



EPA NLLAP-Accreditation Procedure

PJLA offers third-party accreditation services to Conformity Assessment Bodies (i.e. Testing and/or Calibration Laboratories, Reference Material Producers, Field Sampling and Measurement Organizations and Inspection Bodies). This procedure outlines PJLA's accreditation process and criteria administered to conformity assessments bodies for the **National Lead Laboratory Accreditation Program (EPA NLLAP)**. **This is a Supplemental Procedure to PJLA's Accreditation Procedure (SOP-1). Both procedures shall be followed for the entirety of this accreditation program.**



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1.0 SCOPE/PURPOSE

- 1.1 The National Lead Laboratory Accreditation Program (NLLAP) is an accreditation program designed to assess the competency and capability of (CABs) to analyze lead in matrices of paint chips, dust and or/soil according to the NLLAP and PJLA criteria.
- 1.2 This procedure includes the process for which PJLA carries out its accreditations in accordance with the NLLAP. This also includes specific requirements of applicant and accredited (CABs) wishing to obtain and maintain an accreditation to the NLLAP. This appendix only includes NLLAP program specific requirements, which are not found in the body of this document. Criteria outlined in the body of this document will be carried out by PJLA and enforced by PJLA to its (CABs) above these requirements as necessary.

2.0 REFERENCES

- 2.1 National Lead Laboratory Accreditation Program (NLLAP) Memorandum of Understanding
- 2.2 Laboratory Quality Systems Requirements (LQSR) Version 3.0, July 05, 2007.

3.0 DEFINITIONS

- 3.1 **Accreditation:** A formal recognition that (CAB) is competent to perform analyses of lead in paint chips, dust and or soil samples associated with the evaluation and control of lead-based hazards. Competence will be based on successful performance in both proficiency testing program and systems audit (inclusive of an on-site assessment) by programs/organizations recognized by NLLAP.
- 3.2 **Assessor:** One who performs systematic evaluation of a (CAB) on behalf of an accreditation organization.
- 3.3 **Environmental Lead Proficiency Analytical Testing Program (ELPAT Program):** The proficiency testing program recognized by the NLLAP. * Participation on a quarterly basis in this program is mandatory for all (CABs) seeking accreditation by an NLAAP recognized accrediting organization.
- 3.4 **EPA National Lead Laboratory Accreditation Program (NLAAP):** A voluntary (CAB) accreditation program with EPA OPPT oversight, which recognizes private sector and public accreditation organizations capable of performing adequate (CAB) assessments as part of their accreditation program of (CABs) requesting accreditation for their analysis of lead in paint chips, dust and/or soil samples associated with the evaluation and control of lead-based paint hazards. (CABs)



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accredited by an NLLAP recognized accrediting organization will be recognized by EPA under NLLAP.

- 3.5 **(CAB):** A facility that is requesting accreditation for the analyses of lead in paint chips, dust and/or soil samples associated with the evaluation and control of lead-based paint hazards.
- 3.6 **(CAB) Accreditation Organization (accreditation organization):** An organization which seeks recognition from the EPA NLLAP as being capable of performing adequate (CAB) assessments for (CABs) requesting accreditation for the analysis of lead in paint chips, dust and/or soil samples associated with the evaluation and control of lead-based paint hazards. (i.e. PJLA)

4.0 SUBSTANCE OF THE AGREEMENT

- 4.1 PJLA is recognized by the ILAC and APLAC MRAs as operating to ISO/IEC 17011 the successor document to ISO Guide 58. This guide is now obsolete and not used by the regional or international recognition bodies.

5.0 MANUAL/ORGANIZATION

- 5.1 PJLA maintains a quality manual and operating procedures and work instructions to document its quality system to comply with ISO/IEC 17011. These and other related documents (including this one) state all of the requirements for (CABs) seeking accreditation under the NLLAP program. PJLA will follow its organization procedures as specified in these documents in the removal, suspension or withdrawal of a (CAB's) accreditation status based on the (CAB's) failure to meet requirements of the program on an ongoing basis or at the (CAB's) request. PJLA will notify the EPA NLLAP in writing within five (5) working days of such actions.
- 5.2 PJLA will also notify the EPA/OPPT within 30 days after deciding on implementing major, substantive changes in its policies or management which could affect the EPA NLLAP program.

