Laboratory Accreditation Advisory Committee

Minutes for July 15, 2021-Virtual Meeting

MEMBERS PRESENT

Bryan Swistock, Penn State State University (Academic Laboratory)
Cristin Geletei, US Steel Clariton Works Lab (Industrial Environmental Laboratory)
John Stolz, Department of Biological Services Duquesne University (Academic Laboratory)
Twila Dixon, M.J. Reider Associates, Inc. (Technical Expertise in Testing and Analysis of Environmental Samples)
Danielle Cappellini, A.E. Kirby Memorial Health Center (Commercial Environmental Laboratory)

DEPARTMENT OF ENVIRONMENTAL PROTECTION STAFF PRESENT

Annmarie Beach, Laboratory Accreditation Program Chief
Dwayne Burkholder, Laboratory Accreditation Program
Amy Hackman, Laboratory Accreditation Program
Laura Griffin, Policy Office
Leda Lacomba, Bureau of Regulatory Counsel

CALL TO ORDER AND ATTENDANCE

The meeting was called to order by Annmarie Beach at 9:03 AM. At this time, there were not enough committee members on the call for a quorum.

INTRODUCTION

At 9:09 AM Annmarie Beach welcomed everyone to the committee meeting and went over the agenda-Dwayne Burkholder will discuss Legionella and Annmarie Beach will discuss limits for PFAS.

QUORUM

Annmarie called for a quorum at 10:07 AM-there were still not enough members to vote on approving the meeting minutes from 12/1/2020.

LEGIONELLA ACCREDITATION UPDATES

Dwayne Burkholder introduced himself at 9:10AM. He will discuss the different testing methods and setting up an accreditation program for *Legionella* testing. Dwayne discussed the background of *Legionella* and the diseases it causes (Legionnaires' disease and Pontiac Fever). He also talked about who is more at risk, and the natural environment of *Legionella*. He discussed how *Legionella* can grow in man-made structures if the water is not properly treated. He also discussed disease transmission. Dwayne Burkholder discussed the number of species and serogroups. *L. pneumophila* is responsible for >90% of cases of Legionnaires' disease. Serogroup 1 (SG1) is responsible for >80% of cases of Legionnaires' disease. Currently, *Legionella* is regulated under the SWTR (MCL goal of zero organisms). Treatment technique is maintaining residual chlorine, not through testing. *Legionella* is in UCMR5 as being proposed to being added in the future (only *L. pneumophila).* Dwayne discussed the available methods for use (culture method, IDEXX Legiolert, qPCR based methods).

- The culture method is considered the 'Gold Standard', requires analytical expertise. Can have some background organism grow. Long testing time.
- IDEXX Legiolert only detects *L. pneumophila.* This method is easier to use, similar to Colilert. Analytical technique is simple. However, additional testing would be required to determine serotype (isolation required). There have been peer-reviewed papers coming out where it has been found that non-*Legionella* organisms are presenting as positives but are actually false positives.
- qPCR based methods-DNA testing. Ability to detect organisms that are not culturable (dead). Rapid detection, specificity rate relatively high for *L. pneumophil*a, but not for *Legionalla* spp. Can't determine viability and serotype.

LAP is currently evaluating offering accreditation for *Legionella*. We are looking at our purpose (surveillance vs. Investigation), criteria (presence/absence,

enumeration, % positivity), sample collection and handling protocols, test methods/level of identification, proficiency testing.
LAP would like to know the lab communities' thoughts on the testing, we'd like to discuss these thoughts.

Questions:
John Stolz-are hospitals required to perform routine testing? He knows there are labs in the area of Pittsburgh. Dwyane Burkholder: he's not sure if it's routine, but they do outbreak investigations. John Stolz-not sure why they haven't developed a test for SG115.
No other questions.

PA Method Detection Limit Levels for per-and poly-fluoroalkyl substances (PFAS)

Annmarie Beach started the PFAS discussion at 9:40AM. The Drinking Water Program is working hard to develop limits for PFAS. Deadline is 8/24/2021 (includes RAF and preamble). The expense of enforcement needs to be evaluated. Also, if too stringent, or too wide and how they fit with EPAs proposed limits. The deadline for completed regulations is 12/2022. The EPA has proposed UCMR 5 for 29 of the compounds and proposed reporting limits, however, they are not regulated. PADEP is researching monitoring requirements-might consist of quarterly monitoring. Also considering phased in approach so municipalities are not on the same schedule. There is 1 accredited lab in PA, 9 outside of PA (secondary accreditation). EPA has proposed reporting limits in the UCMR 5. They have proposed a RL for each individual analyte. Need to consider instrument capability. Even though an instrument can attain a low level, it doesn't mean that level should be that low. Do not want a situation where results are qualified because the reporting limit is too low.
Public Works board meeting scheduled for July 29, 2021 agenda, pre-draft proposed PFAS regulations with Appendix A and monitoring summary is available online on the PA government website under the public tab.
Questions:
John Stolz-can Annmarie send out a link. Annmarie-yes we can.

Danielle Cappellini-are other states running into shortages with laboratories (states that have established regs).
Annmarie Beach: there is not an abundance of labs nationwide.
Danielle Cappellini -are there any incentives on the state level that could help labs?
Annmarie Beach -not sure, good idea.
John Stolz -LC MS/MS for both methods
Annmarie Beach -very expensive instrument, high expertise analyst, methods are complex
John Stolz -background-like microplastics-PFAS is everywhere.
Annmarie Beach -yes, just trying to get method blank and field blank into range is a struggle. Must be careful when sampling, prepping and analyzing samples.
Danielle Cappellini -what is EPAs suggestion? Do States not have to require?
Annmarie Beach -yes, because it's not regulated. However, states do not want to wait for EPA because it's important. UCMR is the first step (evaluation process). PA feels like they can't wait for EPA.
Danielle Cappellini -how can a regulation be imposed on a water system if there are not enough labs, same as radiological-not enough labs. The question is how it can be enforced if there is a limited number of testing facilities.
Annmarie Beach - we have secondary labs that are accredited, but only 1 in PA. We are all going to have to work together.
John Stolz-he thinks more labs will pop up once the regs are passed.
Cristin Geletei -are these already in permits for industry?
John Stolz -EPA permitted fracking facilities to use PFAS in their fracking water.
Cristin Geletei - The reason she asked-will it affect wastewater programs?
John Stolz - Also-Landfills
Annmarie Beach -we don't have methods for NPW and SCM.
Brad Nelson from Microbac Labs- will PFAS be entered into DWELR for DW?
Annmarie Beach -assume this will happen once it becomes regulated.
Dwayne Burkholder-the drinking water program will assign codes to each of the regulated contaminates that will be used to enter into DWELR.
Annmarie Beach -the key is it needs to be regulated.
Cristin Geletei -looks like EPA is looking into wastewater, according to the EPA website.
Annmarie Beach -yes EPA is working on this.

Cristin-this would affect all areas of accreditation.
Annmarie Beach -yes it would.
Danielle Cappellini -timeline situation-how quickly do we think this would come to fruition?
Laura Griffin- rule making process-takes 18-24 months- the Department and the Administration recognize the importance. Draft proposed regulations-set to go in front of advisory committee in late summer. Laura went over the review process and the steps for proposed regulations. She said they are trying to proceed expeditiously. Legislative committees are involved in the process and we will have to take their comments into consideration and well as public comments

OTHER BUSINESS

No other business

CLOSE OF MEETING

No quorum, therefore, no official adjournment of the meeting. Meeting ended at 10:07 AM.