# Whole Effluent Toxicity Testing Expert Committee Meeting Summary July 15, 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 June 17 were approved, with Steve abstaining due to his absence. There were no changes to the agenda, which is in Attachment 2, below.

#### 2. Updates for Ongoing Activities

- PT Instructions for PT Providers (Ginger, Pete and Mark)
  - Rami will meet with PTPEC to discuss further
- Assessor Training Reviews (Stephen, Sarah, Elizabeth, Katie, John and Mike Chanov)
  - Rami sent the errata sheet to the trainer, who promised to provide feedback
- Draft Outline for Data Interpretation Training (Teresa and Natalie)
  - Natalie believes this is ready for review and comments
- Method Codes for WET Analyses (Michele, Ginger and maybe Teresa)
  - o No update, awaiting Teresa's review and input
- LAMS Clean-up for WET Methods (Rami, Michele and Elizabeth)
  - A back burner issue for now
- QC for Support Measurements (Michele and John, Marlene interacting w/ EPA)
  - Existing language placed into draft revision; separate updates will no longer be provided
- Analyst IDOC Write-up (Rami)
  - Rami distributed a draft (with two attachments in separate files) and discussed it with participants for the remainder of the meeting. The following is a summary of that discussion.

Rami walked through the draft document about IDOCs, describing the two options presented, and noted that he had gotten feedback from most of the ABs on the committee. One option would be for ABs to continue accepting the lab-defined training program as evidence of competency, which some ABs now do (assuming that the assessor agrees to the adequacy of the program), and the other option would be more structured, to be used for new labs or if the lab's proposed training program was deemed to be deficient by the assessor(s). He pointed out that the lab's initial and ongoing DOCs are well addressed in the method manuals, and that the analyst ongoing DOC is typically satisfied by the normal routine conduct of SRTs, and that it is the individual analyst's initial demonstration of competency that is problematic to define.

NOTE: we have verified that offering two options in the revised module will be acceptable if the NELAP Accreditation Council finds it to be acceptable.

He noted that the committee has struggled with this issue for three years now – how to provide baseline requirements without being completely prescriptive – and cannot settle on an approach that satisfies all ABs without totally disrupting the labs whose lab-defined training program is already accepted by their NELAP AB. Rami also reviewed the challenges of IDOCs for toxicity testing – the length of time required to complete many of the tests, the fact that tests are typically conducted by variable teams, and the similarity of tasks across multiple methods, plus the issue that for sediment testing, an SRT is different than the test itself, by necessity. Also that completion of a chronic test will demonstrate competency to address all tasks of an acute test.

Another aspect of analyst IDOCs concerns handling of the test organisms. Pete has proposed a chart of surrogate organisms that can represent more than one species (Attachment 1 of the draft), and agreed with the suggestion that an analyst should have to perform at least one test with each of the surrogates but not necessarily every surrogate for every test. Another suggestion was that familiarity with the species could also be gained by reading or acclimating organisms/cultures upon arrival at the facility (if not cultured on-site).

The following points were made during discussion:

- o One AB would only allow the second option.
- Having two options promotes inconsistency among NELAP ABs.
- Assessor training is the underlying issue, as many assessors appear not to understand toxicity testing but focus on the chemistry parts of a test which they do comprehend rather than the science behind the test methods.
- Assessment reports are often difficult to review because the details of what was actually assessed are missing and it's not possible to know the assessor's qualifications for WET.
- Need to clearly define minimum acceptable requirements for the first option, or for both (minimum elements of a lab's training system).
- Clearly distinguish that lab DOCs are separate.
- Even two SRTs is "overkill" compared to chemistry IDOC requirements in V1M4.
- Must allow for analysts that only perform certain tasks but not entire tests (weekend staff)
- o Could blind PTs be used for IDOCs?
- Should include grandfathering of existing analysts, not requiring new IDOCs but requiring that any new training requirements be met for existing analysts.
- It is important not to disrupt those already accredited labs that have successful training programs and are not required to perform multiple SRTs for IDOC, while still meeting the enforcement needs of other ABs that seek more prescriptive requirements.

Rami made homework assignments, as described below:

- For all participants, look at the bulleted items in the draft and its Attachment 2, consider what more (or less) needs to be included as minimum requirements for analyst training that would satisfy accreditation needs.
- For the AB that would only accept two SRTs as successful IDOC, consider whether clearly defined minimum training requirements would be acceptable and if so, what would those need to be? Hopefully, we can settle on minimum requirements that will satisfy both labs and ABs.
- For labs, review the current bullets in the draft and its Attachment 2 to see if they
  constitute a dramatic change for the lab.
- For ABs, review the bullets in the draft and its Attachment 2 to determine if they are sufficiently specific as written (or with additional items added, and specify)
- Steve agreed to review the Quality Systems module, V1M2, for additional relevant information so that it can be referenced instead of repeated.

The document and both of its attachments are being re-sent with these minutes for ease of reference. Please note that the attachments mentioned in this section of the minutes are not included as part of the minutes themselves.

#### 3. Revising the Module

The above discussion about the Analyst Individual Demonstration of Competency is a critical part of the revised module, but the actual text of the module was not discussed due to time constraints.

