TNI PT Program Executive Committee Meeting Summary

May 22, 2024

1. Roll call, approval of minutes and overview:

Chair, Stacie Crandall, called the TNI PT Program Executive Committee (PTPEC) meeting to order at 11am Eastern on May 22, 2024. Attendance is recorded in Attachment A – there were ten (10) voting members present. Associate members present: Michella Karapondo.

There were no changes made to the agenda and it was approved by unanimous consent.

2. Summer Meeting Preparation

Stacie will prepare DRAFT slides from the winter meeting that have been updated for the summer meeting. Stacie, Susan and Ilona will meet to finalize DRAFT slides for the Committee to review.

The PTPEC meeting in Garden Grove will be on Monday from 3:30-5pm Pacific Time. The following people are planning to attend: Jack, Amy is working on approval, Amanda, Craig, Tim, and Jennifer is waiting for confirmation.

The PTPAs will be doing their annual report, and the Subcommittee Chairs will be doing an update. Patrick will need to record his report and will work with Ilona on this.

Craig asked if there is an ARA for PFAS in wastewater. There is not. There is now a method and people are expecting to see an ARA in the near future. NJ is looking at being the Sponsor.

3. Comment on DRAFT PFAS FoPT Limits

There were 7 comments received that can be viewed in Attachment C.

Comment 1

The first column matches CAS number and LAMS. Michella thinks it looks like it is from 533 (and need to check 537.1.) Second column is what commenter says it should be. Remember Carl Kircher also had an issue with some of the nomenclature. Amy noted that the Chemistry FoPT Subcommittee took their nomenclature from the ARA they received. They also looked at LAMS. CAS numbers match also.

The Committee is not certain where the commenter pulled their information from. Stacie decided to form a Nomenclature Workgroup that will meet the first week of June. The Workgroup will include: Amy, Stacie, Paul Junio (LAMS Administrator), Craig, Michella and Tim.

Stacie will break compounds out into groups for people to review against methods, LAMS, and CAS numbers. Michella volunteered to put together the list and send it to Paul Junio.

A final response cannot be developed today.

Comment 2a:

Asking for 30% for all PFAS analytes, not just the six. PTPEC is currently looking at only adjusting to 30% on the six compounds.

Comment 3:

The response is the same as #2.

Comment 4:

Resolved already.

Comment 5:

Change abbreviations - will need to see what Nomenclature Workgroup comes up with.

1. Looked at data we had to decide what the limits should be. Look at 4-101.

2. It would be difficult for that to be the case. Changes the definition of PTRL and contradicts the footnotes on table. Michella noted that PQL is the same as MCL. The PT Providers have to quantitate at 1/2 the PTRL for verification and this would be difficult.

(Addition: Stacie sent the following response on 7/15/24:

Thank you so much for your comments on the addition of PFAS compounds to the TNI Drinking Water Fields of Proficiency Testing (FoPT) Tables. In responseto your comments, all nomenclature has been updated to match the exact spelling, spacing and punctuation used in EPA method 533, or EPA method 537.1 for compounds not listed in EPA 533. This review also included a review and updating of abbreviatins where needed. In addition, LAMS has been updated to ensure consistency.

The Proficiency Testing Program Executive Committee approved this table in the June meeting, and the updated FoPT Table will be posted to the TNI website, with an effective date of January 1, 2025 by the TNI webmaster.

In addition to the updating of nomenclature, the Chemistry Fields of Proficiency Testing Chemistry Subcommittee reviewed the acceptance limits calculations for the compounds included in the final National Primary Drinking Water Regulation (NPDWR) for six PFAS. As a result of that review, the acceptance limits have been adjusted to \pm 30% (70-130%) to ensure consistency between the PT Program and this regulatory action. The committee also reviewed PTRL assignments and made the decision to not make any changes. Part of the role of the Chemistry FoPT Subcommittee is to perform a periodic review of FoPTs and part of this future review will be to evaluate the assigned PTRLs once a data set has been developed for these additions to the table.)

Comment 6:

Craig asked what EPA thinks about other analytes. Michella believes labs could do 70-130% on the other analytes. She has no idea if they will have another rule for the other analytes. It would be years out given the process.

Stacie asked about the effective date of the FoPT table verses dates set by EPA. Michella noted that they will do the best they can until this this criteria is put into place and the PT providers can start using it.

