

US EPA ARCHIVE DOCUMENT



## **ENVIRONMENTAL LABORATORY ADVISORY BOARD MEETING**

**Monthly Teleconference: 202-991-0477/7939251#, March 20, 2019; 1:00 – 3:00 p.m. ET**

### **MEETING SUMMARY**

The U.S. Environmental Protection Agency's (EPA) Environmental Laboratory Advisory Board (ELAB or Board) teleconference meeting was held on March 20, 2019. The agenda for this meeting is provided as Attachment A, a list of meeting participants is provided as Attachment B, and action items are included as Attachment C. The official certification of the minutes by the Chair or Vice-Chair and the Designated Federal Officer is included as Attachment D.

#### **ROLL CALL/ INTRODUCTION**

Dr. Tom O'Farrell called the meeting to order and called roll.

#### **APPROVAL OF THE PRIOR MINUTES**

Mr. Mike Flournoy motioned to approve the February 2019 meeting minutes. The minutes were approved unanimously.

#### **OPENING REMARKS AND UPDATES FROM THE DFO**

Dr. O'Farrell thanked Mr. Flournoy for accepting the role as ELAB Chair, and ELAB members for participating in the voting process for Vice Chair. He congratulated Mr. Brad Meadows for being voted in as the new Vice Chair of ELAB. Mr. Meadows thanked Mr. Flournoy for his leadership. His goal is to use everyone's input to improve ELAB.

#### **TASK GROUP UPDATES ON CURRENT TOPICS**

##### ***User-Generated Mass Spectral Library Acceptance Criteria***

Dr. Brian Buckley presented this topic. ELAB received two response letters from the EPA, stating that the methods 8260D and 8270E - already have provisions that allows users to generate libraries. These methods specify users can generate their own libraries for identification, using the same conditions required for sample analysis. There is no requirement to duplicate the NIST generated libraries in terms of performance or ion ratios. These methods permit the use of the best instrumentation available and ion traps. However, Dr. Buckley is concerned that some users may be constrained to 624 and 625 methods and may not have the flexibility to use 8260D and 8270E.

Ms. Deb Waller stated that 8260D and 8270E cannot be used because they are not yet approved in the Federal Register, and that for regulated wastewater, the 600 series methods are required. Dr. O'Farrell confirmed that Dr. Buckley has read Mr. Adrian Hanley's response from EPAs OW. Dr. Chauvin had concerns with Adrian Hanley's response, due to timing limitations. California is still using 1996 regulations, that allow the use of other methods. This means they could potentially use 8260D and 8270E, instead of the 600 series methods. Ms. Waller disagrees because this is policy, and not regulation, and the States could potentially overrule it. Mr. Richard Gossett stated because the States are responsible for regulating this policy, they are potentially an impediment. Ms. Waller recommended entities check with the State before proceeding to be safe. A follow-up from ELAB may not be necessary because the topic is an issue with the States. Dr. O'Farrell identified a similar recommendation in EPA response letters, stating the EPA methods are guidance and to make sure to check with the regulating authority.

The letters are going to be posted on ELAB's website, and ELAB can reference them when communicating with labs regarding this issue. Ms. Waller reminded ELAB that SW-846 is not being referenced in the current 600 series methods, and clarification may be needed. Mr. Flournoy will send a follow-up letter to Adrian Hanley to clarify a couple points in the OW response regarding the 8260/8270 criteria.

### ***Acrolein and Acrylonitrile Preservation***

Mr. Meadows has a template letter from the ACIL ESS and he is going to modify it to solicit laboratory participation in the preservation studies. He is going to coordinate with the co-chairs of the ESS committee to complete the letter.

Dr. Mike Delaney stated that there are labs outside of ACIL that may be interested in participating in the preservation study and inquired about the possibility. Mr. Meadows response is the ACIL is being used because they have large lab membership, but labs outside of ACIL are welcome. The study is more likely to be accepted by the EPA if more labs are involved. Feedback from Adrian Hanley stated that previous studies were too limited.

Ms. Stacie Crandall volunteered HSRD to participate in the study, stating that HSRD has a diverse pre-treatment program. HSRD has already asked pre-treatment personnel to collect a variety of different sample matrices for testing. Ms. Crandall suggested adding resources to this effort to get the data for the preservation studies.

