

**TNI PT Executive Committee
Meeting Summary
December 2, 2010**

1) Roll call and approval of minutes:

Chairman Eric Smith called the TNI PT Executive Committee meeting to order on December 2, 2010, at 1:01 PM EST. Attendance is recorded in Attachment A – there were 9 Executive Committee members present on the call. Associate members Stephen Arpie, Jeff Lowry, Mike Weisrock, Randy Querry, and Aruna Kaveeshwar were present. The following guests were also present: Becky Hoffman (beckyh@mail.slh.wisc.edu), Mike Zimmerman (Zimmerman.Michael@epamail.epa.gov), Carrie Miller (Miller.Carrie@epamail.epa.gov) and Dan Hautman (Hautman.Dan@epamail.epa.gov) were also present.

The minutes from the 11/18 meeting were reviewed. A motion was made by Curtis to approve the minutes. The motion was seconded by Gary and unanimously approved. The minutes will be posted on the TNI website.

2) Cryptosporidium Work Group

EPA is looking at the feasibility of opening the current PT program to other providers. It could be done through: (1) contract (but EPA would like to see other options), (2) EPA to work on ISO accreditation with other international ABs (EPA would have to write specifications for multiple ABs, etc ...) or (3) use the TNI PT program. The advantage of the TNI PT program would be that EPA would have direct input and could develop policy, but TNI would manage the PT side. There are still resource drains in setting it up, but there is less time involvement long term. They would like to move towards program development with TNI.

Discussion:

- Since this is Drinking Water, do you add a FoPT- Protozoa or do you have a separate program like SSAS?
- Carrie – Another pro to TNI is longevity – implementing a regulation has an end date ... this will continue over the long haul.
- Dan asked if the TNI program is sufficient and whether the table approach would work. Matt thought that it should be sufficient and the accreditation program is already in place. We need to see if anything needs to change in the PT standard itself. He thinks it is only a question of PT development.

- Carl – PT standards should be sufficient for Cryptosporidium and Giardia. Need to establish a FoPT. The PT standard discusses homogeneity, stability, etc. These things need to be considered and worked out. The PTPA and PT providers need this information. Are there any issues on frequency? This will need to be worked out with the PT Expert Committee. Carrie noted they already have specifications.
- Matt – A subgroup for the FoPT needs to be established.
- Gary – Are there any PT Providers on the call who will plan to participate in this program? Becky Hoffman will continue to provide PTs. Becky will be able to help with this. They will be seeking accreditation through TNI. They are the only provider in the US at this point. Others have expressed interest. If the other PT providers can follow the format ...they can join in.
- Gary – Does EPA perceive an increase in the need for these PT samples? The EPA will continue to do the lab accreditation side of this. Several labs have expressed interest in this program, but currently the EPA program is closed. EPA regulations have stated that states can approve equivalent programs. Florida already accredits for this. New York may also be looking at this. Gary raised the concern that more labs may be interested in these PTs and was concerned whether there would be enough PTs.
Carrie noted that there are about 60 labs in the program currently. The change will be that the labs will need to start paying for the PTs.
- Becky was asked what her cost currently is – probably about \$200 per lab – partially due to shipping. Adding accreditation to this process – could raise it. The PTs are not necessarily similar to the micro PTs labs are currently using. This would be a specialty analyte and could be much more costly.

Eric noted that it does not appear there are any roadblocks to moving forward. He suggested changing the name of the current work group to Protozoa FoPT Subcommittee. The subcommittee should look at EPA's specifications and develop the PT.

Jeff asked if historical data would be available and it was confirmed that it would be available.

Matt made a motion to develop a Protozoa FoPT Subcommittee to establish FoPT criteria with the current EPA Cryptosporidium program (Eric will forward e-mail). Curtis seconded the motion. There was no further discussion. The motion passed unanimously.

Matt will reach out to PT providers for help in developing this product.

Carrie will be drafting a memo – they will pay for one more round of PTs and then it will be opened up to other providers. They are run twice a year.

3. Status of ACLASS Assessment

ACLASS is being recommended for accreditation. Carl and Amy summarized the information. A vote will be taken at the Dec 16th call.

A Statement of Work will be developed between the TNI Board of Directors and ACLASS. This can be done before or after the accreditation is granted.

Committee members were asked to carefully review the documents for discussion on the 16th. It will be a primary topic.

4. Executive Committee Membership

There are two applications that have been distributed - Dr. Brenda McGrath and Joe Pardue. One other candidate is expected to submit an application (Dr. Valkenburg). Valkenburg would be a lab and the other two are Others. There is also an expectation that a nomination will be received from the field program.

The nominations will be reviewed at the next meeting and decisions will be made.

5. Drinking Water FoPT Tables

Eric will be sitting in on the NELAP AC call on Monday to discuss status of Experimental PTs.

Steve - Why is 1,2,3-Trichloropropane and Naphthalene listed twice with two different ranges and acceptance criteria? There are different preps and methods used (524 vs 525 for Naphthalene), thus different concentrations need to be available.

