

Laboratory Accreditation Advisory Committee
Minutes for December 12, 2019 – Harrisburg, PA

MEMBERS PRESENT

Anita Martin, Chester Water Authority (Municipal Authority)
Danielle Cappellini, A.E. Kirby Memorial Health Center (Commercial Environmental Laboratory) via telephone
Cristin Geletei, US Steel Clairton Works Lab (Industrial Environmental Laboratory)
David Barrett, Mahaffey Laboratory (Small Environmental Laboratory)
Joel Jordan, PA Rural Water Association (Association of Community Water Supply Systems)
Twila Dixon, M.J. Reider Associates, Inc. (Technical Expertise in Testing and Analysis of Environmental Samples)
Bryan Swistock, Analytical Quality Assistance (General Public Member) via telephone

DEPARTMENT OF ENVIRONMENTAL PROTECTION STAFF PRESENT

Martina McGarvey, Bureau of Laboratories
Laura Edinger, Policy Office
Jason Minnich, Drinking Water Data Management
Kim Snook, Drinking Water Data Management
Dwayne Burkholder, Laboratory Accreditation Program
Yumi Creason, Laboratory Accreditation Program
Virginia Hunsberger, Laboratory Accreditation Program

CALL TO ORDER AND ATTENDANCE

The meeting was called to order by Mr. Barrett at 9:07 AM. Committee members and the public gave introductions.

REVIEW AND APPROVAL OF 12/5/2018 MEETING MINUTES

Mr. Barrett asked if there were any comments on the minutes. The committee members did not have any comments or changes. Ms. Dixon moved to approve the 12/5/2018 meeting minutes. Ms. Geletei seconded the motion. All committee members were in favor of the motion and the meeting minutes were approved.

TECHNICAL GUIDANCE DOCUMENT FOR MICROBIOLOGY

Dr. McGarvey asked for any questions on the public comments or program responses to the comments. Ms. Martin asked where the documents were in the approval process. Dr. McGarvey stated the program received the public comments and have determined a response and is now having a public discussion on the program's responses. Dr. McGarvey asked for comments on the other three public comments to the guidance document. Ms. Edinger responded that the committee doesn't respond to the public comments, the committee is supposed to agree or disagree with the changes made from the public comments. Dr. McGarvey asked if anyone had comments on the document itself or comments on the 4th public comment. Ms. Dixon asked, based on section 4.2.1.2, if the guidance document should state that the temperature is required to be taken when the samples are removed from the incubator – so there

isn't a 3- or 4-hour gap between when the incubator temperature is taken and when the samples are removed. Ms. Geletei agreed that the temperatures should be taken when samples are removed from the incubator. Mr. Jordan responded that the example meets the minimum requirements and taking the temperature when samples are removed is just good laboratory practice. Mr. Burkholder read the Chapter 252 requirement stating temperatures must be read twice per day at a minimum of 4 hours apart. The program interprets this to mean once in the morning and once in the afternoon, at least 4 hours apart, therefore it is not a requirement to take the temperature of the incubator when samples are removed.

TECHNICAL GUIDANCE DOCUMENT FOR SAMPLE COLLECTION

Dr. McGarvey asked if there were any questions about the public comment. Ms. Dixon pointed out that section 3.2.4.1 should state that two field blanks are required instead of one field blank. Mr. Barrett added that in the same section, it should state that four 40 mL vials are collected instead of three. The program agreed to make those changes. Mr. Barrett asked what the program's requirements were for field blank holding times for drinking water volatiles. The program responded that, though it needed to meet with representatives from the drinking water program, its current stance is that holding time starts from the collection time of the associated samples. Mr. Barrett and Ms. Dixon agreed that the interpretation made sense and that many laboratories are handling it differently. Mr. Barrett asked if the program could release an interpretation to the public concerning the holding time of field blanks. The program said they would after conferring with the drinking water program's requirements.