### ***600-Series Methods***

Dr. Henry Leibovitz presented this topic. The task force- consisting of Mike Delaney, Francois Chauvin, Jayesh Ghandi, Ray Frederici, Rich Gossett, David Thal met, and will meet again before the March 2019 meeting. They discussed two topics: 1) the letter the ELAB originally sent EPA when the method update rule was proposed, and 2) the comments Dr. Richard Burrows from TestAmerica submitted. Dr. Delaney found a copy to the EPA response letter. The EPA did revise the method rule according to the comments they received. Dr. Chauvin asked Richard Burrows to provide an example where a calibration curve generated a  $R^2$  of 0.92, which is believed to be too low and unacceptable. Richard Burrows provided an example which concerned Dr. Leibovitz. Another concern is the "blanket statement" in the method for all the



analytes. Some analytes are “bad actors,” or do not perform as expected in analysis. The task group will review the regulated analytes to make recommendations to the EPA for setting additional criteria. The recommendations will be more flexible for the “bad actors” and more stringent on the more predictable analytes. Lastly, Dr. Leibovitz presented Richard Burrows question regarding calibration: When the calibration for several analytes fail, is it acceptable to rerun the calibration and ignore the performance of the other analytes? The task group will meet and have an update on this topic at the next ELAB meeting.

Dr. Delaney discussed concerns raised by a laboratory in Massachusetts: the 625.1 method has a new requirement to compare internal standards to the LCS. They reached out to the Region 1 QA chemist, Mr. Lemuel Walker, who replied that this requirement was a mistake. They were attempting to make the regulation consistent with 624, forgetting that the LCS for 624 and 625 are not the same. Dr. Delaney would like to include this concern in a letter to EPA regarding the 600 series. Dr. Leibovitz added that 624.1 is a volatile organic method that does not require an extraction. It requires a purge and trap. The LCS is treated the same way as a CCV. For 625.1 the LCS is extracted, while the CCV is not. The two methods are not comparable.

Ms. Sharon Mertens received a call from TestAmerica regarding the “blanket statement”. TestAmerica received a violation from a customer (customer A). A different customer (customer B) requested samples tested at a strict QC specific to a project. Customer A requested their samples tested, and TestAmerica performed the test for both customers simultaneously using customer B’s strict QC. Customer A issued a violation, stating that the customer B’s QC did not pass normal QC. Customer A wanted the entire batch to be reanalyzed. Dr. Leibovitz responded that ELAB raised this concern previously, and EPA did not change the method. Ms. Mertens stated that this concern is costing laboratories monetary resources. Dr. Leibovitz stated the EPA response: the promulgated methods already provide the laboratories with the flexibility desired. The task group will take a closer look at this concern and decide how to respond. Dr. Delaney asked if labs are doing what is required by method and if there are extra components. Is there a way to flag it? Ms. Mertens answered that there is a way, and that TestAmerica did comply. It was the customers interpretation of EPAs “blanket statement” that caused the issue. Dr. Leibovitz wonders if it was EPA’s intention with this method to avoid the usage of data qualifiers. The “blanket statement” is an ethics concern causing laboratories to throw out “defensible” data.

Ms. Mertens would like the task group to address this issue with potential changes to the language used in the current 600 series regulation. Ms. Stacie Crandall added that HRC has already submitted suggested language changes to the EPA in the past and received no response. She suggested the task group could look at those suggested language changes as a starting point. ELAB may make new recommendations for criteria for some regulatory and non-regulatory analytes.

### ***OGWDW Guidance on Drinking Water MDLs***

Dr. Delaney, Ms. Mertens, and Ms. Waller offered a letter to the EPA for approval by ELAB. The letter is a recommendation for the EPA to publish documents publicly and distinguish between policy requirements, guidances, and suggestions. A participant from the Massachusetts DEP asked a question regarding the ion chromatography methods: If you are following new

procedures to test MDLs every 6 months, do you have to still do the 6-month MDL testing? Ms. Mertens would like this issue addressed in the letter to the EPA. An EPA Region 1 representative told Dr. Delaney that state labs should recalculate MDLs every 6 months because that is what is in the method. "Should" is not a requirement. The letter will address the issue of the EPA creating memos and guidances that are not readily available to the entities that need to be using them and are open to interpretation by regulatory officials.

