

US EPA ARCHIVE DOCUMENT

**SUMMARY OF THE
ENVIRONMENTAL LABORATORY ADVISORY BOARD MEETING**

Teleconference: 866-299-3188/9195415544#

October 15, 2014; 1:00 – 3:00 p.m. EDT

The U.S. Environmental Protection Agency's (EPA) Environmental Laboratory Advisory Board (ELAB or Board) teleconference was held on October 17, 2014. The agenda for this meeting is provided as Attachment A, a list of the participants is provided as Attachment B, and action items from the teleconference are included as Attachment C. The official certification of the minutes by the Chair or Vice-Chair is included as Attachment D.

AGENDA ITEMS:

1. OPENING REMARKS

Ms. Patsy Root, Chair of ELAB, and Ms. Lara Phelps, Designated Federal Official of ELAB, welcomed participants to the teleconference and called an official roll of the Board members and guests. Ms. Root asked the members to briefly introduce themselves and explained that the new members had been provided with a 1-hour orientation about ELAB and its processes.

2. APPROVAL OF SEPTEMBER MINUTES

Ms. Root asked whether any members had comments regarding the September teleconference minutes other than the one sent via email by Ms. Patty Carvajal. Dr. Charlie Carter moved to accept the minutes with the change, and Dr. Dallas Wait seconded the motion. The Board approved the September minutes with Ms. Carvajal's change unanimously.

3. UPDATES ON CURRENT TOPICS

Method Update Rule (MUR)

Ms. Root explained that the Board has been discussing the MUR process and current update with the Agency for some time. ELAB will be able to provide comments when the Agency proposes the MUR, probably in December. Ms. Root will provide a link to the *Federal Register* announcement to the Board members when it is available.

Mr. Michael Flournoy noted that he has attempted to review prior ELAB minutes to understand the current topics, but he has had some difficulty in finding archived minutes on the Board's website. Ms. Phelps explained that there have been issues in updating the website with the latest minutes, so she will send the Board members the minutes from the past year; she will send additional minutes on request.

Polychlorinated Biphenyls (PCBs)

In terms of the PCB effort, Dr. Pujari explained that Method 608 is used for wastewater analysis, and it is outdated. Therefore, changes to EPA methodology are needed to meet new permit requirements. The goal is to recommend that EPA include PCB congeners in the method in addition to aroclors. Use of Method 1668 would be considered an improvement, although there still is some uncertainty in some sections, so Dr. Pujari would like this method to be more user-friendly.

Dr. Wait noted that Method 608 is a regulated method, and he was unsure of the mechanism available for the Board to affect change. Dr. Pujari agreed and reiterated that the method is outdated. Dr. Henry Leibovitz explained that Methods 608 and 1668 are wastewater methods that serve two different purposes. Both methods should be available for laboratories to choose depending on their program needs. He agreed, however, that it is necessary to update Method 608 to reflect technology advances (e.g., lower detection limits, greater sensitivity). In relation to harmonization, PCB and aroclor methods are used for wastewater, the Resource Conservation and Recovery Act (RCRA) and the Contract Laboratory Program.

Ms. Root explained that at the Agency's request, the Board provided comments regarding Method 608 the previous year, and the comments are being considered for the upcoming MUR. She agreed with Dr. Wait's observation that any method revisions must be valuable to the Agency. The Task Group should approach EPA to determine what type of effort regarding Method 1668 would be most useful. Ms. Phelps will determine the most appropriate contact within the Agency.

Mr. Michael Flournoy and Dr. Mike Delaney volunteered to serve on this Task Group.

Methods Harmonization

Dr. Wait explained that the Board's comments about methods harmonization had been well-received by the Agency. At this point, it is up to EPA to determine the best next steps. The Task Group, based on Ms. Phelps' advice, will continue to follow Agency efforts during the next 6 months and be ready to respond to any requests if and when they are received. ELAB can follow up with the Agency during the spring of 2015 to determine what progress has been made.

