

Ballot comments and responses

Date: 1/29/2025	Ballot Document: et al - 40i62, 46i47, 245i39, 350i83 - Alternate Methods (Kathryn Foster)	Group: WWT
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Commenter name, Company	Voting Member or Nonvoting member (includes observers and public comments)	Section, Paragraph , Figure, or Table (ex: Section 3.1 or Table 4.1)	Type of comment ^a (ge, te, ed)	Comments (Subject, Comment)	Proposed change	Response to comment
Roeder, Eberhard Florida Department of Environmental Protection	Voter		General	The goal of allowing for flexibility in methods if they arrive at the same results I agree with. The discomfort stems from a lack of clarity of how transparent and reproducible decision processes about equivalency will be. I suspect that this problem has been addressed in other contexts, before.	<p>1. put a definition into the definition section, or the definition standard</p> <p>2. wherever alternate methods are mentioned, define them. E.g., for discussion purposes, the following could be added to NSF 350 section 8</p> <p>The analytical methods listed in Table N-1.2 shall be used for testing. Alternate validated methods with documented equivalent performance are permissible. <u>Equivalent performance means having the same or better accuracy and precision over the expected measurement range. Validated means that both the alternate and the standard method were used on the same standards. Documented means that methods, analytical results and equivalency assessments are summarized in written form and made accessible to readers of the testing report.</u> All sample collection methods shall be in accordance with Standard Methods unless otherwise specified.</p>	<p>Thank you for your comment.</p> <p>The process that analytical test labs used to validate analytical methodologies is covered under the ISO 17205 accreditation of the test labs. Analytical test labs must be accredited to this standard to perform certification testing. Typically, rather than validate their own methods, labs will be accredited to published, harmonized reference methods. In North America, for wastewater analysis, the commonly referenced methods are from Standards Methods of Analysis and/or EPA. Often when considering alternate methods, the comparison is of the Standard Method or EPA method to a different published method (e.g. harmonized ISO, regional, or country approved methods of analysis). The burden of demonstrating and documenting equivalency of any alternate methods used ultimately lies with the certifier. Oversight for this demonstration and documentation of equivalency is covered under both their ISO 17025 and ISO 17065 accreditation and audit requirements. Requiring JC approval of individual equivalent methods is overly restrictive and generally lies outside of the scope of the committee's expertise. Additionally, it may hinder</p>

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						<p>timely responses for approval of alternate methods. This allowance for alternate methods is an established practice in many other water safety standards, including drinking water standards.</p> <p>We agree with the suggestion to add more definition to the requirements for documenting and validating alternate equivalent methods and have revised the proposed language accordingly.</p> <p>We have also updated the draft language to require that the analytical test method used be disclosed in the test report, and that the equivalency documentation to be made available from the certifier upon request.</p>
Denise Wright, Indiana State Department of Health	Voter		Editorial	The proposed language is too vague. This should be worked on in subcommittee and brought back when there is more detail	Committee work to research, review, discuss, and outline acceptable alternate methods, if appropriate.	Thank you for your comment. Please see response to Eberhard Roeder and updated draft language.
Groover, Roxanne FOWA	Voter		General	I agree with the other negative votes. This is not ready for ballot without clarification.		Thank you for your comment. Please see response to Eberhard Roeder and updated draft language.

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Hennig, Bradley Anua	Non-Voter		Editorial	Since alternative, and equivalent, test methodology already exist in STD 350. I propose that Tables N-1.1 and N-1.2 be harmonized throughout all NSF WW Standards: 40, 46, 245, and 385. It should include language as to how these methodologies are determined to be equivalent or alternative, and what factors would exclude other methodologies from being accepted.		Thank you for your comment. Please see response to Eberhard Roeder and updated draft language.
Wirth, Joelle Consultant - User	Voter		General	Need additonal language and discussion to understand the intent of the ballot. Too vague to do much with what is proposed.	Take this language back to committee for additonal discussion.	Thank you for your comment. Please see response to Eberhard Roeder and updated draft language.
Wolfe, June Texas A & M University	Voter		General	I agree with others that note any alternative methods need to be published and avaiable for anyone to verify.		Thank you for your comment. Please see response to Eberhard Roeder and updated draft language.
Braden, Mike LBC Manufacturing	Voter		General	I agree withe the other comments		Thank you for your comment. Please see response to Eberhard Roeder and updated draft language.
Rubin, Albert (Bob) North Carolina State University	Voter		General	The ballot option is not clear to me and i would like additional information regarding the exact nature of the issue.		Thank you for your comment. Please see response to Eberhard Roeder and updated draft language.
Bell, Jim Bio-Microbics, Inc.	Voter		Substantive	I agree with others that this language is to vague. I also think that the manufacturer who's equipment is being tested should have a say in	Clear up the language in the Task Group and send out for rebalot.	Thank you for your comment. Please see response to Eberhard Roeder and updated draft language.

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				whether or not an alternative method is used.		Additionally, while it is not practical for the standard to require that manufacturers to be able to specify the individual analytical test methods to be used for their certification tests, this could be a consideration for manufacturers when determining their preference of testing laboratory.
Blount, PE, John Civil Solutions	Voter		General	I think this need to be clarified, I am in favor of the concept.		Thank you for your comment. Please see response to Eberhard Roeder and updated draft language.
Morse, Audra Michigan Technological University	Voter		General	I agree with the other comments, a little more detail on validated and alternate methods means would make this more clear to the users.		Thank you for your comment. Please see response to Eberhard Roeder and updated draft language.
Belanger, Marie-Christine Premier Tech	Voter		General	I am not against opening the door to alternate and improved analytical methodologies. However, the proposed language lacks clarity. For instance, alternate analytical test methods that apply to drinking water may not apply to wastewater as there could be interference with different reactants. I am also questioning in the proposed language 1) who will determine that a method is validated, 2) what means "documented equivalent performance": which documentation? Documented by whom? and 3) equivalent performance shall be defined/precise - equivalent in	If NSF could develop and keep an up-to-date listing of new analytical methods that would have been documented and validated by NSF according to clear specifications, then the wording could be adjusted accordingly: "or other methods accepted by NSF" in all subsequent sections under review.	Thank you for your comment. Please see response to Eberhard Roeder and updated draft language.

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				terms of precision, the time required, detection level, etc., all of the above... In addition to the Standard Methods, could NSF develop and keep an up-to-date listing of these new analytical methods that would have been documented and validated according to clear specifications? If so, the wording could be adjusted accordingly: "or other methods accepted by NSF".		
Meyer, Jim Norweco, Inc.	Voter		General	I am in favor of allowing alternate methods to be used, but I think this language is unclear. The part I am hung up on is "with documented equivalent performance". What is acceptable documentation?	We either need to define what documentation is acceptable or drop the words "with documented equivalent performance" in all locations proposed.	Thank you for your comment. Please see response to Eberhard Roeder and updated draft language.
Sherman, Kevin SeptiTech, Inc.	Voter		General	I have no problem with the issue. The alternative method should have been published in a retrievable way so all can see the equivalenec.		Thank you for your comment. Please see response to Eberhard Roeder and updated draft language.

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