

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

Teleconference: 866-299-3188/9195415544#

February 20, 2013; 1:00 – 3:00 p.m. EST

The U.S. Environmental Protection Agency's (EPA) Environmental Laboratory Advisory Board (ELAB or Board) teleconference was held on February 20, 2013, from 1:00 to 3:00 p.m. EST. 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. Aurora Shields, Chair of ELAB, and Ms. Lara Phelps, Designated Federal Officer (DFO) of ELAB, welcomed participants to the teleconference and called an official roll of the Board members and guests.

2. APPROVAL OF JANUARY MINUTES

Mr. Jack Farrell moved to accept the most recent version of the minutes, and Mr. Dave Speis seconded the motion. The Board approved the January minutes with no discussion and one abstention.

3. GENERAL BOARD ACTIVITIES

Ms. Shields explained that there were three issues that the Board needed to address prior to discussing Workgroup activities. The redesign of the ELAB website will be moving forward. The *Ad Hoc* Website Workgroup discussed maintenance of the website, which will be placed as a standing item on the monthly meeting agenda. All ELAB members will be responsible for reviewing the website and ensuring that it is accurate and up-to-date. Ms. Phelps stated that the internal request to update the website had been submitted, and web personnel are working on the website currently. She said that the updates would be complete no later than the following week and would be placed in a staging area on the EPA website. Because the staging area is not accessible to non-Agency personnel, Ms. Phelps can schedule an Adobe Connect meeting for the *Ad Hoc* Website Workgroup members, or the full Board if there is interest, and perform a site demonstration. The website should be active prior to the March meeting.

Ms. Patsy Root said that she had images for the ELAB website and asked when Ms. Phelps needed them. Ms. Phelps responded that Ms. Root could send them as late as close of business on Friday, February 22, 2013. She appreciated these pictures, as some of the current pictures from ELAB face-to-face meetings are too dark.

Ms. Shields reported the results of the email vote to approve the letter to Ms. Jan Matuszko (EPA) regarding the establishment of the stakeholder review group; she received 13 "yes" votes,

and three members did not respond. The Board members decided that a lack of response from a member would be considered an abstention.

Ms. Shields noted that Mr. Jerry Parr (The NELAC Institute [TNI]) has requested ELAB's assistance regarding the state of national accreditation. The Board's status as a Federal Advisory Committee means that its information is public. Mr. Farrell explained that he had volunteered to discuss the results of the Board's efforts with TNI to determine whether there were activities that TNI could undertake to improve the accreditation process. TNI has charged its Advocacy Committee to gather information for the Agency about TNI's activities in this area. Because ELAB has a great deal of raw information about the state of national accreditation that was not published, Mr. Farrell recommended that Mr. Parr request any raw stakeholder information that will not violate confidentiality to assist TNI in its efforts.

Ms. Shields said that because ELAB was established under the Federal Advisory Committee Act (FACA), the request should be submitted directly to Ms. Phelps. It is necessary to determine what information TNI is requesting, and Ms. Phelps can clarify this with Mr. Parr. Ms. Phelps agreed that it would be appropriate for her to pursue this. She explained that all Board activities are subject to the Freedom of Information Act, and unless there is a reason that a request should be documented through the act, directly contacting Ms. Phelps for the information simplifies the process. As DFO, it is her responsibility to manage ELAB's records and provide them on request. Confidential information that the Board discusses is not subject to the Freedom of Information Act, and Ms. Phelps works with FACA attorneys to determine which information is confidential and cannot be released. Ms. Shields will respond to Mr. Parr to explain that Ms. Phelps will be handling his request and that he will need to work with her to resolve the request.

4. GENERAL WORKGROUP ASSIGNMENTS/ACTIVITIES

Monitoring Workgroup

Ms. Root explained that Ms. Shields had forwarded to the Board members the comments that the Monitoring Workgroup had developed during several teleconferences about the EPA Method 624 and 625 revisions. Ms. Root had not received any additional comments since they had been circulated among the ELAB members.

