SUMMARY OF THE
PROFICIENCY TESTING COMMITTEE MEETING
DECEMBER 15, 1999

The Proficiency Testing (PT) Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met on Wednesday, December 15, 1999, at 12 p.m. Eastern Standard Time (EST) as part of the Fifth NELAC Interim Meeting in Washington, DC. The meeting was led by its chair, Ms. Barbara Burmeister of the Wisconsin State Laboratory of Hygiene. A list of action items is given in Attachment A. A list of participants is given in Attachment B. *The purpose of the meeting was to review proposed changes to the NELAC Standard, discuss the interpretation and implementation of the NELAC PT program, and discuss the new Safe Drinking Water Act regulations as they relate to the PT program.*

INTRODUCTION

The meeting began with an introduction of committee members. Ms. Burmeister then reviewed ground rules for the meeting and asked that participants follow these rules.

Ms. Burmeister stated that the committee anticipated extensive discussion regarding the new Safe Drinking Water Act (SDWA) regulations. The SDWA rule requires analysis of one PT sample per year per method. This differs from NELAC standards, which require two PT samples per year for each program/matrix/analyte for which the laboratory wants to be certified. Ms. Burmeister said that the committee has spent a great deal of time discussing this issue, and asked the audience to hold comments until the second half of the meeting so that all of the agenda items can be covered. She said that the committee would try to get through the agenda as quickly as possible.

CHAPTER 2 COMMENT SUMMARY

Ms. Cindy Nettrour reviewed the changes proposed by the committee which affect Sections 2.1.3, 2.2, and 2.7.3. These changes are proposed in response to comments received by the committee. In addition, she said that Section 2.2.2 will need to be revised because NELAC, or any subset of NELAC (such as the PT Committee), cannot make a designation or approval of a Proficiency Testing Oversight Body(PTOB)/Proficiency Testing Provider Accreditor (PTPA) because NELAC is a standards setting body only.

APPENDIX F (ENVIRONMENTAL TOXICOLOGY)

Dr. Faust Parker reviewed the changes to Appendix F. He said that Section F.0 has been moved to Section F.4.1 because it was out of sequence. Subsequent sections have been renumbered. There are no other proposed revisions at this time.

Dr. Parker provided the audience with information related to whole effluent toxicity (WET) testing. He said that the U.S. Environmental Protection Agency (USEPA) National Standards for WET testing are in the works and an internal draft may be available at the end of December 1999. Proposed implementation date is the year 2001. The National Institute of Standards and

Technology (NIST) has agreement with USEPA to approve PT Providers for WET testing. The USEPA Discharge Monitoring Report (DMR) - Quality Assurance (QA) program for WET testing has as a goal to externalize in 2001. There will be one more study (#20) under the current program. Dr. Parker also thanked the Quality Systems Committee for doing an excellent job of addressing the issues associated with environmental toxicology.

APPENDIX G (RADIOCHEMISTRY)

The committee is waiting for a final version of the USEPA National Standards for Radiochemistry to make sure that Appendix G is consistent with it. Once that happens, the committee will post the new appendix and request comments. The committee plans to propose this appendix for vote at NELAC VI.

APPENDIX H (FIELD AIR MEASUREMENT)

A new version of Appendix H, which addresses field air measurements, was distributed to the audience. The only comments that had been received on this appendix were from the subcommittee members who helped develop the appendix and from the PT Committee. The only changes to the draft appendix were removal of language which could be included by reference instead. The committee plans to propose this appendix for vote at NELAC VI.

INTERPRETATION AND IMPLEMENTATION OF THE NELAC PT PROGRAM

Where do I obtain PT samples?

The committee developed a Guidance Document for Section 2.0 Interim Standards to help laboratories in obtaining PT samples. Copies of the guidance document were distributed at the meeting. Ms. Burmeister requested that written comments on the guidance document be submitted by January 15, 2000. The committee will consider these and modify the guidance accordingly. The guidance should be available on the NELAC website in February, 2000.

One participant suggested that the first paragraph of Section 2.0 be deleted and the language from the guidance document be inserted as a second paragraph. Another suggestion was to remove references to NIST from the standard, since this would make the standard more flexible and operational. Ms. Burmeister responded that the committee's goal is to delete the interim standards by June, 2000, and asked the participant to submit his comment in writing to the committee.

Another participant noted that there is a lot of "double talk" in the guidance and recommended that it be simplified. The participant asked whether a list of organizations which meet the criteria of the standards be provided.

The suggestion was made that the guidance document be modified to include clarification of "members" and suggested the term "mutual recognition agreement." The participant making the suggestion will put the suggested language in writing and submit it to the committee.

A participant pointed out that Section D.4 requires some very specific oversight. He suggested adding language to the Guidance Document to state that the PTOB/PTPAs need to meet the requirements of Appendix D.

A participant said that we all have to be concerned about the oversight of the oversight body. NELAC cannot be an oversight body because it is just the standard setting body. He asked how the committee expected to handle this. Committee members responded that neither NELAC nor the PT Committee can have oversight responsibilities. Two possibilities are the Accrediting Authority (AA) group or a new review board (formed by USEPA). There is no answer at this time.

What PT samples do I need to run?

PT samples need to be run for each field of testing (program/matrix/analyte) in which it is requesting accreditation. The PT Committee has developed a list of PT fields of testing where PT samples are available. The issue of the definition of matrix as it pertains to PT samples has been voiced as a concern from the National Environmental Laboratory Accreditation Program (NELAP) AA group. Ms. Burmeister asked for comments about definition of "matrix."

