

TNI PT Program Executive Committee Meeting Summary

February 3, 2015

1. Roll call and approval of minutes:

Chair, Maria Friedman, called the TNI PT Program Executive Committee (PTPEC) meeting to order on February 3, 2015, at 8:04 AM Eastern. Attendance is recorded in Attachment A – there were 9 Executive Committee members present. Dixie Marlin was just voted onto the committee and she was also present.

Maria reviewed the handouts everyone should have received for today's meeting.

Due to an oversight, a vote was not taken on the December 18, 2014 minutes. A vote will therefore be held at the next PTPEC meeting on 2-19-2015.

Maria asked that everyone review the January 22, 2015 minutes. A motion was made by Joe and seconded by Justin to approve the January 22, 2015 minutes. The motion was unanimously approved.

2. Chair Update

Membership

Dixie Marlin has been voted in as the newest member of the PTPEC. Ilona will follow-up with an email to the Board of Directors.

SOP Review by Policy Committee

Maria talked to Alfredo about the SOP reviews and he said we will not receive the information for a few more months. This will be placed on hold. There are other SOPs the Subcommittee is working on.

PT Provider / PTPA Conference Call

Maria and Ilona met with the PT Providers and PTPAs to talk about better ways to receive PT data for limit updates and for addressing complaints. The group reviewed confidentiality issues and discussed what is currently being collected versus what they would like to see collected to maintain their confidentiality. They reviewed a DRAFT conflict of interest form, Excel spreadsheet for data collection and an example letter for collecting information.

The group came to some agreements that will need to be followed up in written procedures. They would like Conflict of Interest forms completed by people who receive access to the data. TNI is working on creating FTP sites for each PT Provider to upload their data confidentially. The PTPEC (or FoPT Subcommittee) will request specific data within a time frame and with “n” participants or greater from TNI IT. They will not know anything other than the time frame and that all data has the correct number of participants. PT Provider names will not be given when the information is released by TNI IT.

The PT Providers are reviewing and commenting on the Conflict of Interest form. The next step is to meet with the FoPT subcommittees and see if the modifications to the Excel spreadsheet are acceptable. Once this is done – TNI IT will need to create the FTP sites.

Compound Naming and Identification Inconsistency - (2,2'-oxybis (1-chloropropane) vs. bis (2-chloroisopropyl) ether

Resolution has been reached on the correct naming and CAS number. The next steps are to get the LAMS corrected and then the FoPT Table needs to be updated. Right now in LAMS there are two codes. The correct name is 2,2'-oxybis(1-chloropropane). This process will take some time so all the proper notifications can be made before anything changes. Dan Hickman thinks it will take 3-6 months.

Ilona noted that Dan mentioned a concern whether the changes being made are correct, because he made changes last year in response to ELAB's request. Maria confirmed with Patsy Root last night. 2,2'-oxybis(1-chloropropane) is confirmed with the name and CAS number. When Dan made a change last year, there was an incorrect CAS number used.

(Addition: Correction. There were further concerns raised after the meeting that lead to further discussion on this issue. It is not yet resolved.)

3. SIRs

Maria prepared responses to the SIRs for committee review. She asked for comments.

SIR #26

I have been recently inspected by the State of Florida DOH. The inspection was very well done and along NELAC standards.

The auditor indicated that if we were certified for compound 1,2,4-trichlorobenzene for 8260 we would be required to perform the PT if 1,2,4-trichlorobenzene was offered for any group. It is not currently in the 8260/624 volatile grouping as offered by WIBBY or NIS. It is however listed in the base neutral grouping. We were advised that we would have to perform the volatile analysis using the base neutral sample. We are not currently certified for 8270.

If we put this base neutral PT on the volatile instrument we would ruin the column

with the very first PT.

I emailed Steve Arms the program director at the State of Florida and got a similar response.

This is just an example of one parameter there are others that fall into this issue
Thank you for your time.

SIR #80

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.

2-2-2015 Maria's Draft Response for both SIRs:

The ABs are correct in requesting the analysis of PTs where available by analyte/matrix. While the 2003 NELAC Standard defined an FoPT as having all three elements of matrix, method/technology, and analyte/analyte groups, these elements were not all defined in the FoPT Tables. Most FoPT Tables contain only matrix, analyte, and analyte groups. To date, only the Whole Effluent Toxicity Testing FoPT Table includes the applicable methods. It should be noted that analyte groups, as currently used in FoPT Tables, are primarily used only to define groups of analytes for the purpose of setting requirements for the minimum number of analytes that must be included from a specific analyte group in each PT sample. Analyte groups may also separate medium or low level analytes for purposes of acceptance limit evaluation. The analyte groups do not define the method or technology to be employed.

