

Protozoa/Crypto Workgroup Meeting Summary

Forum on Laboratory Accreditation, Savannah, GA

Wednesday, February 2, 2011 8:30 a.m.

Participants:

Phone – Leah Villegas, Carrie Miller, Rick Danielson, Becky Hoffman, To Chang, Carl Kircher, Steve Via

In Room – Mike Wichman, Brooke Connor, Dan Hauptman, Cindy Netrou, Sue Boutros, Patsy Root, Curtis Wood, Greg Carroll

Minutes provided by Lynn Bradley, TNI staff

Background:

EPA's Technical Support Center (TSC) is considering transferring its Proficiency Testing (PT) sample program to TNI's PT Program, and this workgroup was established to facilitate that process. Crypto testing is required by the Long Term 2 Enhanced Surface Water Treatment Rule, and "Systems must have *Cryptosporidium* samples analyzed by a laboratory that is approved under EPA's Laboratory Quality Assurance Evaluation Program for Analysis of *Cryptosporidium* in Water or a laboratory that has been certified for *Cryptosporidium* analysis by an equivalent State laboratory certification program.(§141.705)" Only 1 more PT round will be provided by EPA, before laboratories will need to contact a provider acceptable to the laboratory's State. Labs in EPA's program analyze 2 PTs per year, and pass 2 out of 3.

Participants in the meeting were uncertain whether the working group was formally chartered as a subcommittee by TNI's PT Executive Committee, and thus did not feel empowered to make any decisions about how to move forward.

The meeting began with Carrie Miller and Carl Kircher providing background on the effort. To date, EPA has prepared and distributed the PT samples, but seeks to privatize that activity. Specifications for the existing PT program are available; a Federal Register Notice about laboratory requirements is available (FR 74 (36):8529 2/25/2009) and a supplement to the Drinking Water Certification Officer Manual is also nearing final preparation (Chapter 7.) Certification Officer training was given in September 2010, and another training in June 2011; candidates are nominated by states to the EPA Regional Offices for final recommendations about who participates.

Wisconsin's State Laboratory of Hygiene (SLH) is developing PT samples for the program, for the immediate future; currently this effort is contracted by the TSC support contractor. WI SLH is currently preparing for ACLASS accreditation, and intends to continue providing crypto PTs for laboratories in the approval program, with laboratories purchasing directly with WI SLH after the final EPA-provided round in March 2011.

Given that only 55-60 laboratories are approved for the program, representatives of one PT provider present for the discussion indicated that it would not be feasible for them to attempt a competitive program, given the difficulty of the microbes and the small number of labs involved. EPA will prepare the

samples for the March 2011 round, and WI SLH will prepare the August 2011 specimens, and both will be provided to approved labs in the program for those rounds.

Carl indicated that three questions needed answered before TNI can proceed, although the current specifications can simply be carried forward if there are no changes:

1. What concentration range
2. What are the desired acceptance limits and should that be a consensus mean or an assigned value (fixed percentage of standard)
3. What matrix -- full volume water or seeded into a filter cartridge

Estimates were that it will require 4-5 months to prepare the new Field of Proficiency Testing tables (FoPT.)

There was also limited discussion of whether TNI might be asked to implement a lab approval program for this regulation, and if so, whether it would require a new standard be developed, or just FoPT tables that would be required for the PT program anyway.

Concerns were raised about sustaining laboratory capability and capacity for crypto testing during the 3 year period when mandatory testing is not required, since there is a need for capacity for voluntary testing of recreational waters, regardless of the drinking water regulation. Concerns about whether the approval program would continue were raised, as well.

Near the end of the meeting, Greg Carroll, TSC Director, joined the meeting and clarified the Agency's position on several items, as follows:

- EPA intends to continue the lab approval program until a replacement program is available. EPA will continue to be "the safety net" for crypto testing until/unless another option becomes available.
- EPA will audit the crypto-approved labs again, once every 3 years until the program is shifted elsewhere. Approval will continue until a date for replacement program take-over is set, and assurances of consistency and comparability with the EPA program provided. Labs would continue to send PT results to EPA TSC in the interim.
- If a state wants to establish an approval/oversight program for crypto labs (e.g., a state AB offers a program equivalent to the existing approval program), EPA would welcome that. It was noted that PA and FL offer accreditation for crypto now, and that other Accreditation Bodies are considering adding this field of accreditation, but that is not presently deemed equivalent to the EPA approval program.

The meeting closed with TNI Board members present suggesting that if EPA desires TNI to establish an accreditation program for crypto labs, a request should be made to the TNI Board of Directors. This could be either within the NELAP structure, or a separate program (such as the SSAS program) if additional/different requirements were mandated.