

Laboratory Accreditation Advisory Committee
Minutes for April 23, 2024 Hybrid Meeting

MEMBERS PRESENT

Anita Martin, Chester Water Authority (Municipal Authority)
Danielle Cappellini, A.E. Kirby Memorial Health Center (Commercial Environmental Laboratory)
David Kohl, CWM Environmental (Environmental Laboratory)
Justin Matincheck, Skelly and Loy (Environmental Engineer)
Chad Heister (alternate to Joel Jordan), PA Rural Water Association (Association of Community Water Supply Systems)
Molly Campbell, Sharon Sanitary Authority (Association of Wastewater Systems)
Richard Stump, Suburban Testing Laboratories, Inc. (Technical expertise in the testing and analysis of environmental samples)
Andrew Yencha, Penn State University (General Public, Member)
Terry Obal, Metiri Group (General Public, Member)

CALL TO ORDER AND ATTENDANCE

The meeting was called to order by David Kohl. Mr. Kohl told all attendees that the meeting is being recorded and their presence at the meeting will be taken as consent to the recording. Annmarie Beach with the Department of Environmental Protection Laboratory Accreditation Program (LAP) performed a roll call to take attendance of the committee members. Mr. Kohl clarified the rules for the committee stating committee members must wait to be acknowledged before speaking and all attendees must introduce themselves prior to speaking.

ELECTION OF CHAIR AND VICE-CHAIR

Mr. Kohl requested a motion to nominate a committee member as chair of the Laboratory Accreditation Advisory Committee (LAAC). Danielle Cappellini motioned to approve Richard Stump as chair. Terry Obal seconded the motion. All present committee members voted to approve Richard Stump as chair. Mr. Kohl requested a motion to nominate a committee member as vice-chair. Mr. Kohl motioned to approve Terry Obal as vice-chair. Richard Stump seconded the motion. All present committee members voted to approve Terry Obal as vice-chair. Mr. Kohl turned the meeting over to Mr. Stump.

REVIEW AND APPROVAL OF 5/23/2023 MEETING MINUTES

Mr. Stump requested comments or a motion to approve the meeting minutes from May 23, 2023. David Kohl motioned to approve the minutes. Danielle Cappellini seconded the motion. All present committee members voted to approve the meeting minutes. Before starting the next part of the agenda, Mr. Stump reminded the public to keep all questions until the end of the meeting while the committee discusses each agenda item.

BUREAU OF SAFE DRINKING WATER INSPECTIONS

Dawn Hissner with the Department of Environmental Protection Bureau of Safe Drinking Water (BSDW) presented a new process for inspecting accredited laboratories that collect samples for compliance safe drinking water under Chapter 109. Accredited laboratories are responsible for collecting samples according to the regulations and ensure all samples are taken from the appropriate sampling sites.

Additionally, accredited laboratories are also responsible for accurate reporting of data to the DEP's electronic reporting system (DWELR) along with performing proper 1 hour and 24-hour notifications for MCL exceedances unless that responsibility has been specifically transferred to another entity (like the client or subcontracted laboratory). BSDW was recently audited by the EPA and is required to consistently enforce the schedule in the comprehensive monitoring plans. Sample collection dates were not lining up to the comprehensive monitoring plan requirements.

The first round of inspections is meant to educate laboratories on its responsibilities when new clients are taken on. The inspections will be performed by a handful of people in BSDW central office. They plan to inspect one or two labs each quarter of the year and partner with LAP as much as possible for these inspections. Their inspections will be prioritized based complaints, higher than average positivity rate for microbiology and reporting issues to DWELR. The group intends to notify a laboratory 4 months prior to the evaluation and negotiate a set date for the inspection based on availability. BSDW will notify the laboratory the people they want to interview and what documents they need to review for the inspection. BSDW's inspection will not interfere with the LAP's assessment of the laboratory's accreditation. After an inspection, BSDW will perform an exit interview and provide a written report of deficiencies and request for a corrective action. Any questions or comments about the procedure can be send to the LAP resource account, eplabaccredit@pa.gov by May 17, 2024. BSDW may adjust the process based on the feedback received and present that process to accredited laboratories at the June Pennsylvania Association of Accredited Environmental Laboratory (PaAAEL) meeting. BSDW intends to run a pilot test in the last 6 months of this year and requests a volunteer accredited drinking water laboratory to participate. If you'd like to participate in the pilot test, please reach out to Dawn Hissner directly.

Erin McKechnie with M J Reider asked Ms. Hissner if the inspections would concentrate on microbiology issues or would BSDW also inspect other laboratories that, for example, perform radiochemistry testing. Mrs. Hissner responded that coliform testing is the most universal test for problems, but they intend to inspect all accredited laboratories. Issues with other rules, such as lead and copper, will also prioritize an inspection.

