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L Q A P N E W S

October/November 2008 Issue

CPSC Issues Testing Laboratory Requirements

On September 22, 2008, the Consumer Product Safety Commission published requirements for third party testing laboratories conducting lead testing of painted children's products. According to the new requirements, labs interested in testing these products must be accredited by organizations that are part of an ILAC Mutual Recognition Arrangement or an equivalent regional body. Already, AIHA customers are seeing our competitors (that are internationally recognized) market their services to accredit labs interested in doing CPSC testing. Here at AIHA headquarters, we are starting to field questions from our accredited labs about these guidelines and AIHA's MRA status.

AIHA laboratory customers should know that AIHA is currently not operating under an ILAC MRA although we expect to be in the coming months. Although we have yet to attain this MRA status, AIHA's entire operation has undergone an extensive peer evaluation as an accreditation body recognized by the National Cooperation for Laboratory Accreditation (NACLA) against the same standard that is used to evaluate accreditation bodies under the ILAC MRA. As the director of LQAP, I am fully aware that the recently issued requirements may make it difficult for some AIHA-accredited laboratories to compete with other labs that are accredited by internationally recognized organizations. As such, AIHA is taking the following steps to ensure that AIHA-accredited labs have an opportunity to become registered third party labs eligible to do this work:

Submission of Written Comments to CPSC:

In comments filed with CPSC on Oct. 22, AIHA conveyed that AIHA-accredited labs must be included as third party labs since the association has demonstrated compliance with ISO/IEC 17011—the standard that ILAC-recognized accreditation bodies follow—as a NACLA-recognized accreditation body. We also stressed that AIHA labs are assessed to the ISO/IEC 17025 standard in addition to AIHA's own requirements. Our laboratories are, in effect, operating at an even higher level. We hope to get a response from CPSC in the next few weeks, particularly since manufacturers, importers and companies warehousing children's products will be required to submit these items to independent laboratories beginning in December. A copy of these comments can be found on our website.

Aggressively Pursuing International Recognition:

AIHA is simultaneously expediting its efforts to attain international recognition over the coming months. AIHA is already a member of two ILAC regional bodies—the InterAmerican Accreditation Cooperation (IAAC) and the Asia Pacific Laboratory Accreditation Cooperation (APLAC). (continued on page 2)

AIHA Laboratory Quality Assurance Programs

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As a member, AIHA is eligible to apply for MRA status under either regional body since recognition by either would automatically translate into ILAC MRA recognition status for us. We have already submitted an application to be recognized by IAAC and expect to undergo an evaluation in 2009 as a part of that process in order to attain IAAC recognition shortly thereafter. AIHA will also apply for recognition under APLAC because this organization may be able to audit us and provide this recognition status to us even sooner.

Looking to Offer Services in the Near Future:

While waiting for CPSC to consider our comments (and hopefully deliberating in our favor), we are determining the most appropriate way to offer these services to our customers—either through the paint matrix in ELLAP and/or a new program.

If and when CPSC deliberates in AIHA's favor, or when AIHA attains international recognition, we will move quickly to include applicable lead paint methods (for CPSC testing) under our Environmental Lead Laboratory Accreditation Program (ELLAP) for the paint matrix where we already offer a companion proficiency testing program. Having spoken to EPA officials, our site assessors and volunteers and having reviewed our lead program requirements, we are confident that AIHA labs can be accredited under ELLAP to comply with 16 CFR 1303.

Our accredited labs who have invested in our programs already know that AIHA operates world-class accreditation programs, and that we have a 34-year history of accrediting testing laboratories in the U.S. and abroad. AIHA has demonstrated compliance with international standards and accredits laboratories to international standards—even imposing additional AIHA requirements on laboratories. There is no doubt that AIHA labs stand ready to do CSPC testing. That said, AIHA is moving quickly and aggressively to ensure that AIHA-accredited labs are given the opportunity they deserve to become third party laboratories to engage in CPSC testing.

We will keep you posted on developments related to this testing. In the meantime, should you have any questions about our planned efforts or need information, please contact me at cmorton@aiha.org or at (703) 846-0789.

