

3157

Kathy Cooper

From: ecomment@pa.gov
Sent: Monday, September 19, 2016 10:20 AM
To: Environment-Committee@pasenate.com; IRRC; 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:

Debbie Shockley
Allegheny Valley Joint sewage Authority (lab@avjsa.org)
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IRRC

Comments entered:

252.306 (8) Incubators, water baths, heating blocks and ovens/(iv) Calibration-corrected temperatures for each incubator, water bath, heating block or oven...."When used as an incubation unit for microbiology, the calibration-corrected temperature shall be recorded at least twice per day each day the incubator is in use....

Comment: We are in agreement regarding the requirement to monitor and record the temperature twice per day Monday-Friday when the incubator, oven, etc are in use, however Saturday and Sunday most labs are staffed long enough to complete microbiological tests (<4 hours) and is not staffed long enough to take two readings 4 hours apart. We suggest to consider indicating one temperature measurement be taken on working days when lab is staffed less than 4 hours when incubators are in use.

252.401 (1) "checking thermal or chemical, or both preservation and the sample container and verifying the condition of the sample. The environmental laboratory shall check:

- (i) The sample container and the sample preservation, both thermal and chemical, of each sample.
- (ii) The sample pH for all samples to be analyzed for chemistry, whole effluent toxicity and radiochemistry fields of accreditation.

Comment: (i) - Samples that are collected, iced and placed in a cooler are contained within an environmental chamber (cooler) similar to a refrigerator. Refrigerator temperature checks are not required for each sample container but rather for the environmental chamber. The Agency should consider accepting a temperature check of a representative bottle from the cooler and

not all bottles from the cooler. The cooler is a sealed environmental chamber and one that is not repeatedly opened (like a refrigerator).

Comment: (ii) – This section implies the pH for all samples need to be measured for pH for chemistry, WET and radiochemistry. In part (1) it states the laboratory needs to verify thermo and chemical preservations. Chemistry tests that do not require chemical preservation should not need to be measured for pH at the time of receipt. The pH for unpreserved samples should only be checked if the analytical test method requires the sample pH to be within a stated range (BOD for example) and the analyst performs the measurement and documents the pH at the time of analysis and/or makes pH adjustments per the method. Checking the pH for an unpreserved sample to be analyzed for TSS, for example is not a requirement of the method.

252.404 Essential quality control requirements – microbiology (d) The requirements for reagent water are as follows: (7) The heterotrophic plate count and bacteriological water quality test ratio analyses described in paragraphs (2) and (3) shall be performed by an environmental laboratory accredited under this chapter for the appropriated field of accreditation.

Comment: Does this requirement apply to purchased, pre-sterile dilution water for fecal coliform analysis? Consideration should be taken for those laboratories that perform only fecal coliform analyses and have documented history of no method blank contamination with purchased, pre-sterile dilution water not be required to perform these tests.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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