Dr. Leibovitz suggested that the Board develop a spreadsheet with information about the methods it was considering harmonizing. Dr. Wait said that textbooks were available that would provide a great deal of information about the various EPA methods. In the past, Dr. Wait had attempted to develop similar informational tables. Dr. Leibovitz noted that a list of methods the Board recommended without the additional information would be helpful. Dr. Wait explained that ELAB had not recommended harmonization of any specific method because the first step was to determine whether EPA could or would act on any recommendations that the Board might make.

Dr. Leibovitz wanted to ensure that the Agency understood exactly what ELAB meant when it referred to methods harmonization. Ms. Root responded that the Board's perspective was that similar quality control criteria should exist for similar methods/instruments. Dr. Wait agreed that quality assurance aspects, construction of calibration curves and so forth could be harmonized

and were the focus of any harmonization recommendations that ELAB might make. Ms. Root added that it is necessary for the Board to remain cognizant of this topic and act on any future opportunity that is presented. Dr. Leibovitz noted that harmonization appeared to focus on analytical practices. Mr. Flournoy noted that some Office of Water, RCRA and wastewater methods are similar, and this is where he sees harmonization occurring.

Dr. Wait will send information about the *Guide to Environmental Analytical Methods* to the Board members. He noted that the group established within the Agency to deal with this issue has a comprehensive membership. Ms. Phelps added that all relevant programs, except for pesticides because of the nature of how this program operates, are represented, including homeland security.

Interagency Data Quality Task Force/Data Quality Objectives Process

In Ms. Silky Labie's absence, there was no report for this Task Group.

Task Group Reorganization

Ms. Root highlighted the spreadsheet tracking the current Task Groups. Those members who recently rotated off the Board are highlighted in yellow. The new members should consider which Task Groups that they are interested in serving on and inform Ms. Root of their top three choices. Ms. Root will forward the Task Group spreadsheet to the Board members, which will include the new topics ELAB is considering.

4. NEW TOPICS/ISSUES FOR CONSIDERATION

Ms. Root will follow up on the action items identified during the September ELAB meeting (i.e., writing two letters) regarding the whole effluent toxicity and selected ion monitoring analysis issues. Ms. Kristen LeBaron will forward Ms. Root language to include in the two letters.

Ms. Root reported that EPA has an interest in in-line/on-line monitoring of various analytes and how it can be expanded for testing environmental samples in a rule-based process. Dr. Jim Seiber said that there may be in-line chemical sensors in the discharge route that are measuring chemical parameters on a real-time basis, and the question is how to manage them, determine sensor calibration, run a calibration, and ensure that the quality control parameters meet those of the methods. Mr. Flournoy said that there is no EPA oversight regarding this issue. Ms. Michelle Wade noted that there is an Agency in-line monitoring method for chlorine. Ms. Aurora Shields explained that on-line monitoring is fairly common for process control for wastewater nutrients. When this topic was introduced during the Board's last face-to-face meeting, Ms. Shields' impression was that the desire was to use this for compliance monitoring and reporting. Calibration and quality control requirements will need to be more rigorous if this is to occur.

Before ELAB can address the issue, the members will need to research the topic further and determine, with Ms. Phelps' assistance, the most appropriate personnel in the Agency to help the Board address this issue. Agency air monitoring methods may be useful to inform water testing.

Ms. Root explained that she had received a letter from QC Laboratories regarding the American Council of Independent Laboratories and the Pennsylvania Association of Accredited Analytical Laboratories paper about qualifying drinking water data that are reported. Dr. Leibovitz thought that EPA's Office of Ground Water and Drinking Water (OGWDW) should work closer with state drinking water programs, which lack the understanding that laboratories possess. This is an important topic because public water systems will need to use routine monitoring unless the data are reported as "nondetect" all the way to the detection limit. OGWDW must educate programs on the meaning of qualifiers and how they will help their regulated systems meet the detection limits rather than reporting limits. Mr. Flournoy agreed that communication and understanding are important. Dr. Leibovitz added that he often must explain that reporting and detection limits are not the same. Mr. Flournoy stated that perfect data are not possible. The Board members will research and determine how to address this topic with the Agency.