Dr. Mahesh Pujari commented that Tables 1, 2 and 3 in Method 624 could be combined into one table. He also wondered whether it would be appropriate for EPA to develop the tables for metals methods prior to seeking public comment. Ms. Root appreciated Dr. Pujari's comment, and explained that this had been an opportunity for ELAB to provide specific comments about the method revisions prior to their publication in the *Federal Register* for public comment. EPA had set the deadline for ELAB to provide comments about the revision. In response to a comment by Dr. Pujari, Ms. Root explained that it was not ELAB's responsibility to rewrite the methods; the Board only was asked to provide comments. The comments address Dr. Pujari's concerns as they include suggestions that the tables be removed or updated. When the method revisions are published in the *Federal Register*, ELAB will have an additional opportunity to provide more in-depth comments. Dr. Michael Wichman noted that ELAB had requested to be able to comment, and the members need to acknowledge that their request was granted.

Mr. Speis thought that Dr. Pujari's comments applied to a more global issue; the method tables need a global overhaul. Mr. Speis appreciated that ELAB would have another opportunity to comment, but Ms. Shields noted that once the method revisions are published in the *Federal Register*, the Agency will be less likely to undertake additional revisions based on comments.

Mr. Farrell thought that it was a relatively simple fix by noting that ELAB has concerns about the need to update the tables based on current technology. The information in the tables needs to be addressed to bring it up to date. Mr. John Phillips agreed with Mr. Speis and Mr. Farrell. The Office of Water (OW) revised an extremely old method in a piecemeal manner without providing the quality control data that are needed, especially given the fact that the office is relying on quality assurance and control to validate the data generated by the method. The office needs to provide comprehensive, current information about the current technology. Ms. Shields suggested that the general comments be included in the letter with the specific comments following within each method.

Mr. Farrell applauded OW's effort to revise these methods, but given the fact that these methods are very old and contain a good deal of outdated data in tables and figures, he strongly recommended that EPA provide a more in-depth examination of updating this information. The update should provide typical analysis tables, realistic precision and accuracy data, and figures that reflect current technology. Such an update would increase the value of the methods significantly. Ms. Root and Mr. Farrell devised the following language to be included in the third paragraph of the introductory letter: "Given that these methods are quite dated, ELAB strongly suggests that the Agency consider updating the information contained in the tables and figures in both methods to reflect current technologies and laboratory practices. In terms of where such efforts can be directed, please note the specific comments within the text for each method."

Mr. Farrell commended the Workgroup for its work on this issue. In terms of Method 625, Section 1.5, he wondered why the comments do not suggest including a limit of detection similar to the TNI standard or a verification of the ability to detect compounds based on 40 CFR 136. There needs to be a verification step to determine that the selected method detection limit (MDL) is analytically achievable. Dr. Pujari thought that the current definition of the MDL was wrong, and he was unsure whether the Board needed to address this at this point. Dr. Wichman said that there had been great deal of discussion about this, and it is addressed partially in Section 15.2.2.1. Mr. Farrell thought that a sentence should be included that verifying that the calculated MDL to assure that it could be detected analytically is strongly encouraged to ensure good science. Dr. Wichman said that the MDL was statistically derived, and he thought that the quantitation limit needed to be verified. Mr. Farrell thought that both needed to be verified; this is not a foreign concept to Mr. Lemuel Walker (EPA), as Mr. Farrell has discussed this with him in the past. Dr. Dallas Wait agreed and thought that there also was a data quality objective (DQO) issue. Ms. Shields did not want a requirement to verify the MDL in the methods; the flexibility to report reporting levels is desirable. Mr. Farrell said that this could be a general comment about MDLs, and ELAB could suggest that EPA review the 2009 TNI standards for requirements to use and verify the limits of detection and quantitation to bring them back to reasonable science. Ms. Root reiterated that the comments regarding Section 15.2.2.1 addressed this issue.

Mr. Farrell said that Section 5.1.2 regarding refrigeration already is required in the CFR. He was unclear about the comment regarding Section 7.2.1. Ms. Root explained that the point of the

comment was in regard to a specific point being included in the curve. Ms. Shields thought that the current comment addressed Mr. Farrell's concern.

Mr. Farrell asked about Section 14.1.2 and whether this method formalized the identification criteria that has been used. Should ELAB include a statement that there should be signal-to-noise ratio and retention times for low concentrations? A signal-to-noise ratio of 3:1 is an industry standard.

Mr. Farrell asked whether the methods address manual integration and documentation of manual integration. Ms. Shields did not think that any method addressed these items. Mr. Farrell thought that this could be an opportunity for ELAB to encourage that Agency methods to begin to address these issues. His comments regarding Method 625 are similar to the comments that he would provide for Method 624. The methods must provide good science and reflect industry standards.

