

Laboratory Accreditation Advisory Committee  
Minutes for April 12, 2018 – Harrisburg, PA

**MEMBERS PRESENT**

Anita Martin, Chester Water Authority (Municipal Authority)  
Danielle Cappellini, A.E. Kirby Memorial Health Center (Commercial Environmental Laboratory) via phone  
Cristin Geletei, US Steel Clairton Works Laboratory (Industrial Environmental Laboratory)  
John Stolz, Duquesne University (Academic Laboratory) via phone  
David Barrett, Mahaffey Laboratory LTD (Small Environmental Laboratory)  
Stephen Morse, P.E., Skelly and Loy (Environmental Engineer)  
Joel Jordan, PA Rural Water Association (Association of Community Water Supply Systems) via phone  
Gene Greco, Franklin Township Municipal Sanitary Authority (Association of Wastewater Systems) via phone  
Twila Dixon, M.J. Reider Associates, Inc (Technical Expertise in the Testing and Analysis of Environmental Samples)  
Bryan Swistock, Penn State University (General Public Member) via phone  
Marykay Steinman, Analytical Quality Assistance (General Public Member)

**DEPARTMENT OF ENVIRONMENTAL PROTECTION STAFF PRESENT**

Aaren Alger, Laboratory Accreditation Program Chief  
Laura Edinger, Regulatory Coordinator, Policy Office  
Amber Ross, Laboratory Accreditation Program  
Martina McGarvey, Director, Bureau of Laboratories

**CALL TO ORDER AND ATTENDANCE**

The meeting was called to order by Ms. Steinman. Committee members gave introductions.

**REVIEW AND APPROVAL OF 10/12/17 MEETING MINUTES**

Ms. Dixon moved to approve the minutes. Mr. Greco seconded the motion. All present were in favor and the meeting minutes were approved.

**DISCUSSION OF CONCEPT PAPERS**

The committee first reviewed the sample collection concept paper. Ms. Alger gave an overview of the reason behind the creation of a technical guidance document. Ms. Alger explained that the updated Chapter 252 has been published in the Pa. Code and the Department has included a link on the laboratory accreditation website. Ms. Alger further explained that with all of the various options and different laboratory types, it would not be possible to include specific details or requirements in the Chapter 252 regulation for sample collection. However, the comment period for Chapter 252 did include several requests for guidance in how to comply with the regulation. Ms. Alger explained that instead of creating a guidance document first, the Department is releasing a concept paper to get feedback and comments now to assist in the development of the guidance document.

Ms. Alger reminded the audience and committee that while the new regulations require sample collection instructions to be provided to all individuals that collect samples (both employees of the laboratory and customers), the new regulations do not require laboratories to be responsible for training non-employees. Ms. Alger also added that the guidance document is only to clarify or add suggestions for compliance. The guidance document cannot add, change or amend the regulations in any way. Ms. Steinman opened the floor for questions.

Mr. Barrett asked for clarification concerning the verification of pH. As he understood it, the requirements are for all WETT and drinking water samples but not for non-potable water samples. Ms. Alger responded that he was correct, however any sample that requires a pH adjustment or when a method would require a pH check, then the laboratory must perform and document these checks too.

Ms. Cappellini asked why subcontracted samples were specifically mentioned in the concept paper as those samples are handled in the same way as any other received sample. Ms. Alger responded that the Department wanted feedback on any specific sample handling differences and that this section could be removed if not applicable.

Ms. Cappellini asked if section 4, bullet iii on page 5 of the concept paper requires that the name of the collector be present and not just initials. Ms. Alger responded that if the laboratory can recognize the initials and has a list that matches to the collector's name, that would also be acceptable. Ms. Dixon asked about the requirement to maintain that information as the subcontract laboratory. Ms. Alger responded that this is similar to separating out subcontracting samples. As long as one of the accredited laboratories had the collector information, it is not necessary that the subcontracted laboratory maintain/have that information. The laboratory can proceed with testing without the collector's name, in this circumstance.

A member of the public asked how this affects samples that are moved between satellite laboratories. Ms. Alger responded that to the Department, satellite laboratories are considered two different laboratories and samples must be processed as if they were subcontracted from a different laboratory. Receiving samples from a sister laboratory does not negate the requirement to check the accreditation status of the subcontracted laboratory or check the temperatures of samples at receipt.

Another public comment concerned qualifications on temperatures at receipt and specific temperature requirements versus on ice requirements. Ms. Alger responded that the Department will add this discussion to the concept paper.

Ms. Cappellini asked if the concept paper is open to treatment plants as well. Ms. Alger responded that the concept papers were added to the public participation website and are available to the public and stakeholders. Mr. Greco asked if it was okay to circulate the paper amongst laboratories to get comments since the concept paper could be confusing to single person treatment plants. Ms. Alger affirmed that would be okay. Ms. Edinger added that when distributing the paper, it should be made clear that this paper is for guidance only. Mr. Greco asked Ms. Alger to write up a note for the paper that would include this warning. Ms. Alger agreed.

