

National Environmental Monitoring Conference



DoD Environmental Laboratory Accreditation Program (DoD ELAP)

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DoD Environmental Data Quality Workgroup (EDQW) Overview

- Principal (voting) members
 - Each Component (Navy Chair)
 - DLA
- OSD Liaison
- Technical Workgroup Representation
 - USACE, USACHPPM, NAVSEA, NAVFAC, AFCEE, AFIOH
- Contractor Support

Procurement Policy

DP&AP and ADUSD(ESOH), Dec 07

- Laboratories must:
 - Possess required state or host nation certification – OR – be accredited by nationally recognized accreditation body (AB)
 - Maintain quality system compliant with DoD QSM
 - Declare conformance to DoD QSM
 - Participate in proficiency testing (PT)
 - Make PT results available to DoD
 - Allow on-site assessments by DoD

DoD Laboratory Accreditation

- Confusion
 - Redundant Component processes
 - Self-declaration to DoD QSM
- Participation
 - Incomplete NELAP implementation
 - Laboratories limited in ability to participate
- Reciprocity
- DoD/projects bear the costs
- Limited Flexibility
 - Emerging Contaminants (Perchlorate)
 - New methods

DoD ELAP *Proposal*

- Accreditation Bodies (AB) perform assessments
- EDQW provides administration/oversight
- Benefits
 - Opens participation/increases competition
 - Implements Procurement Policy & DoD QSM
 - Accommodates new methods/programs
 - Allows DoD to shift focus to project-specific goals
 - Facilitates ID of labs competent in specific fields of testing (ABs maintain lists)
 - Reduces interruption to laboratory operations

DoD ELAP



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MEMORANDUM FOR DEPUTY ASSISTANT SECRETARY OF THE ARMY
(ENVIRONMENT, SAFETY AND OCCUPATIONAL HEALTH)
DEPUTY ASSISTANT SECRETARY OF THE NAVY
(ENVIRONMENT)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE
(ENERGY, ENVIRONMENT, SAFETY AND OCCUPATIONAL HEALTH)
DIRECTOR DEFENSE LOGISTICS AGENCY (DSS-E)

SUBJECT: DoD Environmental Laboratory Accreditation Program (DoD ELAP)

This memorandum establishes the DoD ELAP, a DoD-wide program to accredit laboratories that perform environmental testing in support of the Department of Defense and tasks the DoD Environmental Data Quality Workgroup (EDQW) with responsibility for implementing and providing oversight of this program as outlined in Attachment 1. Third party accrediting bodies will be used to assess laboratories on meeting the requirements of the DoD Quality Systems Manual for Environmental Laboratories (DoD QSM).

DoD ELAP shall implement the quality systems requirements of DoDI 4715.15, "Environmental Quality Systems," dated December 11, 2006 and the DoD policy and guidelines for Acquisitions Involving Environmental Sampling and Testing Services, dated December 4, 2007 (Attachment 2). DoD ELAP supports the goals of the National Technology Transfer and Advancement Act (1996), as implemented by the National Institute of Standards and Technology. The objectives of this accreditation program are to: 1) promote interoperability among DoD Components; 2) promote fair and open competition among commercial laboratories; 3) streamline the process for procuring environmental laboratory services; and 4) promote the collection of data of known and documented quality, suitable for their intended uses. It also complies with Section 515(a) of Public Law 106-554 (the Data Integrity Act) as implemented by OSD memorandum, *Ensuring Quality of Information Disseminated to the Public by the Department of Defense*, February 2003.



- Established by ADUSD(ESOH)
- Effective 1 October 2009
- Laboratories currently in Component programs
 - May continue to provide services within scope of current contract or approval
 - Will not be on list of accredited laboratories until DoD ELAP accreditation is granted

DoD ELAP Scope

- Applies to collection of *definitive data* for environmental restoration programs
- Applies to all laboratories regardless of
 - Size
 - Volume of business
 - Field(s) of accreditation
 - Public/private
 - Mobile/fixed
 - CONUS/OCONUS

DoD ELAP Roles & Responsibilities

EDQW

- Maintain the DoD QSM
- Evaluate and recognize ABs
- Publish list of recognized ABs
- Develop DoD QSM Training
- Provide government oversight
- Resolve DoD QSM interpretation issues
- Recognize proficiency testing providers

DoD ELAP Roles & Responsibilities

Accreditation Bodies

- Must be a Signatory to the ILAC MRA
- Operate i/a/w ISO/IEC 17011 and DoD ELAP Conditions and Criteria
- Conduct assessor training approved by EDQW
- Establish DoD ELAP accreditation process
- Conduct assessments (on-site required every 2 years)
- Ensure deficiencies are resolved
- Issue accreditation certificates
- Monitor Proficiency Testing
- Participate in annual AB review meeting
- Publish/maintain list of accredited laboratories

DoD ELAP Roles & Responsibilities

Assessors

- Understand requirements of ISO 17025, NELAC Standards, and the DoD QSM
- Adhere to NELAC Standards of Professional Conduct
- Complete required training
- Assess laboratories to the DoD QSM
- Document assessment findings
- Assess Corrective Action Plans (CAP)
- Ensure documentation provides OQE of closure of findings

