

The background of the slide is a light gray gradient with several realistic water droplets of various sizes scattered across it. The droplets have highlights and shadows, giving them a three-dimensional appearance. They are located in the top-left, top-center, bottom-left, and bottom-right areas of the page.

# **ELAP -ELTAC**

FOT SUBCOMMITTEE REPORT

JUNE 15, 2016

# ELAP-ELTAC FOT SUBCOMMITTEE

## COMMITTEE MEMBERS

- JILL BRODT
- GAIL CHO
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# ELAP-ELTAC FOT SUBCOMMITTEE

- **ITEM 1- THE FOT SUBCOMMITTEE IS RECOMMENDING THE EXCEL FORMAT TEMPLATE IN THE FOLLOWING SLIDE EXAMPLE FOR ALL FOT SPREADSHEETS.**
- **NOTE: THE EXAMPLE PRESENTS EACH FOT LISTED BY ANALYTE HOWEVER IN ITEM THREE THE OPTION TO USE ANALYTICAL GROUP HAS BEEN SUGGESTED (TO BE DISCUSSED LATER AS PART OF ITEM 3). USING EITHER OPTION, THIS RECOMMENDATION WOULD STILL BE APPLICABLE.**

# ELAP-ELTAC FOT SUBCOMMITTEE

ATTACHMENT 1																							
Analyte	Method	EPA	UoA	Yes/No	ASTM	UoA	Yes/No	SM (18th, 19th ed.)	UoA	Yes/No	SM (20th ed.)	UoA	Yes/No	SM Online	UoA	Yes/No	USGS	UoA	Yes/No	DOE	UoA	Yes/No	
Gamma Emitters	Gamma Ray Spectrometry	901.1	112.01	No	D3649-91, 98a	112.22	No	7120	112.31	No	7120	112.38	No	7120-1997	112.45	No	R-1110-76	112.52	No	4.5.2.3	112.59	No	
Gross Alpha	Evaporation				D1943-90	112.23	No	7110 B	112.32	No	7110 B	112.39	No	7110 B-2000	112.46	No	R-76-177	112.53	No				
Gross Beta	Evaporation	900	112.02	No	D1890-90	112.23	No	7110 B	112.32	No	7110 B	112.39	No	7110 B-2000	112.46	No	R-76-177	112.53	No				
Radioactive Cesium	Radiochemical	901.0	112.03	No	D2459-72	112.24	No	7500-Cs B	112.33	No	7500-Cs B	112.40	No	7500-Cs B-2000	112.47	No	R-1111-76	112.54	No				
	Gamma Ray Spectrometry	901.1	112.04	No	D3649-91	112.24	No	7120	112.33	No	7120	112.40	No	7120	112.47	No	R-1110-76	112.54	No	4.5.2.3	112.60	No	
	Gamma Ray Spectrometry	EMSL LV 053917	112.05	No																			
Radioactive Iodine	Radiochemical	902.0	112.06	No	D3649-91, 98a	112.25	No																
	Gamma Ray Spectrometry	901.1	112.07	No	D4785-93, 00a	112.26	No	7500-I C	112.34	No	7500-I C	112.41	No	7500-I C 2000	112.48	No				4.5.2.3	112.61	No	
	Gamma Ray Spectrometry	EMSL LV 053917	112.08	No				7120	112.35	No	7120	112.42	No	7120	112.49	No							
Radium-226	Radon emanation	903.1	112.09	No	D3454-91	112.27	No	7500-Ra C	112.35	No	7500-Ra C	112.42	No	7500-Ra C 2001	112.49	No	R-76-177	112.55	No				
Radium-228	Radiochemical	904.0	112.10	No													R-1142-76	112.56	No				
	Radiochemical	EPA 600/4-75-008	112.11	No																			
	Radiochemical	Ra-05	112.12	No																			
Strontium	Radiochemical	905.0	112.13	No													R-1160-76	112.56	No	SR-01	112.62	No	
	Radiochemical	EMSL LV 053917	112.14	No																			
	Radiochemical	SR-04	112.15	No																			
Total Alpha Radium	Radiochemical	903.0	112.16	No	D2460-90	112.28	No	7500-Ra B	112.36	No	7500-Ra B	112.43	No	7500-Ra B	112.50	No							
	Radiochemical	EPA 600/4-75-008	112.17	No																			
Tritium	Liquid Scintillation	906.0	112.18	No																			
Uranium	Radiochemical	908.0	112.19	No													R-1181-76	112.57	No	U-02	112.63	No	
	Radiochemical	EPA 600/4-75-008	112.20	No	D2907-97	112.29	No										R-1171-76	112.58	No	U-04	112.64	No	
	Alpha Spectrometry	00-07	112.21	No	D3972-90	112.30	No	7500-U C	112.37	No	7500-U C	112.44	No	7500-U C	112.51	No							

