SUMMARY OF THE
ENVIRONMENTAL LABORATORY ADVISORY BOARD MEETING
Monthly Teleconference Meeting: 866-299-3188/9195415544#
November 18, 2015; 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 November 18, 2015. 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.

ROLL CALL/INTRODUCTION OF GUESTS

Ms. Patty Carvajal, Chair of ELAB, and Ms. Marie Russell (representative of Ms. Lara Phelps, Designated Federal Official [DFO] of ELAB), welcomed participants to the teleconference. Ms. Kristen LeBaron called an official roll of the Board members and guests.

OPENING REMARKS FROM THE DFO

There were no DFO remarks.

APPROVAL OF OCTOBER MINUTES

Ms. Carvajal asked for comments regarding the Board's October meeting minutes; there were none. Mr. Michael Flournoy moved to accept the minutes; Dr. Mahesh Pujari seconded the motion. ELAB approved the October minutes unanimously with no discussion.

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION (PADEP) DATA REVIEW PROGRAM

Ms. Aaren Alger explained that, at the beginning of 2014 and based on feedback from laboratories, the Pennsylvania drinking water and laboratory accreditation programs began to discuss whether they would accept qualified data. During these discussions, the programs could not determine which qualifiers that they should accept. As a result, the state developed a form for laboratories to use to request the acceptance of qualified data, with extensive instructions for completing the form and which specific information the state was looking for in terms of qualifications. Laboratories submitted approximately 300 applications when the process was introduced at the beginning of 2015, and PADEP streamlined the process in July 2015 to reduce the number of applications. The turnaround time for PADEP review of applications ranges from 2–3 days to 2–3 weeks, depending on staff availability. In Ms. Alger's experience, newer laboratories have been having the most difficulty in understanding PADEP's parameters for qualified data acceptance.

Mr. Flournoy asked whether accepting level 4 data review packages would have been an easier process to determine the most and least beneficial qualifiers. Ms. Alger responded that PADEP does not have the personnel available to evaluate a level 4 data review package for each laboratory; the department's approach utilizes laboratory personnel to evaluate the quality of their data to help determine qualifiers. The form not only explores the various qualifiers; rather,

this approach also maintains an electronic records system to track data qualifiers, which is a step beyond the level 4 data review. Ms. Carvajal noted that it often is difficult to incorporate additional data types into a database if they had not been incorporated in the original database structure.

Dr. Mike Delaney asked for clarification about whether PADEP's efforts began because laboratories had requested to submit qualified data or because EPA had issued an instruction. Ms. Alger explained that PADEP believed that the laboratory-reported data in its system were valid for compliance purposes but began discussing internally whether cases existed in which PADEP would accept qualified data. At approximately the same time, laboratories had approached the department regarding acceptance of qualified data. During the process, PADEP worked with the Pennsylvania Association of Accredited Environmental Laboratories. In response to a comment by Dr. Delaney about laboratory audits, Ms. Alger explained that PADEP is conferring with the state accreditation advisory committee about the development of standardized data qualifier codes that all laboratories reporting data in Pennsylvania would be required to use. The department has not received any negative feedback from laboratories regarding this effort.

Dr. Pujari commented that qualified data should be used only in isolated cases because he thought that the inclusion of too many qualifiers decreases the quality of the report. He thought that work should be repeated to report sound rather than qualified data. Dr. Delaney commented that he had heard similar comments from a California laboratory.

Ms. Carvajal noted that if a system does not include a reporting mechanism for qualified data, the system owner may unknowingly have qualified data within the system. The question is how to make the end user aware of qualified data when the system does not accommodate qualified data. Mr. Flournoy commented that the key is to understand the effect that the type of qualified data has on the data quality within the system. Ms. Alger responded that this is why her state decided to institute this system. PADEP required laboratories to provide justification that the data were valid despite the qualification.

Dr. Henry Leibovitz asked whether drinking water programs have accepted the department's assessment of the data validity. Ms. Alger responded that they had been receptive, and the programs work closely together to ensure that the recommendations are the best they can be. PADEP also is keeping EPA's Office of Ground Water and Drinking Water apprised of the program. In response to a question from Dr. Leibovitz, Ms. Alger explained that PADEP considers accredited laboratories responsible for the data, with the onus being on the laboratories rather than the public water supply system. The goal is an open dialogue among the drinking water programs, public water supply systems, laboratories and laboratory accreditation programs about the quality/usability of the data. Mr. Flournoy noted that many other states and entities are watching Pennsylvania's efforts.

