



AAPCO Laboratory Committee Meeting

March 8-9, 2021



Laboratory Director Liaison Report

Full SFIREG December 2020



AAPCO Laboratory Committee Collaboration

- *Advanced agenda planning for monthly AAPCO Laboratory Committee Directors call. (EPA/OECA/OC)*
- *Full update of the Laboratory Directors contact list.*
- *Initial development of outreach to laboratories on needs.*

Issue Paper – *Pesticide Impurities: EPA Response Follow up*

Reference: aapco.org Minutes, Documents, & Surveys, Documents: 2002 to Present
<https://aapco.files.wordpress.com/2020/10/epa-response-sfireg-impurities-issue-paper-final-10-15-2020.pdf> (response to 10/16/18 SFIREG Issue Paper)

- *Discussion with EPA (SFIREG Project Officer, Fort Meade Laboratory)*
- *Next Steps: determine support need, number of potential samples from states, reporting requirements.*

Laboratory Operations During COVID-19

- *Majority of Laboratories “Essential” and operational during the pandemic.*
- *Shift work, Hybrid WFH/Onsite schedules*
- *Distancing / Masks / Increased Cleaning and Disinfection of Common Areas.*
- *Limit visitors and non-essential staff into facilities / Deliveries left outside.*
- *New processes developed for remote data evaluation, review and reporting.*

Future Laboratory Needs

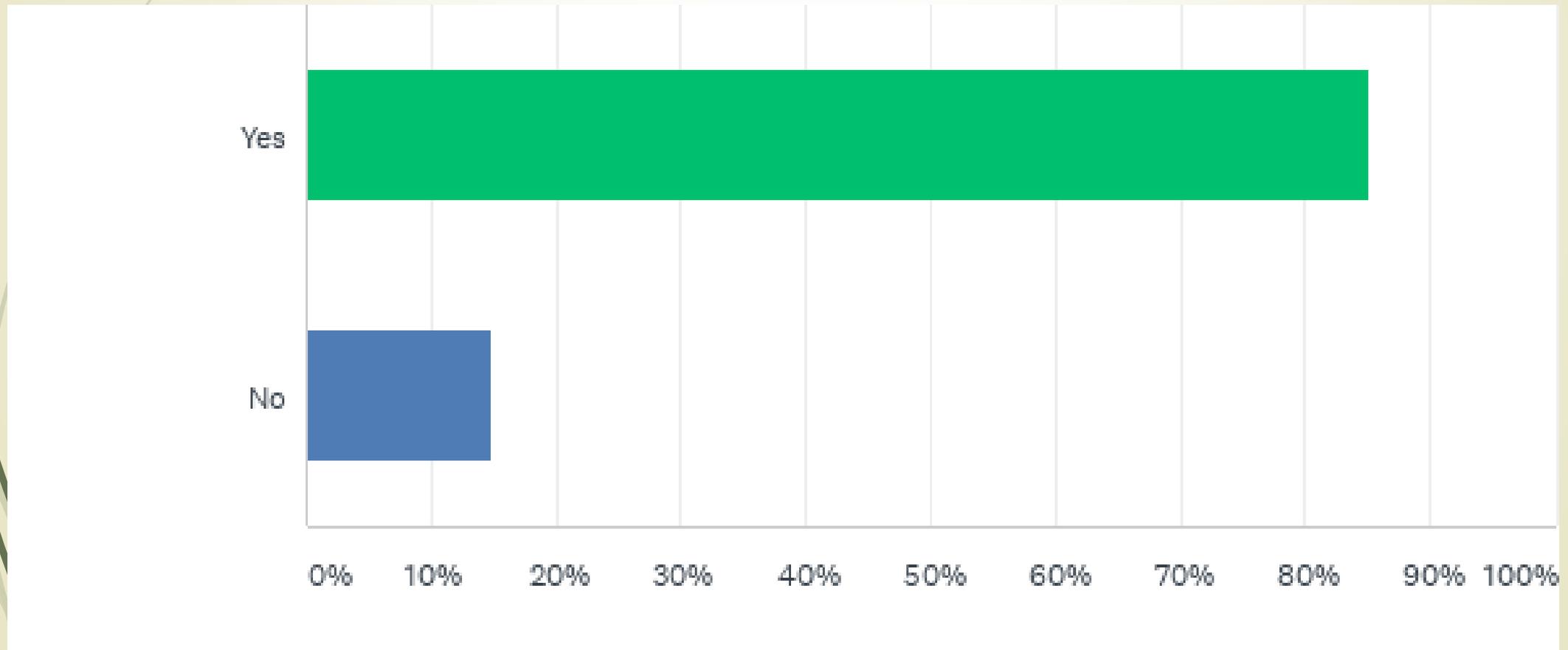
- *Increased communication and survey to determine critical pesticide testing laboratory needs.*
- *Pesticide contaminant / Pesticide formulation training / tools. (EPA Resources?)*
- *Disinfection products training – regional center? (EPA Resources?).*

