**MEETING SUMMARY**



EMC Environmental Monitoring Coalition



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Environmental Monitoring Coalition

Monday – February 22, 2021 at 3:00 pm ET

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1. The meeting was called to order at 3:03 pm by Jerry Parr, Chair

2. Roll call – Uttenweiler

See Roll Call at the end of the summary.

3. Update on Current Activities

a. Acrolein/Acrylonitrile Holding Time Study – Friedman

Adrian Hanley sent an email with questions about the diagram proposed for the study. David Friedman replied that he could not change the diagram and that Sarah Burket who developed it would need to provide required changes.

Adrian’s email: after a question, it was stated that the entire group would review the data; the data being collected seems adequate; the Office of Water will evaluate the data assuming the data shows that a change in holding time is warranted; there can be no assurances as to rule-making decisions which are done by higher level management. If data and conclusions are reasonable, the Office of Water will support the conclusions.

Hanley raised a question about making “day zero” different for each lab. The general discussion about using different “day zero” was supported by some on the call but not by others. Reasons supporting both positions were given. The only issue currently being addressed is with high salinity ground water sample – what will be considered a high salinity sample? Would diluted ocean water be acceptable? There were no answers from Hanley. David Friedman will get in touch with him for clarifications.

David reported that at this point, all the laboratories are collection samples and getting ready for analysis.

Jerry asked a question the data analysis on the determination of validity, item #2 – a number of methods were discussed and David responded that the working group will look at all those types of analysis.

The basic answer is that the group will not be looking at raw data.

Troy had a question about adjusting the ph of samples … he was questioning the difficulty of that process. While adjusting ph can be a bit problematic, Richard Burrows stated that it probably can be done as needed for the study since the ph change will be done on larger samples and then distributed. A short discussion continued on the issue.

The sampling collection process is underway. Some laboratories have started collecting samples.

b. Updating of EPA Method 200.8 – Friedman

Jerry has suggested that a task force be formed to deal with this topic. Jack Creed could not participate in this February 22 call. However, there have been a lot of emails on this topic.

The volunteers are David Friedman, Richard Burrows, William Lipps, Tarun Anumol, Kathleen Young, Michael Flournoy and Judy Morgan.

c. Initial Demonstration of Capability – Parr

Comments have been received, including from Mike Delaney and William Lipps. A clean version of the document is embedded below. A question arose regarding the origin of the table. That came from Tom Georgian of the US Army Corps of Engineers. Jordan was asked if there was a way to track down a source for this information. Jerry Parr will send the material to Jordan who will contact Tom at the Corps of Engineers.

There was a discussion of whether or not the table can used to demonstrate an initial indicator of capability. David raised the question that the table included could be used for a demonstration of ongoing testing capability for analysis. David questioned the number of failures for analytes. Jerry stated that this was based on the original 624/625 Federal Register Notice. The Office of Water has used this approach but this is not used by the Office of Drinking Water.

David stated that for an ongoing demonstration of capability, there could be some outliers in results. For initial testing, would it have to occur four times? There was a question as to the applicability of the use of “four times” as language. Jerry replied that the language was in existing rules. William agreed that there could be some failures and that testing repeats would be needed. There is a question as to whether or not some failures should occur to be under a 95% confidence interval. Jerry stated that he was trying to understand the issue since this has been around in the water program for forty years. This has always been on the initial testing. It’s called on IPR test. Retesting would be done for analytes that don’t pass. Additional discussion and explanation took place.

In 1.6.2.2 d) - “If any one of the analytes does not meet the acceptance criteria, the performance is unacceptable for that analyte.” In 1.6.2.2 e) – “When one or more of the tested analytes fail at least one (1) of the acceptance criteria, the analyst shall repeat the test for all analytes that failed to meet criteria.” The table was developed by Tom for LCS samples so the presumption is this should work for other samples. The table was in QSMB3 and in the 2003 NELAC standard. It is unclear where the table appeared first, but further discussion decided the table first appeared in the QSM.

There was a discussion as to adding a statement below the table to provide clarification. There also was a discussion about removing 1.6.2.2 e) for clarity. Judy asked why the group was discussing marginal exceedances in an initial demonstration of capabilities. Jerry mentioned that this went back to the ELAB days, when retesting was allowed for failed analytes in wastewater. However, there was no guidance on what to do when analytes fail. There was a short discussion about simply writing the guidance to allow for failed analytes. At one point, the number of failures allowed was method specific. If the group is looking to use method specific testing results, then this table could work.

In the 1984 Federal Register Notice, the table had specific numbers for failures for each method. Prior to that, the FRN states that EPA is correcting for this possibility in several ways. Most users will not apply most analysis parameters simultaneously. A second statement stated that a retest was allowed. This is where the practice comes from.