EPA to Implement Strategy to Reduce the Use of Mercury-filled Thermometers

The Environmental Protection Agency recently announced that it will be implementing a strategy to reduce the use of mercury-filled, non-ferrous thermometers, including those used in analytical laboratories. For example, EPA will revise the National Lead Laboratory Accreditation Program (NLLAP) to address alternatives to mercury-filled, non-ferrous thermometers. Research to develop ways to phase out mercury-filled non-ferrous thermometers in testing laboratories operating under ISO/IEC 17025 guidelines is expected to continue at the federal level. The National Institute for Standards and Technology (NIST) will also collaborate with EPA to develop a flow chart and guidance for mercury-filled thermometer substitutes that will assist labs and others wishing to make changes in their use of thermometers. Expect to see more information about EPA's strategy published in future editions of the LQAP Newsletter as it develops. For more information about the strategy or the timing of its implementation, please contact quality systems manager Scott Goeringer at sgoeringer@aiha.org or (703) 846-0791

Good News about LQAP Fees in 2009

Participants in AIHA's Laboratory Quality Assurance Programs (LQAP) will soon receive their 2009 LQAP annual invoices which were generated based on each laboratory's current enrollment and participation. Being fully aware of and being impacted by the current economic climate, AIHA is pleased to inform its customers that it will not increase the dues in 2009 for:

- Initial accreditation and filing
- Annual accreditation
- Re-accreditation applications
- Annual PAT participation
- Surveillance and follow up visits
- Asbestos Analysts Registry

Like all businesses, AIHA expects to continue to experience increases in its operating expenses in 2009, including increases in the costs for PAT and AAT samples. While many of our competitors have just announced across-the-board fee increases, AIHA is only increasing its 2009 PAT and AAT sample fees enough to cover our costs for obtaining these samples. We expect the overall impact of sample price increases to be relatively minimal, translating into a total increase of about 2.0 percent for an accredited industrial hygiene laboratory with full participation in IHPAT programs.

For the first time in four years, there will be an increase for the site assessment fee to ensure that our assessors are being compensated at a higher rate for their time spent conducting assessments. The daily rate for site assessments, which has remained steady since 2005, will go from \$1,100 to \$1,200 a day.

AIHA will continue to make its monthly payment plan available to those labs that may face difficulty paying for services and is also willing to work with customers on a case by case basis to set up special payment arrangements for 2009.

For more information about your LQAP invoice and/or payments, contact Anthony Hodge at (703) 846-0796.

Field of Testing (FoT) Additions

The Laboratory Quality Assurance Programs of AIHA would like to cover a few related items regarding Field of Testing (FoT) additions that you may not know. Did you know you may add an FoT at a separate time from your reaccreditation application within a Laboratory Accreditation Program in which you are already involved? When deciding if you would like to add an FoT at the time of reaccreditation or send it in a separate application, there are a few things to consider—time and money.

To save time, you can send in an FoT addition with the associated fee. A separate application does not require a site assessment if you are already accredited in the program under which the FoT falls, saving you time spent for a site assessment. If time is less of an issue or you have not previously been accredited for the program under which the FoT falls, roll the FoT addition into your reaccreditation application. You have the same processing fee and site assessment for a reaccreditation application regardless of the number of FoTs.

There are some things to note on reaccreditation applications in which you wish to add FoTs for the first time. Please note that when your application is reviewed in the AIHA office before it is sent to the site assessor, we confirm that you have enrolled and have completed at least one round with overall proficiency of the appropriate proficiency testing, and that the appropriate attachments are included in the application.

This same practice should be taken into consideration if you decide to add FoTs at the time of site assessment. You must be prepared to show that you have enrolled in proficiency testing and have analyzed samples, and/or include the appropriate information regarding your method and QC (especially if proficiency is demonstrated internally rather than through the AIHA Proficiency Analytical Testing). The one exception is the ELLAP program, where you will not have analyzed any client samples prior to accreditation. Please read Module 6 of the Policies and/or the site assessment checklist for specific information.

If you are adding the FoT at the time of site assessment, your site assessor will need this information and may include this in your list of deficiencies so that he/she may review them and AIHA has copies on record. You will need to be enrolled and demonstrate an overall proficient rating because when that FoT is sent to Ballot, it may be denied without it. If you would like to add the FoT with your reaccreditation application or at the time of site assessment, you can add it to the 2B Form. As mentioned above, the corresponding paperwork will be required on what you have listed on the 2B Form, but the application is the same for the most part. If you would like to add an FoT separately, the accreditation application can be used; simply mark it as an FoT addition and follow the corresponding instructions in the attachments section. The application is administratively reviewed; once it passes review it is sent to a Technical Advisory Panel reviewer, and, once TAP approves, it is sent to Ballot.