Comment 7:

Craig has not seen many failure rates for the PTs, so he can go either way.

New compounds and limits are looked at as part of a review process, so any needed changes will be evaluated during this review.

4. Accelerated Implementation of DW FoPT Table

Stacie asked the PT Providers what is possible as far as implementation dates.

- Need to correct nomenclature.
- We are not locked into a 6-month time period.
- June 25, 2024, starts the inițial monitoring period. This monitoring period is set for 3 years. Water systems will be looking for labs, but not for compliance monitoring.

The Committee will look to move ahead with a target implementation of January 1, 2025. Both Craig and Patrick were OK with this timing. Craig noted that they are already getting pressure for the 30% by June.

Nomenclature and limits will be voted on at the PTPEC meeting in June.

5. Technology Workgroup

There is concern about how the term "technology" is used in the Standard. The term "technology" is also used by PTPEC.

Stacie reported that PTPEC can continue to use the term "technology". "Analytical Discipline" will be used related to items dealing with QSM items - internal audits, matrix, etc. … This will not affect PTPEC.

6. Subcommittee Updates

<u>Chemistry FoPT Subcommittee</u> They are waiting for one last PT Provider's data. Ilona has not received an update from William.

WET FoPT Subcommittee

Craig reported they are still working on some data crunching and combining a couple different methods, but it's still been a challenge to get a quorum.

<u>PTP SOP Subcommittee</u> No new business.

7. New Business

None.

8. Action Items

The action items can be found in Attachment D. Attachment B includes a list of reminders.

9. Next Meeting

The next meeting will be on June 26, 2024, at 11:00am Eastern. The meeting was adjourned at 12:23 pm Eastern.

Attachment A Participants TNI Proficiency Testing Program Executive Committee

Members	Rep	Affiliation	Contact Information
Stacie Crandall (2025*) (Chair) Present	Lab	HRSD	scrandall@hrsd.com
llona Taunton, Program Administrator Present		TNI	tauntoni@msn.com
Susan Jackson (2025*) (Vice-Chair) Absent	Lab	South Carolina DHEC	jacksosb@dhec.sc.gov
Amy DeMarco (2027*)	Other	NY	amy.demarco@health.ny.gov
Present			
Craig Huff (2027*)	Other	QASE Inc.	craig_huff@waters.com
Present			
Tim Miller (2024*) Present.	Other	Phenova	timm@phenova.com
	011		
Jennifer Best (2025*) Present	Other	USEPA	Best.Jennifer@epa.gov
Jack Denby (2025*)	Lab/FSMO	HRSD	jdenby@hrsd.com
	Lad/FSIVIO	ROD	Juenby@msa.com
Present	4.5		Destate the Original and
Rachel Ellis (2025)	AB	New Jersey DEP	Rachel.ellis@dep.nj.gov
Present			
Patrick Selig (2024*) Present	AB	ANAB	pselig@anab.org
Prasanth Ramakrishnan (2024*)	AB	ISA	pramakrishnan@iasonline.org
Absent			
Amanda Fehr (2027*) Present	Lab	GEL	amanda.fehr@gel.com
Marina Aziz (2027*) Present	AB	NY	marina.aziz@health.ny.gov

Attachment B

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	Item	Meeting Reference	Comments
7	Add the Field PT Subcommittee to the limit update SOP during its next update.	3/4/10	In Progress
11	Evaluate how labs are accredited for analytes that co-elute.	5-19-11	See meeting reference for details.
13	Charter needs to be reviewed/updated in November.	Ongoing	
18	Shawn noted that PTPEC should have some specific measurements. This should be passed along to the PTP SOP Subcommittee. Nicole noted that we need to determine which items to measure.	6-29-17	To be added to 2021 goals.
19	Review possible issues surrounding one vendor for Radiochemistry PTs.	3/24/23	