Mr. Greco commented that the section on acceptance and rejection of samples should include that samples have to be rejected prior to analysis. Ms. Alger agreed that this is important and that the drinking water supply section has been clear that any result obtained after analysis for a sample that should have been rejected at sample receiving is considered to be the final result.

A member of the public asked about a reasonable time frame for not taking the temperature at receipt. He often receives samples within minutes of collection at the plant. Ms. Alger responded that temperature is required if receipt is greater than 15 minutes from sample collection. She added that for samples collected the same working day and on ice will almost always have a negligible temperature difference as evidence of cooling will have begun. She warned that laboratories should still be cognizant of what is written on a chain of custody for anomalies. An example being a sample collected from a stream in winter should not arrive at 85F at the laboratory on the same day of collection. Ms. Alger added that similarly we are not requiring a specific range for unpreserved sample pH checks. That will be up to the laboratory to decide what to put in its sample acceptance policy.

A member of the public had an issue with the drinking water sampling plans for copper and lead not being available on the Department's website, resulting in invalid sample results. Ms. Alger responded that he should direct his questions to the Bureau of Safe Drinking Water about making that information public. That is beyond the purview of this committee.

No further questions or comments from the committee or the public on the sample collection concept paper were put forward. Ms. Steinman and Ms. Alger requested that any additional comments can be sent to Ms. Alger, the accreditation program's general email account ([eplabaccredit@pa.gov](mailto:eplabaccredit@pa.gov)) or to the committee members.

Ms. Steinman asked for comments on the microbiology incubator concept paper. Ms. Alger noted a correction – on page 2, bullet number 1 is above section (j) and (i)-(iii) should be (1)-(3) under (j). Ms. Alger explained that the Department received comments that circulating baths should be exempt, so they were removed in the final rulemaking. The Department wanted to provide technical guidance on the temperature distribution study and incubators in general because incubators have been problematic during recent assessments. The concept paper also includes references from standard methods to demonstrate existing requirements concerning temperature distribution studies.

Ms. Martin asked if the concept paper should include the edition of standard methods referenced. Ms. Alger explained that the concept paper was to show the committee the language existed.

Ms. Dixon asked if the committee should add a section stating that if all samples are taken out in the morning on a weekend, and the incubator is not in use in the afternoon, no afternoon temperature is required to be taken. Ms. Alger agreed and noted that the guidance document will have that clarification.

A member of the public asked if an average temperature passed criteria, if the incubator could be used. Ms. Alger responded that the regulation is clear that any area that fails the temperature requirements cannot be used. Averaging the temperatures is not allowed. Additionally, the Department recommends not opening the door during the study and instead use thermocouples for better accuracy. If the laboratory knew the reason for an outlier temperature, an exclusion may be allowed.

The public wanted clarification on number of shelves versus height of the incubator and height of each shelf. Ms. Martin commented that if every shelf position was used, it is required to be included in the study. Ms. Alger added that the study has different requirements than sample analysis. Only top and bottom shelves are checked during analysis, but all shelves are required

to be checked during the distribution study. The Department did not want to put a specific study procedure in place due to the different types of incubators that can be used, thus it is up to the laboratory to establish a proper procedure.

Ms. Dixon asked if every shelf had to be done all at the same time since laboratories might not have enough thermometers to perform that study all at once. Ms. Alger responded that the Department would not require all shelves to be studied simultaneously.

Ms. Steinman asked if the laboratory was required to perform this study or if they could hire a third party. Ms. Alger answered that the laboratory is not required to perform the study and can hire someone else.

Ms. Martin was concerned about page 6 and evaluating the impact and handling past data, especially when data spans three years. Ms. Alger recommended the laboratory perform an ongoing study, regularly moving thermometer locations to complete the study. Ms. Martin asked what a laboratory should do if they do not use all the shelves in the incubator. Ms. Alger responded that only the shelves used during testing are required to be tested. Mr. Barrett added that labs would need to document which shelves are being used for samples.

A member of the public wanted to know what to do with incubators currently in use. Ms. Alger answered that since the regulation went into effect July 2017, the temperature distribution study must be performed before July 2020 (taking into account the 3-year rule of the regulation). If an incubator is repaired or a new one purchased, then the laboratory is required to perform the study before using that incubator. Ms. Alger added that the new MDL procedure will be required during the next cycle of MDLs, whenever that occurs for each laboratory.

Ms. Steinman asked if there were any other questions or comments. There were no additional comments or questions from the committee members or the public. Ms. Steinman requested any suggested wording or comments be sent to Ms. Alger or a committee member.

#### **OTHER BUSINESS AND CONCLUSION**

Ms. Steinman suggested scheduling next year's meetings. Ms. Edinger stated that all meeting dates are published at the end of December, but that those dates may be cancelled or some dates added. The committee agreed to have two scheduled meetings in 2018. The meetings would be held on April 12, 2018 and October 16, 2018 if the conference room is available. Ms. Steinman asked the public and committee members for any other business. There was no other business to discuss.

#### **ADJOURN**

Mr. Greco motioned to adjourn the meeting. Mr. Barrett seconded the motion. The meeting was adjourned at 10:50 AM.