

**Whole Effluent Toxicity Testing Expert Committee Meeting Summary**  
**May 20, 2020 1:00 pm Eastern**

**1. Welcome and Announcements**

Rami welcomed everyone to the meeting. Attendance is recorded in Attachment 1, below. The minutes of April 15 were approved with one edit to correct that Rami was present; Sarah abstained from voting.

**2. Updates for Ongoing Activities**

- PT Instructions for PT Providers (Ginger, Pete and Mark)
  - Mark reported that they will have draft instructions addressing the following items for the study: number of replicates and organisms, specified age ranges for organisms, data reporting specifics for test conditions, test criteria, PMSD and interpretation of the dose-response curve. Participants discussed the possibility of putting such specifications in the standard itself and also whether organism suppliers could meet demand for specific age ranges during DMR-QA/PT study timeframes. Rami noted that if NOEC is dropped from the reporting for PTs (as the committee prefers), then PMSD would be unnecessary; others questioned the value of reporting it, period
- Assessor Training Reviews (Stephen, Sarah, Elizabeth, Katie, John and Mike Chanov)
  - A recommendation not to publish the webinar training as a webcast for future viewing was sent to TNI's Training Administrator and the training provider. An errata sheet for the materials provided to the existing trainees is in development
- Draft Outline for Data Interpretation Training (Teresa and Natalie)
  - Teresa still intends to update this based on the WET workshop in Toronto, and is now aiming for the June teleconference
- Method Codes for WET Analyses (Michele, Ginger and maybe Teresa)
  - Ginger sent a rough draft, a work in progress for now, and not distributed to the committee
- LAMS Clean-up for WET Methods (Rami, Michele and Elizabeth)
  - No action yet, but this issue is on the agenda for the June NELAP AC meeting, specifically about how accreditations are issued by ABs (which is variable, we know, but one AB is trying to decide how that AB will do it)
- QC for Support Measurements (Michele and John, Marlene interacting w/ EPA)
  - On hold for now, pending more definitive information from EPA; we may be done and just don't know it yet
- Technical Director Requirements (Beth, Pete and Ginger)
  - There were no comments on the revised draft, but one minor edit was agreed upon during the meeting. It was transmitted to Quality Systems Expert Committee on May 20 and is available in Attachment 2, below
- Analyst IDOC Write-up (Rami)
  - Rami has started on this
- PT Data Request (ARA re-send)
  - Sent to PTPEC Chair. This item will be dropped from the update list until some response is received
- Letter sent to TNI IT Administrator (Katie, Ginger and Lynn)
  - This item will be dropped from the update list until some response is received

**3. Status of Assignments for Review and Revision of the WET Module V1M7**

- §1.1-1.3.2 – Beth Thompson has resigned – new volunteer needed
- §1.4-1.5 – Pete De Lisle

- Pete provided a draft revision (distributed with meeting reminder) containing annotated sections from the Quality System module, explaining that QS seems unclear (except possibly to chemists) but that the Microbiology module is “sort of” relevant. All agreed that validation will rarely be needed for a WET lab since most accredited methods (used for compliance reporting) are validated prior to publication by EPA, and thus need not be fully re-validated in each laboratory, since the required SRTs and DOCs demonstrate that the lab follows the method. TIE work (non-compliance investigations, typically not accredited methods) uses modifications of existing WET methods and a DOC should not be required because they are not typically compliance. He proposed that the only time a method would require full validation in a lab would be a non-standard, non-reference method being used for regulatory compliance as an accredited method.
- Pete did note that “standard method” should be clearly defined. The publication titled “Standard Methods...” is NOT what the ISO language refers to, rather it is a generic term for methods commonly used and considered to be previously validated (such as reference methods). However, that ISO definition is not presently included in TNI’s standard.
- The draft has §1.4, selection of method and §1.5, process for validation of non-reference methods.
- EPA Region 8 sometimes sees requests to use “other methods” for NPDES permit compliance, but noted that 1) such a method would require validation (per EPA’s Alternate Test Procedure process, if used by more than 1 facility) and 2) for now, there is no procedure for getting a biological method through that process. Terminology should be clear about what is needed for “EPA compliance under NPDES permits”. There exists some disagreement about whether TIE testing is “compliance testing” or not, although the published TIE methods are formally “guidance”.
- The West Coast methods are also “guidance” and not promulgated by regulation. Pete proposed to add disclaimer language that V1M7 validation does not necessarily meet EPA requirements for validation under the NPDES regulations.
- Further discussion considered limiting the scope of V1M7 to pre-approved, accredited compliance methods, with the understanding that any other methods would be stated as being non-accredited tests (such as when OECD methods are used). Rami asked that committee members consider that as a possible option. While DOC for an unaccredited method might be needed, that option would remove from the standard any requirement that TIE methods be validated. Consensus formed around the concept that, if validation *IS* needed for some reason, intra-lab validation should be adequate.
- One AB indicated that they use an Analytical Data Package (consisting of reference toxicant data or a DOC, including test results with raw data for the last two years; culture maintenance logs; test organism food records, including preparation logs; raw water quality analyses; and annual test organism taxonomy certifications) in lieu of PTs, and that such a package might substitute for validation.
- Rami will talk with the Quality Systems Chair, Jessica Jensen, about using some of the V1M2 (QS) language in V1M7.
- §1.6 – Rami Naddy, Amy Hackman, Dwayne Burkholder & Michele Potter
  - This is on hold pending the IDOC write-up and feedback from NELAP AC
- §1.7, 1.7.1, 1.7.1.1, 1.7.1.2, 1.7.2.1, & 1.7.2.2 – Steve Rewa
  - Steve received comments from one person, and those will be incorporated as he creates a new version of the module with each of the revised pieces (as provided by volunteers) into the document. Not everyone has reviewed it yet, but so far, there are no objections to the proposed rearrangement
- §1.7.1.3 – determined to be redundant
  - Steve did not include this section in his draft revision, but would prefer to retain the clause, as §1.7.1.a aligns with it. Keep as placeholder for now
- §1.7.1.4 – Chris Burbage
  - Not addressed at this meeting
- §1.7.1.5 – John Overbey

