



HYGIENIC LABORATORY

**Iowa's Environmental and
Public Health Laboratory**

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July 8, 2005

Ms. Lee Ann Byrd
EPA Office of Homeland Security (1109A)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Byrd:

The University Hygienic Laboratory, the state of Iowa's *Environmental and Public Health Laboratory*, at the University of Iowa is submitting written comments associated with the July 15th, 2005 EPA Science Advisory Board (SAB) public meeting of the Homeland Security Advisory Committee with this letter. As the state environmental and public health laboratory, we have several concerns about EPA roles within the mission critical areas (MCAs) and the relationship of those roles with state laboratories in regard to chemical terrorism preparedness.

We, the state laboratory, have and continue to receive considerable assistance from the Centers for Disease Control and Prevention (CDC) related to preparing for a potential terrorism event. Through their cooperative agreement program, the CDC has provided funds to the states to hire highly skilled staff, obtain instruments, purchase analytical standards, and attend training courses associated with the determination of chemical agents or their metabolites in clinical samples. The CDC has also developed the methods, provides proficiency samples or funding to purchase proficiency samples, provides oversight of the proficiency program and determines whether laboratories are 'qualified' to provide analytical capacity to the CDC should an event occur. Our laboratory receives a multitude of suspicious powder samples from throughout the state to determine if the powder is a biological or chemical threat to public health. For biological parameters, we follow Laboratory Response Network (LRN) procedures provided by the CDC; however for chemicals, there are no existing guidelines or standards for identifying chemical agents in these and other environmental samples. We gratefully acknowledge EPA's recent assistance in establishing triage guidelines for processing 'unknown' samples and fully support the Water Alliance concept. We also recognize that the EPA has received very little if any funding support for terrorism preparedness.

The Federal Register announcement states, *EPA's roles within the MCAs include protection of critical infrastructure including water and wastewater industries; aiding other federal agencies in the protection of the chemical, food, transportation, and energy sectors; responding and recovering from any chemical, biological, radiological, or nuclear terrorist events; providing environmental expertise to support federal law enforcement activities; improving compliance monitoring and surveillance of imports in U.S. ports of entry; and synthesizing and communicating complex information related to human health and the environment. Additionally, EPA is committed to protecting its own personnel and infrastructure and conducting internal*

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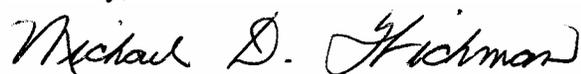
evaluations of the Agency's homeland security activities to determine if objectives are achieved.
As the state laboratory, we have many similar critical areas of concern. We are involved in drinking water, wastewater analysis, air and other environmental analysis as needed by the public, private or government sectors. We are very concerned about our ability to respond and recover from any chemical, biological, radiological, or nuclear terrorist events. While we recognize that we will be called upon to provide analytical determinations of both clinical and environmental samples should an event occur, we can provide limited assistance with the analysis of clinical specimens and simply are not prepared for analysis of environmental samples contaminated with chemical agents. We have grave concerns about protecting our personnel and infrastructure when responding to terrorist events. We believe that the EPA has the responsibility to provide guidance and assistance to the state laboratories.

We respectfully request the EPA Homeland Security Advisory Committee provide the following to state environmental and public health laboratories:

- Develop methods for the determination of chemical agents in environmental samples.
- Provide training courses to state laboratory personnel in order that the methods can be implemented in each state.
- Provide dilute analytical standards of chemical agents to state laboratories.
- Develop a validation program to ensure that the state laboratories have properly implemented and validated the methods within their laboratory.
- Provide assistance, funding permitting, to provide funds necessary to state laboratories to hire staff and obtain necessary instrumentation for the determination of chemical agents in environmental samples.
- Develop a proficiency testing program, including provision of proficiency testing samples, to assess competence of state laboratories performing testing of environmental samples for chemical agents
- Develop and conduct a certification or qualification program for state laboratories associated with testing environmental samples for chemical agents.

We appreciate the opportunity to provide comments to the EPA Homeland Security Advisory Committee for consideration during the July 15th meeting. If you have any questions please call me at 319-335-4479 or contact me via email at michael-wichman@uiowa.edu.

Sincerely,



Michael D. Wichman, Ph.D.
Senior Program Manager
Environmental Health Programs

c: Dr. Mary J. R. Gilchrist, UHL Director