When situations such as those reported in this SIR are encountered, the recommended course of action is to discuss the matter with the AB. If resolution cannot be achieved, then the laboratory may have to dilute the PT sample. The extra work and potential for error underscores the importance of communication and collaborative efforts with the AB.

With all of the above said, the PTPEC is in progress working to add methods (where required) or specific technologies, for which the acceptable ranges would be intended. Additionally, these efforts could be supplemented with instructions on the use of FoPT Tables. The PTPEC will consult and collaborate with the ABs in this regard.

Jeff Lowry commented that he thinks the committee's response needs to be stronger. The laboratories are in horrible positions when PT concentrations don't match the limits of the method.

Ilona noted that the commentary parts need to be removed from any response. The NELAP AC is going to be looking for a concise response to these SIRs. Suggesting that the lab dilute the samples would be considered outside of the scope of a response. They have also rejected responses where future plans are described. She also noted that there is a big difference between the previous response and the one we are looking at today.

Maria asked about discussing this issue with the NELAP AC before completing the response. The request came from LASEC, so PTPEC should contact LASEC to let them know we would like to meet with the NELAP AC before we respond. Maria will follow-up with this.

Stacie commented that she never interpreted the headers as described in the note. Shawn commented that it is in Volume 3 and that the statement of what the headers are for is not consistent with Volume 3. *(Maria's Addition: Note that there was no Volume 3 in the NELAC 2003 Standard that was in effect when the two SIRs were received in 2008. Need to look at NELAC 2003 references.)*

It should be noted that analyte groups, as currently used in FoPT Tables, are primarily used only to define groups of analytes for the purpose of setting requirements for the minimum number of analytes that must be included from a specific analyte group in each PT sample. This statement is inaccurate.

The analyte groups do not define the method or technology to be employed. This statement is also not correct.

Continued Discussion After Remaining Agenda Items Were Completed (9:30am Eastern):

To continue with this discussion, Maria asked each of the committee members to give their thoughts on next steps or how to respond to the SIRs.

- Justin - Would prefer to take the position the previous committee took when they originally responded to the SIRs.
- Matt - Prefers to stick with a position similar to the original response and to have stronger language to identify what the issue is. Matt went back to the standard and feels that the ABs are correct in their interpretation that the analyte needs to be run by all methods.
- Stacie – Need to refer to Volume 3 to make it a stronger response.
- Joe – In agreement with above.
- Andy – He prefers to look at the PTs by technology. He agrees with Matt's comment.

- Dixie – We are seeing ABs that are interpreting the standard in the strictest sense. She feels the committee should be providing guidance to the ABs where there really aren't PTs available – rather than have the AB require an analyte to be run using an inappropriate method because a “PT is available”. The PT does include the analyte, but the concentration is inappropriate for the method the lab is seeking accreditation for. It should be clear that in cases like this ... a PT is not available.
- Nicole - Maria reminded people about Nicole's suggestion last time. There could be a guidance document on how the tables should be used. She does not think this will be helpful for responding to the SIRs. She noted the committee needs to define what the intent is. She thinks there needs to be more collaboration between the PTPEC and the NELAP AC so that when tables come out they are correctly interpreted.
- Susan – She agrees with what Nicole commented and the others. She said in SC an analyte that is within a SVOA grouping is only required to be run by a SVOA method. SC is not a NELAP AB.

Matt again emphasized that the ABs are applying the Standard and this committee is wrestling with the concern that the Standard was not intended to cause the issue we are looking at. The PTPEC can't just respond that “this” is what we meant. The Standard does not back-up the PTPEC position.

Matt also questioned whether the FoPT Table Format Subcommittee is in conformance with the Standard. Are they looking at it as stated in the Standard? Maria feels it is. The subcommittee was formed to add Technology (and method in the case of DW).

The solution is not as simple as requesting an Interim Amendment because there are multiple standards that would need to be changed.

Andy noted that some low level analytes have been added to the table recently. If a custom PT is used – it would still need to abide by the limits that are currently in the table for the analyte. Stacie and Matt confirmed this would not be a valid TNI PT. This is not a solution using today's requirements.

Ilona asked if the committee is reconsidering their response based on Matt's comment that the Standard does not allow what the committee believes is the correct response. Matt felt it might be appropriate to state that the intent of the headers was “this” and try to propose a solution to this issue.