Dr. Wait said that there have been major technology changes since the methods had been written in 1984. He asked what these changes entailed and wondered whether they even would be addressed by revising the methods. Mr. Farrell explained that the changes increased the technology and stability of the instrumentation. Additionally, there are more allowances for traps and increased flexibility for purging. Dr. Pujari thought that the revisions would help laboratories perform their work.

Ms. Root moved to approve the ELAB comments regarding the Method 624 and 625 revisions following: (1) the addition of two sentences in the third paragraph requesting an update of the method tables and figures and (2) editorial review by Ms. Kristen LeBaron (SCG). Dr. Wichman seconded the motion. The motion was approved with a majority vote. Mr. Farrell voted no because he did not think his issues had been addressed. Ms. Wade voted no because she wanted to review the document prior to voting. Dr. Wichman agreed that it was appropriate for the ELAB members to view the document prior to it being sent to Mr. Walker.

In response to a question from Mr. Farrell, Ms. Shields responded that the approved letter could be distributed to stakeholders.

Measurement and Technology Workgroup

Mr. John Phillips reported that the Workgroup had established regularly monthly teleconference on the second Tuesday of each month, making it approximately 1 week prior to the monthly ELAB teleconference. One action item on which the group is working is enhancing OW's use of the DQO process. OW has indicated to Ms. Phelps that it uses a systematic planning process that meets its program needs and will not entertain any additional discussion regarding this topic. Ms. Phelps noted that the Federal Advisory Committee on Detection and Quantitation (FACDQ) had handled this issue for OW previously, and a determination had been made by that committee that the processes in place meet the office's programmatic needs. ELAB has the right to provide advice to OW for consideration; however, OW has considered the advice and has determined that there is no need to revise its processes. Mr. Phillips, who served on the FACDQ, said that he did not recall an OW response regarding the FACDQ's recommendations. Ms. Phelps explained that she would need to review the records of that committee to determine whether OW had

provided comments, but the office discussed its use of the DQO process at the time of the FACDQ's work.

Ms. Shields asked whether the Board would receive official notification from Ms. Matuszko that OW no longer would consider this topic. Ms. Phelps said that she could ask Ms. Matuszko to respond if the Board chooses. Mr. Phillips reiterated that he recalled no official response from OW to the FACDQ. Ms. Phelps explained that if revision of the DQO process was not an identified action item for followup, then the office probably would not have provided a response.

Mr. Farrell outlined two potential actions for the Board: (1) decide to take no further action or (2) provide one last advice letter while recognizing that it will not lead to an interactive process with OW. Ms. Shields thought that part of ELAB's task was to address this issue, and it always will be part of the Board's comments on future relevant publications. Ms. Phelps said that the Board could provide the comment for the record. Mr. Phillips volunteered to examine the FACDQ correspondence to determine whether OW had provided an official response, which then would help the Board to determine whether it would like to provide additional advice to OW. Ms. Shields agreed with this approach.

Dr. Wait had the perception that OW was comfortable with the DQO-type system that it employs. Mr. Phillips said that the office's systematic planning process satisfies Agency requirements but does not meet DQO process requirements. Ms. Phelps clarified that "G" documents are guidance documents, whereas "R" documents are requirements. A new quality policy will be issued, but she was unaware of any plans to modify the DQO process guidance document. There is no Agency requirement to institute a DQO process. The only current requirements are to develop a quality management plan and a quality assurance project plan for any environmental data activity.

Mr. Phillips explained that another Workgroup action item was to work with the Intergovernmental Data Quality Task Force to increase laboratory involvement in the DQO process; Ms. Silky Labie is in the process of contacting the chair of the task force. The Workgroup also is establishing a stakeholder review group to comment on the MDL and minimum limit procedures being revised by TNI's Chemistry Expert Committee. The letter to Ms. Matuszko regarding the stakeholder review group already had been signed by Ms. Shields and sent. While waiting for Ms. Matuszko's response, the Workgroup is continuing to develop the vision for the stakeholder review group. The goal is to have the stakeholder review group in place by midyear as the TNI Chemistry Expert Committee is expected to release the proposed revisions by August 2013.