Mark Your Calendars

Keep the following remaining 2008 deadlines in mind and on your calendar:

Industrial Hygiene Proficiency Analytical Testing Program Enrollment
Deadline December 1, 2008 (Round 176)

Environmental Lead-Air Proficiency Analytical Testing Program Enrollment
Deadline December 1, 2008 (Round 66)

Environmental Microbiology-Direct Exam Proficiency Analytical Testing Program Enrollment
Deadline December 15, 2008 (Round 18)

Environmental Microbiology-Culturable and Direct Exam Combination Proficiency Analytical Testing Program Enrollment
Deadline December 15, 2008 (Round 18 and 39)

Asbestos Analysts Registry Enrollment
Deadline November 17, 2008 (Round 88)

LQAP Calendar

LQAP Training and Orientation to Be Held in San Diego in February 2009

February 10–13, 2009, training and orientation sessions will be offered for all Laboratory Quality Assurance Program staff, volunteers and site assessors.

The sessions will be held in San Diego, CA. New volunteers and site assessors will be introduced to the LQAP structure and policies, AIHA's antitrust policies, ISO/IEC 17025:2005, and the four-step LQAP accreditation process. The AAB meeting will follow on February 13–14, 2009. For more information about the orientation and training session, contact Margie Breida at (703) 846-0713 or mbreida@aiha.org.

Industry Calendar

Third International Symposium on Beryllium Particulates and Their Detection

Nov. 17–19, 2008
Albuquerque, NM
To register visit
<http://dce.unm.edu/Custom/Beryllium/index.cfm>

ISO/IEC 17025 Training

December 16–17, 2008,
Indian Rocks Beach, FL
To register call 321-275-0610

Pittcon 2009

March 8–13, 2009
Chicago, IL
To register <http://www.pittcon.org>

Accreditation by Method – Guidance for AIHA Accredited Laboratories

In response to inquiries from its customers, AIHA's Analytical Accreditation Board (AAB) developed the following guidance for selecting methods for accreditation from the AIHA Laboratory Quality Assurance Programs.

AIHA's quality management system (ISO/IEC 17011:2004) requires it to accredit laboratories by method. A listing of methods on a laboratory's scope of accreditation allows the consumer of laboratory services to determine if the laboratory has the desired capability and is accredited to provide a specific analysis. AIHA recognizes that many laboratories provide tests and services that may be outside the scope of AIHA accreditation, and AIHA must determine which methods fall within the scope of AIHA accreditation.

Consumers of laboratory services are often looking for a laboratory that can analyze a chemical by standard reference methods. Reference methods are developed and/or validated by recognized agencies (NIOSH, OSHA, EPA, ASTM), and much of the industrial hygiene community will search capabilities for OSHA and NIOSH methods as the first choice.

The methods evaluated for AIHA accreditation are primarily air methods, but also include wipe and bulk surface sample methods, with a primary focus on evaluating the potential for employee or personnel exposures.

Listing EPA Drinking and Wastewater Methods

Most EPA drinking and wastewater methods, while similar to many OSHA and NIOSH methods, are compliance methods to be performed under an environmental accreditation having legal or regulatory responsibility (including local, state or national environmental certification). Since AIHA does not have reciprocity or the same regulatory status as these environmental certification programs, AIHA is concerned that a laboratory customer could misinterpret AIHA accreditation of EPA drinking and wastewater methods as equivalent to local, state or national certification.

For laboratories that wish to use elements of EPA drinking and waste water methods, AIHA suggests that the laboratory reference their in-house method, and not that of the respective EPA method, on their report and AIHA scope page. Exceptions to this suggestion include appropriate EPA methods for environmental lead analysis in soil and paint. In this way, it will be clear to customers that AIHA is only accrediting analysis of matrices that are applicable to the AIHA programs. Similarly, AIHA does not accredit bodily fluid methods (blood, urine, etc.), since other accrediting authorities regulate these methods.

Listing an EPA Method as the Laboratory's Method for Scope Page and Reports for Environmental Testing

Preparation and analytical aspects of the EPA or other organizations' methods can be listed, as long as the laboratory has adequately documented and validated the procedure for the appropriate matrix (filters, sorbent tubes, wipes, etc.) if the methods were not already intended (e.g., EPA bulk asbestos methods or passivated canister methods such as TO-15 for organic solvents in air). The laboratory must also add to its test method the appropriate calculations for reporting results to the industrial hygiene customer and list the method as modified when necessary. (continued on page 5)

Helpful Hints about the Accreditation Application Process

Here are a few simple ways to speed up the application process:

- Use the instructions and checklists found within the application.
- Submit the correct amount of copies of the application and quality manuals.
- Use the most current application found on our website www.aihalqap.org.
- Remember that accreditation applications (including any attachments) and Quality Manuals must be submitted in English per 3.3.1.

