

US EPA ARCHIVE DOCUMENT



May 17, 2017

Dr. Michael Shapiro
Deputy Assistant Administrator, Office of Water
United States Environmental Protection Agency
Ariel Rios Building (MD 4101M)
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Whole Effluent Toxicity (WET) Proficiency Testing (PT) White Paper

Dear Dr. Shapiro:

The Environmental Laboratory Advisory Board (ELAB or Board), a standing Federal Advisory Committee Act board that advises the U.S. Environmental Protection Agency (EPA or Agency), was asked by The NELAC Institute (TNI) to review and comment on a white paper on proficiency testing (PT) for whole effluent toxicity (WET) tests. ELAB's review is in general agreement with the theme of the white paper that all WET laboratories testing PT samples should use test conditions and procedures that are as consistent as possible. Because WET testing is inherently variable, tight and consistent control of test conditions should reduce variability and allow laboratories to adequately demonstrate their capability.

The Board also agrees with TNI that the PT instructions should direct laboratories performing WET proficiency testing to closely review and carefully follow the PT instructions. To achieve consistency, the laboratory should follow the PT instructions even if different procedures or conditions are used when the laboratory tests actual WET samples for its customer's National Pollutant Discharge Elimination System samples.

In addition, ELAB agrees with TNI that for consistency the WET PT program should drop the use of No Observed Effect Concentration (NOEC) values for PT samples so that laboratories report one LC₅₀ endpoint for acute tests and one IC₂₅ endpoint for chronic WET tests.

Minor comments are as follow:

1. In the table, the temperature for analyte codes 816, 818 should probably be corrected to 25°C.
2. It may be helpful to the reader to attach a glossary to the paper that briefly discusses some of the conceptual acronyms, such as LC₅₀, IC₂₅ and NOEC.

ELAB appreciates the opportunity to provide its opinion to the Agency in support of PT testing for WET. In the future, ELAB will consider providing guidance and outreach on this topic as needed.

Please let us know if you would like ELAB to provide additional input regarding this topic.

Respectfully,

Henry Leibovitz, Ph.D.
Chair, Environmental Laboratory Advisory Board

cc: ELAB Board

Lara Phelps, ELAB Designated Federal Official