

commentletters



From: Justin Livesay <jlivesay@avek.org>
Sent: Thursday, September 15, 2016 4:02 PM
To: commentletters
Subject: Comment Letter - ELAP Regulations Development/Laboratory Standard

Follow Up Flag: Follow up
Flag Status: Flagged

Dear State Water Board Members:

On Wednesday, September 7th notice was given of the opportunity for public comment and workshop to hear the preliminary staff recommendation for a new CA ELAP laboratory accreditation standard. While this announcement provides one month for stakeholders with the ability to attend the workshop in person to provide educated oral comments – it leaves the vast majority without the opportunity to travel only seven working days to review the proposed standard and formulate comments. This timeline is entirely too short to obtain the standard and review it thoroughly. It is true that the TNI standard has been a proposed option for some time, but there has been contentious debate among ELTAC members - and after ELTAC voted in favor of using an alternate standard and did not achieve a majority in favor of the TNI standard it did not seem that it was a viable option worthy of purchasing.

It seems that this option is being recommended for its perceived expediency, which should not be the driving factor in this very important decision. The Expert Review Panel identified many deficiencies within ELAP which had nothing to do with which standard was being used. I applaud the effort that ELAP and the Water Board has made in making significant progress in correcting these internal deficiencies. As such, there should be no rush to adopt a standard for a program that is already well on the path to improvement.

I cannot support the recommendation of a standard without knowing the contents and implications, and I cannot know the contents or implications without sufficient time to review the proposed standard.

I ask that the workshop and thus, the deadline for written comments please be extended to allow time for stakeholders to review the 2016 TNI Volume 1 requirements so that we may formulate meaningful comments on the impact that it may have on our individual operations.

Sincerely,

Justin Livesay
Laboratory Director
Antelope Valley-East Kern Water Agency (ELAP #1460)
6500 West Avenue N
Palmdale, CA 93551
661.943.3201
661.943.3204 (fax)