Pennsylvania Department of Environmental Protection
Bureau of Laboratories

GUIDELINES FOR SAMPLE COLLECTION, RECEIPT, AND HANDLING
(DEP ID: 150-4200-002)

COMMENT RESPONSE DOCUMENT
May 2, 2020

LIST OF COMMENTATORS

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COMMENTS AND RESPONSES

General Comments

1. **Comment:** The commenter requests that terms used in the draft technical guidance document (TGD) are defined; particularly those not already included in Chapter 252. Regulatory citations should also be added; including 40 CFR Part 136 and Part 141. The commenter recognizes that some references could be specific to a method and or program.

Throughout the guidance the terms "recommend" and "strongly recommend" are used. Please clarify what is meant by these terms. What do they mean and how are they different?

Page 1, 2.0: PWD requests that the publication date of Chapter 252 be added to the TGD. PADEP should clarify the date as to when the revisions were applied, promulgated and reflected/published in Chapter 252. This would be useful for anyone using this TGD and referencing Chapter 252.

Page 2, 3.1.2: It would be useful for PADEP to develop a guide similar to EPA's Guide to Drinking Water Sample Collection. A similar guide for Clean Water Act Samples would also be useful. These guides could further promote consistency across sample collection and handling practices in Pennsylvania. The following link is EPA's Guide to Drinking Water Sample Collection: https://www.epa.gov/sites/production/files/2015-11/documents/drinking_water_sample_collection.pdf

Page 7, 3.1.6.2: Please clarify "paired" sample requirements and possibly illustrate this through examples. Although some analyses for analytes are obtained from the same sample container, such as lead and copper, under the Lead and Copper Rule (LCR), not all paired samples are analyzed similarly. This should be clarified to avoid any confusion to those using the TGD to supplement existing requirements.

Page 14, 5.0: In the first paragraph it is stated, "The laboratory cannot bypass its normal/documented sample acceptance and receiving protocols. If short holding time samples are handled differently, then those procedures and practices must be documented, validated, and ensure compliance with applicable requirements".

PWD requests the following rewording: "If short holding time samples are handled differently, then those procedures and practices must be documented, validated, and ensure compliance with applicable requirements. The laboratory cannot bypass its normal/documented sample acceptance and receiving protocols." This language clarifies that the laboratory procedures just need to be documented; however implemented by the laboratory.

Page 19, 5.3.2.3: PWD requests the following language: Laboratories must document that samples are collected by trained laboratory personnel. In that case, the pH would not be required to be checked and verified by the subcontracted laboratory. Example: Samples are collected by accredited Laboratory A and analyzed by Laboratory B. Laboratory B would not be required to check and verify the pH of SDWA samples collected by the Laboratory A trained laboratory personnel.

Page 21, 5.4.1: The current requirement of testing every individual microbiological sample for a chlorine residual is problematic. There is an increased risk of sample contamination with this additional test. The financial cost of additional consumables combined with the environmental costs of exponentially more plastic waste should also be serious considerations for evaluating this requirement. As an alternative, that would preserve the spirit of this requirement, PWD recommends referencing the procedure set forth in TNI Standard EL-V1M5-2015-MWDS-11-21-14: TNI Volume 1, Module 5, Section 1.7.5.2 for Microbiological Testing.

Page 22, 5.4.2.3 and Page 26, 6.4.2: Do these sections of the guidance supersede the DEP requirement to request to report qualified data when a laboratory fortified matrix (LFM) recovery fails due to the expected and acceptable oxidation effect of chlorine on nitrite in the LFM sample?

Page 19, 6.5.1: The terms "sample" / "samples" and "result" / "results" seem to be used interchangeably when discussing invalidation in section 6.5 causing confusion. PWD requests that DEP uses terminology that properly describes the "sample" requirements versus the "result" requirements. This is applicable to all of 6.5.

Page 27, 6.5.1.1: Currently included in Section 6.5.1.1 of the TGD, it is stated that for the analysis of a non-compliant SDWA Microbiology sample yielding a positive result, 1-hr notification to the PWS and 24-hr written notification to DEP is required. Since Chapter 109 is referenced in 6.5.1 and there is discussion in section 6.5.1.1 of 1-hr notification to the PWS and 24-hr written notification to PADEP, then PADEP should specify within the TGD where those requirements/instructions are located both within Chapter 252 and Chapter 109.810. (1)

Response: Due to insufficient specificity in the request for definitions, the Department did not include a set of definitions separate from those included in 25 Pa. Code Chapter 252.

DEP does not intend to differentiate between "recommend" and "strongly recommend", thus the TGD was updated to only use "recommend".

- Page 1 – This TGD is published with an effective date and a citation to regulations in 25 Pa. Code Chapter 252. Given these parameters, it is not necessary to include a date which may eventually become inaccurate and misleading.

- Page 7 - "Paired" is defined on page seven, section 3.1.6.3.

- Page 14 - Per the commenter's suggestion, DEP amended language in paragraph one.

- Page 19 - The laboratory must check any samples not collected by their own trained staff. Samples collected by trained staff at another accredited lab must still be checked.

- Page 21 - The Department makes an allowance for the use an efficacy check to be performed per lot of sodium thiosulfate tablets. This allowance is for laboratories that collect the samples and take the field residual chlorine readings.

- Page 22 – The recommendations within this guidance document do not supersede regulatory requirements in 25 Pa. Code Chapter 252.

- Page 19 - Per your suggestion, DEP amended language in sections 6.5, 6.5.1, 6.5.1.2, 6.5.2, and 6.5.2.2.

- Page 27 – Per the commenter's suggestion, DEP has included references to Chapter 252 and 109 where appropriate.