Method 524.2 and 504.1 target analytes. Gary commented that it implies PTs by method. Carl noted that a FL lab can select either concentration range it wants to run. How will the PT provider know which acceptance criteria to use? Stephen Arpie noted that their catalogs are geared towards a fit for use. They call out appropriate methods. This helps labs know which PTs to run.

Steve is concerned there will be push back on this issue from the NELAP AC.

There are discussions of doing away with Experimental references in the new standard.

Carl would prefer to see the committee continue to work with the tables that originally had all the experimental analytes included that could be moved over using the TNI 2009 standard.

There are no new headers being used on the NPW and SCM FoPT tables.

6. Review Open Action Items

Updates were made to the Action table (Attachment B).

Database Subcommittee: The question was raised as to whether A2LA and ACLASS are capturing the same information? The answer is yes. The database subcommittee will continue to work on this issue.

7. New Business

- Need to begin thinking about the agenda for the conference in Savannah. This committee is meeting Feb 1st at 1:30.
- Eric received an e-mail from Kirstin (Chair, PT Expert Committee) regarding an FoPT question that he forwarded to the committee:

Eric:

I thought of submitting an SIR for this question but because the FoPT tables are not part of the standard a request for standards interpretation did not seem appropriate so I am sending it directly to you with CC to TNI staff and the Chair of the LASC in a format that could be dropped into an SIR if that is the right way to go.

Bear with me – this is a long one...

Question:

The FoPT Table for NPW says the FoPT are applicable to wastewater or non-potable water. How is non-potable water defined? Does NPW include aqueous waste by SW-846 methodology?

It is my understanding that the acceptance criteria for the analytes listed in the NPW table were derived from the former criteria document using methodology associated to the methods approved under 40 CFR Part 136. Therefore the data used to establish acceptance ranges for NPW did not include data from SW-846 methodology because SW-846 methods are associated to the RCRA program for solid and hazardous waste.

For this reason it has been my contention that the NPW FoPT tables are not applicable to SW-846 methods and aqueous FoPT for SW-846 methodology do not currently exist. Therefore aqueous PTs for SW-846 methodology are not required as condition for NELAC accreditation (some states may require them but NELAC does not). Some ABs do require labs to analyze the NPW PT samples by SW-846 methodology as a condition of NELAC accreditation and others do not. In looking into this issue, I now realize the FoPT tables do not clearly identify the regulatory programs or methodology for which “NPW” applies.

Are NPW FoPT tables applicable to SW-846 methods? If so, do the acceptance ranges established take into account the differences in methodology between regulatory programs?

For example, the wastewater methods formerly and currently approved under 40CFR 136 for Sulfide is a titration only method (EPA 376.2 and SM4500 Series). The SW-846 method (9030/9034) for sulfide in aqueous waste is distillation method followed by titration. With the SW-846 procedure, acid soluble and acid-insoluble sulfide is separated from the sample matrix with the addition of acid prior to distillation; samples are distilled and then titrated. The "WP" method does not include the addition of acid and samples are not distilled prior to titration. The "WP" and the "RCRA" method yield different results. If the acceptance criteria for the FoPT are based solely or mostly on data from a titration only method, then the criteria may not be appropriate to evaluate proficiency for the SW-846 method which has a more rigorous preparation procedure. Additionally, if the data that was originally used to establish acceptance criteria for the FoPT was from "WP" PT samples, it is likely that the data was primarily derived using EPA 376.2, a method which has since been withdrawn from the federal register. The SM series methods are not always equivalent to the EPA methods and therefore may also produce different results.

My laboratory does not provide analytical service for the approved wastewater method for sulfide (SM4500 S²). We provide analytical service for the solid and hazardous waste method (SW-846 9030/9034). We run the "WP" PT sample by the SW-846 method for non-NELAC reasons. Our lab consistently reports a high bias result for the WP PT sample using the SW-846 methodology. Thorough root cause analysis indicates that the high bias is likely attributed to preparation and distillation step required by the SW-846 method which leads me to believe that the NPW FoPT PT for Sulfide and the acceptance criteria equations has not been proven to be applicable or appropriate for the SW-846 method.

I have confirmed with at least 1 PT provider that very few labs report results for the PT sample using the SW-846 method. This makes sense. NELAC does not require PT by method and if a lab is approved for both methods under the separate regulatory programs; it is likely they will run the "WP" PT sample by the approved method for the wastewater program. The PTP also confirmed that that they do not distill the "WP" PT sample prior to their verification of the true value of the PT sample; the PTP uses a titration only method for verification.

If the acceptance criteria equations are set based on historical data of a titration only method; are the acceptance criteria appropriate for a method that uses a more rigorous preparation procedure? Is the true value of the PT sample considered "verified" for the SW-846 method if the PTP has not distilled the sample as part of the verification procedure?

The questions have merit because PT performance affects laboratory accreditation especially if the different ABs are enforcing PT requirements differently.

