TNI PT Board Meeting Summary June 17, 2010

1) Roll call and approval of minutes:

Chairman Eric Smith called the TNI PT Board meeting to order on June 17, 2010, at 1:02 PM EST. Attendance is recorded in Attachment A – there were 7 Board members present on the call. Associate members Aruna Kaveeshwar and Chuck Wibby were also present. Randy Querry joined the discussion towards the end of the meeting.

Minutes from the June 3rd meeting were reviewed. This was a special meeting called to focus on the PTPA Evaluation SOP. A motion was made by Matt to approve the minutes with the correction that Michella attended the meeting. It was seconded by Michella and unanimously approved. The minutes will be posted on the TNI website.

The minutes from the May 20th meeting will be reviewed at the July meeting.

2) PTPA Evaluation SOP

Carl Kircher sent the following comments by e-mail and Eric responded with the italicized text:

I have a couple comments below, although if you do not use them it won't change my vote. If they are helpful and the other PT Board members agree, please feel free to make the changes:

- global comment: Do we need to make a global change from "PT Board" to "PT Executive Committee"? Does the TNI Policy Committee do that for us? I had planned to make that change before sending the final draft SOP to the policy committee.
- Section 4.0: Bullet 3) should probably be worded, "... Volumes 3 & 4 of the TNI Environmental Laboratory Sector Standards" O.K. I will make that edit to the final draft if everyone agrees.
- Section 5.2: This paragraph commits the PT Board to constitute the evaluation team AND to do the Application Completeness review within 30 days of application submittal. Can we do this? I hope we can, but we need to avoid foot-dragging consciously. Good point. I don't think both steps could reasonably be done within 30 days, since we only meet once a month. I would suggest the following language change to 5.2, "The completeness review should be conducted within 30 days of the PT Board receiving the application and required supporting documentation. PT Board's appointment of an evaluation team."

Eric will make the suggested changes and forward to the Policy Board for review.

3. ACLASS and A2LA Assessment

Eric may have a potential conflict of interest with auditing A2LA because he is accredited by A2LA. Carl had mentioned he could participate in the A2LA audit too, but Eric would prefer two more volunteers to reduce the burden on Carl.

No one has yet volunteered for the A2LA Assessment team.

4. NPW FoPT Table

Steve had mentioned some concerns about failure to meet some of the Limit SOP requirements.

			Std.	
			Dev.	Mean
		Number		
		of	vs. AV	vs. AV
	Proposed WP Analytes	Results	> 0.75	> 0.9
5	Azinphos methyl	✓	✓	
6	Diazinon	✓	✓	
7	Malathion	✓	✓	
11	4-Am-26-DNT	✓	✓	
13	HMX	✓	✓	
14	Nitrobenzene (low level)	✓	✓	
15	2-Nitrotoluene	✓	✓	
16	3-Nitrotoluene	✓	✓	
18	13-Dinitrobenzene	✓	✓	
19	24-Dinitrotoluene (low level)	✓	✓	
20	26-Dinitrotoluene (low level)	✓	✓	
21	Tetryl	✓	✓	✓
22	Disulfoton	✓	✓	
23	Chloropyrifos	✓	✓	
25	135-Trinitrobenzene	✓	✓	
26	246-Trinitrotoluene	✓	✓	

Eric sent out additional information on the compounds listed above. The January 19th Chemistry FoPT Subcommittee meeting minutes also provided additional information on these analytes (minutes available on the TNI website).

Eric reviewed some of the information forwarded. Steve was concerned that a few compounds were set at limits that seemed lower than what the data Eric forwarded supported. Carl commented that some limits were set based on the grouping of the analyte. The labs on the subcommittee call supported lowering these limits.

Steve commented that if the limits keep getting wider ... why have them on the PT table? Carl responded that it was difficult for the subcommittee to determine what could be removed from the table. The subcommittee made it clear where the analytes failed the Limit Update SOP criteria so that the PT Board and the NELAP Board could provide input if the analyte is not needed. A number of the analytes on the list above were retained at the current acceptance limits as currently posted.

Carl supports the addition of the analytes in the table above, though he has some concerns on Tetryl and would entertain the deletion of this analyte. Eric agreed that Tetryl should be considered for removal. Svetlana pointed out the failure rate on this analyte (14%) and noted there are other analysis issues with the analyte. There was general agreement with the people on the call to remove Tetryl.