Backburner / Reminders – TNI PT Executive Committee

Attachment C: PFAS FoPT Table Comments Received

PTPEC PFAS Comment Summary 05/20/24 SCrandall

Comment 1

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Method Analyte Name/Acronym 11-Chloroeicosafluoro-3- oxaundecane-1-sulfonic acid (11Cl- PF3OUdS)	FoPT Analyte Name/Acronym 11-Chloroeicosafluoro-3-oxaundecane-1- sulfonic acid (11-Cl-PF3OUdS)	Inconsistencies There is no "-" between 11 and Cl in the method; in DW FoPT, there is a "-"
1 <i>H</i> ,1 <i>H</i> , 2 <i>H</i> , 2 <i>H</i> -Perfluorodecane sulfonic acid (8:2FTS)	1H, 1H, 2H, 2H-Perfluorodecanesulfonic acid (8:2 FTS)	"Hs" are italicized in method; in DW FoPT they are not and there is a space between perfluorodecane and sulfonic in method; in DW FoPT there is no space.
1H,1H, 2H, 2H-Perfluorohexane sulfonic acid (4:2FTS)	1H, 1H, 2H, 2H-Perfluorohexanesulfonic acid (4:2 FTS)	There is no space between 2 and F in the method; in DW FoPT there is a space "Hs" are italicized in method; in DW FoPT they are not and there is a space between perfluorohexane and sulfonic in method; in DW FoPT there is no space.
1 <i>H</i> ,1 <i>H</i> , 2 <i>H</i> , 2 <i>H</i> -Perfluorooctane sulfonic acid (6:2FTS)	1H, 1H, 2H, 2H-Perfluorooctanesulfonic acid (6:2 FTS)	There is no space between 2 and F in the method; in DW FoPT there is a space "Hs" are italicized in method; in DW FoPT they are not and there is a space between perfluorooctane and sulfonic in method; in DW FoPT there is no space.
4,8-Dioxa-3 <i>H</i> -perfluorononanoic acid (ADONA)	4,8-Dioxa-3H-perfluorononanoic acid (DONA)	There is no space between 2 and F in the method; in DW FoPT there is a space "H" is italicized in method; in DW FoPT it is not. The acronym is ADONA in the method; in DW FoPT the acronym
9-Chlorohexadecafluoro-3- oxanonane-1-sulfonic acid (9Cl- PF3ONS)	9-Chlorohexadecafluoro-3-oxanonane-1- sulfonic acid (9-Cl-PF3ONS)	is missing the "A" There is no "-" between 9 and Cl in the method; in DW FoPT, there is a "-"
Hexafluoropropylene oxide dimer acid	Hexafluoropropyleneoxide dimer acid (HFPO- DA) (GenX)	There is a space between Hexafluoropropylene and oxide in method; in DW FoPT there is no space.

(HFPO-DA) N-ethyl	N-Ethylperfluorooctane sulfonamido acetic	The "e" in ethyl is not capitalized, there is a space between ethyl
perfluorooctanesulfonamidoacetic acid (NEtFOSAA)	acid (NEtFOSAA)	and perfluorooctanesuflonamidoacetic, there is no space between perfluorooctane and sulfonamido, and no space between suflonamido and acetic in the method; in DW FoPT, the "e" in ethyl is capitalized, there is no space between ethyl and perfluorooctanesulfonamidoacetic, and there are spaces between between perfluorooctane and sulfonamido between suflonamido and acetic.
N-methyl perfluorooctanesulfonamidoacetic acid (NMeFOSAA)	N-Methylperfluorooctane sulfonamido acetic acid (NMeFOSAA)	The "m" in methyl is not capitalized, there is a space between methyl and perfluorooctanesuflonamidoacetic, there is no space between perfluorooctane and sulfonamido, and no space between suflonamido and acetic in the method; in DW FoPT, the "m" in methyl is capitalized, there is no space between methyl and perfluorooctanesuflonamidoacetic, there are spaces between between perfluorooctane and sulfonamido, and between suflonamido and acetic.
Nonafluoro-3,6-dioxaheptanoic acid (NFDHA)	Nonafluoro-3,6-dioxaheptanoic acid (NFDHA)	NONE
Perfluoro(2-ethoxyethane)sulfonic acid (PFEESA)	Perfluoro(2-ethoxyethane) sulfonic acid (PFEESA)	There is no space between (2-ethoxyethane) and sulfonic in the method; in DW FoPT, there is a space.
Perfluoro-3-methoxypropanoic acid (PFMPA)	Perfluoro-3-methoxypropanoic acid (PFMPA)	NONE
Perfluoro-4-methoxybutanoic acid (PFMBA)	Perfluoro-4-methoxybutanoic acid (PFMBA)	NONE
Perfluorobutanesulfonic acid (PFBS)	Perfluorobutane sulfonic acid (PFBS)	There is no space between perfluorobutane and sulfonic in the method; in DW FoPT, there is a space.
Perfluorobutanoic acid (PFBA)	Perfluorobutanoic acid (PFBA)	NONE
Perfluorodecanoic acid (PFDA)	Perfluorodecanoic acid (PFDA)	NONE
Perfluorododecanoic acid (PFDoA)	Perfluorododecanoic acid (PFDOA)	The "o" in PFDoA is lower case in the method; in DW FoPT, it is capitalized.
Perfluoroheptanesulfonic acid (PFHpS)	Perfluoroheptane sulfonic acid (PFHpS)	There is no space between perfluoroheptane and sulfonic in the method; in DW FoPT, there is a space.
Perfluoroheptanoic acid (PFHpA)	Perfluoroheptanoic acid (PFHpA)	NONE
Perfluorohexanesulfonic acid (PFHxS)	Perfluorohexane sulfonic acid (PFHxS)	There is no space between perfluorohexane and sulfonic in the method; in DW FoPT, there is a space.
Perfluorohexanoic acid (PFHxA)	Perfluorohexanoic acid (PFHxA)	NONE
Perfluorononanoic acid (PFNA)	Perfluorononanoic acid (PFNA)	NONE

