Environmental Monitoring Coalition

Monday – April 26, 2021 at 3:00 pm ET

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1. The meeting was called to order by Jerry Parr, Chair at 3:01 pm

2. Roll call – Uttenweiler (see below)

3. Update on Current Activities

1. Updating of EPA Method 200.8 – Friedman

David did not receive a commitment from Jack Creed as to whether he is willing to participate in a EMC Work Group. Since the EMC has not finalized what it wants to do, he has not made a formal invitation to Jack on behalf of the EMC. After our last meeting, David asked him for the information package that he mentioned that he had shared with some of the instrument vendors earlier. In response he sent basically the same information that he had sent to the EMC earlier. What we need to do today is decide on a path forward.

Burrows – We need to decide what, if anything, needs to be added to 200.8.

Hautman – Alternative approach is from DW analysis to have a standard method that does what  
we want.

Burrows – It is preferable to have an update to 200.8

Farrell – Have the Task group decide what it thinks needs to be done to fix the method.

Burrows – Task Force should come up with a proposal as to what they would like to do to correct   
the problem.

Parr – Have the Task Force meet and decide what to do.

David Friedman will take charge of this process.

b. Acrolein/Acrylonitrile Holding Time Study – Friedman

Laboratory work is progressing well. Two of the laboratories have completed their work and one is currently conducting the study. So far, the seems to data support the use of pH 2. By our next meeting we should know how well everything went.

c. Initial Demonstration of Capability – Parr

After conversations with Mike Delaney and Sharon Mertens, it turns out the ELAB issue was not the IDOC per se, but the requirement for a prediction interval of recovery (PIR). Most, if not all of the Drinking Water methods for organics have this statement:

The MRL is validated if both the Upper and Lower PIR Limits meet the criteria described above. If these criteria are not met, the MRL has been set too low by the laboratory and must be demonstrated again at a higher concentration.

Jerry requested input from Dan Hautman on the issue. Sharon Mertens stated that her understanding is that the issue is the large analyte lists and some don’t meet every replicate. Would the whole study need to be redone to handle outliers? Dan stated that compliance parameters that if cases aren’t involved or regulated in drinking water, perhaps those are not problems.

However, that is not written guidance. That is an area of question relating to the guidance for auditors. Some states are more stringent than others. Perhaps EPA could provide a guidance memo of clarification. Dan will go back to ask his laboratory certification team for a response. It may be more of an education of the assessors and if the state assessor group is meeting. After the call, Dan reported back to Jerry with this message:

I discussed this topic both internally with our TSC Lab Cert team and also brought it up with all our EPA Regional DW Certification Officers during a conference call this afternoon.  We are not aware of any issued guidance or correspondence that specifically addresses or advises drinking water laboratory Certification Officers to exclusively focus on regulated parameters when conducting drinking water laboratory audits and/or reviewing IDC data.  As you know, there are several approved analytical methods that include an extensive list of target analytes that fall within the scope of the procedure, but most often only a subset of these analytes are federally regulated in drinking water.  During yesterday’s EMC call, I made the point that I suspect nothing was ever issued because this position could be inferred since we codify within 40 CFR Part 141:  the regulated analytes, the approved analytical methods specific to monitor those regulated analytes, and the lab certification requirement that applies to conducting compliance monitoring for these regulated analytes with those approved methods.  EPA allows drinking water primacy states to be more stringent than federal requirements and some may establish state codified monitoring requirements for these additional non-federally regulated analytes, which then would warrant a state auditor’s cited finding.  States also have the authority to be more stringent than federal regulations in how they implement their laboratory certification/accreditation programs and could require labs to generate IDC data for all analytes included in the method scope.  Included within our CO training program are ways for COs to be efficient and prioritize data review during a lab audit.  We suggest the auditor not include in their lab audit these non-regulatory analytes that fall within the scope of the method, but rather they specifically focus on the drinking water federally regulated analytes and associated QC.

During our call with the Regional COs, it was mentioned that auditors review a significant amount of information and if during a lab audit the regional CO would happen to notice poor performance for a non-regulated analyte with failing QC data or poor recoveries in the IDC, they may identify that observation in their report.  In this case, the Region mentioned the observation would include a recommendation that the lab maintain awareness and consider looking into why the method may be performing poorly for that non-regulated analyte, but they would not make it a finding requiring any corrective action.  The observation would be shared with the lab for broad awareness and recognition that the failed IDC for the non-regulatory analyte may represent an early warning of potential future lab performance problems.  Often times specific target analytes can be more sensitive and may serve as early indicators/sentinels that the analytical system (extraction and/or analysis) may be teetering and soon may fall out of control for regulated analytes.

After the call Sarah Wright indicated the state assessor group was no longer meeting, but she does have an email list.

For methods with many analytes, it is likely that some number of them will not meet this requirement, but most will. The language in the method does not indicate a retest for just those that failed is possible or if all analytes must be repeated at a higher concentration.

The test does rely on the mean and SD of 7 replicates, which should alleviate the failure of an analyte in just one of the 7, but ELAB still thought this was an issue.

Parr - This should go to the TNI State Assessor group.