We need a solution, but this is outside of the SIR process. The SIR process does not provide guidance – it provides an interpretation. LASEC is working on an FAQ type of document that might be an appropriate avenue to provide guidance on this topic.

Ilona noted that there at two topics being discussed – a response to the SIRs (that we may not like – but we have to respond based on the Standard) and work on addressing the real issue for a long term solution.

Dixie would like to offer guidance to include in LASEC's document and simply respond to the SIR.

Jeff Lowry commented that any response to the SIR should still state that the current practice is inappropriate from a technical standpoint. The response should only address the specific questions.

Stacie thinks the response on the SIR should be that use of the PT in this manner is inappropriate, but this is what the Standard requires. This concept would be elaborated on in the actual response.

The committee is in agreement with Matt's comment that we should be able to discuss this with the NELAP AC because their interpretation is based on tables that aren't currently compliant with the Standard. The PTPEC should be able to push the original response because the tables are not currently in the correct format. We are working towards tables where matrix, technology/method and analyte are clear – this is a good time to be talking about this. Technically the NELAP ABs are regulating on something that is incorrect. The current tables are not set-up as required in the Standard.

Jeff thinks there are Technologies on the table.

The PTPEC will try to solve the problem with the NELAP AC before responding to the SIR. Maria will talk to Judy and Aaren to set-up a meeting to discuss how to do this.

4. PTPA Presentations – See slides in Attachment D.

A2LA

Kelly presented failure rates for Solids, WS and NPW. It was noted that the graphs should read Percent on the Y-Axis.

Solids Failure Rates:

>10% Failures –
Aroclor 1242
Ignitability (Flashpoint)
Etc ...

WSCHEM:

>10% Failures

1,2,4-Trimethylbenzene
1,3,5-Trimethylbenzene
Etc ...

ANAB

Dates for PT Provider assessments are all in 2015 for ANAB. Some are Surveillance Assessments and some are Reassessments – so there should not be a problem being able to go on an assessment with a PTPA. NSI will be the likely candidate. Kelly thought there would not be any problems for A2LA either.

We need to decide on time frames for the PTPA evaluations so they can work with us on making a PT Provider assessment available.

Matt commented that fixed limits do affect passing rates.

There were experimental analytes that had higher failure rates, but these do not currently affect the tables.

5. Subcommittee Reports

Chemistry FoPT

Andy reported the subcommittee is still going through SCM analytes. They are finding that there are not really any big changes and results are fairly consistent with the previous limits.

WET FoPT

Maria has not heard from the NELAP AC. We are asking that they reconsider their original rejection of the table. She plans to meet with Aaren (NELAP AC – Chair) later in the week when she comes in.

There is a provision in the standard that states that the PT Provider will provide instructions. We may need to point to this requirement in the standard (Volume 2 – Section 6.1.1 of the PT Standard). This fits with what the NELAP AC would like to see done.

The NELAP AC doesn't want the preparation instructions on the FoPT table. They don't look at FoPT tables during their assessments and would prefer that the PT Providers send the instructions.

SOP Update Subcommittee

Nicole commented that there is no update for this subcommittee.

Maria commented that a chair is being looked for. Shawn will reach out to PT Expert Committee members today.

FoPT Table Format Subcommittee

Craig would like to submit the Drinking Water table before they begin work on the others.

Methods will be listed in a separate column. In general, the analytes will be grouped under methods instead of each analyte having a method listing. This makes the table manageable.

The Subcommittee Chair is asking for a change to the PTPEC decision at the last meeting to include all methods. He would like to only include approved method.

Craig is concerned that a method that is not an approved method will cause some issues.

Stacie pointed out an example where there are methods developed that are not approved methods – do we go down to the level of all methods having to be listed.

Jeff - Putting all the methods on the table will also impact the FoPT tables. EPA has a website that gives methods for an analyte, so is this really necessary? He is concerned about how this will be kept up.

Only include accredited methods or what ABs accredit for. Some ABs accredit to SOPs – should these be included? No.

The methods could be qualified on the table.

Maria noted that the Scope needs to be reviewed. We may need to talk to NELAP AC about what methods are being used. Shawn confirmed this is not needed because this information is being pulled from the PT Providers.

Matt asked if the PT data currently being collected will need to collect methods used to produce the table the committee is working on.

The committee will start with the methods that are being reported to the PT Providers. This will be the initial list of methods on the table that will be presented to the PTPEC.