Perfluorooctanesulfonic acid (PFOS)	Perfluorooctane sulfonic acid (PFOS)	There is no space between perfluorooctane and sulfonic in the method; in DW FoPT, there is a space.
Perfluorooctanoic acid (PFOA)	Perfluorooctanoic acid (PFOA)	NONE
Perfluoropentanesulfonic acid (PFPeS)	Perfluoropentane sulfonic acid (PFPeS)	There is no space between perfluoropentane and sulfonic in the method; in DW FoPT, there is a space.
Perfluoropentanoic acid (PFPeA)	Perfluoropentanoic acid (PFPeA)	NONE
Perfluorotetradecanoic acid (PFTA)	Perfluorotetradecanoic acid (PFTDA)	The acronym in the method is PFTA; in DW FoPT it is PFTDA)
Perfluorotridecanoic acid (PFTrDA)	Perfluorotridecanoic acid (PFTrDA)	NONE
Perfluoroundecanoic acid (PFUnA)	Perfluoroundecanoic acid (PFUnDA)	The acronym in the method is PFUnA; the DW FoPT acronym includes a D (PFUnDA)

Comments:

1) As you can see from the table above, there are discrepancies between the name and/or acronym used in the method and the proposed FoPT designation. They should match.

2) Please consider adjusting the TNI PTRLs when the MCLs are issued. If they are finalized as proposed, I would recommend the TNI PTRLs be at least as low as the MCLs (draft are 4 ppt for PFOA and PFOS each).

Comment 2.a XX

I am responding to the proposed FOPT for PFAS. The proposed acceptance criteria is $\pm 40\%$. The method acceptance criteria for quality assurance is $\pm 30\%$ for Method 537 as listed in Tables 12 and 13. The labs need to obtain this range for method compliance so to remain consistent with the criteria that the labs are already achieving I propose that the acceptance criteria be $\pm 30\%$.

Comment 2.b

I would also like to add EPA rule requires 70 - 130% for the six regulated PFAS:

Pre-Publication Version

(2) *Laboratory certification*. Analyses under this section for regulated PFAS must only be conducted by laboratories that have been certified by EPA or the State. To receive certification to conduct analyses for the regulated PFAS, the laboratory must:

(i) Analyze Performance Evaluation (PE) samples that are acceptable to the State at least once during each consecutive 12-month period by each method for which the laboratory desires certification.

(ii) Beginning [**INSERT DATE 60 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER**], achieve quantitative results on the PE sample analyses that are within the following acceptance limits:

Table 2 to paragraph (b)(2)(ii): AcceptanceAcceptance Limits (percent of true value)Limits for PFAS Performance EvaluationSamples Contaminant

Perfluorobutane Sulfonate (PFBS)70-130%Perfluorohexane Sulfonate (PFHxS)70-130%Perfluorononanoate (PFNA)70-130%Perfluorooctanesulfonic Acid (PFOS)70-130%Perfluorooctanoic Acid (PFOA)70-130%2,3,3,3-Tetrafluoro-2-70-130%(heptafluoropropoxy)propanoate (HFPO-DA70-130%