Some of the suggestions were:

- simplify matrices
- define "non-potable water" (not really included by surface water/ground water matrices)
- define "non-aqueous liquids" (not be covered by "non-potable water", e.g., waste oil programs)
- link this to the EPA solid waste program
- rather than try to fix the definition of matrix, fix the problem of "program/matrix/analyte"

In response to the question of who will provide oversight similar to NIST for the additional matrices, it was stated that the new PTOB/PTPA would do this. One participant was concerned that laboratories will have to keep running multiple PT samples for all the different USEPA programs. Another participant said that unless these samples come with interference, there is no difference between the water supply (WS) and water pollution (WP) samples for laboratories.

How far back do PT samples count?

July 1, 1999.

How will PT samples be scored?

Mr. Caruso distributed a summary document for the NELAC PT Fields of Testing (FOT) having acceptance criteria. For each FOT, the document listed program, matrix, analyte, PTOB/PTPA, and references for concentration range and acceptance criteria.

The comment was made that the actual concentration ranges and acceptance criteria should be made public. The committee had been concerned that providing this information might give the

laboratories an unfair advantage in analyzing PT samples. The goal was to keep the sample as close to a real world sample as possible. A participant said that the approximate concentration range is always much wider than the actual level, so it does not provide too much of an advantage. Further, he said that even in real world samples, the laboratory is usually provided with an approximate concentration range. Another participant said that some of the providers have already given out this information and therefore, it may be pointless to try to keep the ranges hidden. Because some laboratories already have this information, it would make it a more level playing field to make the ranges public. The concentration range allows the laboratory to determine how to analyze the sample (low or high level) and allows them to meet Department of Transportation (DOT) and Occupation Health and Safety Administration (OSHA) regulations for shipping and disposal. The PT committee will reconsider whether or not to include the concentration ranges and acceptance criteria in the PT Fields of Testing lists.

A participant questioned why the list of analytes was not included in the NELAC Standards. Ms. Burmeister informed the committee that the list of analytes were kept out of the standards because the committee intended to update the analyte list and regression equations each year as new data became available. If the analyte lists were included within the standards, there would be substantial delay. She remarked that the committee is following the current standards as written in C.1.1.2. Another committee member added that the list does not meet all the requirements of all the states, however additional analytes can be added. The method for doing so is included in the standards.

Another comment was that there needs to be something to override the regression equations (e.g., +/- 20% of true value). The participant said that he would submit this comment in writing to the committee.

A participant pointed out that there is an inconsistency between Chapter 2 and Chapter 4. Section 4.1.4 states that labs must analyze PT samples for each field of testing in which it is requesting accreditation. The issue was that Section 4.1.4 does not distinguish between accreditation decisions based on PT data from analytes with established acceptance criteria versus experimental data. The committee will review this issue and possibly make a recommendation to the Accreditation Process Committee.

SAFE DRINKING WATER ACT (SDWA) RULE

Ms. Burmeister said that January 3, 2000, is the effective date for the SDWA rule. She requested feedback from participants on this issue. She asked two questions:

1) How do you feel about analyzing the same PT sample by different methods?
2) Should the scoring be 2 out of 3 acceptable results by program/matrix/anayte, or 2 out of 3 acceptable results by method?

Several people responded that they preferred to be allowed to analyze the same sample by different methods. Mr. Caruso pointed out that the first analysis of a PT sample would be a single-blind analysis, but the second analysis by different method would not be single-blind.

Another participant stated that PTs should be done the same way as accreditation. If NELAP accredits by program/method/analyte then PTs should be done the same way. Someone else commented that if a sample is run by multiple methods, it does not tell the analyst which result is better.

One participant suggested that if NELAC switches to PT samples "by method," then there needs to be a phase-in period because the state databases may not be able to handle this change.

Ms. Burmeister took a straw poll. The question was "Who would prefer that PTs be done by method for safe drinking water? and which would prefer to keep it program/matrix/analyte?" The outcome of this poll was, respectively, 7 to 4 for states, and 17 to 1 for laboratories.

FREQUENTLY ASKED QUESTIONS (FAQS)

FAQs are posted on the NELAC Website, but there will be revisions made to them that will be submitted to the Board of Directors for approval and then re-posted on the website.

MISCELLANEOUS

A participant stated that they had submitted comments previously about waste water coliforms. She said that she preferred that the sample set be expanded to 5 quantitative samples; 1 sample is not sufficient. It was requested that she resubmit the comments along with justification for the request. Another participant expressed a preference for 3 samples.

Attachment A

ACTION ITEMS
PROFICIENCY TESTING COMMITTEE MEETING
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Item No.	Action	Date to be Completed
1.	Finalize Section 2.0 Guidance Document and post on website.	2/1/00
2.	Finalize list of PT fields of testing and acceptance criteria and post on website.	2/1/00
3.	Clarify language in Section 2.4.1 regarding required PT samples.	5/1/00
4.	Revisit definition of matrix as it pertains to PT fields of testing.	5/1/00
5.	Re-evaluate standards per recent changes in SDWA regulations.	5/1/00
6.	Update FAQs and submit to Board of Directors for review.	ASAP
7.	Resolve whether Transition Committee or NELAP AA group will endorse the use of PT FOT list for all labs seeking NELAP accreditation.	ASAP
8.	Resolve date that NELAP AA group will require labs to analyze PT samples for analytes beyond the WS/WP scope.	ASAP

Attachment B

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PROFICIENCY TESTING COMMITTEE MEETING
DECEMBER 15, 1999

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