

## Policy for Membership in the Environmental Response Laboratory Network (ERLN)

The Homeland Security Laboratory Response Center, located within the U.S. Environmental Protection Agency (EPA) Office of Emergency Management, Office of Solid Waste and Emergency Response, generates and updates criteria for admission into and continued participation of all laboratories in the ERLN. ERLN membership criteria are designed to follow the operational framework key components of the *Environmental Response Laboratory Network (ERLN) Laboratory Requirements Document*. These same criteria also apply to the WLA as a component of the ERLN. The WLA is managed by the U.S. EPA's Office of Water, Water Security Division. The criteria *are as follows*:

- A comprehensive quality system, based on industry-accepted standards, designed to ensure that ERLN data meet their intended use;
- A stable sample management system designed to maintain the integrity of samples at the laboratory;
- An analytical services system designed to identify the laboratories best able to meet a project's analytical, capacity, and data needs; and
- A data reporting requirement designed to provide consistent, reliable data of known and documented quality to its ERLN customers.

Therefore, laboratories applying for ERLN and, as applicable, WLA membership must meet the following basic criteria:

- **Laboratory affiliation.** Full membership in ERLN and WLA will be limited to public and private institutions performing regulatory and/or relevant analytical work. Exceptions are possible and will be determined on a case-by-case basis.
- **Quality.** Must have a quality assurance program in place to ensure the quality of data or other results. Accreditation is not required; however, quality systems should reflect those similar to the International Organization for Standards (ISO) 17025, the National Environmental Laboratory Accreditation Program (NELAP), or other acceptable accreditation or certification systems (e.g., Drinking Water Certification).
  - Proficiency: Must demonstrate proficiency by participating in ERLN-sponsored or accepted proficiency testing programs (combination of ERLN sponsored program and/or other approved program such as the National Environmental Laboratory Accreditation Program and successors).
  - Audits: Must agree to receive on-site audits by ERLN, and as applicable WLA, representatives for the purposes of assessing qualifications for membership, capabilities, capacity, and quality.
  - All documentation relevant to accreditation, proficiency, and audits must be submitted to the Homeland Security Laboratory Response Center.
  - The Homeland Security Laboratory Response Center will review the laboratory's Quality Management System for completeness and accuracy. Failure to comply with a documented Quality Management System may disqualify the laboratory from the ERLN program.
- **Data and Information Security.** Must agree to share data through authorized network channels and only to designated personnel during large scale national incidents. Data and communications related to data should be appropriately secured. Laboratories must be capable of producing an electronic data deliverable (report) which contains the minimum data elements identified in the *Requirements for Environmental Response Laboratory Network (ERLN) Data Submissions* within six (6) months of acceptance into the ERLN.
- **Sample Handling.** Must have sample transport, chain-of-custody, and sample accountability controls to support law enforcement activities. Laboratories should be able to demonstrate that the items/samples examined and reported on were those submitted to the laboratory. A chain-of-custody record should be maintained from the receipt of items/samples which details each person

who takes possession of an item or alternatively the location of that item (e.g., if placed in storage). In addition, procedures should be documented which describe the measures taken to secure exhibits in the process of being examined which must be left unattended.