Microbiology FoPT Subcommittee

The PTPEC is looking to reform the Microbiology FoPT Subcommittee. Maria is looking for Chair. She has been talking to Gil Dichter.

6. Michella's Update

EPA approved a new method for PCBs – there is no PT available for 524.3. She sent information to Maria, but an application is now needed. The PTPEC will respond within 30 days of the receipt of the application. It will need to be a presence/absence PT. This is going to be beyond what was done before.

7. New Business

- None.

8. Action Items

- See Attachment B.

9. Next Meeting

The next PTPEC teleconference will be held on 2-19-2015 at 1:00pm EST.

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

The meeting was adjourned at 10:03pm EST. Matt motioned, Stacie seconded. Unanimously approved.

Attachment A

Participants TNI

Proficiency Testing Program Executive Committee

Members	Affiliation	Contact Information
Stacie Metzler (2009) Present	HRSD	757-460-4217 smetzler@hrsd.com
Maria Friedman (2014) - Present	TestAmerica	949-260-3201 maria.friedman@testamericainc.com
Ilona Taunton, Program Administrator Present	TNI	828-712-9242 tauntoni@msn.com
Eric Smith (2010) Absent	ALS Environmental	904-394-4415 eric.smith@alsglobal.com
Justin Brown (2011) Present	Environmental Monitoring and Technologies, Inc.	847-875-2271 jbrown@emt.com
Susan Butts (2012) Present - Phone	South Carolina DHEC	(803)896-0978 buttsse@dhec.sc.gov
Patrick Brumfield (2012) Absent	Sigma-Aldrich RTC	(307) 721-5488 Pat.Brumfield@sial.com
Michella Karapondo (2011) Present	USEPA	513-569-7141 karapondo.michella@epa.gov
Nicole Cairns (2012) Present - Phone	NY State DOH	(518) 473-0323 nicole.cairns@health.ny.gov
Joe Pardue (2011) Present	Pro2Serve, Inc.	423-337-3121 joe_pardue@charter.net
Dr. Andy Valkenburg_(2011) Present	Energy Laboratories, Inc.	406-869-6254 avalkenburg@energylab.com
Ron Houck Absent	PA DEP	rhouck@pa.gov
Matt Sica Present	ANAB, ANSI-ASQ National Accreditation Board	msica@anab.org
Dixie Marlin (2015) Present	Environmental Science Corporation	DMarlin@esclabsciences.com

Attachment B

Action Items – TNI PT Executive Committee

	Action Item	Who	Expected Completion	Actual Completion
185	Send updated DW table with Footnote 15 to NELAP AC for approval.	Stacie	4/1/12	Stacie submitted this. Need to confirm approval.
214	Update Tin, Total Xylene and Total Cyanide on FoPT tables and submit for approval.	Carl Stacie	Next Meeting	In Progress
233	Review complaint process.	Maria Ilona	5/14/14	In Progress
244	Draft response to complainant for 3051A complaint and distribute to committee for review.	Maria	9/11/14	Complete
246	Rewrite request to the Chemistry FoPT subcommittee and send to Ilona for distribution.	Maria	10/6/14	
249	Meet with PTPAs to discuss issues surrounding receiving data for FoPT Limit Updates and complaints. Determine if issue exists and whether subcommittee is needed to address this issue.	Maria	11/13/14	In progress.
251	Follow-up with Rami to provide support to solve footnote issue on WET FoPT Table.	Maria	10/30/14	Still in Progress
252	Set-up meeting with Aaren (NELAP AC) to discuss approving the WET FoPT Table as is.	Maria	12/5/14	Maria has tried to contact her by phone and email. Will talk to her in Crystal City.
253	Check with EPA attorney on requirement that Vinyl Chloride cannot be “0”.	Michella	12/15/14	
254	Review PT SOP comments by the Policy Committee and add to agenda	Maria Ilona	12/15/14	12/18 & 1/22: Maria did not