Farrell – Get the language that Hautman said and give that to the assessor group to consider.

f. Collaboration with EPA letter - Friedman

In this latest version, Jerry revised the bullets at the top of page 2 in the letter. ELAB never validated methods nor developed measurements and EMC is in no position to do so. Also, the tried and false “data of known and documented quality” was revised to reflect the TNI white paper.

Note: In moving the text into the new letterhead, most of the track changes language disappeared so a version showing all the changes in also provided.

- The letter is too long

- We should cite transparency memo that recently came out.

- The letter should spell out what we want earlier in letter - reorganize.

- The letter should put the makeup of EMC earlier than founding organizations. The EMC is a wide group representing many viewpoints and sectors of the community. These four founding groups were just the ones who took the lead in helping to get this effort going.

- Sharon Mertens also provided comments

- David Friedman will ask Mike Oscar, ACIL Government Relations Director, if he would review and edit letter.

g. EMC Proposal to help EPA address Monitoring Issues (Attachment to EMC letter)

Jerry softened the language on VCSBs per David’s request. David provided feedback and other edits are marked in letter. There was a discussion about adding calibration issues and whether that already was included. Perhaps a direct statement of benefit to EPA would be included.

Jerry will work on benefits statement. Group is also looking for comments. William suggested an area to be reworked to indicate what this can do to help EPA do what needs to be done. Explanation as to EMC’s make-up that can provide input and assist EPA.

Jerry asked for volunteers to assist. Sharon Mertens, William Lipps and Jay Gandhi will assist. The goal is to have a revised edit of the letter for review next month (May 2021.)

h. QC Criteria Effort – 608.1, 624 and 625.

This is still stalled for lack of volunteers. William Lipps is working with Jerry. Judy Morgan will provide a volunteer from Pace. Richard Burrows also volunteered. Other members are encouraged to volunteer.

About thirty-five (35) laboratories have volunteered to provide data. The work plan already is done.

2. Any other business

1. Jerry sent an email about an asphalt driveway sealing issue. This is not for DoE but for the District of Columbia. However, this may be used by other municipalities.

There was a discussion around which type of laboratory would be equipped and experienced enough to do this asphalt testing. There also was a discussion about the standard(s) to apply and the type of accredited laboratory to suggest. William Lipps will review the ASTM standard on these issues.

Jerry will review the subject and it may return as a topic for the May meeting.

1. Mary Johnson – at WEF went through using technical discussion comparing using TOC to using BOD and had a correlation study on that subject. EPA allows using TOC instead of BOD.

William Lipps provided more details. There is a sentence in the regulation but does not provide details. WEF has four labs on their professional community that might be able to provide definitions of a long term study and what a correlation is. This is relating to a wastewater treatment plant.

William, Mary and others will make a suggestion regarding this. Mary will reach out to Devon Morgan and others. Mary Johnson will reach out to get a group together in the WEF lab community and bring this discussion back in May.

There was a discussion about Secondary Treatment regulation. It may also apply to tertiary treatment. This could assist in clarification. A question on this issue will be sent to Adrian at EPA. Jerry will send information to Adrian.

3. There being no further business, the meeting was concluded at 4:07 pm.

4. Next meeting, Monday, May 24, 2021 @ 3:00 pm.

Respectfully submitted,

Robert Uttenweiler  
ACIL Section Executive Officer

and

David Friedman  
EMC Vice Chair

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| **Members** |  | P / A |
| Jordan Adelson | US Navy (DOD ELAP) | P |
| Kristin Brown | Utah DOH | P |
| Richard Burrows | Eurofins | P |
| Michael Delaney | MRWA (retired) | A |
| David Friedman - Vice Chair | ACIL | P |
| Jay Gandhi | Metrohm | P |
| Mary Johnson | Rock River Reclamation District (WEF) | P |
| Kitty Kong | Chevron | A |
| William Lipps | Shimadzu | P |
| Sharon Mertens | Milwaukee MSD (TNI) | P |
| Judy Morgan | Pace Analytical (ACIL) | P |
| Jerry Parr - Chair | TNI | P |
| Steven Rhode | MWRA (APHL) | P |
| David Thal | Environmental Standards | P |
| Sarah Wright | APHL | A |
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| **Staff / Invited Guests** |  |  |
| Carol Batterton | TNI | A |
| Robert Uttenweiler | ACIL | P |
| Kathleen Young | PerkinElmer | P |
| Tarun Anumol | Agilent | P |
| Richard Bright | ACIL | A |
| Michael Flournoy | Independent Consultant | A |
| Lori Pillsbury | OR Dept. of Environmental Quality | A |
| Zach Mandera | OR Dept. of Environmental Quality | P |
| Jack Farrell | AEX | P |
| Brad Meadows | Babcock Labs | A |
|  |  |  |
| **EPA / Others** |  |  |
| Dan Hautman | EPA | P |
| Adrian Hanley | EPA | P |
| Kim Kirkland | EPA | A |
| Troy Strock | EPA | P |
| Bekah Burket | EPA | P |
| Lemuel Walker | EPA | A |
| Brian Damico | EPA | A |