

Highlights

- ITLA Letter to Mr. Foy, MA DEP
- ITLA Quarterly Meeting Notice
- MWRA



ITLA

*The Newsletter of
Independent Testing
Laboratories Association
Volume 21 - Issue 24
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2002-2003 ITLA Officers

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Message from the President

By Bob Bentley

It's May and we've seen April showers turn into May showers. Business is finally picking up after the "out of the ordinary" winter, but most importantly, your organization is humming along!

By the time you get this, we will have had two training sessions - one on beach microbiology testing and another on mass

spectral interpretation. We will also be providing a half-day seminar with SPEX CertiPrep entitled "Effective Solutions for Your Day-to-Day Challenges." This will cover how to achieve success when analyzing performance testing samples, how to deal with problem organic analytes, and how to use clean lab techniques for trace metals analysis. Watch your mail for further details. One of the benefits of ITLA membership is that we offer members a reduced rate on all of our seminars. Did you see how *inexpensive* the mass spectral interpretation seminar was compared to the industry's pricing? Sending one person to that seminar saved you more than the cost of this year's membership!

We are interested in your feedback. Have these varied sessions given you and your staff enough choices? Are there other seminars that might be useful to staff in your lab? Please e-mail me or any member of your Executive Committee with your

thoughts. We know that we work better when we are not in a vacuum.

The budgetary crisis in the Commonwealth of Massachusetts has many of us concerned. In particular, we have been hearing rumors about the possibility of further personnel cuts in the Lab Certification Office. Although all of us maintain high quality, we in ITLA remain apprehensive about the other labs - and we know they are out there - who might not be audited on a routine basis should further staff reductions take place. We have therefore voiced our collective opinion to the powers-that-be in the State. A copy of that letter is part of this newsletter. All feedback is welcome. (*See page 4*)

The upcoming quarterly meeting promises to be an interesting one. Jim Occhialini will share additional news on changes (yes!) in the MCP. Do you have multiple versions of software running your instrumentation? Can they be integrated? **Ken Eglinton**

Quarterly Meeting

Wednesday, June 11, 2003 * Radisson Inn, Marlboro, MA

Feature Presentation: The Data Quality Act by Dallas Wait, Gradient Corp. *See page 3 for agenda*

President's Message continued....

of Waters will discuss new software that allows different software programs to “talk” intelligently. The Data Quality Act has real potential to impact all of our reporting - so we have lined up Dallas Wait to give us the lowdown on this. We will also hear about problems in the FBI laboratories and others from Mike Delaney. This should be an informative meeting for all! See you there.

NELAC – An Update

By Bob Bentley

Well, I wish it was not so, but again, I don't have anything new to report for this newsletter. The process seems mired in the mud. Yes, there is the annual meeting coming up (before our meeting, so there may be something to report), and as we all know, the process is about to change. Inconsistencies continue to show themselves, and we deal with yet another growing bureaucracy! Stay tuned.

MWRA by Mike Delaney

Pharmaceutical Manufacturers - A response to a recent commercial lab request: MWRA regulations at 360 CMR 10 require that a DEP certified lab be used when such certification is available. MWRA is broadening this approval to include NELAP accreditation. For certain parameters for which DEP certification is not offered, MWRA has specified the methods to be used. In particular, for petroleum hydrocarbons (PHC) and formaldehyde, MWRA has provided a copy of a Standard Operating Procedure that a laboratory should use as a basis for their procedure.

For other parameters for which DEP certification is not offered, including certain pharmaceutical parameters, a laboratory must use and follow the analytical methods specified in the pertinent regulation (such as 1666 and 1671). This includes any specified initial demonstration of capability or quality control requirements.

At this time, MWRA has not specified any

additional requirements for methods 1666 & 1671.

Local Limits Changes: The Local Limits changes have passed through the public comment phase and have been approved by our Board of Directors. They are expected to go into effect on 6/20/03 and each permitted industry will receive a letter revising their permit. A detailed discussion of the changes is available at http://www.mwra.com/sewer/html/local_limits.htm. One significant change will be the dropping of the GC/FID petroleum hydrocarbons test in favor of Methods 624 and 625 for specific volatile and semivolatile organics on the Total Toxic Organics (TTO) list. Also, NELAP accreditation will be accepted in lieu of MA-DEP certification.