The current recommendation is to allow no more than two representatives from each stakeholder group to serve, which could potentially be filled by ELAB members. It is likely that Dr. Richard Burrows and Mr. Phillips, as chairs of the respective TNI and ELAB committees working on the effort, would serve on the stakeholder review group. Mr. Phillips asked whether other Board members would like to serve on the stakeholder review group. In response to a question from Mr. Farrell, Ms. Phelps explained that members are allowed to serve on more than one FACA committee. In response to a question from Ms. Shields, Ms. Phelps said that the number of members serving on the stakeholder review group only would be an issue if the Board sets a functional limit in the announcement, which she recommended that ELAB do. Most FACA subcommittees contain no more than two or three members from the original FACA committee.

Ms. Shields thought that allowing additional outside members to join would broaden participation from additional organizations. Ms. Phelps said that when the FACA subcommittee releases a product, it is considered to be released by the FACA committee. Therefore, all of the Board members will have an opportunity to review and approve the stakeholder review group's product(s) prior to publication. Mr. Phillips said that the current assumption would be that only he and Dr. Burrows would serve on the subcommittee.

The final action item on which the Workgroup is working is to harmonize methods across various EPA program offices, specifically integrating OW and Office of Solid Waste and Emergency Response methods. The state of Wisconsin previously had been using OW methods in its Clean Water Act program and recently was told to cease and desist because of the requirement to use 40 CFR 136 methods. To undertake a more broad harmonization effort, the Workgroup discussed collaborating with the Forum on Environmental Measurements (FEM) to identify harmonized methods that could be used among all program offices. The Workgroup members had queried a number of laboratories regarding the most beneficial methods for harmonization: gas chromatography-mass spectrometry volatiles and semivolatiles methods, inductively coupled plasma-atomic emission spectroscopy and inductively coupled plasma-mass spectrometry for metals, and general cyanide methods. One potential activity is to identify the cost savings that harmonizing the methods would achieve.

Ms. Connie Demaray (City of Tulsa Quality Assurance Laboratory) commented that the Method 624 and 625 analyte tables do not include some of the compounds in Methods 8260 and 8270. If these were harmonized, it would allow analysis of some compounds under Methods 624 and 625 for Clean Water Act permits. Mr. Farrell noted that the TNI standards could be used for the validation of compounds.

Ms. Shields said that one option to pursue this effort was to concentrate on one or two methods as targets to be used as multipurpose, multimatrix methods. The other approach would address the heart of the issue, which is whether EPA programs need to publish their own individual methods when they could work together to publish harmonized methods that work simultaneously for several programs. Mr. Phillips thought that harmonization should be a standard practice for future methods. He asked the ELAB members whether they thought that it was worthwhile to determine an estimate of the national cost benefit of harmonizing methods. Mr. Speis said that economic benefit usually is a compelling item. Volunteer organizations would need to provide this information, and ELAB would have to develop a methodology to obtain this information.

The Board members agreed that it would be beneficial to collaborate with the FEM on this issue. Mr. Speis said that this issue has been discussed for at least 20 years, and understanding the history can help ELAB move forward. Ms. Shields said that the FEM had worked hard to establish one location for all EPA published methods and develop cross-referenced tables with each program's terminology. Ms. Phelps said that the history of FEM's effort is available on its website; the glossary was a result of several years of discussion. The difference in guidelines, tools, calculations, methods and so forth have been captured in rules and regulations, and these will not be redone as there is no practical resource availability for them to be revisited. FEM attempted to better inform people of the current options so that redundant ones were not created in the future.

Mr. Farrell recommended that the Board approach the Association of Public Health Laboratories, American Public Health Association, Water Environment Federation and similar organizations to determine whether they could collect cost-savings data from their members.

Laboratory Management Workgroup

Ms. Wade explained that she needed to schedule a Workgroup teleconference to discuss the helium issue. Mr. Speis added that there is a great deal of information about this issue that the Workgroup will need to assimilate and present to the Board for its discussion.

5. NEW TOPICS/ISSUES FOR CONSIDERATION

The Board members did not introduce any new topics or issues for consideration.

6. UPDATES FROM THE DFO

Ms. Phelps already provided information about the ELAB website earlier in the meeting. She emphasized that the Board will not be conducting a survey regarding the cost benefits of method harmonization.

7. WRAP-UP/REVIEW ACTION ITEMS

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

8. CLOSING REMARKS/ADJOURNMENT

Mr. Speis moved to adjourn the meeting, which Mr. Farrell seconded. The meeting was adjourned at 2:58 p.m.

