

California Environmental Laboratory Accreditation Program

Environmental Laboratory
Technical Advisory Committee (ELTAC) Meeting

January 4, 2017





EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

Division of Drinking Water

NOTICE OF ENVIRONMENTAL LABORATORY TECHNICAL ADVISORY COMMITTEE (ELTAC) MEETING

January 4, 2017
10:00 a.m. – 5:00 p.m.
(or until completion of business)

Location 1	Location 2
California Environmental Protection Agency Building	Metropolitan Water District of Southern California – La Verne
1001 I Street, Sierra Hearing Room	700 Moreno Avenue, Weymouth Room
Sacramento, CA 95814	La Verne, CA 91750

The Environmental Laboratory Accreditation Program (ELAP) will host a meeting of its technical advisory committee, as noted above. The notice and agenda for this meeting and others can be found at www.waterboards.ca.gov/elap. For further information regarding this agenda, see below or contact ELAP at elapca@waterboards.ca.gov or (916) 323-3431.

This meeting is available via webcast at <https://video.cal.epa.gov>.

AGENDA

ITEM #1 - Call to Order/Roll Call

ITEM #2 - Public Comments on Items Not on Agenda
(The Committee will not take any action but will consider placing any item raised on the agenda at a future meeting.)

ITEM #3 – Summary of November 2, 2016 Meeting and Approval of Minutes

ITEM #4 – DELAPO Report

ITEM #5 – Informational Item – 2017 Method Update Rule

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | www.waterboards.ca.gov



ITEM #6 – Unfinished Business

1. Assessor Checklists
2. Modifications to the TNI Standard
3. Fee Structure

ITEM #6 – Close – Review Action Items

Action may be taken on any item on the agenda. The time and order of agenda items are subject to change at the discretion of the ELTAC Chair and may be taken out of order. The meeting will be adjourned upon completion of the agenda, which may be at a time earlier or later than posted in this notice.

In accordance with the Bagley-Keene Open Meeting Act, all meetings of ELTAC are open to the public.

Government Code section 11125.7 provides the opportunity for the public to address each agenda item during discussion or consideration by ELTAC prior to ELTAC taking any action on said item. Members of the public will be provided appropriate opportunities to comment on any issue before ELTAC, but the ELTAC Chair may, at his or her discretion, apportion available time among those who wish to speak. Individuals may appear before ELTAC to discuss items not on the agenda; however, ELTAC can neither discuss nor take official action on these items at the time of the same meeting [Government Code sections 11125 and 11125.7(a)].

The meeting locations are accessible to the physically disabled. A person who needs a disability-related accommodation or modification in order to participate in the meeting may make a request by contacting Katelyn McCarthy at (916) 322-7902 or emailing katelyn.mccarthy@waterboards.ca.gov. Providing your request at least five business days before the meeting will help to ensure availability of the requested accommodation.

Webcast Information

Webcast	https://video.cal.epa.gov
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**ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM
ELTAC MEETING**

Wednesday January 4, 2017 – 10:00 a.m.
1001 I Street, Sierra Hearing Room
Sacramento, CA 95814

And
Metropolitan Water District of Southern California
700 Moreno Avenue
La Verne, CA 91750

Meeting Agenda

TIME	AGENDA ITEM	PRESENTER(S)
10:00am	Call to Order <i>Objective: Roll call.</i>	Andy Eaton, <i>Chairperson</i>
10:05am	Public Comments on Items not on Agenda	Open
10:10am	Summary of November 2, 2016 Meeting & Approval of Minutes <i>Objective: Amend or approve minutes.</i>	Andy Eaton
10:20am	DELAPO Report <i>Objective: Update members on recent developments and activities.</i>	Christine Sotelo, <i>DELAPO</i>
10:30am	Informational Item – 2017 US EPA Method Update Rule <i>Objective: Provide information to committee members.</i>	Christine Sotelo
10:45am	Assessor Checklists <i>Objective: Decide when the committee would like to discuss checklists.</i>	Christine Sotelo

