

October 17, 2016

Public Comment
ELAP Regulations Development/Laboratory Standard
Deadline: 10/20/16 12:00 noon

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



By E-mail to: commentletters@waterboards.ca.gov

Subject: Comment Letter – ELAP Regulations Development / Laboratory Standard

Dear Chair Marcus and Members of the Board:

The California-Nevada Section of AWWA (CA-NV AWWA) is a nonprofit, member association of the professional water community. Our approximately 5,000 members in California include water suppliers for over 95 percent of the state's population, and dozens of our members operate laboratories that range widely in size and tests performed. CA-NV AWWA appreciates this opportunity to provide comments on California Environmental Laboratory Accreditation Program (ELAP) regulations development and ELAP's recommendation to adopt the 2016 NELAC Institute (TNI) Standard, Volume 1.

CA-NV AWWA supports the adoption of laboratory standards which will meet California's entire environmental laboratory community of large and small, commercial and municipal laboratories. Many laboratories contract for work outside the state of California; however, the majority of laboratories only perform "In-House" analysis to support their own operations. We feel the 2016 TNI Standard is not the best option available for all laboratories and data users.

We recommend the SWRCB require ELAP to offer more than one type of accreditation. One could be the full 2016 TNI Volume 1 option to support the labs requiring that type of documentation of data quality. The other could be a modified TNI or other standard which would be a California only option that would waive certain TNI 2016 requirements that may not be applicable based on the Fields of Testing that each laboratory is certified to perform.

Small and municipal laboratories may be adversely affected by adoption of a full TNI requirement. Some portions of the TNI standard are redundant and onerous for small municipal labs which may perform only one or two Fields of Testing (FOTs). We are concerned small municipal laboratories that provide data for process control purposes will drop their certification rather than bear the additional costs to meet added TNI requirements.

This will result in a loss of outside oversight of small laboratories that exist only for process control purposes.

Allowing a California-only standard (modified TNI or other) for labs that perform most analyses for process control maintains protection of public and environmental health. We are concerned that a full scale TNI requirement would result in closures of many small labs due to increased costs of maintaining compliance with all parts of the standard. Closures of small municipal labs would mean a decrease in process data provided to operators and a slower response time for quality data to be provided to operators. We feel that the ELTAC committee is best qualified to perform an in-depth review of TNI 2016 and make suggestions to pare down TNI 2016 requirements to aid ELAP in drafting a California only standard that works for small laboratories.

We support a requirement for analysts or operators performing lab analyses to be certified appropriate to the FOTs the lab maintains. Certification and continuing education requirements – such as the Water Quality Laboratory Analyst certification of CA-NV AWWA – improve the quality of lab data.

CA-NV AWWA appreciates this opportunity to share our views with the Board, and we thank you for the careful consideration of our comments.

Sincerely,



Timothy Worley
Executive Director