

**Whole Effluent Toxicity Testing Expert Committee Meeting Summary**  
**January 15, 2020 1:00 pm Eastern**

**1. Welcome and Announcements**

In Rami's absence, Pete welcomed everyone to the meeting. Attendance is recorded in Attachment 1, below. The minutes of December 18 were approved.

**2. Updates**

Draft Outline for Training Course in Data Interpretation

Natalie reported by email, prior to the meeting, that she forwarded a draft outline to Teresa for review and expansion.

PT Data Request

Katie asked for clarification about the task and the reason that PTPEC declined the committee's previous request, and also about whether this request will be asking for data to be collected to our specifications or just for data that is already collected.

Some PTPEC members were reluctant to share information from the PT databases maintained by the two PT Provider Accreditors, and instead referred WET to a new database constructed by the TNI Webmaster. We have the list of data elements in TNI's database, and can request data for any of the methods or analytes that are on the WET FoPT table.

Katie and Ginger will craft a letter to the Webmaster for this purpose.

NOTE: The draft letter was received on Friday, January 17, and is being sent to committee members for review along with these minutes.

**WET Assessor Training**

Pete discussed the teleconference among Marlene Moore, Ilona Taunton, Rami, himself and Lynn, held on January 7. There were three items addressed.

First, the parties reached agreement that a subgroup of WET committee members would review the slides and note any needed corrections or clarifications, and those changes would be made prior to conversion of the recorded training into a webcast available for individual training, to be posted on the website. Marlene asked to review the names of volunteers to ensure that none are involved with training activities, since her slides are considered proprietary material, and to have the reviewers sign a non-disclosure agreement.

The WET committee is involving itself in review of this training course because of its vested interest in having assessors who accurately understand the nature and specifics of toxicity testing and not just chemistry and microbiology. Stephen Clark, Sarah Hughes, Elizabeth West, Katie Payne, John Overbey and Mike Chanov agreed to review the training slides. This provides a balance of stakeholder representation, and they will report their findings to the full WET committee for consensus, although the slides themselves will not be distributed to the entire committee. NOTE: Marlene has okayed the six volunteers and we are awaiting to receive a disclosure agreement from TNI.

Support measurements were also discussed on this call. While Marlene herself is adamant that any support test results included in the study report must be accredited in order for the report to carry the NELAP logo, the NELAP ABs vary considerably and most ABs (and labs) are content to include a disclaimer that the support measurements are not to be reported for compliance purposes. This issue probably needs to be resolved with the ABs, beyond the WET committee, but it cannot be the trainer who sets policy for the program.

Marlene had earlier reached out to Teresa about whether only tests listed in 40 CFR 136 could be used for support measurements, since the methods noted in the method manuals are outdated, but had not received a response. During this committee meeting (January 15), Teresa explained that she is working with Lem Walker to get a definitive regulatory position, but that it's not going to be a rapid response (which was needed for the training course).

Secondly, Marlene requested that the committee clearly define what data is "reported" (in this case, an endpoint determined by or calculated from the experimental results, thus requiring method accreditation) and what are "support measurements". As noted, this presently depends on individual states and what the standardized reporting format requires, state-by-state, and may not be something that the WET committee can resolve. Some NELAP ABs require that 40 CFR 136 methods be used but none appear to require accreditation to those methods for WET testing, even for states that require that all test data (metadata as well as experimental result) be submitted.

Apparently, most labs use methods from **Standard Methods**, but some may use old equipment which probably gives acceptable results for support measurements anyway. There was consensus that pH, D.O., conductivity, temperature, ammonia, hardness, and possibly light intensity and the age of organisms are the usual support measurements.

Chandra noted that his lab submitted a Standards Interpretation Request (SIR) about whether specific pieces of analytical equipment must be reported as being used for analyses. The Quality Systems Expert Committee determined that an answer to that question would require adding additional language to the standard, which cannot be done through the SIR process, and instead provided Implementation Guidance to address the issue. See "Tracing Support Equipment to Analytical Result", [https://nelac-institute.org/content/load\\_guidance.php?id=28](https://nelac-institute.org/content/load_guidance.php?id=28). While Implementation Guidance is not enforceable, Chandra maintains that this guidance does imply that "as long as the support equipment's calibration is documented and traceable, we do not need to associate every piece of support equipment by their serial number to individual samples and their results".

Third, Marlene asked that requirements for method validation be added to the standard module. After brief discussion, the committee recommended that this issue be placed on a back burner for now, since the methods are specified in NPDES permits. As permit specifications, there is no flexibility to develop new methods or even to modify existing methods, as permit compliance is mandatory.

Apparently, there was a lawsuit about 20 years ago, concerning WET method validation. One participant noted that for a different temperature, it is normally sufficient to generate a new control chart but for a new species, then method validation is highly complex. V1M2 section 5.4.5 addresses method validation, and there is one sentence in V1M7 defining method validation, but because of the need for permit compliance, validation is moot for WET methods except in highly unusual circumstances. In any case, the regulatory agency receiving the data would need to

approve any method modification used, whether or not it is accredited by an AB. Perhaps this should become a “parking lot” issue for future revision, since the issues already under consideration seem to be consuming extended time periods already.

**3. Revision to Chemistry QC**

Time ran out before this issue could be addressed.

**4. Next Meeting**

There will not be teleconference capability for the WET session at conference on Tuesday morning, February 4, 2020.

The next teleconference meeting will be on Wednesday, February 19, 2020, at 1 pm Eastern. An agenda and any needed documents will be sent in advance.

**Attachment 1**

**WET Expert Committee Membership**

<b>Member</b>	<b>Affiliation</b>	<b>Email</b>	<b>Category</b>	<b>Term Expiration</b>	<b>Present</b>
Ginger Briggs	Bio-Analytical Laboratories	<a href="mailto:bal@bioanalyticallabs.com">bal@bioanalyticallabs.com</a>	Lab	Dec. 2020 (2)	Yes
Chris Burbage	Hampton Roads Sanitation District	<a href="mailto:cburbage@hrsd.com">cburbage@hrsd.com</a>	Lab	Dec. 2020 (2)	Yes
Kari Fleming	WI DNR	<a href="mailto:kari.fleming@wisconsin.gov">kari.fleming@wisconsin.gov</a>	AB	Dec. 2020 (2)	Yes
Amy Hackman	Penn. Dept. Environ. Protection	<a href="mailto:ahackman@pa.gov">ahackman@pa.gov</a>	AB	Dec. 2020 (2)	Yes
Sarah Hughes	Shell Oil Co.	<a href="mailto:s.hughes@shell.com">s.hughes@shell.com</a>	Other	Dec. 2021 (1)	Yes
Pete De Lisle (Vice Chair)	Coastal Bioanalysts Inc.	<a href="mailto:pfd@coastalbio.com">pfd@coastalbio.com</a>	Lab	Dec. 2020 (2)	Yes
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