6.0 TRAINING AND QUALIFICATION

- 6.1 PJLA maintains a training, qualification and on-going continuing education program for assessors based on the EPA curriculum guidance document "Pb-Based Paint Laboratory Accreditation: Curricula Recommendations for Assessor Training Programs- Revision 1.0" (EPA document No. 747-R-92-005). New and experienced assessors are required to meet the requirements contained in this document. Should the need arise to use training based on its own or other curricula, then these curricula will be submitted in advance to the EPA for review and approval. PJLA may, at its option, utilize the training of another accrediting



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organization. However, that accrediting organization must also be recognized under the EPA NLLAP.

7.0 ASSESSMENTS AND DOCUMENTATION

- 7.1 PJLA will perform on-site assessments of (CAB's) quality systems to include their general ISO/IEC 17025 requirements, the LQSR, and the specifics of the EPA NLLAP program. These will, at minimum, meet the requirements of the then current EPA NLLAP LQSR. Each assessment will include the completion of a checklist that follows the example of that in the "Pb-Based Paint Laboratory Accreditation: Curricula Recommendations for Assessor Training Programs-Revision 1.0" or one that gives equivalent coverage of the example current to the requirements of the EPA NLLAP program. The checklist and other pertinent documentation will be kept for 10 years or otherwise instructed by the EPA NLLAP program (see 11.1 below).

8.0 PROFICIENCY TESTING (ACCREDITATION PROCESS)

- 8.1 PJLA requires all (CABs) applying or maintaining accreditation under the NLLAP to participate in the American Industrial Hygiene Association (AIHA) Environmental Lead Proficiency Testing Program (ELPAT) program on a quarterly basis. All (CABs) applying for accreditation and maintaining accreditation must perform such proficiency testing successfully and be rated "proficient" or "P" by the National Institute for Occupational Safety and Health (NIOSH) in their participation in the ELPAT program. PJLA will work with (NIOSH) and the (CAB) to secure the ELPAT data on an ongoing basis for the ELPAT program.

9.0 ACCREDITATION INTERVAL/CYCLE (ASSESSMENT PROCESS)

- 9.1 PJLA currently accredits (CABs) for a two-year accreditation cycle, supplemented with yearly surveillance assessments. While no change in this interval is anticipated, for the EPA NLLAP program, it will not exceed three years. Initial Accreditation and reassessments involve the off-site review of documentation and performance information and an on-site assessment that addressed all elements of ISO/IEC 17025 and the EPA NLLAP program.

10.0 NOTIFICATION (CERTIFICATE PROCESS)

- 10.1 PJLA will notify designated contacts at the EPA NLLAP of all accreditation approvals to include the effective date of accreditation, the expiration date and the specific matrices for which the (CAB) holds accreditation as expressed in its scope statement or scope supplement. This notification will be made within forty-five (45) days of the date the accreditation is effective. PJLA will send EPA



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NLLAP a current list of all (CABs) accredited under the program at least one every three months at minimum.

11.0 RECORD RETENTION (RECORDS/COMPLAINTS)

11.1 PJLA currently retains records from three (3) to five (5) years (depending on the record), minimum. However, records for the EPA NLLAP program will be retained for at least ten (10) years minimum. These records will include all complaints received from customers and others about (CABs) accredited by PJLA in the EPA NLLAP program.

12.0 DELEGATION (SUBCONTRACTING OF ASSESSMENT ACTIVITIES)

12.1 PJLA will not delegate (whole or in part) the responsibility of (CAB) assessments to another organization, which is not itself recognized under the EPA NLLAP. This will not extend to the assessors themselves, many/most of who are independent contractors. PJLA confidentiality and conflict of interest policies will be enforced.

13.0 SUBCONTRACTING OF (CAB) ACTIVITIES

13.1 (CABs) accredited by PJLA under the EPA NLLAP program will not subcontract routine sample analyses as described under the scopes of their accreditation and for which they are recognized unless the subcontracted (CAB) is also recognized under the EPA NLLAP program for the same analyses. Other provisions of ISO/IEC 17025 regarding subcontracting will, of course, also be enforced.

14.0 PARTICIPATION AND MAINTENANCE OF RECOGNITION

14.1 PJLA will participate in meetings with the EPA as scheduled and announced, or at least once every two years subject to EPA scheduling, to help in the evaluation, maintenance and improvement of the EPA NLLAP.

15.0 UTILIZATION OF EPA NLLAP ACCREDITATION REFERENCE

15.1 PJLA will ensure through the utilization of our Accreditation Symbol Procedure (SOP-3) that laboratories accredited under this program will utilize language such as the following: EPA-Recognized Testing Lab or EPA-Recognized NLLAP Lab.