11:00am	Modifications to the TNI Standard <i>Objective: Update the committee on the status of proposed modifications from the November 2nd meeting and discuss further recommendations.</i>	All Members
12pm-1pm	Lunch	
1:00pm	Modifications to the TNI Standard Continued <i>Objective: Update the committee on the status of proposed modifications from the November 2nd meeting and discuss further recommendations.</i>	All Members
TBD	Fee Structure <i>Objective: Introduce fee structure topic.</i>	All Members
4:45pm	Close – Review Action Items <i>Objective: Review any assignments generated during the meeting.</i>	Andy Eaton
5:00 pm	Adjourn	

Welcome Environmental Laboratory Technical Advisory Committee

January 4, 2017

Accomplishments from Last Meeting

- You voted on **46** proposals for modification of the TNI Standard
- Also provided **82** proposals that were not voted on

Today's Focus

- We will share with you SAPC's recommendations on the proposals you put forward
- Provide you with ELAP's determinations on 87 of your proposed modifications
 - Will ask for additional input from you on 37 more
- We also hope to begin discussions on fee structure

ITEM 1

Call to Order/Roll Call



ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM ELTAC MEETING

Wednesday, January 4, 2017 – 10:00 a.m.
1001 I Street, Sierra Hearing Room
Sacramento, CA 95814
And
700 Moreno Avenue, Weymouth Room
La Verne, CA 91750

MEETING PACKET

AGENDA ITEM #1

Call to Order/Roll Call

Name	Affiliation	Type	Present
Christine Sotelo	ELAP	DELAPO	
Katelyn McCarthy	ELAP, Scribe	Scribe	
Mindy Boele	CWEA	Rep	
Jill Brodt	Brelje and Race Laboratories	Rep	
Bruce Burton	Division of Drinking Water	SRAE	
Gail Cho	CA Dept. of Fish and Wildlife	SRAE	
Stephen Clark	Pacific EcoRisk	Rep	
Ronald Coss	CWEA	Rep	
Huy Do	CASA	Rep	
Andy Eaton	Eurofins Eaton Analytical	Rep	
Miriam Ghabour	Metropolitan Water District of Southern California	Rep	
Bruce Godfrey	ACIL	Rep	
Anthony Gonzales	CAPHLD	Rep	
Rich Gossett	Physis Environmental	Rep	
David Kimbrough	Pasadena Water and Power	Rep	
Mark Koekemoer	Napa Sanitation District	Rep	
Bruce LaBelle	Dept. of Toxic Substances Control	SRAE	
Allison Mackenzie	Babcock Laboratories	Rep	
Gilda Neshvad	Positive Lab Service	Rep	
Renee Spears	State Water Resources Control Board	SRAE	

Abbreviation	Member Type
DELAPO	Designated ELAP Officer, nonvoting
Scribe	Minutes (non-member)
SRAE	State Regulatory Agency Employee, nonvoting
Rep	Representative Member, voting

ITEM 2

Public Comments on Items
Not on Agenda

Public Comments on Items Not on Agenda

Members of the public may address the Environmental Laboratory Technical Advisory Committee (ELTAC) regarding items that are not contained in the meeting agenda at this time.

However, ELTAC may not discuss or take action on any item raised during this public comment session, except to decide whether to place the matter on the agenda of a future meeting [Government Code sections 11125 and 11125.7(a)].

ITEM 3

Summary of November 2nd Meeting and Approval of Minutes

Approval of Minutes from November 2, 2016 Meeting

The Environmental Laboratory Technical Advisory Committee (ELTAC) is asked to review and approve the November 2, 2016 Meeting Minutes.

Attachment:

Draft Minutes from November 2, 2016 ELTAC Meeting

CALIFORNIA ENVIRONMENTAL LABORATORY TECHNICAL ADVISORY COMMITTEE (ELTAC)
COMMITTEE MEETING MINUTES
November 2, 2016

More information on the Environmental Laboratory Accreditation Program (ELAP) and previous ELTAC meetings can be found at <http://www.waterboards.ca.gov/elap>.