BSDW is currently meeting with all regional and district staff to remind them of the importance of public water suppliers (PWSs) having comprehensive monitoring plans and having those plans available to an accredited laboratory to review. Plans will be evaluated during BSDW's inspection of each PWS. The monitoring plans are not available on DWRS but the locations and number of samples required per quarter for each PWS is on DWRS. BSDW's requirements for scheduling is to take samples evenly spaced throughout the monitoring period (i.e. not 3 samples collected in a single day) per sample location. Ms. Hissner confirmed that for a monthly schedule, a sample collected in week 1 can be received and analyzed in week 2 of the same month. Richard Stump requested the current coliform positivity rate for all laboratories. Ms. Hissner did not have that information but will bring that to the next PaAAEL meeting.

Anita Martin with Chester Water Authority asked what were the significant reporting errors that would cause BSDW to prioritize an inspection. Ms. Hissner responded that reporting errors include incorrect location and duplicate reporting, but they have also seen a wide range of other inaccurate reporting. Prioritized inspections will be based on >5% reporting errors or >100 reporting errors. BSDW's goal is to educate laboratories and reinforced that any results reported can be corrected until midnight on the 10th of the month. Richard Stump explained the difficulty in removing one sample result from an upload due to the current set up of DWELR and results being sorted by PWS identification number. Aaren Alger

with Alger Consulting and Training requested a checklist of everything a laboratory should know when they agree to perform the sample collection for a client. Ms. Hissner responded that the request has not come up before but they do have a list of questions a laboratory should ask new clients in an earlier edition of their BSDW newsletter. BSDW meets continually to reinforce the requirement to obtain comprehensive monitoring plans from all PWSs and make those available to an accredited laboratory. If an accredited laboratory is not collecting samples, the requirement for following the comprehensive monitoring plans falls back to the PWS.

Anngela Chapman with Suburban Testing Laboratory asked if the review of coliform positivity rates takes into account who is sampling. Dawn Hissner responded that there's no way to currently track that information in their system but they will take that into account during an inspection.

MONITORING REQUIREMENTS AND LABORATORY CAPACITY

Dawn Hissner presented several charts outlining where commercial laboratories were located throughout Pennsylvania and how many PWSs there were throughout the state that required testing. BSDW presented this information to inform laboratories of the reduced number of commercial laboratories and the sense of where work is located throughout the state.

FEDERAL REGULATIONS UPDATE

Dawn Hissner reviewed several upcoming Federal Rules that will affect drinking water compliance work. Rules such as the new PFAS final rule and Lead and Copper rule (LCR1) are pending this year. Several other rules, such as disinfection by-products and perchlorate rules may be proposed next year. Richard Stump described the issue his laboratory has with the monitoring frequencies and maintaining accreditation. Specifically, his laboratory may perform 100 samples a month for lead and copper or may perform 7,000 samples a month based on the monitoring period for all PWSs. Ms. Hissner responded that a change in monitoring frequency would require a regulation change for Chapter 109 but agrees that discussion should be made.

DRINKING WATER SAMPLE COLLECTION OPEN DISCUSSION

Richard Stump explained there is a disconnect between BSDW and LAP on what to enforce and what quality control must be performed, specifically when it comes to field reagent blanks. Adding an additional inspection may push laboratories out of business and training sessions will be received better. Dawn Hissner responded that BSDW and LAP continue to meet and work together on consistency and the field reagent blanks from their perspective is about whether or not a result is invalid. BSDW and LAP are working on additional questions to the EPA concerning PFAS sample collection issues not specifically discussed in the approved methods. Mr. Stump requested that LAAC be included in that discussion with the EPA.

Julie Brooks asked which versions of the PFAS methods were approved by the EPA. Dawn Hissner explained the different available methods and the differences in approved methods between Chapter 109's PFAS rule and EPA's proposed PFAS rule.

Anita Martin, Richard Stump and High Garst with the Department of Environmental Protection Policy Office discussed additional committee meetings or workgroup meetings. LAAC has the authority to call

additional public meetings but the Policy Office could not guarantee a DEP presence during those meetings.

Anngela Chapman requested citations to be included in the inspection reports from BSDW. Danielle Cappellini described ongoing issues she has with PWSs that consistently make the same mistakes during sample collection. Her laboratory is not seeing a positive result from BSDW's inspections of PWSs for sample collection. Dawn Hissner replied that they don't interview everyone at the PWS during their inspections but that she would pass that information along to her staff.

NPDES PERMIT UPDATE OPEN DISCUSSION

High Garst explained the new NPDES permit update does not require a comment period but he has notified other members of the Policy Office working with the Clean Water Program to include accreditation laboratories in future meetings related to technical updates. Any questions can be sent to Annmarie Beach who has a contact with the Clean Water Program.

PUBLIC COMMENT

Richard Stump asked if there were any additional public comments or questions. There no additional comments or questions.

CLOSE OF MEETING

Richard Stump reminded the committee the next LAAC meeting will be October 15th in the same conference room 105 at the Rachel Carson building. David Kohl motioned to adjourn. Anita Martin seconded the motion. All present members voted to adjourn the meeting at 11:08 AM.