There were no volunteers in response to Rami's request for someone to take over the revision of §1.1-1.3.2. The committee has not yet settled on whether the chapter should incorporate toxicity testing beyond WET. Participants noted that at least FL and OR accredit other toxicity tests (using V1M7) such as sediment testing based on method SOPs. No one responded to Rami's request to revise §1.7.4, either. NOTE: Tom Widera will hopefully be returning to the committee soon and can pick up §1.7.4 again.

#### 4. New Business

Ginger noted that the Texas Water virtual conference was underway for the week of the meeting.

Pete moved and Michele seconded that the meeting adjourn, and the time was 2:42 pm Eastern.

#### 5. Next Meeting

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

### Attachment 1

## **WET Expert Committee Membership**

Member	Affiliation	Email	Category	Term Expiration	Present
Ginger Briggs	Bio-Analytical Laboratories	bal@bioanalyticallabs.com	Lab	Dec. 2020 (2)	Yes
Chris Burbage	Hampton Roads Sanitation District	cburbage@hrsd.com	Lab	Dec. 2020 (2)	No
Kari Fleming	WI DNR	kari.fleming@wisconsin.gov	АВ	Dec. 2020 (2)	Yes
Amy Hackman	Penn. Dept. Environ. Protection	ahackman@pa.gov	AB	Dec. 2020 (2)	Yes
Sarah Hughes	Shell Oil Co.	s.hughes@shell.com	Other	Dec. 2021 (1)	Yes
Pete De Lisle (Vice Chair)	Coastal Bioanalysts Inc.	pfd@coastalbio.com	Lab	Dec. 2020 (2)	Yes
Rami Naddy (Chair)	TRE Env. Strat. LLC	naddyrb.tre@gmail.com	Lab	Dec. 2020 (2)	Yes
Teresa Norberg-King	USEPA	norberg-king.teresa@epa.gov	Other (Affiliate)	Dec. 2020 (2)	No
Mark O'Neil	Environmental Enterprises USA, Inc.	moneil@eeusa.com	Lab	Dec. 2022 (1)	No
John Overbey	American Interplex Corp.	joverbey@americaninterplex.com	Lab	Dec 2020 (1)	No
Chris Pasch	Alan Plummer Associates, Inc.	cpasch@apaienv.com	Other	Dec. 2020 (2)	Yes
Michael Pfeil	Texas Comm. Environ. Quality	Michael.pfeil@tceq.texas.gov	AB	Dec. 2020 (2)	Yes
Michele Potter	New Jersey Dept. of Environ Protect.	Michele.Potter@dep.nj.gov	AB	Dec. 2020 (2)	Yes
Steven Rewa	Environmental Resources Management	steven.rewa@erm.com	Lab	Dec. 2020 (2)	Yes
Elizabeth West	LA DEQ LELAP	elizabeth.west@la.gov	AB	Dec. 2020 (2)	No
Associat	e Members		1	<b>'</b>	ı
Sylvia Bogdan	EPA R6	Bogdan.sylvia@epa.gov	Other (Assoc.)	Other (Assoc.)	
Steve Boggs	CA ELAP	steve.boggs@waterboards.ca.gov	Other (Assoc.)	Other (Assoc.) No	
Dwayne Burkholder	PA DEP	dburkholde@pa.gov	AB (assoc.)		No

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

Program Administrator: Lynn Bradley, <a href="mailto:lynn.bradley@nelac-institute.org">lynn.bradley@nelac-institute.org</a>

#### **Attachment 2**

#### WET Expert Committee Meeting Agenda, July 15, 2020

- Welcome and Roll Call
- Approval of Minutes (June 17 minutes attached)
- Updates for Ongoing Activities
  - ✓ PT Instructions for PT Providers (Ginger, Pete and Mark) -- draft instructions were shared with the PTEC as well as the PT Program Executive Committee; Rami meeting with PTPEC in July to discuss issues
  - ✓ Assessor Training Reviews (Stephen, Sarah, Elizabeth, Katie, John and Mike Chanov) -errata sheet sent, outcome not final yet
  - ✓ Draft Outline for Data Interpretation Training (Teresa and Natalie) -- awaiting revised draft outline from Teresa.
  - ✓ Method Codes for WET Analyses (Michele, Ginger and maybe Teresa) -- Teresa promised to work on Ginger's initial draft
  - ✓ LAMS Clean-up for WET Methods (Rami, Michele and Elizabeth) -- back burner issue for now
  - QC for Support Measurements (Michele and John, Marlene interacting w/ EPA) -- existing language placed into the draft revision; no further updates will be provided.
  - ✓ Analyst IDOC Write-up (Rami) -- working on draft with two options as discussed in June
- Revising the Module
  - √ §1.4-1.5 -- discuss responses from Jessica (Quality Systems Expert Committee) and also Marlene's feedback prior to revising actual language
  - ✓ Individual Analyst Initial DOC draft explanation from Rami, if available, otherwise move to §1.7 Technical Requirements
  - ✓ Still need volunteers for sections 1.1-1.3.2 and 1.7.4
- Possible Scheduling for August Meeting (overlap with NEMC virtual meeting)
  - The sessions scheduled for the WET meeting time are Haloacetic acids in drinking water (lunch talk) and then PFAS; will these impact attendance? NOTE: Ginger's talk is on Tuesday afternoon. Signing up for one track (\$100) will allow signing in to lunch and Keynote speaker talks plus vendor virtual exhibits.
- New Business, if any
- Adjourn