DoD ELAP Roles & Responsibilities Laboratories

- Comply with DoD QSM
- Submit application
- Provide required documentation
- Coordinate on-site assessment
- Respond to deficiencies
- Implement & document corrective actions
- Participate in approved PT program (NELAP)

DoD ELAP Roles & Responsibilities

DoD Project Managers & Contractors

- Provide resources for, and conduct Systematic Planning
- Produce Quality Assurance Project Plan (QAPP)
- Select DoD ELAP-accredited laboratories
- Verify that project's required tests are within laboratory's scope of accreditation
- **Verify that laboratory can meet project-specific requirements**
- Notify EDQW of any failure to comply with program requirements

DoD ELAP Accreditation Bodies

- American Association for Laboratory Accreditation (A2LA)
- ANSI-ASQ National Accreditation Board (ACLASS)
- Laboratory Accreditation Bureau (L-A-B)
- Perry Johnson Laboratory Accreditation, Inc. (PJLA)

DoD ELAP - Status

- 14 Laboratories assessed
- 13 Laboratories scheduled
- EDQW is monitoring assessments and evaluating customer feedback
- DENIX website under development
 - List of accredited laboratories
 - Fields of accreditation

DoD ELAP – Issues

- Laboratories are not in compliance with Version 4.1 at the time of the assessment
- Consistency across ABs (level playing field for laboratories)
- NELAP-accredited laboratories
- Level of DoD involvement
- Specialty testing

DoD ELAP – FAQ's

- Are Component approvals accepted by all Components?
- Is NELAP accreditation sufficient?
- Is NELAP accreditation required?
- What are the DoD observers roles in the assessment process?
- If a laboratory cannot be accredited by 1 October, what are its options?
- Is there a forum for clarification of DoD ELAP requirements?

DoD ELAP – FAQ's

- Is the procurement policy self declaration required for DoD ELAP accredited laboratories?
- Will assessors write up OSHA type deficiencies?
- Are the ABs allowed to use employees of other laboratories as assessors?
- Are assessors allowed to assist with the resolution of deficiencies?
- What if there is no DoD-ELAP accredited laboratory for a specific field of testing?
- Will variances be allowed?

DoD ELAP – FAQ's

Mobile Laboratories

Mobile Laboratory: Fully equipped, self-contained, transportable testing or calibration laboratory capable of performing tests or calibrations under controlled environmental conditions.

- Must be accredited if producing definitive data
- ABs assess the laboratory's quality system and methods to the DoD QSM requirements
- **Projects conduct assessments for conformance to project-specific goals**

DoD ELAP FAQ's

Toxicity Testing Laboratories

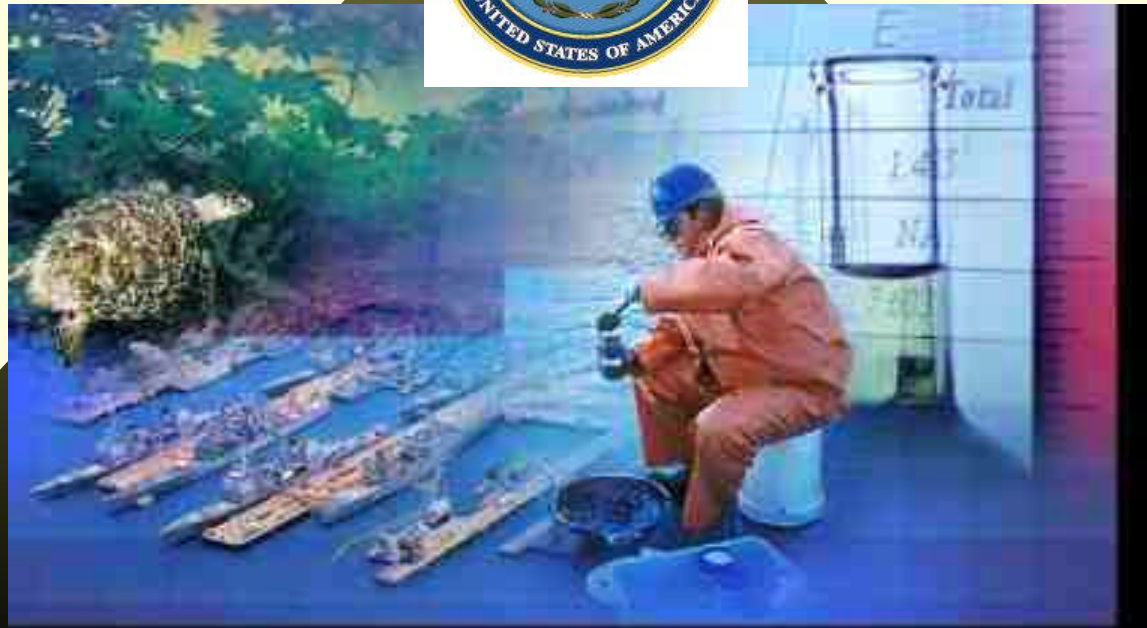
- Must be accredited if producing definitive data
- The laboratory's quality system will be assessed to the DoD QSM requirements
- Projects assess the laboratory's methods to determine if they meet the project-specific goals

Questions?????



Improving Environmental Data Quality

... Because the Right Decisions Require Quality Data



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