- Submitted but not discussed due to time
- §1.7.1.6 except 1.7.1.6.e – T. K. Chandrasekhar
  - From April, Chandra will edit per comments and submit a revised draft for further review. Time did not permit addressing this section.
- §1.7.1.6.e – Michele Potter and John Overbey
  - This item is on hold pending definitive decision from EPA
- New §1.7.3 (formerly 1.7.3.2) – Kari Fleming
  - Submitted but not discussed due to time
- New §1.7.4 (formerly 1.7.3) – *new volunteer needed*

#### **4. Next Meeting**

The next teleconference meeting will be on Wednesday, June 17, 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
Rami Naddy (Chair)	TRE Env. Strat. LLC	<a href="mailto:naddyrb.tre@gmail.com">naddyrb.tre@gmail.com</a>	Lab	Dec. 2020 (2)	Yes
Teresa Norberg-King	USEPA	<a href="mailto:norberg-king.teresa@epa.gov">norberg-king.teresa@epa.gov</a>	Other (Affiliate)	Dec. 2020 (2)	Yes
Mark O'Neil	Environmental Enterprises USA, Inc.	<a href="mailto:moneil@eeusa.com">moneil@eeusa.com</a>	Lab	Dec. 2022 (1)	Yes
John Overbey	American Interplex Corp.	<a href="mailto:joverbey@americaninterplex.com">joverbey@americaninterplex.com</a>	Lab	Dec 2020 (1)	Yes
Chris Pasch	Alan Plummer Associates, Inc.	<a href="mailto:cpasch@apaienv.com">cpasch@apaienv.com</a>	Other	Dec. 2020 (2)	Yes
Michael Pfeil	Texas Comm. Environ. Quality	<a href="mailto:Michael.pfeil@tceq.texas.gov">Michael.pfeil@tceq.texas.gov</a>	AB	Dec. 2020 (2)	Yes
Michele Potter	New Jersey Dept. of Environ Protect.	<a href="mailto:Michele.Potter@dep.nj.gov">Michele.Potter@dep.nj.gov</a>	AB	Dec. 2020 (2)	No
Steven Rewa	Environmental Resources Management	<a href="mailto:steven.rewa@erm.com">steven.rewa@erm.com</a>	Lab	Dec. 2020 (2)	Yes
Elizabeth West	LA DEQ LELAP	<a href="mailto:elizabeth.west@la.gov">elizabeth.west@la.gov</a>	AB	Dec. 2020 (2)	No
<b>Associate Members</b>					
Sylvia Bogdan	EPA R6	<a href="mailto:Bogdan.sylvia@epa.gov">Bogdan.sylvia@epa.gov</a>	Other (Assoc.)		No
Steve Boggs	CA ELAP	<a href="mailto:steve.boggs@waterboards.ca.gov">steve.boggs@waterboards.ca.gov</a>	Other (Assoc.)		Yes
Dwayne Burkholder	PA DEP	<a href="mailto:dburkholde@pa.gov">dburkholde@pa.gov</a>	AB (assoc.)		No