Ms. Creason went over the LAP corrections to the guidance document based on the public comments. Ms. Edinger added that the program would provide a document showing track changes that would include all the edits and send that document for the committee for approval. Mr. Barrett asked if the committee agreed, could the guidance documents be approved over email. Ms. Edinger stated that the committee could approve the documents for final publication over email or could sent up another meeting. The next scheduled meeting is April 2, 2020. Ms. Martin asked if the committee thought the sodium thiosulfate table comment had been properly responded to. Ms. Cappellini stated that the response was clear about checking the bottles per lot for the tablets as the laboratory already checks field residual chlorine to meet the drinking water requirements. Ms. Martin agreed with Ms. Cappellini. Mr. Barrett asked if there were other comments? He also stated that it will be revised and sent to the committee again.

Ms. Martin motioned to vote on the temperature distribution study guidance document. The public asked if the motion included the program's amendment which removed section 5.3.3. Ms. Edinger advised that the committee could motion to approve a document based on an amendment. Ms. Dixon motioned to accept the guidance document with the removal of section 5.3.3. Ms. Geletei seconded the motion. Ms. Cappellini stated that there should be something in the guidance document about how to evaluate results when a temperature distribution fails. Dr. McGarvey stated that the first and last sentences for section 5.3.3 should be kept in the guidance document. The public explained that the document has requirements additional to Chapter 252 which is why the program agreed to remove the section from the document. Ms. Cappellini and Ms. Martin asked if the intent was to go back 3 years in the data from when the last distribution study was performed – or longer in the case of initial distribution studies. Ms. Edinger added that the guidance document cannot add requirements. Ms. Cappellini asked which part of section 5.3.3 was an additional requirement. Mr. Burkholder explained that Chapter 252 does not require laboratories to document where in an incubator samples are placed and therefore the laboratory cannot determine which sample results are affected by certain failed areas

of an incubator. Mr. Barrett stated that section 5.3.3 should be removed and asked for the motion to continue. He asked if there were any comments and asked the committee if they approved of the document. All committee members approved the document with the removal of 5.3.3. The public asked if the draft document could be made available on the program's website. Ms. Edinger stated that the revised versions would be sent to the committee which could choose to talk about it at the next meeting. Otherwise, the public should contact the committee members concerning the changes to the documents. Ms. Martin asked how long it would take to receive the revised documents. Ms. Edinger stated it would need to go through the policy office and legal department again. She also stated that both documents would need to be submitted to the policy office and legal department.

TECHNICAL GUIDANCE DOCUMENT FOR DISINFECTION BYPRODUCTS AND PRECURSORS

Mr. Minnich introduced himself and stated that the two guidance documents had already gone through a comment period from its advisory committee but since these documents also pertain to the testing laboratories, he wanted to discuss them here. Mr. Minnich stated there were significant changes since the previous version included older requirements and contained information from both proposed technical guidance documents. The guidance documents should be published the first half of next year for public comment. Mr. Minnich will notify Dr. McGarvey when the documents are open for public comment so she can notify the accredited laboratories.

Ms. Martin stated that the committee was given less than a week to review the documents, so they may have additional comments later. Mr. Minnich asked that any additional comments to this meeting should be made during the open public comment period. Mr. Minnich explained that section 2 in both documents were updated for consistency with each other and the regulations. The drinking water program also added a link to a list of district offices so that linked document can be updated and viewed regularly rather than leaving a list in the appendix that could not be updated. Mr. Minnich stated that the new requirements for reporting the individual THMs and HAAs was also added to match current regulations. The document does not list the individual contaminants or contaminant identification numbers, so it will soon be updated with those. Mr. Minnich explained that most changes were to update to the new stage 2 monitoring requirements and for the examples to reflect how DWELR currently looks. Mr. Minnich notified the committee that page 59 still has a list of regional office numbers, but there is now one centralized after-hours number for emergency results. The phone number is the same as the 24-hour emergency line for the Southcentral Regional Office. Ms. Cappellini stated that she was not given any notice about a new centralized number. The rest of the committee and public also stated that they were not aware of the new number. Mr. Minnich said he would take care of that. The public asked if they were still to contact the regional office after hours or only contact the centralized number. Mr. Minnich responded the laboratory should only call the centralized number for after-hours emergencies.