Dr. Pujari said that his laboratory uses Method 200.8 to analyze drinking water and wastewater, and there is the question of collision cells in terms of the MUR. He has spoken about this to Mr. Lem Walker (EPA), who indicated that this will be addressed in the upcoming MUR. Dr. Pujari asked the Board members to comment on the lack of collision cell technology mentioned within the method. Ms. Root questioned the relevance of this issue to the issue of qualifying drinking water data and noted that individuals could provide comments on the MUR in addition to those provided by the Board. Ms. Cindy Nettrour explained that she has been told that collision cells cannot be used for drinking water, and the *Federal Register* makes it clear that they can be used for wastewater only. Dr. Leibovitz said that if collision cells are allowable in the method, then they will be mentioned in the method. The MUR includes information about methods similar to Method 200.8 so that, by default, laboratories are able to take advantage of other approved methods. Although the Method 200.8 collision cell issue is not relevant in regard to the QC Laboratories letter, it can be included in the comments about the MUR.

Mr. Flournoy is interested in the Sufficiently Sensitive Methods topic. Ms. Phelps explained that the Board provided comments at the time that the rule was introduced. Ms. Shields added that ELAB had discussed the topic with staff members at EPA who were dealing with the rule. Some issues were addressed during the comment period, but the main issue regarding Method Detection Limits (MDLs) was not addressed. Ms. Phelps said that the Board did what it could at the time, but it is not a closed topic because of the outstanding MDL issue. There are steps being taken at the Agency to integrate MDLs in a way that has not been addressed in the past in terms of rule integration. Ms. Shields explained that the Sufficiently Sensitive Methods rule is final, and it now is up to states to implement it, so she did not think that the Board could address the issue via that avenue. Mr. Flournoy volunteered to monitor this issue and notify the Board when there is an opportunity to move forward.

Dr. Leibovitz stated that many manuals say that laboratories need to treat proficiency testing (PT) samples the same as routine samples. In terms of reporting, however, laboratories enter values and test methods, and the data are not reviewed and verified until there is an onsite audit. He wondered whether a mechanism or program should be implemented to require laboratories to report sample analysis to the PT provider to confirm that the data were obtained properly and reported appropriately. Mr. Flournoy thought that this might be difficult because PT providers are not validators. The laboratory should have a quality assurance manual that indicates how it

processes its samples, including PT samples. It is the laboratory's responsibility to provide quality data, and the auditor's responsibility to verify this during audits.

Ms. Phelps thought that PT is an issue that will continue to surface, and the Agency has explored various methods to manage its PT programs and sources (e.g., the Office of Air and Radiation's work with The NELAC Institute [TNI]). She noted that the Board's approach could be to keep EPA aware of issues surrounding PT with the realization that additional entities, such as TNI, will need to be involved with implementation. This issue might be more appropriate for the TNI Proficiency Testing Program Executive Committee (PTPEC) to address. Ms. Root recommended that Dr. Leibovitz introduce the topic at the next TNI PTPEC meeting or attend a PTPEC teleconference; the schedule is published on the TNI website. Ms. Wade agreed that this is an ongoing issue, but she expected that there would be resistance from the PT and laboratory communities based on the additional cost that a program such as the one Dr. Leibovitz suggested would incur.

5. WRAP-UP/REVIEW ACTION ITEMS

Ms. LeBaron reviewed the action items identified during the meeting, which are included in Attachment C.

6. CLOSING REMARKS/ADJOURNMENT

Dr. Carter moved to close the meeting, and Dr. Delaney seconded the motion. The meeting was adjourned at 2:49 p.m.