There was then a question as to whether or not the group agrees with the EPA’s logic. Judy and David both stated that they did not agree with the conclusion.

ELAB thought this was an issue which is why EMC is discussing the issue. This is an issue for drinking water because the methods did not define what to do if testing was out. David provided additional discussion. Years ago, when NIST inspectors would look at analyses where some analytes did not pass, some wanted the entire test redone when it was related to drinking water.

After a short discussion, it was decided to put the issue back on the agenda for next meeting. Some additional information will be circulated on this topic prior to the March 22, 2021 meeting.

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d. EMC Letterhead – Sarah Wright

Jerry displayed the various designs developed by Kristy Albrecht of APHL. The discussion covered the design, use of capital versus small letters, wave and color designs and more.

There also was a discussion as to the wording used as part of the letterhead. After listing to the input from members, Kristy will work on a new design for the next meeting.

e. Updating of 600 Series Method Quality Control Parameters – Parr

Richard Burrows, Judy Morgan, and William Lipps volunteered to help with this effort. No progress has been made.

f. Collaboration with EPA letter – Friedman - tabled

Jerry made minor edits to the draft letter for the EMC to send to the incoming EPA Administrator proposing that EPA and the EMC enter into a partnership to help improve environmental monitoring technology and data quality, but suggest the attachment be deleted entirely until the approach to new methods can be fully discussed.

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g. EMC Proposal to help EPA address Monitoring Issues (Attachment to EMC letter and J. Willey presentation at the TNI Forum) - tabled

As shown in the EMC letter above, Jerry made significant comments on the proposed approach for collaboration with EPA. Janice Willey from the US Navy gave a great presentation on this topic at TNI’s Annual Meeting on January 28. The EMC needs to discuss this topic in detail.

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h. PFAS Testing for Drinking Water – Delaney - tabled

In reviewing the minutes, not sure any action items came out of the discussion.

2. Any other business

3.Next EMC meeting is set for Monday, March 22, 2021 at 3:00 pm ET.

4. The meeting was concluded at 4:00 pm ET.

Respectfully submitted,

Robert Uttenweiler

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| --- | --- | --- | --- |
| **Members** |  | x – present / a - absent |  |
| Jordan Adelson | US Navy (DOD ELAP) | jordan.adelson@navy.mil | x |
| Kristin Brown | Utah DOH | kristinbrown@utah.gov | x |
| Richard Burrows | Eurofins | Richard.Burrows@Eurofinset.com | x |
| Michael Delaney | MRWA (retired) | mike@mikedelaney.org | x |
| David Friedman - Vice Chair | ACIL | friedmanconsulting@outlook.com | x |
| Jay Gandhi | Metrohm | jgandhi@metrohmusa.com | x |
| Mary Johnson | Rock River Reclamation District (WEF) | MJohnson@rrwrd.dst.il.us | x |
| Kitty Kong | Chevron | DEYK@chevron.com | a |
| William Lipps | Shimadzu | wclipps@shimadzu.com | x |
| Sharon Mertens | Milwaukee MSD (TNI) | SMertens@mmsd.com | x |
| Judy Morgan | Pace Analytical (ACIL) | Judy.Morgan@pacelabs.com | x |
| Jerry Parr - Chair | TNI | jerry.parr@nelac-institute.org | x |
| Steven Rhode | MWRA (APHL) | steve.rhode@mwra.com | x |
| David Thal | Environmental Standards | dthal@envstd.com | x |
| Sarah Wright | APHL | sarah.wright@aphl.org | x |
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| **Staff / Invited Guests** |  |  |  |
| Carol Batterton | TNI | carol.batterton@nelac-institute.org | a |
| Robert Uttenweiler | ACIL | ruttenweiler@acil.org | x |
| Kathleen Young | PerkinElmer | kathleen.young@perkinelmer.com | a |
| Tarun Anumol | Agilent | tarun.anumol@agilent.com | a |
| Richard Bright | ACIL | rbright@acil.org | a |
| Michael Flournoy | Consultant | michael.flournoy@gmail.com | x |
| Kristy Albrecht | APHL |  | x |
|  |  |  |  |
| **EPA / Others** |  |  |  |
| Dan Hautman | EPA | Hautman.Dan@epa.gov | a |
| Adrian Hanley | EPA | Hanley.Adrian@epa.gov | a |
| Kim Kirkland | EPA | Kirkland.Kim@epa.gov | a |
| Troy Strock | EPA | strock.troy@epa.gov | x |
| Brad Meadows | Babcock Labs | bmeadows@babcocklabs.com | a |
| Sarah Burket | EPA | Burket.Sarah@epa.gov | x |
| Lemuel Walker | EPA | Walker.Lemuel@epa.gov | a |
| Brian Damico | EPA | Damico.Brian@epa.gov | a |