### *Inactive Topics*

#### *a) Improved PCB Congener Method*

Adrian Hanley provided an update at the March 2019 meeting that the analysis has begun for the multi-lab study. Dr. Delaney suggested revisiting this subject once the data for the study becomes available later in the year.

#### *b) Whole Effluent Toxicity PT Standards*

Dr. Delaney contacted Mr. Greg Savitske before the February ELAB meeting. Greg Savitske is willing to have task group meeting with ELAB and the WET testing task group, after the middle of April. This topic will remain inactive for now.

#### *c) In-Line/On-Line Monitoring*

Mr. Flournoy stated there was not enough interest from EPA on this topic. Ms. Crandall informed ELAB that EPA is performing actions for chlorine, and that she will talk to Lemuel Walker about whether ELAB can play a role in developing In-Line/On-Line methods. To date, ELAB has not received further feedback from the EPA. ELAB discussed the role of ELAB to the EPA. The question is "Does the EPA need anything from ELAB?" Lastly, Ms. Mertens reminded ELAB that this topic pertains to not only wastewater, but also air, and other things measured with sensor technology. Mr. Flournoy adds that the EPA has already approved on-line monitoring for air. There was a session at NEMC to address this topic.

This topic is inactive for now.

#### *d) Addressing Emerging Contaminants*

Ms. Mertens presented this topic. EPA has started to work on PFAS/PSOS. ELAB is awaiting EPA response.

#### *e) Drinking Water Program Adoption of Recently Approved Methods*

Ms. Waller presented this topic. This topic will remain inactive.



## **NEW TOPICS/ISSUES FOR CONSIDERATION**

Dr. Chauvin led a discussion on the requirements for QC failures and addressing outliers and presented ELAB with a letter to EPA on this topic. ELAB agreed to distribute this letter by email and vote on it at the next meeting.

## **WRAP-UP/SUMMARY OF ACTION ITEMS**

1. Mike Flournoy will send a letter to Tom to distribute to Adrian Hanley (EPA, OW) to clarify a point from his recent comments on the User-Generate Library Acceptance Criteria letter sent from ELAB to EPA in Oct. of 2018.
2. Brad Meadows will ask the ACIL about the possibility of conducting a study to address pH preservation of acrolein and acrylonitrile in wastewater samples.
3. Mike Delaney will send the summary of comments in the docket from the last 600 Series MUR.
4. Deb Waller will make final edits to the DW MDL letter and send to ELAB via email for approval.
5. Mike Delaney will follow up with Greg Savitske about setting up a meeting with ELAB and TNI on WET PT probably in April 2019.
6. Stacie Crandall will ask Lemuel Walker about whether ELAB should play a role in developing In-line/On-Line monitoring methods.
7. Francoise Chauvin will send a letter that will go to EPA on IDOC guidance to ELAB first for review by email. The final version of the letter will be voted on at the April 2019 ELAB meeting.

## **CLOSING REMARKS/ADJOURNMENT**

The April 2019 ELAB Meeting will be held on April 17, 2019 at 1 pm Eastern.

Dr. Delaney moved to adjourn at 2:54 p.m., and it was passed.

## Attachment A

### AGENDA

Teleconference Numbers 202-991-0477 / 7939251#

March 20, 2019

Webconference: [epawebconferencing.acms.com/ofarrel](http://epawebconferencing.acms.com/ofarrel)

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|-------|---|---------------------|
| I.    | Call Meeting to Order   | Flournoy            |
| II.   | Introduction of Board Members/Roll Call   | Board               |
| III.  | Approval of Minutes for Previous Meetings   | Flournoy            |
| IV.   | Remarks and Updates from the DFO <ul style="list-style-type: none"><li>• Vice chair selection</li></ul> | O'Farrell           |
| VI.   | Updates on Current Topics   |                     |
|       | a. User-Generated Library Acceptance Criteria.....  | Buckley             |
|       | b. Acrolein and Acrylonitrile Preservation and pH.....  | Meadows             |
|       | c. 600-Series Methods .....   | Leibovitz           |
|       | d. OGWDW Guidance on Drinking Water MDLs .....  | Delaney             |
|       | f. Inactive topics awaiting feedback/input:   |                     |
|       | ▪ Improved PCB Congener Method .....  | Delaney             |
|       | ▪ Whole Effluent Toxicity proficiency study standards<br>(is this back to active?).....                 | Leibovitz           |
|       | ▪ In-Line/On-Line Monitoring.....   | Flournoy            |
|       | ▪ Addressing Emerging Contaminants .....  | Mertens             |
|       | ▪ Drinking Water Program Adoption of<br>Recent Approved Methods .....                                   | Waller              |
| VII.  | New Topics/Issues for Consideration   | Flournoy            |
|       | What does the Laboratory community want ELAB to work on? (Waller)                                       |                     |
| VIII. | Wrap-Up/Summary of Action Items   | O'Farrell/Flournoy  |
| IX.   | Closing Remarks/Adjourn   | O'Farrell/ Flournoy |