CALL TO ORDER

Chairperson Andy Eaton called the meeting to order on November 2, 2016 at 10:12 a.m. at the California Environmental Protection Agency Headquarters, 1001 I Street, Coastal Hearing Room, Sacramento, CA 95814 and the Metropolitan Water District of Southern California, Room US2135, 700 N. Alameda Street, Los Angeles, CA 90012.

COMMITTEE MEMBERS PRESENT

DELAPO: Christine Sotelo

Representatives:

Mindy Boele
Jill Brodt
Stephen Clark
Ronald Coss
Huy Do
Andy Eaton
Miriam Ghabour
Rich Gossett
David Kimbrough
Mark Koekemoer
Allison Mackenzie
Guilda Neshvad

State Regulatory Agency Employees:

Bruce Burton
Gail Cho
Bruce LaBelle
Renee Spears

Not Present:

Bruce Godfrey
Anthony Gonzalez

OTHER STAFF PRESENT

Scribe: Katelyn McCarthy

ELAP: Maryam Khosravifard, Jacob Oaxaca

ANNOUNCEMENT

- *Evacuation information in case the fire alarm goes off during the meeting.*
- *The Committee meeting is being webcast and recorded.*

COMMITTEE MEETING

PUBLIC FORUM

Any member of the public may address and ask question of the Committee relating to any matter within ELTAC's scope provided the matter is not on the agenda, or pending before the Advisory Committee.

COMMITTEE BUSINESS

ITEM #1 - Call to Order/Roll Call

ITEM #2 - Public Comments on Items Not on Agenda

(The Committee will not take any action but will consider placing any item raised on the agenda at a future meeting.)

- *Mark Bartson, Division of Drinking Water, SWRCB, spoke. The committee was asked to provide feedback on a survey regarding the 1,2,3 TCP MCL. Plans were made to email the draft survey to committee members.*

ITEM #3 – Approval of Amended Minutes from August 24, 2016 Meeting

Motion: Member Clark motioned to adopt the minutes.

Seconded by: Member Mackenzie

MOTION CARRIED: November 2, 2016

Aye: Member Boele
Member Brodt
Member Clark
Member Coss
Member Do
Member Eaton
Member Ghabour
Member Gossett
Member Kimbrough
Member Koekemoer
Member Mackenzie
Member Neshvad

Nay: None

Absent: Member Godfrey
Member Gonzales

Abstain: None

ITEM #4 – DELAPO Report

- *DELAPO Christine Sotelo spoke about ELAP's progress:*
 - *ELAP hired a Supervisor for the Proficiency Testing Unit, Dr. Christopher Ryan*
 - *ELAP appointed Jacob Oaxaca ELAP's Quality Assurance Officer*
 - *ELAP is in the process of interviewing for five new assessor positions and a Supervisor for the Glendale Field Office*
 - *ELAP's assessor training contract is expected to be awarded in mid-February.*
 - *ELAP created 11 additional Standard Operating Procedures. Sotelo briefly summarized them from the list that was included in the meeting materials. Suggestions were made by committee members about additional SOPs needed (management review), and the organization of the existing SOPs.*
 - *ELAP had selected a laboratory accreditation standard and presented their recommendation to the State Water Resources Control Board members and the public at an informational workshop on October 4th in Sacramento.*

ITEM #5 – Unfinished Business – Laboratory Accreditation Standard

DELAPO Christine Sotelo requested ELTAC work on creating a table of recommendations for modification of the TNI Standard document that were made during the meeting. She requested the table include: the section of the standard to be modified, a short summary of the content of that section, the proposed modification, a rationale for the proposal, and the number of ELTAC members in agreement.

This work product, including vote counts, is attached to this minute document as a table titled "PROPOSED MODIFICATIONS TO TNI VOLUME 1, PREPARED BY: ENVIRONMENTAL LABORATORY TECHNICAL ADVISORY COMMITTEE".

ITEM #6 - Close

ADJOURNMENT

The Committee adjourned at 5:08pm.