I have a secondary AB that requires a NPW FoPT for sulfide by the SW-846 method as a condition of NELAC accreditation; my primary AB does not. My primary AB is aware of the PT failures but at their discretion has not taken action against our laboratory because no laboratory error can be found with our method or technique as verified by them during their routine NELAC assessment – and it is unclear if the NPW FoPT tables apply to SW-846 methods.

The 2003 standard clearly indicates that labs with secondary accreditation are not required to submit PT results to the secondary AB and the secondary AB is required by the standard to recognize the accreditation of the primary AB. It is the primary ABs responsibility to determine if the lab has met the requirements for PT; if a secondary AB happens to find an instance of nonconformance; the secondary AB cannot take action against the laboratory, the secondary AB must work it out with the primary AB. Nonetheless, a secondary AB recently requested all of my laboratory's PT results from my primary AB and then the secondary AB revoked our laboratory's accreditation for the SW-846 9030/9034 method based on "PT Performance". Although the secondary AB is not permitted to revoke our accreditation per the 2003 standard, I have no recourse with the secondary AB except to file an administrative hearing with them, a legal process we will not pursue.

My only recourse at this point is to request that the PT Executive Committee clearly define "NPW" in the FoPT table and identify which methodology and regulatory programs for which the NPW FoPT were developed and are appropriate for use. I suspect that for most FoPT the difference in methodology between the regulatory programs is slight but there are differences in the preparation procedures for the methods used by different programs and different prep procedures yield different results even when the same determinative technology is used; therefore for some FoPT different acceptance criteria may be needed or the FoPT may need to be excluded from certain methods until such time as a method specific FoPT is developed.

Thank you for looking into this matter.

Kirstin

Responses were received from Steve and Carl. Non-potable is defined in the standard.

The PT acceptance range is what is lumping this information together. Eric will respond based on Carl and Steve's comments. He will distribute the response to the group for support and then get back to Kirstin.

8. Next Meeting

The next meeting of the PT Executive Committee will be Thursday, December 16, 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 2:23 EST. (Motion: Carl Second: Curtis Unanimously approved.)

Attachment A

Participants TNI Proficiency Testing Executive Committee

Members	Affiliation	Contact Information
Eric Smith, Chair (2010) Present	TestAmerica	615-726-0177 x1238 eric.smith@testamericainc.com
Ilona Taunton, Program Administrator Present	TNI	828-712-9242 tauntoni@msn.com
Gary Dechant (2009) Present	Analytical Quality Associates, Inc.	970-434-4875 gldechant@aol.com
Amy Doupe (2009) Present	Lancaster Laboratories, Inc.	717-656-2300 x1812 aldoupe@lancasterlabs.com
Steve Gibson (2008) Present	Texas Comm. on Env. Quality	512-239-1518 jgibson@tceq.state.tx.us
Svetlana Isozamova (2008) Absent	Accutest Laboratories – Southeast Division	407-425-6700 svetlani@accutest.com
Michella Karapondo (2008) Present	USEPA	513-569-7141 karapondo.michella@epa.gov
Carl Kircher (2010) Present	Florida DOH	904-791-1574 carl_kircher@doh.state.fl.us
Stacie Metzler (2009) Present	HRSD	757-460-4217 smetzler@hrsd.com
Matt Sica (2008) Present	State of Maine	207-287-1929 matthew.sica@maine.gov
Curtis Wood (2010) Present	Environmental Resource Associates	303-431-8454 cwood@eraqc.com

Attachment B

Action Items – TNI PT Executive Committee

	Action Item	Who	Expected Completion	Actual Completion
17.	Work on language for new TNI policy based on NELAC Policy #16 and EPA Criteria Document. Policy #16 deals with headers on the PT tables.	Chuck Eric will review and determine if this is still needed.	Eric will follow-up with Chuck to determine a date.	Looking for volunteer to help Chuck.
97	Make a recommendation to address evaluation of “less than” (<) reporting. Distribute to Board for consideration.	Carl Eric will review	2/18/10 Completion next meeting.	Next call’s agenda.
133	Update Evaluation SOP and application. Distribute for comment. Add information for NEFAP.	Eric	12/16/10	
136	Start work on the SOP to add analytes to Accreditation FoPT Tables.	Eric, Curtis, Stacie	Dec 2010	
139	Complete ACLASS recommendation and distribute to PT Executive Committee members for review at next meeting.	Carl Amy	11/29/10	Complete
140	Compare A2LA and ACLASS database fields and provide input on actual requirements.	Database Subcommittee (Eric, Stephen, Gary, Curtis)	12/16/10	Complete
141	Forward e-mail vote for membership to missing members on 11/20/10 call.	Ilona	12/16/10	
142	Forward membership candidate list to Committee members.	Eric	Ongoing	
143	Make contact with Kirstin (PT Expert Committee) and Aaren (NELAP AC Chair) regarding status of Experimental PTs.	Eric	12/2/10	Complete
144	Prepare response to Kirstin and distribute to committee for comment.	Eric	12/16/10	

	Action Item	Who	Expected Completion	Actual Completion
145	Review membership candidates and prepare to vote.	All	12/16/10	

Attachment C

Backburner / Reminders – TNI PT Executive Committee

	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	