is employed for the test instead of thevolumetric option. Nevertheless, depending on how the Settleable Residue PT ispackaged, it may be possible for PT Providers to verify the Assigned Value to 3significant figures, even if some laboratories cannot do so in the reconstituted PT.However, the PT acceptance limits are currently under review, and the Subcommitteehandling this will take note to see if possible significant figure concerns would factorinto any PT acceptance criteria being recommended.		
	12/17/09: Carl motioned to approve the response above and Curtis seconded the motion. The motion was unanimously approved by the PT Board.		

#95 (10-13-09)

Section (eg. C.4.1.7.4)	F.2.1, F.2.2, F.3		
Describe the problem:	I am confused about the PT requirements for labs doing WET analysis. The only 'true' PT is the DMRQA - but it runs longer than 45 days - which doesn't meet F.2.2 requirements. I need to know will the DMRQA be allowed and counted as a PT until		

	such a time as the PT providers have other PTs available?	
	<u>Stacie comment 11/19/09</u> –	
	Email from Kirsten McCracken to Jerry 10/22/09 – Ilona & Jerry: I had asked Ilona to forward the following SI request to the PT Board which she did and it was assigned to Stacie Metzler. Stacie is on the PTEC and the PT Board and she and I talked about this SI request this morning and she has found a conflict in the language of the 2003 NELAC Standard and we are not sure how to proceed with resolution so I am writing you for guidance.	
Comments	Section F.2.2 of the 2003 NELAC standard says WET PT must be analyzed within 45 days of sample receipt. Section F.4.1 instructs labs to use DMRQ. The DMRQA study is open for 90 days.	
	Either the time-frames of the standard are in conflict or the authors of the standard intended that the DMRQA be used but that the samples be analyzed within 45 days even though DMRQA is open longer. Stacie has a few members and/or contacts that helped develop the appendix in the 2003 standard but nobody seems to recall a 45 day time-frame and the general consensus is that the 45 day time frame does not make sense.	
	If there is a conflict in the 2003 Standard would this resolved by the PTEC, PT Board, NELAP Board, TNI Board, LASC – other? Email from Jerry Parr to Kirsten McCracken 11/19/09:	
	Sorry; I meant to come back to this and then forgot. After looking at all of this closely, I think the NELAP Board will need to adopt a policy on this issue. Clearly, the 2003 standard is in error (one way or the other) and the only way to fix it is with the NELAP Board. LASC or the PTEC might be able to develop a recommendation.	
	I checked the 2002 standard and it had a 60 day period; 30 days for analysis and 30 more days for reporting.	
	Is this issue addressed in the TNI standard?	
	From what you have said, it appears the PT committee would recommend a 90	

	day period if given the choice.
	Jerry
	Eric Comment 11/24/09: It looks to me like based on Jerry's comments provided by Stacie that this SIR #95 should be forwarded to the NELAP Board for response and resolution.
	Discussion 12/17/09: Should be forwarded to the NELAP Board to adopt a policy. There is an error in the standard.
	Ask Carl for a summary of his comment.
	The PT Board is running under the new TNI Standard, but the NELAP Board will adopt the new standard on July 1, 2011.
	Get additional comments from Chuck.
	There are two sets of requirements for the labs -45 days to run from time of sample receipt and 45 days to report.
	Based on discussion, Eric will work up a DRAFT response.
	PT Expert Committee is working on supplemental appendices to the TNI Standard.
Response	

Attachment C

Action Items – TNI PT Board

			Expected	Actual
	Action Item	Who	Completion	Completion
10.	Let the new Chemistry FoPT	Carl / Ilona	When	Describe
	Subcommittee know that information is		Chemistry	what this is.
	available from NY regarding		FoPT	Soil in
	extraction/prep methods and PT results.		Subcommittee	metals too?
			is formed.	SVOA.
17.	Work on language for new TNI policy	Chuck	Eric will	Looking for
	based on NELAC Policy #16 and EPA		follow-up	volunteer to
	Criteria Document.		with Chuck to	help Chuck.
			determine a	
40		. г. ^с	date.	
42	Submit modified footnote based on the	Eric	Before tables	
	micro discussion during the 3/19/09		are finalized.	
	meeting.			
64	Fix type in WS Table	Fric	Ian mta	
04		Life	Juli Intg.	
70	Reassess need to contact PT Providers to	Eric	Ongoing	
	give them a heads-up on the FoPT table			
	updates.			
84	Forward concerns in writing about	Chuck	12/16/09	Complete
	approving Low Level Total Residual	Carl		
	Chlorine.			
07			12/16/00	
85	Ask Brian to provide the reasons for	Carl	12/16/09	Complete
	approving the limit for Low Level Total			
	Residual Chiorine.			
86	Forward Chem FoPT Subcommittee	Ilona	12/16/09	Complete
00	minutes from 11-3-09 meeting to PT	nonu	12/10/07	compiete
	Board.			
87	Revised A2LA documents to Eric later	Randy	11/25/09	Complete
	today (11-19-09) and this will be	Eric		_
	forwarded to the PT Board for final			
	review.			
88	Final comments to A2LA documents	All	12/17/09	Complete
	should be e-mailed to Board members and			
	Randy. A vote will be held at the			
	December 17, 2009 meeting.			

			Expected	Actual
	Action Item	Who	Completion	Completion
89	Review responses and comment on	All	12/17/09	Complete
	Standard Interpretation Requests.			
90	Edit the NPW FoPT table to include LL	Eric	12/18/09	
	TRC and forward to the NELAP Board.			
91	Send Caucus topic ideas to Eric.	All	1/21/10	
92	Send Randy results of final vote on A2LA SSAS documents.	Eric	12/31/09	
93	Talk to Chuck and Carl and DRAFT response for SIR #91.	Eric	1/21/10	

Attachment D

	Item	Meeting	Comments
		Reference	
3	Send A2LA a formal request to ask PT Providers if PT data can be shared with the	1/14/09	
	Board. Needs to be done before 8/09.		
5	Update PTPA Review SOP.	n/a	
6	DW Table Micro Total Coliform Rule	10/15/09	9 out of 10 vs. 10 out of
	Request		10

Backburner / Reminders – TNI PT Board