- **Test Methods.** Must agree to adhere to ERLN approved testing protocols when testing ERLN samples. The most current version of *Standard Analytical Methods for Environmental Restoration following Homeland Security Events* (SAM) ([www.epa.gov/sam](http://www.epa.gov/sam)) is the standard starting point for such protocols. In those cases where methods are not approved, authorization from appropriately designated officials (e.g., Analytical Services Requestor-ASR) requesting the analysis is imperative prior to performing the analysis.
- **Reporting.** Laboratories must immediately report results to the Data Reviewer or his/her designee. In addition, laboratories must agree to provide results of any and all testing performed for ERLN into a designated data repository or as directed by the Data Reviewer or his/her designee specific to the incident. Laboratories must agree to release test results to authorized personnel only.
- **Laboratory Membership Application for EPA's Environmental Response Laboratory Network (ERLN)** Must acknowledge reviewing the *ERLN Laboratory Requirements Document*, and agree that the ERLN membership application accurately reflects their abilities.
- **Participation in the EPA Compendium of Environmental Testing Laboratories (Lab Compendium).** All member laboratories must maintain current information in the Lab Compendium. The Lab Compendium presents a clearinghouse of much of the information that ERLN member laboratories must make available to other members, including:
  - Laboratory contact names and addresses
  - Alternate contact names and addresses
  - Shipping addresses
  - Laboratory capabilities and capacities
    - Matrices
    - Analytes
    - Analyses
    - Instrumentation
    - Staffing levels
    - General information (e.g., certifications, affiliations)

This information must be updated every six (6) months and will be available as a web-based document. All ERLN member laboratories are required to submit and update their information in a timely manner.

- **Facility Safety and Personnel Security.** Laboratory must have manuals and standard operating procedures which include, but are not limited to, a Quality Manual, Waste Management Plan, Health & Safety Plan, Chemical Hygiene Plan, and Radiation Protection Plan and associated standard operating procedures for radiation monitoring (if applicable). These documents and procedures will be made available to the authorized ERLN, and as applicable WLA, representatives upon request.
- **Specific Requirements for Specialty Laboratories**
  - Select (Biological) Agent Registration Laboratories: Must conform to existing requirements of the USA Patriot Act and current version of 42 CFR Part 73.
  - Other Microbiology Laboratories: Should be at least a Biosafety Level 2 (BSL-2) facility and, at a minimum, have a certified biosafety cabinet.
  - Surety (Chemical Warfare) Agent Laboratories: Must comply with EPA/Department of Defense (DOD) ultra-dilute Interagency Agreement requirements (available upon request); and, have contingency plans for handling, reporting, transferring, or disposing of surety agents and contaminated materials, where applicable. Personnel handling surety agents will be subject to background checks and must be U.S. citizens or have

appropriate documentation. In addition, at least one person in the facility must maintain a security clearance at the secret level.

Laboratories participating as Surety Agent laboratories must meet the following minimal requirements:

- 1) Have briefed all appropriate local and State governmental authorities on the laboratory's storage and use of chemical warfare agent. Must have acceptance from local and state authorities;
- 2) Must have a secure facility to ensure security of agent;
- 3) Must have an isolated locked storage area for agent;
- 4) Must have mechanism for tracking all receipt, use, and disposal of agent. Must track volumes to the microliter level;
- 5) Must have a corporate sponsor and written health and safety plan incorporating health and safety requirements of 29 CFR Part 1910.1450;
- 6) Must have a chemical hygiene plan incorporating the storage, handling, use, and disposal aspects of agent;
- 7) Must have background checks on personnel authorized to work with agent;
- 8) Must designate point of contact for issues involving agent;
- 9) Must ensure adequate hood space and draw capacity to work with agent;
- 10) Must ensure analytical equipment is vented to charcoal filters; and,
- 11) Must agree to be audited by EPA to ensure compliance with EPA/DOD requirements.

These requirements may change with changes to the EPA/DOD agreements.

- Radiological Laboratories: Must satisfy all regulations applicable to radioactive materials licensing and radiation protection, and have mechanism in place to ensure safe receipt, handling, storage, and disposition of radioactive materials and sources and to limit personnel exposure to radioactivity according to the principles of "as low as reasonably achievable" (ALARA). Radiological laboratory staff must be trained in radiation protection practices and ALARA and possess a working knowledge in the recognition of hazards and the prevention of cross contamination of samples and laboratory contamination.
- All Hazards Receipt Facilities: Must have trained personnel who are currently capable of analyzing environmental samples for microbiological, chemical, or radiological contaminants, as appropriate.