

Whole Effluent Toxicity Testing Expert Committee Meeting Summary
August 19, 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 July 15 were approved. There were no changes to the agenda, which is in Attachment 2, also below.

2. Updates for Ongoing Activities

- PT Instructions for PT Providers (Ginger, Pete and Mark)
 - Rami to meet with PTPEC; July meeting cancelled and August meeting delayed
- Assessor Training Reviews (Stephen, Sarah, Elizabeth, Katie, John and Mike Chanov)
 - Awaiting feedback from trainer
- Draft Outline for Data Interpretation Training (Teresa and Natalie)
 - Draft provided, comments requested by September 16 meeting
- Method Codes for WET Analyses (Michele, Ginger and maybe Teresa)
 - 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

3. Analyst IDOC Write-up

The original draft with attachments was redistributed with the meeting reminder. Instead of an updated draft, Rami asked to discuss the additional feedback received from ABs on the committee, as Kari had provided some draft language that Amy and Elizabeth commented upon, all by email. The need to explicitly separate training from demonstration of competency (DOC) was emphasized, by putting them in separate sections of the module.

Rami noted that the two-option language has now vanished and the goal is to highlight the main points that need to go into the language of the standard, items that auditors should look for.

Several participants noted that for individual analyst initial DOCs (analyst IDOC), SRTs are solely for DOC purposes and not for training documentation. As a reminder, laboratory initial and continuing DOCs (CDOCs) are addressed in the method manuals and do not require detailed explanation in the standard itself. Also, the language must clearly distinguish initial analyst DOC requirements from continuing analyst DOC requirements, and tasks that are not involved in performing SRTs (such as sample receipt) need to be separate, such as training and documented satisfactory performance after training.

Agreement seemed to form around the following concepts (post-training, for DOC purposes):

- Analyst IDOC requirements could be satisfied by analyst participating with a team in the performance of two (2) SRTs for each method that the analyst will perform, under supervision with sign-off that the SRT met acceptable test criteria.
- Presently, some but not all ABs require five SRTs for an analyst IDOC. This requirement seems to have evolved from the chemistry requirement to run five spiked samples, but it is long-standing requirement of some states' assessors even though nowhere is it documented as required in the standard. With the 5x scheme, some labs have satisfied

the requirement by having the analyst perform at least one set-up, one takedown and three “monitoring” portions of the tests.

- Other ABs have less stringent and perhaps more flexible auditing requirements for analyst IDOCs. Rami noted that it is critically important that the revised standard not invalidate what have been ongoing and acceptable practices in some NELAP labs for many years.
- The training for analysts is typically shadowing an experienced analyst, then specific training in the basics of culturing organisms, all prior to participating in an SRT. The concept is that an analyst will have training in each of the individual tasks that make up a test, before participating in the SRT. The key to successful performance of the SRT is that the sensitivity of the completed test is consistent with recent historical records for the lab.
- Because not all analysts perform all tasks, especially in larger labs, there needs to be sufficient flexibility in both the training and IDOC requirements so that analysts only need to be signed off on those tasks that they will actually perform. This issue is particularly significant in the statistical interpretation of test results, which may be done by individuals not otherwise involved with test performance using the living organisms – those individuals must still complete an IDOC for the calculations for which they are responsible.
- Tests that do not have SRTs also require satisfactory IDOC completion – Craig Watts agreed to provide some draft language to address the IDOC requirement, concerning steps in the SRT for which training is targeted.
- Regarding whether training in individual tasks can substitute for IDOCs for methods where a different organism is used, but the method protocol is otherwise identical – this question remains open as participants were asked to comment on Attachment 1, the initial draft of substitutable organisms for this purpose.
- Another unsettled issue discussed was whether performing the study controls for an SRT would satisfy the SRT requirement, since a control requires every task of the test except for dilution of the study sample. One compromise suggested was that one SRT with dilutions and the other performing only control samples might be adequate. The control would still need to meet test acceptability criteria, or else be repeated until that is established. This would be a considerable cost savings to the laboratory, and would still satisfy the need to show satisfactory performance of all skills for which the analyst is trained.

At this point, Rami asked that the ABs present consider the discussion and the points made, and then the committee can address the issue with hope of approaching consensus on analyst IDOC requirements, so that Rami can take the write-up to the NELAP AC for consideration by all of the NELAP ABs.

Rami then asked for comments from the July homework assignments.

For Attachment 2, cross-training and tasks that are part of multiple or most methods, the comments were:

- Chronic studies substitute for acute studies in DOCs
- *Cerio daphnia* exempt, as those would not be suitable for this substitution
- Not everyone was comfortable with full substitution
- Takedown times are far more crucial for acute studies
- Minor differences in species should be accounted for somehow

- Perhaps by ensuring that analysts read and understand the differences as documented in method manuals?
- Analyst IDOCs ought not to be required for all possible variations of a method (organism, temperature, water type, etc.)

Rami agreed to revise the draft offered by Kari, then send it to the ABs, and once acceptable there, send to the full committee for comment and acceptance.