Dr. Leibovitz said that other EPA offices have Quality Assurance Project Plans regarding data review and acceptance, but these do not exist within the drinking water program. This leads to the assumption that the data always are perfect; a method must be in place to communicate that the data are not perfect and why. He thought that the next step in this area would be for the Agency's drinking water program to accept PADEP's system.

Dr. Delaney commented that EPA drinking water staff had expressed concern that giving laboratories some latitude in data reporting would result in problems not being fixed and the consistent reporting of qualified data. He asked whether this has been the case in Pennsylvania. Ms. Alger responded that the majority of requests have involved either typical method blank contamination with sample nondetect or surrogates that failed high with a nondetect result. Very few requests involved improper laboratory investigation and the presence of a serious problem.

Ms. Carvajal asked whether drinking water programs eventually would perform the data reviews. Ms. Alger did not think that this would happen; she thought that PADEP was moving toward accepting common qualifiers.

Dr. Leibovitz asked Ms. Alger her thoughts about SDWIS (Safe Drinking Water Information System) Prime, which may allow laboratories to submit quality control data and qualifiers on an optional basis. Ms. Alger was unaware of this new version, but her state is discussing the next steps for its database system. Dr. Leibovitz asked whether an electronic data review system might be implemented that would allow electronic review of data. Ms. Alger said that such a system would be helpful.

Ms. Carvajal asked whether other states had contacted PADEP about the success of its program. Ms. Alger responded that she had spoken to a representative in Florida, which has a sophisticated system, and she has presented elsewhere about Pennsylvania's efforts.

Dr. Pujari reiterated that California employs very limited use of qualifiers. Ms. Silky Labie explained that she had been involved in convincing her state's office of drinking water to use qualifiers and determine how the data could be evaluated. Florida allows only certain types of qualifiers. When accredited laboratories in Florida report data, users understand the qualifiers and have the ability to evaluate the data. Various states are approaching the issue differently, and it would be beneficial for an agreement to be reached indicating that drinking water data that can be evaluated can be used. Some states/systems are not amenable to accepting qualified data, but it is important that states that allow the use of qualified data explain the qualifiers so that users understand how to evaluate and use these data.

UPDATES ON CURRENT TOPICS

Qualification of Drinking Water Data

Ms. Carvajal reported that the Task Group is in the process of developing a letter to send to the EPA staff whom the group met with during the Board's last face-to-face meeting. The Task Group has been waiting to finalize the letter until after Ms. Alger's presentation.

Dr. Delaney said that it would be helpful for the states to receive guidance from EPA; understanding the limitations is the root of the analysis that needs to be done to address this issue.

Dr. Leibovitz highlighted Ms. Alger's points about the relationships between laboratories, drinking water programs and laboratory certification programs. Each is responsible for reviewing the certification program. Perhaps the Board's recommendations should advise the Office of Water to emphasize that states (e.g., state laboratories that perform drinking water quality tests

and serve as reference laboratories) should develop beneficial working relationships with certification programs and EPA's drinking water program. Certification programs also should develop guidelines regarding how to make data quality recommendations. Ms. Labie agreed.

Ms. Carvajal is in the process of scheduling a Task Group teleconference to continue to develop the letter, which will be presented to the Board prior to its December meeting.

Methods Harmonization

Dr. Dallas Wait reported that the group still is developing its recommendations for the Board to approve, which should be ready by ELAB's next meeting.

Interagency Data Quality Task Force (IDQTF)/Data Quality Objective (DQO) Process

Dr. Leibovitz explained that Dr. Jordan Adelson (U.S. Navy) had advised him that the Board needs to speak to another group to encourage laboratory involvement earlier in the DQO process, and no focal point exists within the Department of Defense that can address ELAB's concern. The DoD's prime contractors subcontract laboratory work, and the DoD is moving toward a different contracting program that focuses on outcomes. Dr. Adelson's advice is to educate prime contractors on the benefits of coordinating projects with laboratories. The Task Group will discuss with Dr. Adelson whether ELAB can address this issue within the scope of its charter. Ms. Carvajal agreed that developing an outreach program to prime contractors was not within the Board's scope.

In-Line and On-Line Monitoring

Mr. Flournoy explained that the group had had a productive discussion Dr. Joel Creswell (EPA) and will meet the first week of December with Dr. Creswell and Ms. Janet Goodwin (EPA). Dr. Creswell's expertise will be very helpful for the Task Group to develop recommendations. He agreed with the group's assessment that DQOs are important.