DRAFT

PROPOSED MODIFICATIONS TO TNI VOLUME 1
PREPARED BY: ENVIRONMENTAL LABORATORY TECHNICAL ADVISORY COMMITTEE

TNI Section	Summary	Modification	Rationale	# in Agreement
Module 2				
2.0	references other documents	defer to SAPC to judge if the documents are indispensable	not indispensable	9 (in favor) 2 (against) 1 (absent)
4.1.4	requires lab to make a list of potential conflicts of interest	delete	no definition of what conflict of interest is. Covered under mandatory ethics training	8 (in favor) 2 (against) 2 (absent)
4.1.5 (b)	requires lab to have documentation ensuring mgmt. and personnel are free from undue influence	delete	too broad	8 (in favor) 2 (against) 2 (absent)
		modify - strike "have arrangements to"	is necessary to avoid fraudulent actions	9 (in favor) 1 (against) 2 (absent)
4.1.5 (c)	requires procedures for protecting customer information	delete	outside regulatory authority of ELAP	9 (in favor) 1 (against) 2 (absent)
4.1.7.1 (d)	additional requirements for lab	delete	Difficult for 1-2 person lab to comply with. Problem with "documented training"	10 (in favor) 2 (against)
		delay until ELAP can offer better definition of expectation		
4.1.7.2 (d)	requires that separate facilities have separate technical managers	delete	expense to muni labs, cause small labs to revoke ELAP cert (labs won't be overseen by the state), doesn't solve the problem	8 (in favor) 4 (against)
4.1.7.2 (e)	requirements for when tech. mgr. is out for extended period of time	delete timeframe for notification, require an alternate when on leave		10 (in favor) 2 (against)
		delete and replace with current ELAP language	ELAP language is more stringent	
4.3	document control	delay for 3 years	excessive effort	11 (in favor) 1 (abstained)

PROPOSED MODIFICATIONS TO TNI VOLUME 1
PREPARED BY: ENVIRONMENTAL LABORATORY TECHNICAL ADVISORY COMMITTEE

TNI Section	Summary	Modification	Rationale	# in Agreement
4.5 etc.	requires all labs used for subcontracting to be ISO certified	modify - striking ref. to ISO and replacing with CA standard	CA certified labs should be able to send samples to other CA certified labs	10 (in favor) 2 (against)
		any place where ref to ISO, replace with Title 22		
4.6	requires documenting purchasing process for services and supplies	delete	methods already have policies to ensure quality of supplies	9 (in favor) 2 (against) 1 (abstained)
4.8, 4.11, 4.12, 4.13, 4.15	documentation requirements	delay - ELAP provide training and support documents	imperative for implementation	12
4.14.5 (c)	requires annual internal audits	modify - require internal audits during years ELAP is not performing assessment	excessive effort	9 (in favor) 2 (against) 1 (abstained)
5.2.6 (all)	requires B.S degree as a condition of being technical manager or lab director	delete - use current CA language	requiring a B.S. degree eliminates qualified candidates. CWEA/AWWA certificates would not be valid	8 (in favor) 3 (against) 1 (abstained)
5.4	conditions for approval of use of non-standard methods	delete	labs should not be able to use non-standard methods without prior approval	8 (in favor) 2 (against) 1 (abstained) 1 (absent)
		if not deleted then modify - add ELAP/SAPC/EPA can approve methods	non-standard methods should require approval from State Agency	9 (in favor) 2 (against) 1 (absent)
5.6.2.1 and related sections	requirements for calibration labs	delete	not applicable - ELAP labs are not calibration labs	8 (in favor) 3 (against) 1 (abstained)
5.6.3.4	requires documentation of procedures for transport and storage of reference standards	delete	already in the method	7 (in favor) 5 (against)
5.6.4.1	sentence that proceeds subsection (a) is broad	delete sentence that precedes subsection (a)	too broad	7 (in favor) 4 (against) 1 (abstained)
5.6.4.2	sentence that proceeds subsection (a) is broad	delete sentence that precedes subsection (a)	too broad	7 (in favor) 5 (against)

