



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
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INDEPENDENT REGULATORY
REVIEW COMMISSION

July 17, 2009

RegComments@state.pa.us

Federal Express

Pennsylvania Department of Environmental Protection
Environmental Quality Board
Rachel Carson Office Building, 16th floor
400 Market Street
Harrisburg, PA 17105-2301

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OFFICIAL

RE: Comments on the Proposed Laboratory Regulations, Chapter 252

Dear Ladies and Gentlemen:

Please consider these comments on the proposed Environmental Laboratory Accreditation Regulations of June 20, 2009.

1. The current regulations should allow additional time to replace a laboratory supervisor. The revised regulations should extend the time to at least 90 days, instead of the current 30 days to find a supervisor. Small wastewater treatment laboratories that do not have several degreed chemists on staff do not have the depth to name a person on staff as a supervisor with the resignation of a supervisor. As the current "grandfathered" supervisors retire and/or seek other positions, it will be harder for the municipal sector to quickly hire qualified applicants. Likewise, in instances where the supervisor is an approved operator, not all laboratory technicians on staff have their operator licenses. Consideration should be made to allow supervisors to take a test in the laboratory methods to be certified as a supervisor. As an example, DELCORA has three laboratory technicians. Each technician has at least 20 years of lab experience, but they do not currently have an operator's license. We are currently evaluating having them trained to take the operator's exam. This does not have anything to do with their current job requirements, yet it would allow DELCORA to have back-up supervisors. However, the operator's exam is not related to laboratory knowledge and expertise. There needs to be a way to certify supervisors with a specific laboratory test to allow those with extensive experience to be qualified.

ADMINISTRATION

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2. The current regulations require extensive education for the laboratory supervisor or the operator's exam. Additional education has been added at 252.302 to require that supervisors have four semester hours of general microbiology. Now, in addition to the chemistry credits, supervisors must have educational credits in microbiology. This puts an additional burden on wastewater treatment plants that now have one person in charge of the laboratory.
3. The quality control requirements in the regulations are extensive. The PADEP should consider additional training to allow the small water and wastewater treatment plants to continue to operate their laboratories. The requirements may be forcing plants to abandon their laboratories and contract work out at a high cost to utility customers. There needs to be a balance on quality control. There should be consideration for more outreach to help the small laboratories.

Please contact me at 610-876-5523, ext 116 if you require additional information on these comments. Thank you for your attention.

Sincerely,

A handwritten signature in cursive script that reads "Christine Volkay-Hilditch".

Christine Volkay-Hilditch, P.E., DEE
Director of Engineering

CVH:smf

cc: File