Environmental Monitoring Coalition

November 23, 2020

3:00 pm EST

Call in Number 425-436-6260

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| **Name** | **Organization**  | **Present/Absent** |
| Jordan Adelson | US Navy | Absent |
| Kristin Brown | Utah DoH | Absent |
| Richard Burrows | Eurofins TestAmerica | Present |
| Michael Delaney | MRWA (retired) | Present |
| David Friedman | ACIL | Present |
| Jay Gandhi | Metrohm USA | Present |
| Mary Johnson  | Rock River Reclamation District (WEF) | Present |
| Kitty Kong | Chevron | Present |
| William Lipps | Shimadzu | Present |
| Sharon Mertens | Milwaukee MSD (TNI) | Present  |
| Judy Morgan | Pace Analytical (ACIL) | Present |
| Jerry Parr  | TNI | Present |
| Steven Rhode | MWRA (APHL) | Absent |
| David Thal | Environmental Standards | Present  |
| Sarah Wright | APHL | Present  |
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| Carol Batterton | TNI staff | Present  |

1. **Roll call and approval of October minutes**

Jerry Parr called the meeting to order. Attendance is recorded in above. Minutes from the last meeting were reviewed. It was noted that David Friedman had volunteered to lead the re-write of 200.8 and that a work group should be established by the beginning of 2021. This will be added to the October minutes. The minutes were accepted by acclamation with this edit.

1. **Update on Priority action items**
2. IDOC Requirements – started thinking about it
3. Rewrite on EPA Method 200.8. – no new action
4. User-Generated Mass Spec Library – Richard Burrows drafted new language and sent edits to Judy Morgan. This will be on the agenda for the next meeting.
5. Acrolein and Acrylonitrile Preservation and pH – expect to finalize sampling plan at the meeting next Tuesday and start work in January. Richard asked if wastewater samples needed to be influent or effluent. David said that would be decided at next week’s call.
6. **Collaboration with EPA**

The original proposal was edited and was attached to this month’s agenda for review. Discussion focused on “Proposed Effort” and whether this was the right approach. Comments included:

* 2.0 (a) EPA already has guidance for method development and validation. However, there are varying approaches for method approval across the program offices. EPA has multiple groups doing method development because priorities differ among the programs. We should promote ASTM Standard Guidance for Method Development and Optimization D8372. If this approach works for EPA, then no action would be necessary under 2.0 (a).
* After discussing 2.0(b) members agreed that this effort should be focused on a higher level. There are efforts underway to re-set EPA under the new administration. It would be good to reach out sometime in January or February 2021. David will draft a letter to the new administration proposing our offer for collaboration.
* 2.0 (c) and (d) will be discussed at a later meeting.
1. **Next meeting**

The next meeting is January 18, 2021, at 2:00 pm CENTRAL time.

**Appendix**

**EMC Proposal to EPA to Address Monitoring Issues**

*Preliminary Rough Draft 2*

*August 28, 2020*

1. **Issues to Be Addressed**

A number of issues have been identified by the Agency (1988 Report to Congress) and by the former EPA Environmental Laboratory Advisory Board that need to be addressed. The Environmental Monitoring Coalition (EMC) proposes to help address them with a collaborative effort by working with EPA across all EPA’s Program Offices. Such issues include:

1. As a result of the growth of EPA’s mission during the 1970’s the Agency ended up with a number of method development programs. As the programs have matured and the matrices and analytes of concern have increased, the number of methods that laboratories are required to employ has expanded. Often different EPA programs have issued analytical methods that employ the same basic measurement technique but with slight differences. This has resulted in a problem for the environmental laboratory community and confusion in the regulated community as to appropriate methodology to employ when conducting compliance monitoring.

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1. The environmental problems facing our country have increased. New analytes of environmental concern have been discovered and measurement methods are needed to determine the extent and severity of these new analytes. Due to the lack of staff and resources, addressing the need has overtasked the ability of EPA staff and has led to long lead times. In many cases, the environmental monitoring needed crosses EPA program offices.
2. The technology innovation community has and continues to develop innovative new techniques and equipment for environmental monitoring. This equipment has the potential to increase the accuracy of, while decreasing the cost of testing, and improve productivity. However, before such technologies can be used, EPA approval is needed. This has been a slow process which decreases laboratory productivity and makes it more difficult for innovators to market their products. The net result is that testing costs are higher than they need to be, and technology innovators are reluctant to invest to develop new techniques in the US.
3. Although the EPA has a national quality assurance program which provides a range of QA supports and guidance, the mandatory quality assurance programs and specific quality control methods established within the Agency's operating programs and in other federal and state programs are often inconsistent, sometimes inadequate, and not always cost­ effective nor ensure the quality of laboratory data.
4. **Proposed Effort**

 The Environmental Monitoring Coalition (EMC) proposes to help address these issues with a collaborative effort by working with EPA across all EPA’s Program Offices. Such efforts would include:

1. The EMC would establish a Task Group to develop a standard practice for Method Development and Validation that all EPA Program Offices could adopt. This Practice would include both single-lab and inter-lab studies. The Task Group would use guidance documents from EPA, ASTM, and AOAC to develop this new practice.
2. When a new monitoring problem is identified, the EMC would establish a Task Group consisting of representatives from each interested EPA Program Office, EPA’s Office of Research and Development, EPA Regional laboratories, other appropriate federal agencies, voluntary consensus standard development bodies, state laboratories, municipal laboratories, commercial laboratories, and the technology community to facilitate the discussion on whatever methodology is needed to address the EPA need. EPA Program Office representatives would help guide the development.
3. The EMC would establish a similar Task Group to review existing Agency monitoring methods and prepare a report that the EPA Program Offices can use to harmonize the method Quality Control requirements. The Task group would look at developing consistent approaches for requirements such as instrument calibration and quality control based on the current best science. Example: Currently every method has its own calibration section which contains varying requirements and acceptance criteria. The EMC report could recommend a “Standard Instrument Calibration Practice” that every method could then reference. As this science improves, this one document could be updated without having to change all the other methods.
4. EMC would establish a Task Group to work with the Agency and the States to explore opportunities to expand NELAP into a true national environmental laboratory accreditation system that covers all environmental monitoring programs.