PROPOSED MODIFICATIONS TO TNI VOLUME 1
PREPARED BY: ENVIRONMENTAL LABORATORY TECHNICAL ADVISORY COMMITTEE

TNI Section	Summary	Modification	Rationale	# in Agreement
5.6.4.2 (f)	allows labs to use standards after expiration date if reliability is verified	modify - delete "if reliability is verified"	standards should not be used after expiration date	3 (in favor) 8 (against) 1 (abstained)
5.8.9 (c)	requires documentation for procedure of sample disposal	delete	outside regulatory authority of ELAP	8 (in favor) 4 (against)
Module 4				
1.5.2.1.1 (Notes)	gives lab the option to use EPA MDL procedures	modify - require use of EPA MDL procedure		
1.7.1		delete last sentence of first paragraph 1.7.1		8 (in favor) 3 (against) 1 (abstained)
1.7.1.1 (f)	requires labs to use a minimum number of calibration standards	modify - only when the method does not specify then the section applies	method already specifies the minimum number of calibration points	
1.7.2.3.3	requires surrogates for all samples, standards, and blanks	delete	method already specifies when surrogates are appropriate	8 (in favor) 2 (against) 2 (absent)
1.7.2.4	requires documentation of procedure for data reduction	modify - strike "such as use of linear regression"	too specific, should be broad	10 (in favor) 2 (against)
1.7.3.2 (b)	allows LCS to have certain # of analytes outside of acceptance range of method and still report results without corrective action	delete	any failure should require investigation/corrective action	4 (in favor) 8 (against)
Multiple Modules				
Module 1 - 4.2.4, 4.3.5, 4.3.7 (a,b,c); Module 2 - 5.9.3; Module 4 - 1.5.2.1, 1.5.2.2	requires that lab determine an LOQ for every analyte	remove any reference to LOQ and replace with something more specific to CA regulatory agency needs (for example DLR for DW). ELTAC will work with SAPC	confusing and non-productive	8 (in favor) 2 (against) 2 (absent)

PROPOSED MODIFICATIONS TO TNI VOLUME 1
PREPARED BY: ENVIRONMENTAL LABORATORY TECHNICAL ADVISORY COMMITTEE

TNI Section	Summary	Modification	Rationale	# in Agreement
Module 2 - 3.1 Module 4 - 1.5.2.1.2, 1.5.2.2.2, 1.7.1.2	verification requirements	remove any reference to MDL as currently specified; work with SAPC to come up with solution that more adequately meets their needs		8 (in favor) 2 (against) 2 (absent)

ITEM 4

DELAPO Report

Christine Sotelo, CA ELAP

ELAP Progress

- Finalized Quality Assurance Manual
 - Implementing our quality management system and SOPs
- Staffing Changes
 - We hired two new staff in Sacramento
 - We hired a supervisor for the Glendale Field Office – Maria Friedman
- Training contract is open for bids
 - Expected to be awarded in February
- US EPA Audit conducted our audit

US EPA Audit – Nov. 16-18

- Still waiting on report, but they gave us positive verbal feedback
 - Identified how much improvement the program is making
- Identified three areas they want us to improve on
 - Documentation
 - Reciprocity
 - Checklists
- We are prepared to take corrective actions once we receive report

Designated ELAP Officer (DELAPO) Report

ITEM 5

Informational Item

2017 Method Update Rule

**INFORMATIONAL ITEM - 2017 United States Environmental Protection Agency
(US EPA) Method Update Rule (MUR)**

Attachment:

Summary of 2017 MUR, drafted by Jerry Parr, Catalyst Information Resources

EPA Finalizes Changes to Part 136 Affecting Laboratories that Perform Water Testing

By Jerry Parr, Catalyst Information Resources

December 18, 2016

EPA has finalized a Methods Update Rule (MUR) that:

- Replaced Methods 608, 624, and 625 with updated versions of these methods,
- Approved over 100 methods published by ASTM International, *Standard Methods*, several vendors and other organizations,
- Clarified the procedures for EPA approval of nationwide and limited use ATPs,
- Amended the procedure for determination of the method detection limit (MDL) in Appendix B, and
- Made many other minor changes affecting methods, sample preservation and other issues.

