

Summary of LASEC SIR Subcommittee Meeting

May 24, 2016

Present: Judy Morgan, Kristin Brown, Carl Kircher

SIRs 26 and 80

These two are interrelated.

SIR 26

This needs to be fixed at the TNI level, rather than with an interpretation of the FoPT table. Carl says the sole resolution within the current process is an Analyte Request Application (ARA). For now, post for AC vote. NOTE later decision was to withdraw as a dispute with AB

SIR	26
Section	2003: Chapter 2
Request	<p>I have been recently inspected by the State of Florida DOH. The inspection was very well done and along NELAC standards.</p> <p>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.</p> <p>If we put this base neutral PT on the volatile instrument we would ruin the column with the very first PT.</p> <p>I emailed Steve Arms the program director at the State of Florida and got a similar response.</p> <p>This is just an example of one parameter there are others that fall into this issue Thank you for your time.</p>
Committee Comments	Revised response from PTPEC to match SIR 80
Response	<p>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, PT data was not available to establish separate FoPTs according to method/technology. The 2003 Standard also specified that sufficient PT data had to be available, specified as at least 10 valid PT studies with at least 20 participant laboratories in each study, in order to establish concentration ranges and acceptance limits for FoPTs.</p> <p>When this SIR was initially submitted for consideration, the TNI PT Program worked to establish additional FoPTs for so-called "dual-purpose" and "overlapping" analytes. The NPW FoPT Table that went into effect on 10/3/2011 added an additional listing for 1,2,4-Trichlorobenzene (and Naphthalene) in the grouping with other Volatile Aromatic analytes for possible use with methods such as EPA 624 and 8260. The same addition was made in the SCM FoPT Table that took effect on 1/3/2012.</p> <p>The TNI PT Program has no control over the business practices of PT Providers on how they package, market, and distribute their PT samples. Therefore, the only</p>

	recourse within the auspices of TNI are to petition the PTPEC to add the analyte in question as a separate entry with separate concentration range and acceptance limits. This could be done by submitting an Analyte Request Application to the PTPEC, with a TNI NELAP AB sponsor and supporting PT data justifying the addition of the requested analyte.
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PTPEC Response Rejected by NELAP AC:

In the absence of a written policy from the previous NELAC PT Board regarding proper interpretation of the FOPT table analyte analysis requirements, the TNI PT Board cannot comment on what may or may not have been the intent of the NELAC PT Board in this regard. Without previous PT Board policy, interpretation to date of analyte analysis requirements for the FOPT tables has been left to an AB's (Accrediting Body's) discretion.

The TNI PT Board believes that there has been a general lack of clarity within the community on how the FOPT tables should be interpreted. The TNI PT Board consensus is that group headers in those FOPT tables must hold significance, and group headers must be utilized to classify when an organic analyte is required to be processed and analyzed using extractable and/or purgeable technologies. The TNI PT Board is currently working to add this clarification to the FOPT tables.

Until such time as the revised FOPT tables become available, the requirement for a PT by the AB must take into consideration current FOPT table group headers and whether TNI approved PT providers offer that analyte in their routinely offered products for volatile analysis. It must not be required by an AB that a PT product specifically designed and packaged by a PT vendor for extraction (semivolatile) methods be analyzed by purgeable (volatile) analysis. If volatile analysis of an analyte listed under a FOPT Base/Neutral grouping is required by an AB, the analyte must be readily available (from at least the majority of TNI approved PT providers) in PT vendor products that have been designed and marketed to be used for volatile method analysis.

SIR 80

The root cause of the problem is within the PT program. Decision was to post this for AC vote.

SIR	80
Section	Chapter 2; FoPT Table: List of Analytes that Require Proficiency Testing
Request	<p>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.</p> <p>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.</p> <p>Please advise. Thank you.</p>
Committee Comments	(revised by PTPEC to match SIR 26)
Response	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

	<p>all three elements of matrix, method/technology, and analyte/analyte groups, PT data was not available to establish separate FoPTs according to method/technology. The 2003 Standard also specified that sufficient PT data had to be available, specified as at least 10 valid PT studies with at least 20 participant laboratories in each study, in order to establish concentration ranges and acceptance limits for FoPTs.</p> <p>When this SIR was initially submitted for consideration, the TNI PT Program worked to establish additional FoPTs for so-called "dual-purpose" and "overlapping" analytes. The SCM FoPT Table that went into effect on 1/3/2012 added an additional listing for Pentachlorophenol in the grouping with other Herbicides analytes for possible use with methods such as EPA 8151. At that time, insufficient PT data was available to support the addition of Pentachlorophenol to the NPW FoPT Table.</p> <p>The TNI PT Program has no control over the business practices of PT Providers on how they package, market, and distribute their PT samples. Therefore, the only recourse within the auspices of TNI are to petition the PTPEC to add the analyte in question as a separate entry with separate concentration range and acceptance limits. This could be done by submitting an Analyte Request Application to the PTPEC, with a TNI NELAP AB sponsor and supporting PT data justifying the addition of the requested analyte.</p>
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PTPEC Response Rejected by NELAP AC:

The Accrediting Body's interpretation is consistent with guidance provided a number of years ago by a different committee overseeing the FOPT tables at that time.

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 looking to address this by adding some clarification on this matter to the FOPT tables.