Antoine Chamsi	East Bay Municipal Utility District	<a href="mailto:antoine.chamsi@ebmud.com">antoine.chamsi@ebmud.com</a>	Lab (Assoc.)		Yes
Thekkekalathil "Chandra" Chandrasekhar	FL DEP	<a href="mailto:Thekkekalathil.Chandrasekhar@dep.state.fl.us">Thekkekalathil.Chandrasekhar@dep.state.fl.us</a>	Lab (Assoc.)		Yes
Michael Chanov	EA Eng., Sci. &Tech.	<a href="mailto:mchanov@eaest.com">mchanov@eaest.com</a>	Lab (Assoc.)		Yes
Stephen Clark	Pacific EcoRisk	<a href="mailto:slclark@pacificecorisk.com">slclark@pacificecorisk.com</a>	Lab (Assoc.)		Yes
Erin Consuegra	ERA LAB	<a href="mailto:econsuegra@eralab.com">econsuegra@eralab.com</a>	Lab (Assoc.)		No
Kevin Dischler	Element Materials Technology	<a href="mailto:Kevin.dischler@element.com">Kevin.dischler@element.com</a>	Lab (Assoc.)		Yes
Monica Eues	CK Associates	<a href="mailto:Monica.eues@c-ka.com">Monica.eues@c-ka.com</a>	Lab (Assoc.)		No
Nicole Fortin	Honolulu City Lab	<a href="mailto:nfortin@honolulu.gov">nfortin@honolulu.gov</a>	Lab (Assoc.)		No
Christina Henderson	Bio-Aquatic Testing, Inc.	<a href="mailto:chenderson@bio-aquatic.com">chenderson@bio-aquatic.com</a>	Lab (Assoc.)		No
David Johnston	Valero Refining Co - Benecia	<a href="mailto:david.johnston@valero.com">david.johnston@valero.com</a>	Lab (Assoc.)		No
Natalie Love	GEI Consultants	<a href="mailto:nlove@geiconsultants.com">nlove@geiconsultants.com</a>	Lab (Assoc.)		Yes
VelRey Lozano	USEPA Reg. 8	<a href="mailto:Lozano.VelRey@epa.gov">Lozano.VelRey@epa.gov</a>	Other (Assoc.)		Yes
Rosana McConkey	WA Dept of Ecology	<a href="mailto:rosa461@ECY.WA.GOV">rosa461@ECY.WA.GOV</a>	AB (Assoc.)		Joined May 21
Marlene Moore	Advanced Systems	<a href="mailto:mmoore@advancedsys.com">mmoore@advancedsys.com</a>	Other (assoc.)		No
Linda Nemeth		<a href="mailto:lkn1304@gmail.com">lkn1304@gmail.com</a>	Other		No
Katie Payne	Enthalpy Analytical	<a href="mailto:katie.payne@enthalpy.com">katie.payne@enthalpy.com</a>	Lab (Assoc.)		Yes
Christina Pottios	Los Angeles Cty Sanitation Districts	<a href="mailto:cpottios@lacsdsd.org">cpottios@lacsdsd.org</a>	Lab (Assoc.)		No
Greg Savitske	US EPA OECA	<a href="mailto:Savitske.gregory@epa.gov">Savitske.gregory@epa.gov</a>	Other (Assoc.)		No
Justin Scott	Cove Sciences	<a href="mailto:justin@covesciences.com">justin@covesciences.com</a>	Lab (Assoc.)		Yes
Lem Walker	USEPA OW/OST	<a href="mailto:Walker.lemuel@epa.gov">Walker.lemuel@epa.gov</a>	Other (Assoc.)		No
Craig Watts	Hydrosphere Research	<a href="mailto:cwatts@hydrosphere.net">cwatts@hydrosphere.net</a>	Lab (Assoc.)		Yes
Bruce Weckworth	HRSD	<a href="mailto:Bruce.weckworth@hrsd.com">Bruce.weckworth@hrsd.com</a>	Lab (Assoc.)		Yes
<b>Program Administrator</b>					
Lynn Bradley		<a href="mailto:Lynn.Bradley@nelac-institute.org">Lynn.Bradley@nelac-institute.org</a>			Yes



## **Attachment 2**

### Technical Manager Requirements for Toxicity Testing

Any technical manager of an accredited environmental laboratory engaged in toxicity testing shall be a person:

- i. with at least a bachelor's degree in life sciences, environmental sciences, natural sciences or environmental engineering and
- ii. a minimum of sixteen (16) college semester credit hours in fields of biological and/or environmental sciences from an accredited institution,
- iii. with at least two (2) years of experience in all parts of the analysis of toxicity testing of environmental samples representative of the analyses for which the laboratory seeks or maintains accreditation.
- iv. A master's or doctoral degree in one of the above disciplines may be substituted for one (1) year of experience.
- v. Additional years of experience working in an environmental toxicity laboratory may be substituted for the course credit hours specified in section ii, above. One year of experience shall substitute for 4 credit hours. Multiple years of substitution may be utilized, but each year substituted must be related to the learning of and proficiency across the scope of accreditation. No more than 8 hours total may be substituted – at least 8 hours must be from actual college courses. Experience must be recent without any lapse in related work history of greater than one (1) year.