Comment 3

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I'm submitting one comment in response to the Drinking Water FoPT table recently released:

1. The acceptance criteria listed for the PFAS compounds being added should be updated to reflect ±30% to ensure consistency with the recently promulgated final EPA rule regulating PFAS. At a minimum, the criteria should be updated for the parameters now regulated by the EPA, and ideally should be updated for all compounds now required as a PT. Without consistency between the EPA requirements and the table, ABs will be required to reevaluate and rescore all PTs associated with the regulated parameter to ensure it meets the EPA requirements. This is additional review the AB should not have to perform if the FoPT table has similar acceptance limits as what is in the CFR.

Comment 4

On April 10, 2024, EPA announced the final National Primary Drinking Water Regulation (NPDWR) for six PFAS. <u>https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas</u> I'm not finding anywhere here, or in the online 40 CFR 141, the final PT acceptance limits. The only reference to PFAS relates to UCMR. All indications have been EPA was going forward with ± 30 % for their six PFAS, which contradicts the approved/yet to be effective Drinking Water

FoPT Table. Has Jerry or EPA provided any intel?

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Comment 5

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- 1. Request that the abbreviation of all PFAS analytes match those identified within EPA's UCMR5 as listed in 40 CFR 141.40. This will require the following conversions:
 - "DONA" to "ADONA"
 - "PFODA" to "PFDoA"
 - "PFTDA" to "PFTA"
 - "PFUnDA" to "PFUnA"
- 2. Request that the concentration range be lowered on both the lower and upper limits for both PFOA and PFOS to be more relevant for their regulatory maximum contaminant levels of 4.0 ng/L.
- 3. Request that the PTRL for HFPO-DA, PFHxS, and PFNA be lowered to 5 ng/L to align with their regulatory trigger level. Additionally, request that the PTRL for PFOA and PFOS be lowered to 2.0 ng/L to align with their regulatory trigger level.
- 4. Request that the acceptance criteria for PFBS, PFHxS, PFNA, PFOS, PFOA, and HFPO-DA all be changed to be ±30% fixed acceptance limit to align with their regulatory criteria for performance evaluation samples (40 CFR 141.901 (b)(2)(ii) Table 2).

Comment 6:

First, I would like to congratulate the TNI Proficiency Testing Program Executive Committee for proposing Proficiency Testing (PT) criteria for 29 PFAS contaminants. I recognize the amount of work it takes to propose new PT criteria. I support the proposed criteria for the unregulated PFAS contaminants. I thank you for the opportunity to comment on the proposed criteria.

I would like to request that the TNI Proficiency Testing Program Executive Committee revise the Drinking Water FoPT table for the six PFAS contaminants regulated under the new National Primary Drinking Water Regulation (NPDWR).

The NPDWR sets regulatory Performance Evaluation (PE) limits for the regulated PFAS contaminants, PFOS, PFOA, PFHxS, PFNA, PFBS, and HFBO-DA, at 70-130% of the true value in a PE sample. The PE requirements are in 40 CFR 141.901(b)(2)(ii) (Note that the effective date of the regulation is 06/25/2024). Below is the regulatory language:

(2) Laboratory certification. Analyses under this section for regulated PFAS must only be conducted by laboratories that have been certified by EPA or the State. To receive certification to conduct analyses for the regulated PFAS, the laboratory must:

(i) Analyze Performance Evaluation (PE) samples that are acceptable to the State at least once during each consecutive 12-month period by each method for which the laboratory desires certification.

(ii) Beginning June 25, 2024, achieve quantitative results on the PE sample analyses that are within the following acceptance limits:

Table 2 to Paragraph (b)(2)(ii) — Acceptance Limits for PFAS Performance Evaluation Samples

Contaminant	Acceptance limits (percent of true value)
Perfluorobutane Sulfonate (PFBS)	70-130
Perfluorohexane Sulfonate (PFHxS)	70-130
Perfluorononanoate (PFNA)	70-130

Table 2 to Paragraph	(b)(2)(ii) — Acceptance	Limits for PFAS Performanc	e Evaluation Samples
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Contaminant	Acceptance limits (percent of true value)
Perfluorooctanesulfonic Acid (PFOS)	70-130
Perfluorooctanoic Acid (PFOA)	70-130
	O = V O (1 + 1) 70 120