For Attachment 1, species that can be substituted within an IDOC (SRTs for one species satisfy IDOC requirement for others):

- Would need salt water species in addition to fresh water, regardless of test method.
- The matrix needs to be worked through, line-by-line.
- Several ABs disagree that chronic tests can be substituted for chronic test, regardless of species, but accept that chronic tests can fulfill the requirements for acute tests. While the tasks and skills are the same, the need for specific endpoints and organisms may impact the chronic tests.
- Organism identification also needs to be documented as acceptable for the analyst.
- Some interchangeability is needed, particularly for rarely performed tests. Some species have no “similar” substitute, such as rainbow trout.
- Once this table is agreed upon, its use must be clearly described in the language of the standard module, but there were no outright objections to using such a scheme.

Rami captured many other comments that Lynn was unable to follow. These will be reflected in an updated draft matrix for later review. The footnote will be either revised or eliminated, as well. Rami asked that additional detailed comments be sent for inclusion in the revision of this table.

The September 16 meeting will focus on method validation. Ginger moved to adjourn and Mark seconded the motion; approval was unanimous.

3. Next Meeting

The next teleconference meeting will be on Wednesday, September 16, 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	Jan. 2021 (2)	Yes
Chris Burbage	Hampton Roads Sanitation District	cburbage@hrsdc.com	Lab	Jan. 2021 (2)	Yes
Kari Fleming	WI DNR	kari.fleming@wisconsin.gov	AB	Jan. 2021 (2)	Yes
Amy Hackman	Penn. Dept. Environ. Protection	ahackman@pa.gov	AB	Jan. 2021 (2)	Yes
Sarah Hughes	Shell Oil Co.	s.hughes@shell.com	Other	Jan. 2022 (1)	No
Pete De Lisle (Vice Chair)	Coastal Bioanalysts Inc.	pfd@coastalbio.com	Lab	Jan. 2021 (2)	Yes
Rami Naddy (Chair)	TRE Env. Strat. LLC	naddyrb.tre@gmail.com	Lab	Jan. 2021 (2)	Yes
Teresa Norberg-King	USEPA	norberg-king.teresa@epa.gov	Other (Affiliate)	Jan. 2021 (2)	Yes
Mark O'Neil	Environmental Enterprises USA, Inc.	moneil@eeusa.com	Lab	Jan. 2022 (1)	Yes
John Overbey	American Interplex Corp.	joverbey@americaninterplex.com	Lab	Jan. 2021 (1)	No
Chris Pasch	Alan Plummer Associates, Inc.	cpasch@apaienv.com	Other	Jan. 2021 (2)	Yes
Michael Pfeil	Texas Comm. Environ. Quality	Michael.pfeil@tceq.texas.gov	AB	Jan. 2021 (2)	Yes
Michele Potter	New Jersey Dept. of Environ Protect.	Michele.Potter@dep.nj.gov	AB	Jan. 2021 (2)	Yes
Steven Rewa	Environmental Resources Management	steven.rewa@erm.com	Lab	Jan. 2021 (2)	Yes
Elizabeth West	LA DEQ LELAP	elizabeth.west@la.gov	AB	Jan. 2021 (2)	Yes
Associate Members					
Sylvia Bogdan	EPA R6	Bogdan.sylvia@epa.gov	Other (Assoc.)		No
Steve Boggs	CA ELAP	steve.boggs@waterboards.ca.gov	AB (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

T.K. "Chandra" Chandrasekhar	FL DEP	Thekkekalathil.Chandrasekhar@dep.state.fl.us	Lab (Assoc.)		No
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.)		No
Paul Junio	Northern Lake Service, Inc.	paulj@nlslab.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.)		No
Christina Pottios	Los Angeles Cty Sanitation Districts	cpottios@lacsdsd.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.)		No
Lem Walker	USEPA OW/OST	Walker.lemuel@epa.gov	Other (Assoc.)		No
Craig Watts	Hydrosphere Research	cwatts@hydrosphere.net	Lab (Assoc.)		Yes
Bruce Weckworth	HRSD	Bruce.weckworth@hrsd.com	Lab (Assoc.)		Yes
Tom Widera	Pace Labs	Thomas.Widera@pacelabs.com	Lab (Assoc.)		Yes
Program Administrator: Lynn Bradley, lynn.bradley@nelac-institute.org					

Attachment 2

WET Expert Committee Meeting Agenda, August 19, 2020

Welcome and Roll Call

Approval of Agenda

Approval of Minutes (July 15 minutes attached)

BRIEF Updates for Ongoing Activities

- PT Instructions for PT Providers (Ginger, Pete, Mark, Rami)
- WET Assessor Training
- Draft Outline for Data Interpretation Training (Teresa and Natalie draft attached)
- Method Codes for WET Analyses (Michele, Ginger and maybe Teresa, see attached first draft/EGB)
- LAMS Clean-up for WET Methods (Rami, Michele and Elizabeth) -- back burner

Analyst IDOC Write-up (original+1+2 attached, Rami to send revision separately)

- Homework assignment comments (see original version plus attachments PLUS pdf of Steve's email about V1M2 language and Ginger's submitted edits to Attachment 2)
- Revised draft after AB input (Rami to send separately)

Discussion of Validation §1.5 – feedback from QS Chair about V1M2 intent (pdf of email plus current draft V1M7 attached)

New Business, if any

Adjourn