	Action Item	Who	Expected Completion	Actual Completion
	as appropriate.			receive anything yet.
255	Get back to Michella regarding Lab IDs.	Maria	12/15/14	Complete
256	Letter to DMR Coordinators	Maria	12/12/14	Complete
257	Email to SOP Subcommittee regarding clarification on how limit updates due to issues should be addressed.	Maria	12/12/14	Maria prepared it, but is waiting for a chair for this subcommittee.
258	Send letter to complainant regarding prep method complaint.	Maria	12/12/14	Complete
259	Prepare response to Policy Committee and Complainant on UV-254 complaint.	Maria	12/12/14	Complete
260	Amend FoPT Table Format Subcommittee Scope and distribute for review.	Maria	12/12/14	
261	Bring naming and ID inconsistency issue to the IT Committee.	Maria	12/12/14	
262	Look into schedule for next PTPA evaluations and confirm TNI Board extended evaluations to 4 years.	Maria	12/12/14	Complete
263	Look into new website design and see if there is an FAQ section that the committee can use to summarize some of their processes – complaint, addition/deletion of analyses to FoPT tables, etc. Talk to IT Committee.	Maria	12/12/14	
264	Update Complaint SOP to reflect Standard requirement that PTPA be contacted.	TBD	TBD	
265	Send out request for a volunteer to Chair the SOP Update		2/1/15	

	Action Item	Who	Expected Completion	Actual Completion
	Subcommittee.			
266	Compound Naming and Identification issue will be brought to ELAB/Patsy Root.	Maria	2/6/15	
267	Prepare Excel Template and letter to send to PT Providers to facilitate discussion at PT Provider meeting.	Ilona	1/25/15	

Attachment C



Backburner / Reminders – TNI PT Executive Committee

	Item	Meeting Reference	Comments
7	Add the Field PT Subcommittee to the limit update SOP during its next update.	3/4/10	
11	Evaluate how labs are accredited for analytes that co-elute.	5-19-11	
12	PTPA Evaluation Checklist needs to be updated prior to next round of evaluations.	8-6-13	
13	Charter needs to be updated in November.	Ongoing	
14	<p>When new limits are established for the FoPTs, what is considered to be a statistically significant change to the old rates? At what point is it appropriate to question new limits? This lends to the TSS discussion a few months ago.</p> <p>Patrick commented that it would make sense to look at changes to pass/fail rates 6 months after new limits are effective. This possible addition to procedures should be evaluated when updating the limit acceptance SOP.</p> <p>3/20/14: Eric noted that there are some logistics with doing a 6 month review. This may need to be a separate committee so it does not hamper the progress of the Chemistry FoPT Subcommittee.</p>	2/20/14	
15	Correct FoPT tables for 2,2'-oxybis(1-chloropropane) once LAMS is updated. It could take 3-6 months.	2-3-15	





ANSI-ASQ National Accreditation Board

2015 PTEC Review





PT Providers

- Absolute Standards
 - RA (February, 2015)
- Sigma Aldrich RTC
 - SA (unconfirmed, Summer, 2015)
- NSI Lab Solutions
 - SA (unconfirmed, Summer, 2015)





Complaints

- No complaints to PTPA




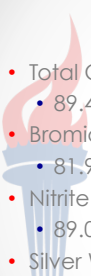
Data Summary

- <90% pass
 - 39 Analytes total
 - WS, WP, SCM
- Low data point studies (<10)
- Fixed limits from FOPT





Fixed Limits

- Total Cyanide WS \pm 25%
 - 89.45%
- Bromide WS \pm 15%
 - 81.95%
- Nitrite WS \pm 15%
 - 89.00%
- Silver WS \pm 30%
 - 87.00%



Questions





A2LA PTPA Update Report

Kelly Black
(Rob Knake)

February 3, 2015



The American Association for Laboratory Accreditation

A2LA PTPA Status

- 4 PTPs currently accredited
- All PT Providers renewed accreditation in 2014



The American Association for Laboratory Accreditation

Failure Rates

- Past 2 years
- Study size ≥ 25
- Average unacceptable rate across all studies/providers by analyte



The American Association for Laboratory Accreditation

Solids Failure Rates

WSCHEM Failure Rates

WPCHEM Failure Rates

Graphs displayed at the conference ...




The American Association for Laboratory Accreditation

We Thank:

- Our customers, the A2LA accredited proficiency testing providers
- Our assessors and the PTPEC and PTEC that support us in the continuous improvement of our accreditation program




The American Association for Laboratory Accreditation

American Association for Laboratory Accreditation 


TNI PTPA Status Update

Winter Meeting 2015

 The American Association for Laboratory Accreditation
"World Class Accreditation"

STATUS OF PTP PROGRAM

- 4 Accredited PTPs:
 - Advanced Analytical Services
 - ERA
 - Phenova
 - New York State Department of Health Wadsworth Center
- 3 PTPs in Renewal process and 1 PTP in Annual Review
- No complaints to report
- No significant scope changes to report

 The American Association for Laboratory Accreditation
"World Class Accreditation"