TRAC “eSMART”: As discussed at the last ITLA meeting, we continue to receive laboratory data electronically using the web-based “eSMART” program. Labs access eSMART using a PIN provided by MWRA. The program accepts either data files in a specific format, or on-line data entry. Chains of custody are scanned and submitted as PDF files. So far, over 20 labs are using eSMART. TRAC does not plan to accept data using old SMART after 9/30/03. To find out more about eSMART contact Alice Chang at 617-305-5621 or alice.chang@mwra.state.ma.us.

VOA “Orphan Analytes”: MWRA has submitted responses back to EPA Region 1 on our request for approval to add five analytes to the VOA Method 624 for industrial pretreatment program testing: carbon disulfide, styrene, vinyl acetate, m,p-xylene, and o-xylene. We refer to these analytes as “orphans” because we regulate them, but they aren't included in a 40 CFR Part 136 approved method.

At MWRA It's All Out There: Visit our website at www.mwra.com. We have a wealth of information for the public & for experts on our water & wastewater activities. This includes monthly updates on drinking water quality testing & many technical reports associated with the Deer Island Treatment Plant and/or the extensive Harbor & Outfall Monitoring program.

May 20-21, 2003
 Mass Spectral
 Interpretation Course
 Radisson Inn, Milford, MA
 8:00 a.m. - 4:30 p.m. (both days)

June 11, 2003
 ITLA Quarterly Meeting
 Radisson Inn, Marlboro, MA
 8:30-12:00 p.m.

June 12, 2003
 Effective Solutions for Your
 Day-to-Day Challenges - A Seminar
 Radisson Inn, Marlboro, MA
 8:30 a.m. - 12:00 p.m.

August 6, 2003
 ITLA Executive Board Meeting
 Doubletree Guest Suites
 Waltham, MA 1:00-4:00 p.m.

August 10-12, 2003
 NYAAEL/PaAAEL Annual
 Convention & Exposition

The Woodlands Inn
 Wilkes-Barre, PA
 ITLA members invited
 at member rates

August 13, 2003
 Deadline for Newsletter Submissions

September 3, 2003
 ITLA Quarterly Meeting
 Doubletree Guest Suites
 Waltham, MA
 8:30 a.m. - 12:00 p.m.

November 5, 2003
 ITLA Executive Board Meeting
 Doubletree Guest Suites
 Waltham, MA
 1:00-4:00 p.m.

November 12, 2003
 Deadline for Newsletter Submissions

December 3, 2003
 ITLA Quarterly Meeting

ITLA Quarterly Meeting

Wednesday, June 11, 2003
Radisson Inn, Marlboro, MA

- 8:30 AM Registration**
- 9:00 AM Committee Reports**
- | | |
|--------------|------------|
| Secretary | Treasurer |
| Technical | Elections |
| Newsletter | By-Laws |
| Lab Advisory | Ethics |
| Regulatory | Membership |
- 9:30 AM Word from our new Administrator - Judy Graves**
- 9:40 AM MCP update - Jim Occhialini - YES, there have been more changes. Jim will bring us the latest news.**
- 10:00 Break**
- 10:15 AM Data Management in Your Lab**
 Do you have multiple versions of

- software running your instruments? Can they be integrated? **Ken Eglinton of Waters** will discuss new software which allows different software programs to “talk” intelligently.
- 11:00 AM The Data Quality Act -** Do you do work for any federal agency? Do they publish your data and/or put it on the Web? Do you know what can happen if your data is questioned? **Dallas Wait of Gradient Corp.** will talk about this new and possibly onerous (for us) law.
- 11:30 AM Did you know that the “foolproof” DNA analyses may be more fallible than we’re told?** Mike Delaney will give us some new food for thought when it comes to laboratories and ethical practices.

ITLA Letter to the State

May 7, 2003

Mr. Douglas Foy
Chief, Commonwealth Development
State House
Boston, MA 02108

Dear Mr. Foy,

I am writing on behalf of the Independent Testing Laboratory Association (ITLA) which is an organization of commercial and municipal laboratories who are certified in the Commonwealth of Massachusetts to analyze various environmental samples. As you may know, this certification is administered by the Department of Environmental Protection's Laboratory Certification Office (LCO). All of our member laboratories work to maintain the high standards that the LCO imposes by statute, and regular on-site audits. We recognize the importance of providing high quality analytical results to our clients both in terms of public health and safety and in terms of environmental cleanup activities.