A pre-publication version of this proposed rule has been posted at the website below and a summary of the proposed rule is provided below. Copies of Methods 608.3, 624.1, 625.1, the new MDL procedure and the revised language in Part 136, highlighting the changes, are available from Catalyst on request. A webinar on the new rule is being planned for early January.

<https://www.epa.gov/cwa-methods/methods-update-rule-2016>

Changes to Previously Approved EPA Methods

Methods 608, 624, and 625

- Substantive changes to both technology and QC have been made. Many improvements were made to the 2015 versions, but some changes will be controversial to both labs and permittees.

Method 611

- EPA corrected the analyte name for bis(2-chloroisopropyl)ether to 2,2'-oxybis(1-chloropropane), which matches the CAS Number 108-60-1.

Methods 1600, 1603, 1680, and 1682

- EPA corrected minor typographical or other errors in methods 1600, 1603, 1680, and 1682 that EPA identified in the methods after publication.

New Versions of Approved Standard Methods

EPA approved new versions of the following currently approved Standard Methods:

9221 B, C, E, F-06	3500-As B-11	4500-NO ³⁻ D, E, F, H-11
9222 B, D, G-06	3500-Ca B-11	4500-Norg (B-D)-11
9230 B, C-07	3500-Cr B, C-11	4500-O B-G-11
2120 B, F-11	3500-Cu B, C-11	4500-P B (5), E-H-11
2130 B-11	3500-Mn B-11	4500 SO ²⁻ B-D, F, G-11
2310 B-11	3500-Na B-11	5210 B-11
2320 B-11	3500-Pb B-11	5220 B, D-11
2340 B-11	3500-V B-11	5310 B, D-11
2340 C-11	3500-Zn B-11	5520 B, F-11
2510 B-11	4110 B-D-11	5530 B, D-10
2540 B, C, D, E, F-11	4140 B-2011	5540 C-11
2550 B-10	4500-B B-11	6200 B, C-11
3111 B, C, D, E-11	4500-Cl ⁻ B-G-11	6440 B-05
3112 B-11	4500-CN ⁻ B-G-11	6630 B, C-07
3113 B-10	4500-F ⁻ B-E-11	6640 B-06
3114 B, C-11	4500-NH ₃ B-H-11	
3125 B-11	4500-NO ²⁻ B-11	
3500-Al B-11		

New Versions of Approved ASTM Methods

EPA approved new versions of the following currently approved ASTM methods:

D 511 – 09 (A, B)	D 3223 -12
D 516 – 11	D 3373 – 12
D 858 – 12 (A – C)	D 3557 – 12 (A – D)
D 859 – 10	D 4382 – 12
D 1067 – 11	D 4658 – 09
D 1068 – 10 (A-C)	D 5257 – 11
D 1126 – 12	D 5673 – 10
D 1179 – 10	D 5907 – 13
D 1246 – 10	D 6508 – 10
D 1688 -12 (A - C)	D 7284 – 13
D 1691 – 12 (A, B)	D 7511 – 12
D 1976 – 12	D 7065 – 11

New Methods

EPA added the following new methods

- USGS Methods I-2547-11 and I-2548-11, *Colorimetric Determination of Nitrate Plus Nitrite in Water by Enzymatic Reduction, Automated Discrete Analyzer Methods*, for nitrate, nitrite, and combined nitrate-nitrite. Method I-2548-11 is a low level (analytical range) version of Method I-2547-11.
- NECi Method N07-0003, *Method for Nitrate Reductase Nitrate-Nitrogen Analysis*;
- Timberline Instruments, LLC Method Ammonia- 001, *Determination of Inorganic Ammonia by Continuous Flow Gas Diffusion and Conductivity Cell Analysis*;
- IDEXX Laboratories, Inc. Colilert®-18, *Coliform/E. coli Enzyme Substrate Test for fecal coliforms in Wastewater*;
- NCASI Method TNTP-W10900, *Total (Kjeldahl) Nitrogen and Total Phosphorus in Pulp and Paper Biologically Treated Effluent by Alkaline Persulfate Digestion*;
- Hach Company Method 10242, *Simplified Spectrophotometric Measurement of Total Kjeldahl Nitrogen in Water and Wastewater*;
- Hach Company Method 10206, *Spectrophotometric Measurement of Nitrate in Water and Wastewater*.