2,3,3,3-Tetrafluoro-2-(heptafluoropropoxy)propanoate (HFPO-DA or GenX Chemicals) 70-130

When EPA implemented the UCMR 3 laboratory approval program, proficiency testing acceptance criteria were indeed 60-140% for the perfluorinated compounds included in UCMR 3 monitoring program, similar to the criteria proposed by the PTPEC. The UCMR 3 criteria were set wider than the LFB acceptance criteria in the methods, primarily because the analytical techniques used in the methods approved under UCMR 3 were new to the certified laboratory community. This is no longer the case. Under UCMR 5, EPA used PT acceptance criteria of 70-130% in the UCMR 5 laboratory approval program. Additionally, laboratories participating in the UCMR 5 laboratory approval program were required to pass 2 PT studies prior to becoming approved to analyze samples for UCMR 5. This is another change from the UCMR 3 laboratory approval program. EPA conducted 8 PT studies prior to sample collection for UCMR 5, using the 70-130% acceptance criteria. Even while utilizing this tighter criterion for PTs, there was an overall passing rate for individual analytes of 97.8%. The UCMR 5 PT data supports the criteria proposed in this rule. Unfortunately, EPA cannot release these UCMR 5 PT data to TNI until the UCMR 5 cycle is completed.

In my research of the laboratory community currently analyzing water samples for PFAS, I have come to realize that there are many laboratories who have either modified the available EPA methods, or have developed their own methodology for analyzing PFAS in water. This was acceptable prior to the promulgation of the NPDWR. The UCMR 5 data are, in my opinion, a much better representation of laboratory capabilities under the NPDWR. In the NPDWR, laboratories will be required to use either EPA Method 533 or EPA Method 537.1, Ver 2.0. These are the same methods that are required under UCMR 5. The data from the UCMR 5 PT program is a "cleaner" data set, as it removes the variability that is introduced when laboratories are not using the same methods. I think that accounts for the wider passing rates found in the data the expert committee used to set these proposed criteria.

If TNI does not adjust the PFAS PT acceptance criteria for the six regulated PFAS, all drinking water laboratory certification programs, including the recognized TNI State Accreditation Bodies, will be required to use the 70-130% criteria to score PTs for certified laboratories, beginning June 25, 2024. PT providers accredited through the TNI PT Program are required to utilize the TNI FOPT tables for scoring, so I am concerned that this will mean that all laboratory certification programs using TNI accredited PT providers will have to re-score PT results for the six regulated PFAS. This is an unreasonable burden on the laboratory certification programs.

The requirement for laboratories to analyze PE/PT samples under this regulatory criteria begins on June 25, 2024. I urge TNI to consider implementing the regulatory criteria as soon as possible. If the currently proposed criteria is put into place, EPA will submit an Analyte Request Application to change the criteria for the six regulated PFAS. However, this will delay the availability of the samples that meet the regulatory criteria by several months, as the current standard allows PT providers six months after publication of a new FoPT table before using new criteria. Again, I thank you for the opportunity to provide this information.

Thank you for your consideration.

Regards,

Comment 7:

The final rule was published on Friday and I found this on page 30038 of the Response to Comments document.

EPA Response: The PT portion of the UCMR 5 laboratory approval program differed from previous UCMR laboratory approval programs. When the EPA implemented the UCMR 3 laboratory approval program, PT acceptance criteria were indeed 60-140 percent for the perfluorinated compounds included in UCMR 3 monitoring program. The criteria were set wider than the laboratory fortified blank (LFB) acceptance criteria in UCMR 3, primarily because the analytical techniques used in the methods approved under UCMR 3 were new to the certified laboratory community. Under UCMR 5, the EPA used PT acceptance criteria of 70-130 percent in the UCMR 5 laboratory approval program. Additionally, laboratories participating in the UCMR 5 laboratory approval program were required to pass two PT studies prior to becoming approved to analyze samples for UCMR 5. The EPA conducted eight PT studies prior to sample collection for UCMR 5, using the 70-130 percent acceptance criteria. Even while utilizing this tighter criterion for PTs, there was an overall passing rate for individual analytes of 97.8 percent. The UCMR 5 PT data and the UCMR 5 laboratories' Initial Demonstrations of Capability support the criteria proposed in this rule.