Pesticide Product Contamination Survey

▶ Friday, March 05, 2021

Q1: Does your laboratory provide analytical services related to the testing of EPA registered suspected contaminated pesticide products?

Answered: 27 Skipped: 0



Q1: Does your laboratory provide analytical services related to the testing of EPA registered suspected contaminated pesticide products?

▶ Answered: 27 Skipped: 0

ANSWER CHOICES	RESPONSES	
Yes	85.19%	23
No	14.81%	4
TOTAL		27

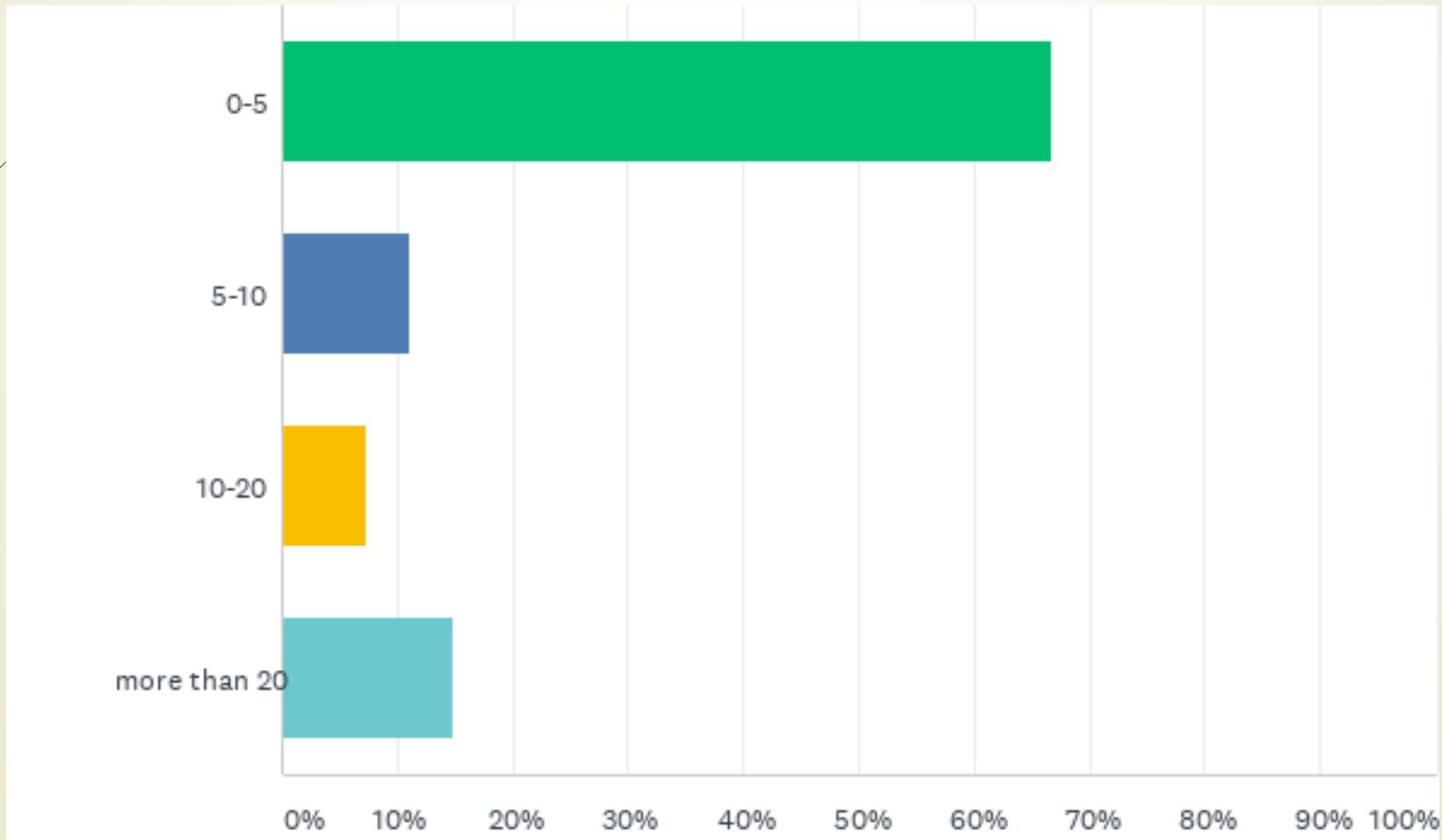


Q1 COMMENTS:

- ▶ We rarely get requests for this type of problem. Typically we analyze pesticide products as part of our agreement with USEPA.
- ▶ Infrequently.
- ▶ Samples from our state are shipped to our EPA R5 lab at OISC.
- ▶ But not very often.
- ▶ We test for residues. We test formulations for label guarantee.
- ▶ As FIFRA lab we would.

Q2: How many EPA registered suspected contaminated pesticide product samples does your laboratory analyze on an annual basis?

▶ Answered: 27 Skipped: 0



Q2: How many EPA registered suspected contaminated pesticide product samples does your laboratory analyze on an annual basis?

▶ Answered: 27 Skipped: 0

ANSWER CHOICES	RESPONSES	
0-5	66.67%	18
5-10	11.11%	3
10-20	7.41%	2
more than 20	14.81%	4
TOTAL		27

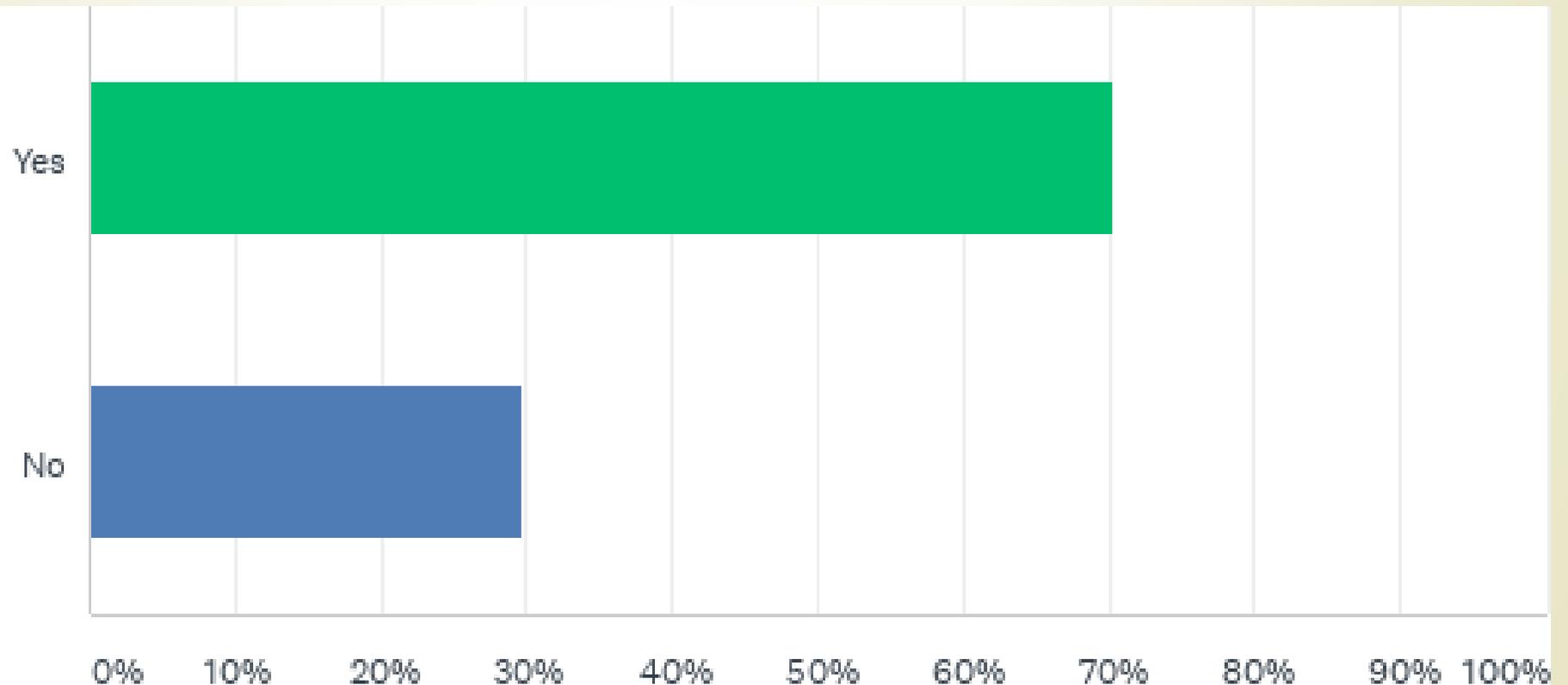


Q2 COMMENTS:

- ▶ As stated above, we rarely receive this type of request.
 - ▶ All samples are shipped to OISC for testing.
 - ▶ Less than 1 a year.
 - ▶ No recent analyses of contaminated products were requested.
 - ▶ Depends on the year.
- 

Q3: Could your laboratory use technical support from EPA to improve your competency in the analysis of suspected contaminated pesticide products?

Answered: 27 Skipped: 0



Q3: Could your laboratory use technical support from EPA to improve your competency in the analysis of suspected contaminated pesticide products?

▶ Answered: 27 Skipped: 0

ANSWER CHOICES	RESPONSES	
Yes	70.37%	19
No	29.63%	8
TOTAL		27

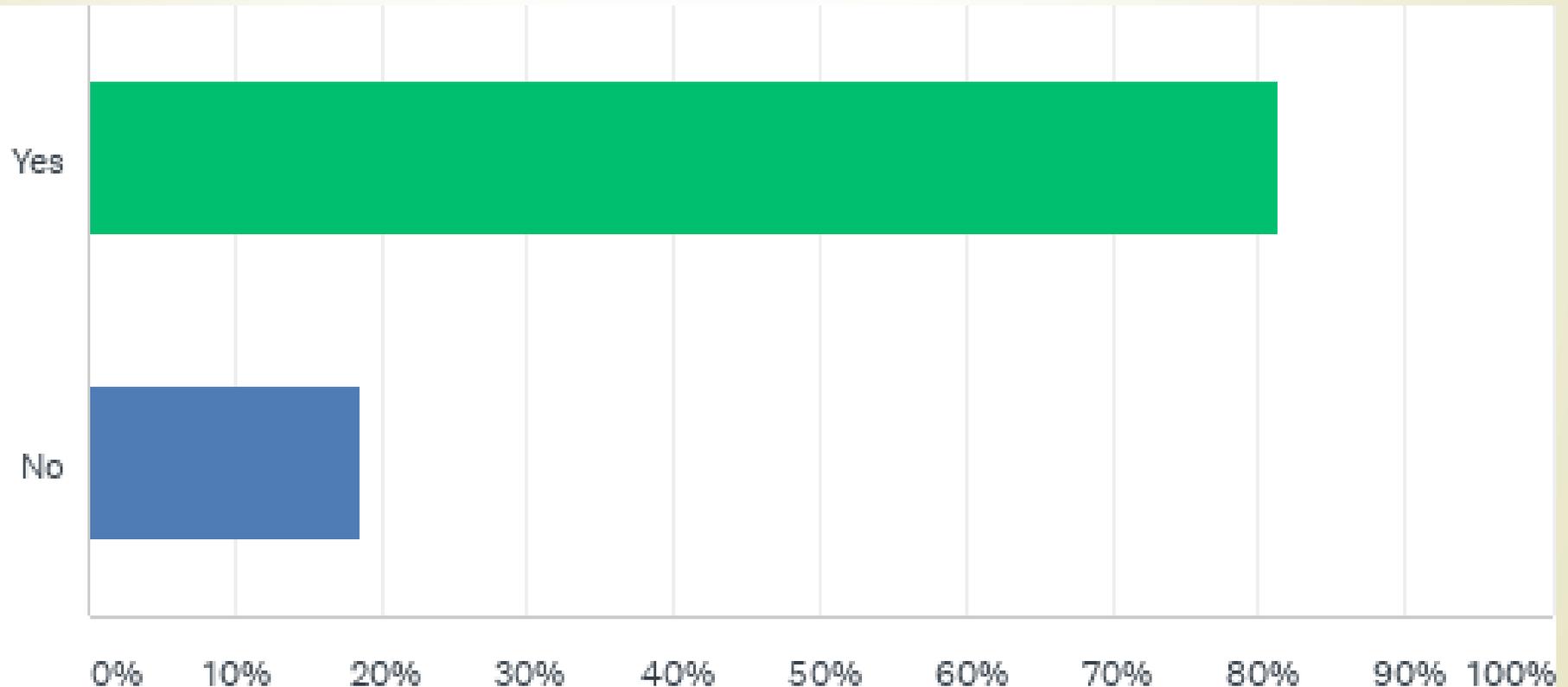


Q3 COMMENTS:

- ▶ We can always use additional information to be more proficient.
- ▶ Any training, method guidance, proficiency tests, points of contact.
- ▶ OISC performs our testing.
- ▶ The frequency of this kind of stuff is pretty few and far between.
- ▶ If we do, we should be able to.
- ▶ Only if the regulatory program initiated the work and subsequent samples.
- ▶ Maybe depending on the contaminant.
- ▶ Any guidance appreciated.
- ▶ Depends on Case.

Q4: Would your laboratory send suspected contaminated EPA registered products to a EPA laboratory for analysis if that support and expertise were available?

Answered: 27 Skipped: 0



Q4: Would your laboratory send suspected contaminated EPA registered products to a EPA laboratory for analysis if that support and expertise were available?

▶ Answered: 27 Skipped: 0

ANSWER CHOICES	RESPONSES	
Yes	81.48%	22
No	18.52%	5
TOTAL		27



Q4 COMMENTS:

- ▶ Sometimes.
- ▶ As needed.
- ▶ Assuming our Pesticide program wanted it.
- ▶ Even if a suspected contaminated sample came in, I still think OISC would perform the work.
- ▶ **Based on the decision of the State Lead Agency not the laboratory.**
- ▶ I guess we could if we are asked.
- ▶ If we did not have capabilities we could send it out.
- ▶ Depends on the analyte requested, available equipment as well as expertise.
- ▶ Yes, if we couldn't do or weren't set up to do the analysis in house.
- ▶ Not sure. Lab would not decide.

Q5 What reporting requirements would your laboratory require of data reported back to you from an EPA laboratory?

Qualitative : presence /absence

Identification / confirmation

Quantitative: amount / confirmation

Formal signed data report

Spreadsheet

Q5 RESPONSES

- Whatever we agreed to in the QAPP, we would expect in return from the EPA laboratory.
- **Quantitative.**
- Both qualitative and **quantitative** results. Also, I would like to get spreadsheet and chromatograms (for positive samples) if available.
- Likely **quantitative** with a formal signed data report.
- **Quantitative amount**, formal signed data report, spreadsheet.
- **Quantitative:amount**/confirmation.
- **Quantitative**: amount / confirmation, formal signed data report, spreadsheet.
- **Quantitative**: level, identification, signed report.
- Identification, amount, signed report.
- Both qualitative and **quantitative**.
- **Quantitative** data would be preferable, but qualitative data might be sufficient dependent on what legal actions might be taken in response to the findings.
- OISC quantitates the amount, sends us a report, which we then include as part of our documentation back to our department program staff.
- N/A
- **Quantitative**, ID, signed report.
- I would assume a contaminated registered product would be referred back to EPA for action / follow up. Ideally a quantitative amount plus confirmation and a signed laboratory report would be needed for data defensibility.

Q5 RESPONSES CONTINUED

- We could request both types (Qualitative or **Quantitative**) depending on case.
- We don't have specific requirements as I know since we actually don't have this kind of sample before. But I normally want a semi-**quantitative** report in general.
- This would be determined by the regulatory Program managers. I assume we would require those listed but under our quality system these are formally determined with the client.
- If sent out would want all of the above.
- The suggested elements are good ideas. Also, we are working towards ISO accreditation for our pesticide methods and would want to fulfill ISO requirements for a final test report.
- **Quantitative**: amount/confirmation, formal signed data report.
- Depends on case. EPA has not done this work. It would be a new workload. This type of case is becoming more common.
- Both qualitative and **quantitative**.
- We generally give qualitative, even if we quantitate. Sometimes we are asked for **quantitative**. These products are adulterated according to our statute.

State Involvement and Laboratory Needs Communication

- ▶ *Participate on the Quarterly AAPCO/EPA Laboratory Call. (Suggest discussion topics for future calls to AAPCO Laboratory Committee Chair.)*
- ▶ *Attend and help to contribute to the planning of the Annual AAPCO Laboratory Committee Meeting.*
- ▶ *Propose and contribute to a laboratory related SFIREG Issue Paper in collaboration with the SFIREG Laboratory Directors Liaison and AAPCO Leadership.*