Steve is also having trouble with all the explosives on the list. In many cases there was not enough data and criteria were not met in the limit update SOP. He felt it was not a good perception. He noted that the NELAP Board did not necessarily want more analytes on the accreditation table, they want to be sure the analytes that are added are substantiated. Quantitative limits for semi-quantitative analyses. Steve thinks the NEFAP Board is going to have a problem with this.

Carl noted that many of the analytes that were marked for not enough studies were very close to 10. There were enough studies for 2-Nitrotoluene – this should not have been checked on the table above.

Chuck commented that the labs will continue to run the analytes using methods that don't necessarily work that well. Even if the limits don't look as good as the NELAP Board would like, a lab falling outside of the limits is likely not following the method properly. The PTs are the only way to currently monitor many of these analytes. He included the following list as reasons for keeping analytes on the tables:

- 1. Proposed limits are based on best available data.
- 2. Limits estimate as closely as possible when a laboratory has not completed a method properly.
- 3. PT results are the only objective evidence that states use to monitor the performance of accredited laboratories on an ongoing basis.
- 4. Limits that appear to be too wide are a good indicator that the methods labs are required to use need to be improved.
- 5. States are still required to accredit laboratories and without PT standards they have one less resource on which to base their decisions.

Svetlana noted that something like Round Robin studies could be used instead of PTs to accomplish what Chuck stated. She felt leaving some analytes on where there are problems is a disservice to the labs.

The PT Board needs to find out what the sticking points are for the NELAP Board. Eric and Carl have been invited to the next NELAP Board call to discuss the questions on the DW table. This discussion could have some impact on future tables. Eric does not think any of these possible issues should impact looking at approving the NPW table.

A motion was made by Carl to approve the NPW FoPT table with the removal of Tetryl. There was no second to the motion and the motion was closed. There are concerns about the nitroaromatics.

Matt feels getting the NELAP Board involved in this discussion could be helpful. He feels we need their input. Some of the analytes are borderline. It would be appropriate to ask if Carl and Eric could ask about this on the call they have been invited to.

Chuck pointed out that the NELAC 2003 standard requires a certain number of studies ... this requirement goes away in July 2011 with the implementation of the new standard. He also noted that some of the analytes of concern will still be offered as PTs because other states require them.

Next Steps:

- Carl and Eric will bring the issues discussed above to next Monday's NELAP Board call. Other PT Board members are welcome to join. If there is not enough time to discuss, the NELAP Board will be asked to join the next PT Board call on July 15th.
- Everyone is asked to provide comments on the NELAP Board questions sent out June 10th by e-mail (see below). Comments should be sent to the entire group.

Questions received from the NELAP Board (PT Board comments are in italics):

- 1) analytes appearing in more than one place in the table *Need to clarify the intent of the PT Board and Chemistry FoPT Subcommittee. Cover letter should have addressed this.*
- 2) new headings for "Purge and Trap Organic Parameters" and "Extractable Organic Parameters" *Cover letter should have addressed this.*
- 3) footnote 13 for EDB and DBCP under "Purge and Trap Organic Parameters": "This analyte's concentration range and acceptance criteria do not meet USEPA Safe Drinking Water Act (SDWA) requirements. See Regulated VOCs in the Extractable Organics section for the analyte that must be performed for USEPA SDWA compliance purposes." *Just need to explain why this is there*.
- 4) footnote 16 for EDB, DBCP and 1,2,3-Trichloropropane under "Extractable Organic Parameters": "The acceptance criteria is technology specific for gas chromatography-electron capture detection." *Not something new from Eric's recollection.*

- 1) Will we have to establish a policy to ensure all the ABs require the same thing? And how will it be communicated to labs? Eric felt this was a good idea. This would be something that would need to come from the NELAP Board. The PT Board could help with this.
- 2) These headings focus on sample prep, which up to now has not been included in the NELAC technologies. While they might make sense analytically, they appear to add criteria that do not exist elsewhere. Not quite sure what is really being asked for. The PT Board's intent was to make it clear what analytes need to be run and when.
- 3) This seems like a step back into Program-based accreditation. Why are they saying that a lab has to run the "Extractables" PT when method 524.3 (P&T GC-MS) is an approved method for EDB and DBCP? True the PT sample could be analyzed by either method, but the new headings seem to contradict this. If a lab successfully uses 524.3 to analyze the P&T sample, how will we deny them Drinking Water certification? Florida, for one, does not differentiate between certifications valid for regulatory purposes and those that are not. I think it may be a mistake to provide PTs for regulated DW contaminants that do not meet the EPA DW PT criteria. Need to hear more on this when we meet with the NELAP Board.
 4) Related to #3. This footnote further confuses the issue of which method a lab could use, and implies that 524.3 could not be used. Before June it was not an option. This can be addressed.