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Attachment D: PTPEC Committee Action Item Summary – 2023/2024

Item	Task Description	Document Number	TNI Contact	Task Added	Start Date	Due Date	Complete Date	Comments
431	Discuss with IT Committee the need for LAMS updates to be communicated to the PTPEC.			10/31/19				2/17/21: Shawn to discuss with Mei Beth and Jerry.
437	Reach out to Sennet Kim and ANAB to confirm there is still an issue related to SCM FoPT table metals footnotes for fixed limits.			3/26/20	3/26/20			 2/17/21: On-going Shawn working with William to access data. 4/21/22: Shawn to follow-up. Sennet has left A2LA. 8/17/22: Shawn thinks this is still an issue. Need to look at this during evaluations. Fred said Nick Slawson is taking over as PT contact for A2LA.

Item	Task Description	Document	TNI Contact	Task	Start Date	Due Date	Complete	Comments
455	Update SOP 4-107: FoPT Table Management	Number SOP 4-107	PTP SOP Subcommittee	Added 2/19/21			Date 11/29/23	2/18/21: Need procedures to make non-ARA changes to the table? 3/16/21: Received initial Policy Committee comments to review. 4/21/22: PTPEC approved. Sent to Policy Committee. 8/12/22: Policy sent comments to PTPEC. Add to agenda. 10/28/22: Sent to PTP SOP Subcommittee. To be discussed in December. 2/23: A few more changes are needed. Resubmitted to PT SOP Subcommittee. 10/27/23: SOP completed, approved by PTPEC and sent to Policy Committee for review. 11/29/23: SOP approved and posted. COMPLETE

Item	Task Description	Document Number	TNI Contact	Task Added	Start Date	Due Date	Complete Date	Comments
456	Update SOP 4-101: Recommendation, Evaluation, and Calculation of Acceptance Criteria and Applicable Concentration Ranges for Proficiency Tests	SOP 4-101	PTP SOP Subcommittee	2/18/21	2/18/21			2/18/21: Combined workgroup established to complete SOP. 3/18/21: workgroup met and SOP Subcommittee will send final DRAFT to Chemistry FOPT Subcommittee for examples. Update 8/17/22: Examples requested from Chemistry FoPT Subcommittee that has not met. PTPEC needs to talk about when the next limit updates will occur. 3/24/23: Examples have been added by Chemistry FoPT Subcommittee and resubmitted to the PT SOP Subcommittee. 6/23/23: Make sure SOP 4- 101 includes procedures for how data is received. 11/29/23: Submitted to PTPEC for final vote. Vote will be in December. 12/18/23: Approved by Committee and sent to Policy for review.

Item	Task Description	Document Number	TNI Contact	Task Added	Start Date	Due Date	Complete Date	Comments
458	Improve communication with non-TNI AB stakeholders.			2/18/21	8/1/22			 8/1/22: Discussed at Crystal City meeting. Need to help Advocacy update the White Paper to help reach out to other states. Ambassador program. Also need to include more non- NELAP ABs in the Executive and Expert committees. Outreach needed. 10/28/22: Workgroup formed to update paper. 3/24/23: Paper completed and sent to Advocacy Committee.

459	ARA: PFAS on DW table	Chamicter	12/1/20	May 2021	12/1/20: ARA sent to
439	ANA. FFAS OILD W LADIE	Chemistry FoPT	12/1/20	Iviay 2021	
		Subcommittee			Chemistry FoPT Subcommittee
		Subcommittee			2/18/21: Shawn has
					requested data. Subcommittee will start
					working on this after data is
					received.
					5/21/21: Data has been
					received. There may not be
					enough. Need to determine
					next steps.
					Update 8/17/22: Survey of
					labs is complete, and data
					needs to be looked at. Amy
					DeMarco will be new
1					Subcommittee Chair.
					12/1/22: The Subcommittee
					will start working in
					February 2023.
					3/24/23: Requesting more
					data from labs and requested
					PT Data from William.
					11/29/23: Chem FoPT
					Submitted final
					recommendation to PTPEC.
					Needs further discussion in
					December.
					12/18/23: A motion was
					made by Tim to approve
					the update to the Drinking
					Water table to include
					PFAS limits for 29
					analytes as recommended
					by the Chemistry FoPT
					Subcommittee and
					provided with the agenda
					to this meeting. The
					motion was seconded by
					Eric. Since Jack Denby is