## Attachment B

### PARTICIPANTS LIST

<b>Board Members Attendance (Y/N)</b>	<b>Name</b>	<b>Affiliation</b>
Y	Dr. Michael (Mike) Delaney	Massachusetts Water Resources Authority (MWRA)  Representing: MWRA
Y	Mr. Michael Flournoy (Chair)	Eurofins Environment Testing USA  Representing: American Council of Independent Laboratories
Y	Dr. Thomas O'Farrell (DFO)	U.S. Environmental Protection Agency  Representing: EPA
Y	Dr. Kim Anderson	Oregon State University  Representing: Academia-Oregon State University
Y	Dr. Brian Buckley	Rutgers Environmental and Occupational Health Sciences Institute  Representing: Academia and Laboratory—Rutgers
N	Dr. Francoise Chauvin	NYC Dept. of Environmental Protection  Representing: NYCDEP
N	Dr. Deyuan (Kitty) Kong	Chevron Energy Technology Company



		Representing: Chevron
N	Ms. Stacie Crandall	Hampton Roads Sanitation District  Representing: HSRD
N	Dr. Henry Leibovitz	Rhode Island State Health Laboratories  Representing: Association of Public Health Laboratories
Y	Mr. Brad Meadows	Babcock Laboratories, Inc.  Representing: Commercial Laboratory— Babcock Laboratories, Inc.
Y	Ms. Sharon Mertens	Milwaukee Metropolitan Sewerage District  Representing: The NELAC Institute
N	Mr. Richard Gossett	PHYSIS Labs  Representing: PHYSIS Labs
Y	Mr. David Thal	Environmental Standards Inc.  Representing: Environmental Standards Inc.
Y	Dr. Jayesh Ghandi	Metrohm USA  Representing: Metrohm USA
Y	Ms. Debra (Deb) Waller	New Jersey Department of Environmental Protection (NJDEP)  Representing: State

		Government—NJDEP
N	Mr. Ray Frederici	TestAmerica Representing: TestAmerica

**PARTICIPANTS LIST (CONT)**

<b>Contractors and Guests Attendance (Y/N)</b>	<b>Name</b>	<b>Affiliation</b>
Y	Ms. Alexis Bryant	EPA
Y	Mr. Nick Ramos	Hunton, Andrews, Kurth
Y	Mr. Dale Tapp	WaterOne
	Penny Shandons	Hunton/Ader

## **Attachment C**

### **Action Items**

1. Mike Flournoy will send a letter to Tom to distribute to Adrian Hanley (EPA, OW) to clarify a point from his recent comments on the User-Generate Library Acceptance Criteria letter sent from ELAB to EPA in Oct. of 2018.
2. Brad Meadows will ask the ACIL about the possibility of conducting a study to address pH preservation of acrolein and acrylonitrile in wastewater samples.
3. Mike Delaney will send the summary of comments in the docket from the last 600 Series MUR.
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6. Stacie Crandall will ask Lemuel Walker about whether ELAB should play a role in developing In-line/On-Line monitoring methods.
7. Francoise Chauvin will send a letter that will go to EPA on IDOC guidance to ELAB first for review by email. The final version of the letter will be voted on at the April 2019 ELAB meeting.




**Attachment D**

I hereby certify that this is the final version of the minutes for the Environmental Laboratory Advisory Board Meeting held on March 20, 2019.

X 

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Mr. Michael Flournoy  
Chair

X 

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Dr. Thomas O'Farrell  
Designated Federal Officer