Changes to Appendix B to 40 CFR part 136 - Definition and Procedure for the Determination of the MDL

EPA finalized revisions to the procedure for determination of the MDL primarily to address laboratory blank contamination and to better account for intra-laboratory variability. The revisions address the following issues and would add new requirements.

- Laboratories would be required to evaluate the MDL to account for background levels of contamination.
- If a laboratory uses MDL values that represent multiple instruments, then the laboratory would be required to calculate the MDL using spiked samples and blank samples from all of these instruments.
- Laboratories would be required to check their MDL values once a quarter.

Clarifications/Corrections to ATP Procedures

Parts 136.4 and 136.5 describe EPA procedures for obtaining approval to use an alternate test procedures either on a national basis, or for limited use by dischargers or facilities specified in the approval. In the 2012 Method Update Rule, EPA made several clarifying changes to the language of these sections. At the same time, however, in many places where the phrase “Regional Alternate Test Procedures Coordinator” or “Regional ATP Coordinator” appears, EPA inadvertently also inserted the phrase “or permitting authority” following the phrase. The effect of the change was to inadvertently authorize State permitting authorities to approve ATPs for limited use within the State. EPA never intended this. Consequently, EPA has deleted all instances of “or permitting authority” to correct this

error and revised the rule text to its original intent. Based on this revision, EPA and EPA alone would have the authority to approve limited use ATPs.

Other Minor Changes

EPA made several other minor changes, including:

- clarifying the language on the term “Director,”
- deleting the words “be sufficiently sensitive and” to eliminate unnecessary confusion,
- make a number of clarifications and corrections to its Whole Effluent Toxicity acute and chronic methods manuals,
- changing the Standard Method listed for *E. coli* most probable number (MPN) in Tables IA and IH,
- reinstating a line for Enterococci that was erroneously deleted in the 2012 Methods Update Rule.
- changing one of the Table IB hardness entries,
- editing Table IB, footnote 52 to show that a 1999 version of Method 300.1 is approved,
- removing the reference to costs in 40 CFR 136.3,
- adding rows to Table II that specify holding times for total/fecal coliforms, and fecal streptococci in Table IH,
- changing the sodium thiosulfate concentrations in Table II for bacterial tests from 0.0008% sodium thiosulfate to 0.008%, and
- re-inserting language that was accidentally deleted from footnote 5 of Table II.

ITEM 6

Unfinished Business

Assessor Checklists

Assessor Checklists

- Training Contract includes method checklists for ELAP
- We can re-evaluate need for review/corroboation once we receive them
- We would like to table this item until a later date

ITEM 6

Unfinished Business

Modifications to the TNI Standard

Process to Modify the TNI Standard

- ELTAC proposes modifications to ease implementation for labs
- The State Agency Partners verify that those modifications don't lessen the value of the program to them
- ELAP makes determination

Summary of ELAP Determinations

ELTAC Agreement

ELAP
Determination

	High (10 or more)	Medium (7-9)	Low (6 or fewer)	No Vote		Total
Accept	7	1	0	2		10
Agree to Minor Mods	3	15	0	23		41
Reject	1	6	0	29		36
Still Under Consideration	0	2	2	37		41

One ELTAC “High Agreement” modification was rejected

- Module 2, Section 4.1.7.1 (d) - Requiring QA managers to have documented QA/QC and quality systems training
- ELTAC proposed two modifications:
 - Delete section (10 votes in favor)
 - Delay requirement until ELAP defines what training is required (10 votes in favor)
- ELAP rejects the proposal to modify; accepts proposal to delay

3 “High Agreement” were accepted with modifications

- We agree that these sections could benefit from additional clarity or modification