Attachment A

AGENDA ENVIRONMENTAL LABORATORY ADVISORY BOARD

Monthly Teleconference: 866-299-3188/9195415544#

February 20, 2013; 1:00 – 3:00 p.m. (EST)

Opening Remarks	Phelps/Shields
Approval of January Minutes	Shields
General Board Activities	Shields
- ELAB website - Previous email vote count - Request for information from TNI	
General Workgroup Assignments/Activities	
Monitoring Workgroup	Root
Measurement/Technology Workgroup	Phillips
Laboratory Management Workgroup	Wade
New Topics/Issues for Consideration	Shields
Updates From the DFO	Phelps
Wrap-Up/Review Action Items	Shields/LeBaron
Closing Remarks/Adjourn	Phelps/Shields

Attachment B**MEMBERSHIP LISTING AND GUESTS**

ELAB TELECONFERENCE
February 20, 2013; 1:00 p.m. – 3:00 p.m. EST

Attendance (Y/N)	Name	Affiliation
Y	Ms. Aurora Shields (Chair)	City of Lawrence, Kansas Representing: Wastewater Laboratories
Y	Ms. Patsy Root (Vice-Chair)	IDEXX Laboratories, Inc. Representing: Laboratory Product Developers
Y	Ms. Lara P. Phelps, DFO	U.S. Environmental Protection Agency Representing: EPA
N	Dr. Richard Burrows	TestAmerica Laboratories, Inc. Representing: Commercial Laboratory Industry
N	Ms. Patricia M. Carvajal	San Antonio River Authority Representing: Watershed/Restoration
Y	Mr. John (Jack) E. Farrell, III	Analytical Excellence, Inc. Representing: The NELAC Institute (TNI)
Y	Ms. Ruth L. Forman	Environmental Standards, Inc. Representing: Large Third-Party Assessors
N	Ms. Sylvia (Silky) S. Labie	Environmental Laboratory Consulting & Technology, LLC Representing: Third Party Assessors
Y	Ms. Susan L. Mazur	Florida Power and Light Representing: Utility Water Act Group
Y	Mr. John H. Phillips	Ford Motor Company Representing: Alliance of Automobile Manufacturers
Y	Dr. Mahesh P. Pujari	City of Los Angeles Representing: National Association of Clean Water Agencies (NACWA)
N	Dr. James N. Seiber	University of California, Davis Representing: Academic and Research Communities
Y	Mr. David (Dave) N. Speis	QC Laboratories Representing: American Council of Independent Laboratories (ACIL)
Y	Dr. A. Dallas Wait	Gradient Representing: Consumer Products Industry
Y	Ms. Michelle L. Wade	Kansas Department of Health and the Environment Representing: Laboratory Accreditation Bodies
Y	Dr. Michael D. Wichman	State Hygienic Laboratory at the University of Iowa Representing: Association of Public Health Laboratories (APHL)

Attendance (Y/N)	Name	Affiliation
Y	Ms. Kristen LeBaron (Contractor)	The Scientific Consulting Group, Inc. (SCG)
Y	Mr. Martin Hyman (Student Contractor)	EPA
Y	Ms. Lynn Bradley (Guest)	TNI
Y	Ms. Connie Demaray (Guest)	City of Tulsa Quality Assurance Laboratory
Y	Ms. Renee Spears (Guest)	California State Water Resources Control Board
Y	Ms. Kathryn Wangsness (Guest)	Arizona State Public Health Laboratory

Attachment C

ACTION ITEMS

1. Ms. LeBaron will finalize the January 2013 meeting minutes and send them to Ms. Lara Phelps via email.
2. Ms. Root will send the images for the ELAB website to Ms. Phelps no later than Friday, February 22, 2013.
3. Ms. Shields will respond to Mr. Parr to explain that Ms. Phelps will be handling his request for information regarding the Board's efforts on the state of national accreditation.
4. Ms. Root will revise the Board's comments regarding the Method 624 and 625 revisions and send them to Ms. LeBaron via email for her editorial review.
5. Ms. Shields will send the revised Board comments regarding the Method 624 and 625 revisions to the ELAB members prior to sending them to Mr. Walker.
6. Mr. Phillips will determine whether there was an OW response to the FACDQ regarding its use of the DQO process so that the Board can determine whether a developing a letter of advice to OW on the topic is worthwhile.

Attachment D

I hereby certify that this is the final version of the minutes for the Environmental Laboratory Advisory Board Meeting held on February 20, 2013.



Signature Chair

Ms. Aurora Shields

Print Name Chair