# ELAP-ELTAC FOT SUBCOMMITTEE

- **ITEM 2- FOT 102 CONTAINS AN EXAMPLE WHERE THERE IS CONFUSION REGARDING ANALYTES SUCH AS COLOR, ODOR, PH, TEMPERATURE, DISINFECTION RESIDUALS, AND ALKALINITY THAT ARE ANALYZED BY TRAINED OPERATORS WITHOUT ELAP CERTIFICATION BUT WHERE A LABORATORY IS REQUIRED TO HAVE CERTIFICATION.**
- 1) SHOULD WE REQUIRE OPERATORS TO BE CERTIFIED BY ELAP?
- 2) SHOULD WE ADD ANY ANALYTES THAT ARE MISSING FROM THE FOT BUT ANALYZED BY A LABORATORY IN LIEU OF A TRAINED OPERATOR? FOR EXAMPLE, IF AN OPERATOR ANALYZES SAMPLES FOR COLOR AND A LABORATORY ALSO DOES COLOR, SINCE THE OPERATOR DOES NOT NEED TO BE CERTIFIED, DO WE NEED TO HAVE THE LAB CERTIFIED AND SHOULD THE ANALYTE BE ADDED TO THE FOT?

# ELAP-ELTAC FOT SUBCOMMITTEE

- **ITEM 3- ONE MAJOR QUESTION IS THE OPTION BETWEEN CERTIFICATION BY PROGRAM (I.E. WASTEWATER, HAZARDOUS WASTE, DRINKING WATER ETC) VS METHOD OR INSTRUMENTATION.**
- AT THIS POINT THE FIELDS OF ACCREDITATION/TESTING ARE SET IN STATUTE AND CANNOT BE CHANGED WITHOUT CHANGING THE STATUTE. THE EXISTING SYSTEM HAS CREATED ISSUES RELATED TO MATRIX/METHOD COMBINATIONS AS WELL AS REQUIRING ADDITIONAL EFFORT TO MANAGE. FOR EXAMPLE, NPDES REGULATORY MONITORING IS BASED ON CLEAN WATER ACT 600 SERIES METHODS. BUT THESE METHODS ARE NOT APPLICABLE FOR SOLID MATRICES WHICH ARE OFTEN INCLUDED IN NPDES PERMITS AND LABORATORIES MUST USE OTHER METHODS SUCH AS SW846 8000 SERIES METHODS. YET THESE METHODS ARE NOT APPROVED FOR REPORTING FOR NPDES REGULATORY PURPOSES. MOREOVER, IF A LABORATORY ONLY WORKS IN THE NPDES FIELD, DOES THE LABORATORY HAVE TO GET CERTIFIED FOR HAZARDOUS WASTE ANALYSIS EVEN THOUGH THE RESULTS WILL NOT BE USED FOR REGULATORY REPORTING IN THE HAZARDOUS WASTE FIELD.
- THE ELTAC FOT SUBCOMMITTEE SUGGESTS THAT FOR THE LONG TERM THIS ISSUE **COULD PERHAPS BE RESOLVED** BY CHANGING THE STATUTES.
- IN THE INTERIM OUR RECOMMENDATION IS THAT THE FEE STRUCTURE BE MODIFIED TO ACCOMMODATE THE SITUATION DESCRIBED ABOVE.

# ELAP-ELTAC FOT SUBCOMMITTEE

- **ITEM 4- SHOULD FOTS BE BASED ON INDIVIDUAL ANALYTES AND/OR ANALYTICAL GROUP E.G. ORGANOCHLORINE PESTICIDES PAHS ACID EXTRACTABLES ETC.**
- GROUPS SUCH AS METALS CAN EASILY BE ACCOMMODATED BY INDIVIDUAL ANALYTE SO THIS ISSUE IS MORE APPLICABLE TO ORGANICS BUT COULD APPLY IN OTHER AREAS AS WELL.
- WILL LABORATORIES BE REQUIRED TO BE CERTIFIED FOR ALL ANALYTES WITHIN A METHOD/GROUP OR CAN THEY CHOOSE INDIVIDUAL PARAMETERS?
- FINALLY THE FOT SUBCOMMITTEE REQUESTS THAT AN EASY PROCESS BE CREATED FOR ADDING OR REMOVING ANALYTES FROM A CERTIFICATE.

# ELAP-ELTAC FOT SUBCOMMITTEE

- **ITEM 5- SHOULD OLD METHODS BE REMOVED FROM THE FOTS? THE FOT SUBCOMMITTEE IS ASKING ELTAC TO DECIDE WHICH OPTION WILL BE USED.**
- IN SOME CASES OLD METHODS ARE STILL LISTED IN EXISTING PERMITS.
- FOR EXAMPLE SHOULD A METHOD BE REMOVED FROM THE FOT IF IT HAS BEEN DELETED FROM THE FEDERAL REGISTER VIA THE METHOD UPDATE RULE?
- OR SHOULD ALL OLD METHODS REMAIN AND ONLY THOSE METHODS THAT ARE NO LONGER USED BY ANY LABORATORY BE REMOVED.?



# ELAP-ELTAC FOT SUBCOMMITTEE

- **ITEM 6- SHOULD METHODS WITH SEPARATE SAMPLE PREP METHODS LIST THE PREP METHOD SEPARATELY OR SHOULD THE FOT LIST ONLY INCLUDE THE ANALYTICAL METHOD.**
- THE FOT SUBCOMMITTEE IS ASKING ELTAC TO DECIDE WHICH OPTION SHOULD BE USED.