Attachment A**AGENDA
ENVIRONMENTAL LABORATORY ADVISORY BOARD**

Monthly Teleconference: 866-299-3188/9195415544#

October 15, 2014; 1:00 – 3:00 p.m. (EDT)

Opening Remarks	Phelps
Board Transitions/Timelines	Phelps
Approval of September Minutes	Root
Updates on Current Topics	All
Method Update Rule	
Polychlorinated Biphenyls	
Methods Harmony	
Interagency Data Quality Task Force/Data Quality Objectives Process	
Task Group Reorganization	
New Topics/Issues for Consideration	Root
Whole Effluent Toxicity Testing	
Selected Ion Monitoring	
In-line and On-line Monitoring	
Qualification of Drinking Water Data	
Wrap-Up/Review Action Items	Root/LeBaron
Closing Remarks/Adjourn	Root

Attachment B**MEMBERSHIP LISTING AND GUESTS****ELAB TELECONFERENCE
October 15, 2014; 1:00 p.m. – 3:00 p.m. EDT**

Attendance (Y/N)	Name	Affiliation
Y	Ms. Patsy Root (Chair)	IDEXX Laboratories, Inc. Representing: Laboratory Product Developers
Y	Ms. Patricia (Patty) M. Carvajal (Vice-Chair)	San Antonio River Authority Representing: Watershed/Restoration
Y	Ms. Lara P. Phelps, DFO	U.S. Environmental Protection Agency Representing: EPA
Y	Dr. Charles (Charlie) Carter	TestAmerica, Inc. Representing: TestAmerica
Y	Dr. Michael (Mike) Delaney	Massachusetts Water Resources Authority Representing: Massachusetts Water Resources Authority
Y	Mr. Michael Flournoy	Eurofins Environment Testing U.S. Representing: American Council of Independent Laboratories
Y	Mr. Keith Greenaway	ANSI-ASQ National Accreditation Board Representing: The NELAC Institute
Y	Dr. Deyuan (Kitty) Kong	Chevron Energy Technology Company Representing: Chevron
N	Ms. Sylvia (Silky) S. Labie	Environmental Laboratory Consulting & Technology, LLC Representing: Third-Party Assessors
Y	Dr. Henry Leibovitz	Rhode Island State Health Laboratories Representing: Association of Public Health Laboratories
N	Ms. Susan L. Mazur	Florida Power and Light Representing: Utility Water Act Group
Y	Ms. Cindy Nettrour	American Water Representing: American Waterworks
Y	Dr. Mahesh P. Pujari	City of Los Angeles Representing: National Association of Clean Water Agencies (NACWA)
Y	Dr. James N. Seiber	University of California, Davis Representing: Academic and Research Communities
Y	Ms. Aurora Shields	City of Lawrence, Kansas Representing: Wastewater Laboratories
Y	Ms. Michelle L. Wade	Kansas Department of Health and the Environment Representing: Laboratory Accreditation Bodies
Y	Dr. A. Dallas Wait	Gradient Representing: Consumer Products Industry

Attendance (Y/N)	Name	Affiliation
Y	Ms. Kristen LeBaron (Contractor)	The Scientific Consulting Group, Inc. (SCG)
Y	Ms. Rachel McIntosh-Kastrinsky	EPA (ASPPH Fellow)
Y	Ms. Karen Menard (Guest)	Upper Trinity Regional Water District

Attachment C

ACTION ITEMS

1. Ms. LeBaron will finalize the September 2014 meeting minutes and send them to Ms. Phelps via email.
2. Ms. Root will provide the link to the MUR proposal announcement in the Federal Register to the Board members when it is available.
3. Ms. Phelps will send the Board members the ELAB minutes from the past year.
4. Ms. Phelps will determine the most appropriate contact within the Agency regarding Method 1668 revisions so that the PCB Task Group can determine the best plan moving forward.
5. The Methods Harmonization Task Group will continue to follow Agency method harmonization efforts during the next 6 months.
6. Dr. Wait will send the reference regarding environmental analytical methods to the Board members.
7. Ms. Root will forward the Task Group spreadsheet to the Board members; incoming ELAB members will provide their top three choices for Task Groups to Ms. Root.
8. Ms. LeBaron will forward Ms. Root language to include in the two letters identified as action items during the September Board meeting.

Attachment D

I hereby certify that this is the final version of the minutes for the Environmental Laboratory Advisory Board Meeting held on October 15, 2014.



Signature Chair

Ms. Patricia Carvajal

Print Name Chair