Ms. Creason asked if the collection time statement on page 16 could be changed from estimating the collection time to marking unknown collection times as 00:00. Mr. Minnich stated that he would take that back to the drinking water program to discuss. Ms. Dixon asked if page 27 meant they could no longer submit DWELR corrections over fax. Mr. Minnich explained that this section dealt primarily with large number corrections and the fax number was not added in case it changed later. Mr. Minnich advised that the laboratory should always contact the drinking water program before submitting a large number of error corrections. Due to federal requirements, the drinking water program cannot currently accept error correction requests via email.

TECHNICAL GUIDANCE DOCUMENT FOR REPORTING INSTRUCTIONS FOR CHEMICAL CONTAMINANTS

Mr. Minnich explained there had been minor updates since 2001 so this document had gone through a major re-write. He suggested that laboratories review sections 2, 3 and 4 for responsibilities of the laboratory and the public water system. He added that section 5 was updated to match the 2009 monitoring requirements that everyone has already enacted. Ms. Cappellini asked about the nitrate and nitrite MCLs of 10.4 mg/L and 1.4 mg/L. Mr. Minnich responded that MCLs are based on whole numbers, so results can go up to 10.4 or 1.4 but still not exceed the MCL. Mr. Minnich added that on page 15, an additional field was added to the SDWA 4 form but that this field is in an experimental phase and is not a required field. This field is meant to help the drinking water program track different operating modes and source locations. The drinking water program will provide more guidance on this field as it is tested.

Ms. Cappellini asked what the >4.4 mg/L referred to on page 11. Mr. Minnich responded that it was a trigger for quarterly monitoring when half the MCL was met. The box has information about meeting half the MCL and an MCL exceedance which needs to be clarified. Mr. Minnich added that all of the analysis methods were updated and requested feedback to TDS and TDS (filterable) being two different contaminants with two different codes. The drinking water program wanted feedback before removing either code. The drinking water program also updated its flow charts to match the 2009 requirements. Ms. Cappellini asked why method 189 on page 26 was called Total Residue (TDS). Mr. Minnich was not sure and would look into it. Ms. Dixon stated she did not understand the reference to two different forms on page 36. Mr. Minnich responded that they will ensure this section is clearer.

Mr. Minnich stated that the contact information would be updated every year, probably January of each year and recommended all laboratories obtain the new list annually. Ms. Creason stated that page 5 included language for formatting of test reports that contradicted Chapter 252. Mr. Minnich stated he would correct that. Mr. Burkholder asked for clarification of what next business day means after failure to get a hold of the DEP emergency hours. Mr. Minnich said he would clarify that in the document.

The drinking water program can be reached at (717) 772-4018. This is the section phone number and it rings at everyone's desk with the new phone system. This is the quickest way to get a hold of someone in the section.

OTHER BUSINESS

Ms. Dixon asked about the survey the program gave concerning the drinking water qualifiers. Dr. McGarvey responded that they are reviewing the qualifier process. The program has done LEAN management review of the process and is starting up a new process with updated sample submission forms to clarify what the program needs for review of the results. The program has looked into a shared account with the drinking water program for simultaneous reviews. The drinking water program would then contact the laboratory instead of going through the laboratory accreditation program. Ms. Snook asked if she would still be notified when requests are made. Dr. McGarvey stated she would speak with Mr. Houck about the process. Ms. Snook said she had a meeting with Mr. Houck and would ask him.

The public asked about the automated PT system. Dr. McGarvey stated the system is still in process. The program is waiting for files from vendors to evaluate PT history and so far has only received files from one vendor. Dr. McGarvey stated a reminder email was sent to IT Contract Vendor yesterday to expedite the process. She does not have a timeframe for the completion of this system.

ADJOURN

Ms. Geletei made a motion to adjourn at 11:30. Mr. Jordan seconded the motion. All committee members were in agreement.