

MINUTES
LABORATORY ACCREDITATION ADVISORY COMMITTEE
December 11, 2014 - Harrisburg

MEMBERS PRESENT

Anita Martin, Chester Water Authority (Municipal Authority)
Danielle Cappellini, A.E. Kirby Memorial Health Center (Commercial) - Phone
Cristin Geletei, US Steel Clairton Works Lab (Industrial)
Dr. John Stolz, Duquesne University (Academic) - Phone
David Barrett, Mahaffey Laboratory LTD (Small commercial)
Joel Jordan, PA Rural Water Association (Water Systems)
Gene Greco, Franklin Township Municipal Sanitary Authority (Wastewater Systems) - Phone
Twila Dixon, M.J. Reider Associates, Inc. (Technical Expertise testing and analysis)
Bryan Swistock, Penn State University (General Public)
Marykay Steinman, Analytical Quality Assistance (General Public)

DEPARTMENT OF ENVIRONMENTAL PROTECTION STAFF PRESENT

Martina McGarvey, Director of the Bureau of Laboratories
Aaren Alger, Laboratory Accreditation Program Chief
Laura Edinger, Regulatory Coordinator, Policy Office
Yumi Creason, Laboratory Accreditation Program
Virginia Hunsberger, Laboratory Accreditation Program

CALL TO ORDER AND ELECTION OF OFFICERS:

The meeting was called to order and roll call taken by Mr. Barrett (acting vice chair) at 9:05 AM.

Mr. Greco nominated Ms. Steinman for chair of LAAC. Mr. Barrett seconded the motion. All present were in favor. Ms. Steinman nominated Mr. Barrett for vice-chair. Ms. Dixon seconded the motion. All present were in favor.

REVIEW OF THE BYLAWS

Aaren Alger, section chief of the Department of Environmental Protection's (DEP) Laboratory Accreditation Program (LAP), proposed two changes to the bylaws that have not been amended since 2002. She proposed to extend the years of appointed membership from 2 to 5 in Article IV and to change the meetings from quarterly to "as needed" in Article IX. The committee agreed that meetings should be at least annually and to extend appointed memberships from 2 to 5 years in Article IV. Mr. Jordan moved to approve both motions. Ms. Dixon seconded the motion. All present were in favor.

The committee asked how the public was notified of the LAAC meetings. The LAP explained that the public is notified through the PA Bulletin, DEP's online public participation center and the LAP website. The committee asked if invitations could be made to other organizations such as the Pennsylvania Association of Accredited Environmental Laboratories ("PaAAEL"). The LAP responded that it would not be an issue and that all members of the public are welcome to the LAAC meetings. The committee asked if the public could use the teleconference line or if a webinar could

be used. The LAP responded that it's a possibility but it would need to check with the Office of Administration and DEP's Policy Office.

LABORATORY ACCREDITATION UPDATE

The LAP provided an update to the committee regarding a new database that is being developed. The database now allows the LAP to export on-site assessment reports to Microsoft Excel for laboratory use and to upload electronic documents related to each laboratory for storage. Plans for the new database include receiving electronic applications and documents from accredited laboratories and tracking proficiency tests. The LAP is changing assessments to include more detailed data review. This recent change has shown issues with reporting, especially when it comes to subcontracting testing, incorrect use of data qualifiers, incorrect analysis date and times and insufficient sample collection records. The LAP has also established a checklist to help laboratories distinguish between correction and corrective action. This checklist is sent to laboratories with the on-site assessment reports. The committee asked to have this checklist available on the website. The LAP has also performed several enforcement actions and noted that laboratories that change the overall management philosophy have come back into the program with improved compliance.

The committee was concerned about the supervisor qualifications in Chapter 252 for operators. The committee discussed how DEP would handle operator certification if seats for the supervisor test were unavailable before the July 1st deadline. The LAP has not received any complaints from supervisors required to take the exam.

The LAP will be sending out two letters to inform the accredited laboratories regarding expectations for reporting to the drinking water electronic laboratory reporting system (DWELR). The first discusses the correct reporting of analysis date and times between DWELR and test reports to the client. The second letter discusses the procedure for requesting to report chemistry drinking water qualifiers.

The committee discussed the difficulty of using the accredited lab web search. The LAP created a list of all drinking water certified laboratories separate from the web search but realizes the search function is difficult to understand and would like some feedback. The committee discussed having a search function based on zip code rather than county. The LAP will discuss this possibility with the IT department.

DISCUSSION OF CHAPTER 252 FEE TABLE

The LAP's last fee change occurred in 2010 working on projections from 2008. The LAP is required to reevaluate the fee every 3 years and this recent projection showed a deficit of \$200,000 based on projected rising costs of staffing and in state assessments. The LAP raised application fees approximately 6% for small laboratories and 15% for larger laboratories and added a new category fee, complex microbiology, for the more assessment intensive microbiology analytes such as Cryptosporidium and Helminth Ova. The committee asked if these new fees would stay at the proposed rate until 2018. The LAP confirmed it would not change before 2018 and reassured the committee that the fees are only to cover the cost of the program. The committee had no additional comments on the fee table and all changes to the 252 regulation were moved to the March meeting.

The committee further discussed issues with the supervisor qualification part of Chapter 252. A member of the public had concerns about personnel meeting internal laboratory qualifications for supervisor but could not meet the education and/or experience requirements of Chapter 252. Another member of the public had concerns that an experienced supervisor could not change areas of supervision based on the experience requirements of Chapter 252. Ms. Alger reminded the committee and public that amendments to Chapter 252 would not change the TNI requirements for a laboratory supervisor, but it will work on this issue and welcome any comments from the committee and public. Changes to the supervisor requirements will be discussed with the fees during the March meeting. All comments or edits are due to Aaren for compilation and addition to the agenda 6-8 weeks prior to the meeting date.

SDWA QUALIFIED DATA AND STANDARD DATA QUALIFIERS FOR ALL MATRICES

The LAP updated the website on December 4th to include the request to report qualified data form and instructions. The LAP has received about 30 requests so far. The LAP and Bureau of Safe Drinking Water (“BSDW”) worked on a qualifier list that can be used for all matrices. The list was formed from a list currently being developed for the eDMRs. The committee agreed that the qualifiers (or “comments”) should be standard language and this list will help accredited laboratories and the public. The committee discussed issues with standardized codes based on different reporting systems. The public questioned that if the qualifier was standard, is it necessary for a standard set of codes? The committee also discussed adding standardized definitions of quality control to the test reports, but the issue was raised that quality control, such as “MDL”, mean different things to different programs in the same agency. The public also commented that the LAP needs to establish what constitutes as an opinion. For example, would “results may be biased low” be considered an opinion? The LAP would like comments, edits, additions and deletions to the standard qualifier form. This discussion will be added as an agenda item to a later meeting due to other higher priority discussions.

OTHER BUSINESS

The committee established meeting dates for 2015. The committee will meet at the Bureau of Laboratories on March 11th, June 24th, September 30th and December 2nd. The committee discussed having a meeting with PaAAEL but a specific date could not be reached. The time of each meeting will be 9AM to 12PM but can go longer depending on the agenda items. The March 11th meeting will include discussion on Chapter 252 regulation changes and the target quantitation limits in permits created by the Bureau of Point and Non-Point Source Management. The LAP will request the presence of the Bureau of Point and Non-Point supervisor Sean Furjanic for the discussion.

ADJOURNMENT

Ms. Geletei motioned to adjourn the meeting. Ms. Martin seconded the motion. The meeting was adjourned at 12:15 pm EDT.