Item	Task Description	Document Number	TNI Contact	Task Added	Start Date	Due Date	Complete Date	Comments
								on leave – super majority is 7/10. Motion passed. 4/8/24: PFAS limits were distributed to a bigger stakeholder group for comment. Comments are due early May. 4/24/24: A motion was made by Susan to have the Chemistry FoPT Subcommittee evaluate the 6 compounds in the PFAS rule with the limits of 70-130%. Look at Carl Kircher's data and the 2 – 25 times the MRL range for spiking. The motion as seconded by Craig and unanimously approved. - Stacie will send comments to Amy. Look at MRLs, look at data, calculate against 30% and how they come out. 5/22/24: 7 Comments were received and reviewed by the Committee. Will look at a 1/1/25 implementation date.
460	Develop PT Program metrics			2/18/21	5/21/21			Update 8/17/22: Developed partially as Charter was updated. Need to formalize.

Item	Task Description	Document Number	TNI Contact	Task Added	Start Date	Due Date	Complete Date	Comments
461	Finish update to Radiochemistry FoPT Table	- DW Rad FoPT		2/18/21			4/28/23	2/18/21: Table submitted to PTPEC. PTPEC waiting for SOP 4-101 to be complete before reviewing table. 4/21/22: Table footnotes need to be updated before PTPEC can vote. Shawn will make these updates. 11/22/22: Updates complete and approved by Committee. Being sent to NELAP AC and PT Providers for comment before effective date approved. 3/24/23: Vote for effective date. 4/28/23: Effective date changed to 11/1/23. Closed
462	Feasibility: Radiochemistry Uncertainty to PT Evaluations			2/18/21	2/22			Jan 2022: Discussed in San Antonio. Radiochemistry Expert Committee to submit recommendation. 7/21/22: Recommendation sent to PTPEC for review. 10/28/22: Recommendations to be reviewed in November. 11/22/22: Radiochemistry Expert Committee recommendation to be sent to ERA for comment.
463	Feasibility: Technology Based PTs			2/18/21				
464	Feasibility: Add Prep Methods on FoPT tables			2/18/21				
465	Feasibility: Air and Emissions PTs			2/18/21				
470	Determine timing for update of FoPT limits.			7/21/22				Determine after completion of SOP 4-101.
471	Advocacy White Paper			1/11/23			4/28/23	Paper submitted.

Item	Task Description	Document Number	TNI Contact	Task Added	Start Date	Due Date	Complete Date	Comments
472	DMR QA is requesting formal comments			1/11/23			2/24/23	Submitted.
473	State of Accreditation Update			4/28/23			Complete	The document was worked on during meeting and will be finalized by email and sent back to Lynn.
474	Ra-226 PTRL Issue – Respond			6/23/23	6/23/23		Complete	Stacie will prepare response and get feedback through email before sending to Annmarie.
475	Potentially develop better process to get data for FoPT table updates.			6/23/23				
476	Choose PTPA evaluator for upcoming evaluations.			10/27/23	10/27/23		10/27/23	Stacie will join Ilona to evaluate PTPAs.
477	TNI leadership and Sigma to meet to manage a historical data base for Sigma.			10/27/23				
478	Address 2 complaints regarding new Radiochemistry FoPT Limits (#48 and #49)		Stacie Ilona	11/29/23	11/29/23		12/18/23	12/18/23: Response approved by PTPEC and Bob Shannon and Kieth McCroan.
479	Review DRAFT Volume 3 and 4 – Get from Bob Wyeth			4/8/24	2/28/24		3/1/24	Volumes are getting ready to post for comment. Part of discussion in Ohio, but Committee did not meet in February. Stacie sent email to Committee to start review on 2/28/24. 3/1/24: Volume 3 and 4 comments from Nicole and Ilona sent to PT Expert Committee.

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480	Request for DW Data for Limit Updates – Missing Data			4/24/24	4/24/24			4/24/24: Data from 2 providers is missing. 7/24/24: Still need data from one more provider. Workgroup in Item 482 formed.
481	Technology Workgroup Updates – Analytical Discipline			5/22/24	5/22/24			5/22: PTPEC can continue to use the term "technology". "Analytical Discipline" will be used related to items dealing with QSM items - internal audits, matrix, etc This will not affect PTPEC.