ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



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IL ELAP Update to Accredited Labs: (October 14, 2021)

This note is intended to provide an update to all Illinois (Primary) labs accredited by the Illinois Environmental Laboratory Accreditation Program (IL ELAP).

- 1. **Standard Methods Update:** Our Laboratory Accreditation Unit is waiting on the Illinois Legislature to approve the pending update and allow us to add the latest version of Standard Methods approved in the 40 CFR Part 136. We will send out an update as soon as the methods are available.
 - Our unit is striving to only accredit for the newest edition of the Standard Methods. The older methods editions/dates will be removed from the application and COA.
 - We suggest submitting PT's for your currently accredited method and the newer one you need to change too. This will aid in a quicker transition.
- 2. US EPA 537.1 and US EPA 533: PFAS/PFOA methods in drinking water are also waiting on legislature approval. We hope these are approved before the end of the year. This update will also be emailed as soon as it is approved.
 - We have a process in place to provide fair and quick implementation of these methods to laboratories that are eager to add them.
 - Summary of the Process: 1) After receiving notice that the methods are approved by the State of Illinois, labs can formally write to apply for these new methods. 2) If extra funds are needed, the invoice will be generated, and payment is due before an on-site assessment can be scheduled. 3) 2 passing PTs, SOPs, IDOCs and MDLs need to be received by our unit. 4) A packet is considered complete when an email formally requests a change/addition to their Certificate, funds (if necessary), and documentation are all received by the LAU. 5) IL EPA LAU will, in the order a complete packet is received, schedule an on-site assessment for the new method/technology as soon as possible. Our unit is striving for to accredit these new methods within 60 days or less, once the complete packet is submitted.
- 3. Why do the assessors request so much documentation? Due to the unstable state of Covid-19, we have tried to receive all the documentation at least 45 days in advance of your assessment. The assessors can review the documents in advance and if the number of positive cases of Covid increases substantially, we can easily switch to a virtual assessment and continue to stay on schedule with the biennial assessment.
 - It is important for our assessors to get the documents on the requested due date so they can be as prepared as possible for your assessment.

- Failure to submit documentation can result in a finding.
 - *i.* 2016 TNI Standards V1M2 4.13.3 c) *Records shall be available to the accreditation body.*
- 4. **Corrective Action Timeline:** When our unit is reviewing an assessment response from a laboratory, we determine if the Corrective Action satisfies correcting the finding. For a timeline, we are looking for implementation or completion as soon as possible but not greater than 4 months. We do not want the timeline for Corrective Action to go longer and get forgotten and possibly end up as a Repeat Finding on the next assessment.

5. US EPA Method Modifications:

- Our Unit had a question that we sent to the Chemistry Drinking Water Certification Officer. For US EPA 552.3, the laboratory was using a wrist shaker for 30 minutes, instead of the written "3 minutes by hand" procedure. Their response: "US EPA TSC confirmed that they are fine with the approach allowing it as a minor method modification, despite lack of language in the reference method. The lab should document it as a minor method modification, including the rationale, and also document that the procedure was evaluated as part of the passing IDOC."
- It is taught in the US EPA Drinking Water Certification course that you <u>can not</u> make any modifications to a US EPA method. This was termed a judgement call and felt the outcome was not altered due to the minor modification.
- The IL EPA LAU is trying to keep a directory of these questions/answers, so our laboratories have access to them. Please send us questions on method modifications and we can try to get clarity from the US EPA.
- **6. Announced or Unannounced Visits:** 2016 TNI Standards V2M3 5.2 *Accreditation bodies have authority to conduct unannounced assessments. Initial on-site assessments are announced.*
 - Our Unit is planning on making unannounced visits. We want to be a visible resource for the laboratories to use if they have questions or need more information. These visits will allow the IL EPA Assessors to conduct a follow up assessment, focusing on looking for the corrective action's implementations.

Please reach out to any of our Lab Accreditation team if you have any questions, suggestions or topic ideas. Thank you all for working with our team to protect the citizens of Illinois.

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