The ITLA is writing to express our concern about staffing of this office. Although we understand the intent to downsize government, we respectfully suggest that the Laboratory Certification Office is now at a sub-critical mass. There are presently four persons in this office - the Director and three laboratory certification officers. These individuals must audit laboratories with microbiological, organic chemical and inorganic chemical (including metals) certifications. There are 101 laboratories in the Commonwealth of Massachusetts who hold one or all of these certifications, and an additional 75 laboratories from out of state whose credentials, at the least, must be reviewed and updated. The U.S. Environmental Protection Agency requires that all laboratories be physically audited once every three years, at a minimum. Significant changes in laboratories' capabilities or personnel may require that personnel from the LCO visit more frequently. Similarly, should problems arise with a

particular laboratory, the LCO personnel's time in auditing and documenting problems becomes even more important.

Currently DEP only certifies laboratories for testing drinking water and wastewater. DEP was working towards extending certification to cover other matrices, including soil, hazardous waste, beaches, etc., but this effort was curtailed due to fiscal constraints. A rigorous laboratory certification program is the most cost-effective way to protect the public and environment from poorly performing laboratories and we hope that this effort can be resumed when the economy improves.

We write this as an organization committed to assisting our members in maintaining the highest standards. Unfortunately, it remains clear to ITLA that some regulatory oversight is necessary to protect the safety of the public and the environment. The minimal size of this office, and the importance of their product leads us to ask that you and the administration not make any cuts in staffing to the Laboratory Certification Office.

Sincerely,
Robert E. Bentley
President
Independent Testing
Laboratories
Association

cc: Ellen Roy Herzfelder, Secretary, EOE
Edward Kunce, Acting Commissioner, DEP
Arleen O'Donnell, Deputy Commissioner,
DEP
Oscar Pancorbo, Ph.D., Director, Division of
Environmental Analysis
Ann Marie Allen, Director, Laboratory
Certification Office

Food for Thought

Character - The willingness to accept responsibility for one's own life - is the source from which self-respect springs.

Joan Didion Writer

Summary of Proposed Changes to the NELAC Standard

Provided by Jerry L. Parr, Catalyst Information Resources

This *Special Edition* was prepared to summarize the proposed changes to the NELAC Standard that will be debated at the NELAC 9 meeting the week of June 2. The full text of these changes is available at www.epa.gov/ttn/nelac. More information on this meeting can be found at www.inela.org.

Constitution and Bylaws

A minor change relating to the roles of the NELAC Director and Executive Secretary has been proposed. The more significant changes, approved in 2002 that relate to the structure of NELAC, will not go into effect until after the NELAC 9 meeting.

Chapter 1: Program Policy and Structure

This chapter contains many significant proposed changes relating to both the restructuring of the NELAC organization as well as changes to the scope of accreditation. The proposed change to the scope of accreditation will allow a laboratory to be accredited to a matrix-technology-analyte combination, thus allowing the flexibility being proposed in Chapter 5. As part of this change, a list of technologies has been developed and published. This chapter also includes new glossary definitions related to other proposed changes.

Chapter 2: Proficiency Testing

The chapter contains several proposed changes. Perhaps the most significant is the removal of analyte group in Section 2.1.3 and Appendix C and a statement concerning multiple methods that states if “a laboratory reports more than one method per technology per study for a field of proficiency testing, an unacceptable result for any analyte by any method would be considered a failed study for that technology for the analyte.”

Chapter 3: On-site Assessment

The proposed changes are primarily for clarification.

Chapter 4: Accreditation Process

New language in Section 4.1.3 clarifies issues surrounding corrective action. Other editorial changes are proposed.

Chapter 5: Quality Systems

In addition to numerous changes throughout the chapter, several significant changes are being proposed. Confusing language related to calibration laboratories (i.e., a laboratory that provides a calibration service) would be removed. New language, especially in appendices C and D.1, that would implement a performance approach to the selection and use of test procedures has been developed. There are several very detailed proposed changes to the calibration requirements in Section 5.5.5.2.2. Appendix D contains a new concept, originally developed by the Department of Defense, that would allow for “marginal exceedances” when a large number of analytes are contained in a QC sample. Many changes to Appendix D.2 for WET testing and Appendix D.4 for radiochemistry are also being proposed.

Chapter 6: Accrediting Authority

Proposed changes to Section 6.2 would allow for an extension of various deadlines. Other changes relating to Accrediting Authorities have been proposed.

Chapter 7: Field Activities

No changes to the existing chapter were proposed. The committee did publish a proposed outline of the chapter, suggesting significant changes for the future.

Food for Thought

Good character...is not given to us. We have to build it piece by piece - by thought, choice, courage, and determination.

John Luther