Commenters were concerned that either labs will get the wrong idea or that ABs will interpret the tables in different ways. (Remember what we went through to establish how we would handle the medium and low-level volatiles on the Solids table?) I would like to see some clear guidance or "notice of intent" or what have you for what we should be looking for and allowing from labs.

The intent was to reduce the confusion, not increase it. Communication is key. NELAP ABs will want to communicate changes to their accredited labs.

5. Statement of Work (SOW)

The SOW was forwarded to Board members on with highlighted edits. There are additional references to SSAS providers.

Eric asked if there is any conflict with the Limit Update SOP? There may be a conflict on providing "n" (number of participants). Randy wanted to be sure to include this in the SOW. Carl did not think there were any problems with the SOP. A2LA will be asked to leave it in there and the SOP will be addressed if needed.

There were no objections to the new wording.

6. A2LA Status with SSAS Providers

A2LA is free to begin accreditation. The regulations are due to take effect the end of July. Eric provided a DRAFT letter that will be sent to the TNI Board to approve A2LA.

A motion was made by Carl that A2LA be designated as a TNI PTPA to include SSAS. The motion was seconded by Michella and unanimously approved. Eric will distribute an e-mail for voting and votes will be tabulated by Ilona.

7. New Items

- None.

8. Open Action Items

See Attachment B.

9. Next Meeting

The next meeting of the PT Board will be Thursday, July 15, 2010, at 1:00pm EST.

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

The meeting was adjourned at 2:38 EST. (Motion: Carl Second: Michella Unanimously approved.)

Attachment A

Participants TNI Proficiency Testing Board

Members	Affiliation	Contact Information
Eric Smith, Chair (2009) Present	TestAmerica	615-726-0177 x1238 eric.smith@testamericainc.com
Ilona Taunton, Program Administrator Present	TNI	828-712-9242 tauntoni@msn.com
Gary Dechant Absent	Analytical Quality Associates, Inc.	970-434-4875 gldechant@aol.com
Amy Doupe Absent	Lancaster Laboratories, Inc.	717-656-2300 x1812 aldoupe@lancasterlabs.com
Steve Gibson Present	Texas Comm. on Env. Quality	512-239-1518 jgibson@tceq.state.tx.us
Svetlana Isozamova Present	Accutest Laboratories – Southeast Division	407-425-6700 svetlani@accutest.com
Michella Karapondo Present	USEPA	513-569-7141 karapondo.michella@epa.gov
Carl Kircher Present	Florida DOH	904-791-1574 carl_kircher@doh.state.fl.us
Stacie Metzler Present	HRSD	757-460-4217 smetzler@hrsd.com
Matt Sica Present	State of Maine	207-287-1929 matthew.sica@maine.gov
Curtis Wood Absent	Environmental Resource Associates	303-431-8454 cwood@eraqc.com

Attachment B

Action Items – TNI PT Board

			Expected	Actual
	Action Item	Who	Completion	Completion
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	
97	Make a recommendation to address	Carl	date. 2/18/10	Next call's
91	evaluation of "less than" (<) reporting.	Carr	2/10/10	agenda.
	Distribute to Board for consideration.			agenda.
	Distribute to Bourd for consideration.			New item for
				May.
102	Highlight analytes that are listed more	Curtis	6/15/10	Complete
	than one time in FoPT tables.			
114	Review SOW to see if an update is	Randy	5-20-10	Per section
	needed to provide data from the			2.7 they need
	database.			written
				permission from the PT
				Providers.
				1 TOVIGETS.
				Send
				language to
				Eric.
122	Find out where PTPA Application will	Ilona	6/17/10	Complete
	be placed on the TNI website.			
123	Update SOP to reflect changes	Eric	6/17/10	
	discussed on the call. Distribute for			
	electronic vote.			
124	Review questions from NELAP Board	All	6/21/10	
14	and provide comment.	7111	0/21/10	
	provide comment.			
125	Distribute voting information on	Eric	7/15/10	
	designating A2LA as a PTPA for SSAS.			

Attachment C

Backburner / Reminders – TNI PT Board

	Item	Meeting Reference	Comments
6	DW Table Micro Total Coliform Rule Request	10/15/09	9 out of 10 vs. 10 out of 10
7	Add the Field PT Subcommittee to the limit update SOP during its next update.	3/4/10	