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Kathy Cooper

From: ecomment@pa.gov
Sent: Thursday, September 15, 2016 7:38 AM
To: Environment-Committee@pasenate.com; IIRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; gvitali@pahouse.net; regcomments@pa.gov; apankake@pasen.gov
Cc: ra-epmsdevelopment@pa.gov
Subject: Comment received - Proposed Rulemaking: Environmental Laboratory Accreditation



Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Environmental Laboratory Accreditation.

Commenter Information:

Glenn DeBernardi
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Comments entered:

The language in Section 252.306 (j) should be changed to "Except for circulating water baths, the laboratory shall perform...." as a circulating water bath has extremely quick recovery times when samples are added.

If changed, this would also be more consistent with Standard Methods (22nd Edition) Section 9020(B)(4)(n) and Section 9020(b)(4)(o) in which there are different specific requirements for both a "Water Bath Incubator" (section n) and an "Incubator (air, water-jacketed, or aluminum block)" (section o).

Section (n) states that for optimum performance, a water bath should be equipped with a gable cover and a circulating pump to maintain an even temperature distribution. This is already a requirement per 252.306(f)(8)(iii).

Then in Section (o), referring to air incubators, it states, " measure and establish that incubators maintain appropriate and uniform spatial test temperatures". To me, this is what the proposed Section 252.306 (j) is supposed to be geared towards.

In consideration of these two very different types of incubators, it can be seen that water maintains its temperature much better than air, and a circulating water bath is sufficiently manufactured to achieve and maintain consistent temperatures throughout. With the water constantly moving and being heated to the correct temperature, it doesn't make sense that there would be any area of the water bath which would not be holding temperature as the water is not motionless. It is not necessary to require labs which have a circulating water bath as

mandated in Chapter 252 to perform a temperature study. By simply clarifying the language in Section 252.306 (j) to "Except for circulating water baths, the laboratory shall perform.." the state will have addressed the issue with air incubators that may not have uniform temperatures throughout while not adding unnecessary requirements to laboratories who use circulating water baths that do maintain a consistent temperature and quickly recover after samples are added.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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