NEW TOPICS/ISSUES FOR CONSIDERATION

Ms. Carvajal asked the Board whether a Task Group should be established to begin work on the selected ion monitoring (SIM) topic that was introduced at a previous face-to-face meeting. The issue is that Methods 8260 or 8270 do not address SIM or the accompanying quality assurance. Laboratories do not examine primary or secondary ion ratios, and the regulations do not require this. Several ELAB members, at the time the issue was introduced during the August 2014 face-to-face meeting, indicated that the Board might want to make recommendations to the Agency regarding better control of SIM analysis.

In response to comments from Mr. Flournoy and Dr. Delaney, the Board members agreed to review the past information on SIM so that, during the December meeting, they can determine whether a Task Group should be established at this time to address this issue.

Ms. Carvajal asked the ELAB members whether luncheon meetings (with a non-quorum of Board members) should be regularly scheduled during future face-to-face meetings to discuss

current Board topics with EPA staff. The ELAB members agreed to this idea. The next ELAB face-to-face meeting will be held in Tulsa, Oklahoma, on January 25, 2016.

Dr. Pujari reported that the EPA development of a method for polychlorinated biphenyls is progressing well.

WRAP-UP/SUMMARY OF ACTION ITEMS

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

CLOSING REMARKS/ADJOURNMENT

Mr. Flournoy moved to adjourn the meeting; Dr. Wait seconded the motion. The Board approved a motion to adjourn the meeting at 2:41 p.m.

Attachment A

AGENDA
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Roll Call/Introduction of Guests	Carvajal/LeBaron
Opening Remarks From the DFO	Phelps
Approval of October Minutes	Carvajal
Pennsylvania Department of Environmental Protection Data Review Program	Alger
Updates on Current Topics	All
Qualification of Drinking Water Data: Carvajal	
Methods Harmonization: Wait	
Interagency Data Quality Task Force/Data Quality Objectives Process: Leibovitz	
In-Line and On-Line Monitoring: Flournoy	
New Topics/Issues for Consideration	Carvajal
Wrap-Up/Summary of Action Items	Carvajal/LeBaron
Closing Remarks/Adjournment	Carvajal

Attachment B

PARTICIPANTS LIST

Board Members

Attendance (Y/N)	Name	Affiliation
Y	Ms. Patricia (Patty) Carvajal (Chair)	San Antonio River Authority Representing: Watershed/Restoration
Y	Dr. A. Dallas Wait (Vice-Chair)	Gradient Representing: Consumer Products Industry
N	Ms. Lara Phelps, DFO	U.S. Environmental Protection Agency Representing: EPA
Y	Dr. Michael (Mike) Delaney	Massachusetts Water Resources Authority Representing: Massachusetts Water Resources Authority
Y	Mr. Michael Flournoy	Eurofins Environment Testing USA Representing: American Council of Independent Laboratories
N	Dr. Deyuan (Kitty) Kong	Chevron Energy Technology Company Representing: Chevron
Y	Ms. Sylvia (Silky) 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
Y	Dr. Mahesh Pujari	City of Los Angeles Representing: National Association of Clean Water Agencies
N	Ms. Patsy Root	IDEXX Laboratories, Inc. Representing: Laboratory Product Developers
Y	Ms. Aurora Shields	City of Lawrence, Kansas Representing: Wastewater Laboratories
N	Ms. Michelle Wade	Kansas Department of Health and the Environment Representing: Laboratory Accreditation Bodies

PARTICIPANTS LIST (CONT)

Contractors and Guests

Attendance (Y/N)	Name	Affiliation
Y	Ms. Kristen LeBaron (Contractor)	The Scientific Consulting Group, Inc. (SCG)
Y	Ms. Marie Russell (EPA ASPPH Fellow)	EPA/OSP
Y	Ms. Aaren Alger (Guest)	Pennsylvania Department of Environmental Protection

Attachment C

ACTION ITEMS

1. Ms. LeBaron will finalize the September meeting minutes and send them to Ms. Phelps via email.

2. ELAB members will review past information and meeting minutes regarding SIM so that, during the December Board meeting, they can determine whether to establish a Task Group on this topic at this time.

Attachment D

I hereby certify that this is the final version of the minutes for the Environmental Laboratory Advisory Board Meeting held on November 18, 2015.

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Signature Vice-Chair

Dr. Dallas Wait

Print Name Vice-Chair