If you have any questions about the application process for accreditation, Field of Testing (FoT) additions, or method additions, please contact Shalini Saha at 703-846-8739 or at ssaha@aiha.org.

NIST Standard Reference Material® (SRM) 1877 Beryllium Oxide Powder

The National Institute of Standards and Technology (NIST) recently issued a new Standard Reference Material (SRM). SRM 1877 Beryllium Oxide Powder is meant for use in laboratory analysis for the development and validation of analytical methods and instruments used to determine beryllium, as well as for proficiency testing of laboratories involved in beryllium determinations.

AIHA's Proficiency Testing Task Force will be reviewing the suitability of this compound for its Beryllium Proficiency Analytical Program (vs. the beryllium acetate that is currently being used) with a goal of transitioning to the new reference material sometime in 2009.

However, as mentioned previously, many clients are consulting the AIHA Scopes list for methods widely accepted in the industrial hygiene community, so laboratories should be prepared to demonstrate to both the client and the AIHA-site assessor how the method has been modified.

Listing a NIOSH and/or an OSHA Method as the Laboratory's Method for Scope Page

AIHA prefers to categorize NIOSH and/or OSHA reference methods under the Industrial Hygiene Laboratory Accreditation Program (IHLAP), with the exception of proprietary methods such as pharmaceuticals. Listing both the internal Standard Operating Procedure (SOP) and the reference method on the final test report would alleviate any confusion and would be acceptable to AIHA. Alternatively, as indicated above for EPA methods, NIOSH and OSHA methods can be listed as "modified" when appropriate.

Reporting AIHA Accreditation to Clients

It is important to note that if a laboratory indicates it is AIHA-accredited on the customer's report by using the AIHA logo or making reference to AIHA accreditation, the method ID must be listed on the laboratory's scope page along with the test result reported. The laboratory must also clearly identify any results not covered under its AIHA accreditation.

Using Older Editions of Methods

The use of prior editions of methods is dependent upon specific requirements of the laboratory's client and circumstance. AIHA requires that a laboratory use the most recent version of a method, especially if prior versions have been found to have operational problems and for comparison of results of other laboratories using the most recent version of the same method.

As mentioned above, if significant changes have been made to a method, then the laboratory must either list the reference method as "modified" or list its in-house method on its Scope page and reports.

LQAP Staff Update

Sage Morgante joins AIHA as the new Marketing and Communications Manager for LQAP. Sage comes to us with at least 10 years of experience; her most recent position being with InfoComm International, an audiovisual technology association, where she specialized in promoting members' products and services. Feel free to contact Sage at (703) 846-0799 or smorgante@aiha.org to welcome her to AIHA.

AIHA would like to congratulate Natasha Sekitoleko, Proficiency Analytical Testing Data Specialist, on her marriage earlier this year. Natasha is now going by her married name, Natasha Mugambwa. She can be reached at her new e-mail address nmugambwa@aiha.org.

AIHA Represented at IAAC General Assembly in Paraguay

As part of our continuing participation as members of the InterAmerican Accreditation Cooperation (IAAC), Quality Systems Manager Scott Goeringer and AIHA Site Assessor Marlene Camacho-Ochoa attended the General Assembly of IAAC that was held Sept. 6-12 in Asuncion, Paraguay. AIHA is a full member of IAAC and is seeking international recognition under the IAAC Mutual Recognition Arrangement. As AIHA representatives at the IAAC meeting, Scott and Marlene also attended IAAC technical meetings, including the Laboratory Safety Committee which focused much attention on proficiency testing programs.

Proficiency Analytical Testing (PAT) Data Entry Portal Access Issues

We recently added additional security to the PT and AAT reports on the AIHA PAT Data Entry Portal. This security is preventing some participants from accessing their reports. We apologize for this temporary inconvenience, and are working diligently to correct the problem(s). The security is necessary to protect your data. Each laboratory's inability to access their reports may be a different client-side environment issue and they may take some trial and error to be resolved.

If you are able to log into the portal but receive an Access Denied message when you attempt to open your reports, please do the following so that the problem can efficiently be diagnosed. Go to <http://dev45.solutionsdevelopers.net/agentInspection/showAgentInfo.aspx> and copy and paste the information the page returns into an email. Send the email to cdezio@aiha.org or nmugambwa@aiha.org. Be sure to include your organization ID number, the program (IHPAT, ELPAT, AAT, etc.) and round number for the report you were trying to access. We will send you a copy of the report you need and send your information to our IT department for diagnosis.

The LQAP thanks you for your patience during this time and willingness to work together to solve these issues.