1. Module 2, Section 4.1.7.2 (e) – Requirements for when technical manager is on leave

- ELTAC recommended using current ELAP language (defining qualifications of alternate and time frame for notification)
 - We accept the suggestion to modify the required qualifications
 - We are uncomfortable with allowing a 90 day extension for alternate

3 “High Agreement” proposals will be modified

2. Module 2, Section 4.5 – Requires all subcontracted laboratories to be ISO certified

- ELTAC suggested replacing all references to ISO with CA ELAP
- ELAP agrees that laboratories should be able to subcontract with other CA ELAP certified laboratories
- We will add that we will also accept laboratories accredited to the TNI or International Standard

3 “High Agreement” proposals will be modified

3. Module 4, Section 1.7.2.4 – Data reductions requirements

- ELTAC suggested striking the phrase “such as linear regression”
- ELAP agrees that the may be confusing as it only lists one specific activity
- ELAP will define all data reduction activities that must be documented

Mods still under consideration

- We request your feedback on 37 of the remaining modifications
 - Your feedback is part of our decision process
- We will inform the agency partners of your votes at their next meeting
- High agreement amongst ELTAC is a strong driving force for agency partners to recommend acceptance
 - This is opportunity for ELTAC to prioritize

Process moving forward

- We are looking for your feedback on 37 of the modifications still under consideration
- We will take these recommendations to the Agency Partners at their January meeting
- Will look for Expert Review Panel feedback on our determinations and consider changes based on feedback

Unfinished Business – Modifications to the TNI Standard

Attachments:

Bucket A – Accepted modifications

Bucket B – Agree to minor modifications

Bucket C – Rejected modifications

Bucket D – Modifications still under consideration

**BUCKET A
ACCEPTED MODS**

Item	Module	Section	Summary	ELTAC RECOMMENDATION	ELTAC AGREEMENT				SAPC RECOMMENDATION
					High	Med	Low	No Vote	
A	2	4.1.7.1 (d)	QA Manager training/experience	Delete	✓				REJECT
	2	4.1.7.1 (d)	QA Manager training/experience	Delay until ELAP defines expectations	✓				ACCEPT
B	2	4.3	Document Control	Rewrite / Revise / Reduce				✓	REJECT
	2	4.3	Document Control	Delay for 3 years	✓				ACCEPT
C	2	4.8	Complaints	Remove				✓	REJECT
	2	4.8	Complaints	Delay until ELAP can provide training and support documents	✓				ACCEPT
D	2	4.11	Corrective action (documentation requirements)	Delay until ELAP provides training and support documents	✓				ACCEPT
E	2	4.12	Preventive action (documentation requirements)	Delete or Revise				✓	REJECT
	2	4.12	Preventive action (documentation requirements)	Delay until ELAP provides training and support documents	✓				ACCEPT
F	2	4.13	Control of Records (documentation requirements)	Revise				✓	REJECT
	2	4.13	Control of Records (documentation requirements)	Delay until ELAP provides training and support documents	✓				ACCEPT
G	2	4.15	Management reviews (documentation requirements)	Remove				✓	REJECT
	2	4.15	Management reviews (documentation requirements)	Delay until ELAP provides training and support documents	✓				ACCEPT
H	2	5.6.4.1	Reference standards and reference materials	Delete sentence that precedes subsection (a)		✓			ACCEPT

**BUCKET A
ACCEPTED MODS**

Item	Module	Section	Summary	ELTAC RECOMMENDATION	ELTAC AGREEMENT				SAPC RECOMMENDATION
					High	Med	Low	No Vote	
	ELTAC HAS NOT VOTED ON THESE PROPOSED MODIFICATIONS								
I	2	4.1.5 (k)	Relevance of Activities	Delete				✓	ACCEPT
J	5	1.7.3.7 (b) (ii) (a)	Autoclaves	Delete				✓	ACCEPT

BUCKET B
AGREE MINOR MODIFICATIONS ARE NECESSARY

Item	Module	Section	Summary	ELTAC RECOMMENDATION	ELTAC AGREEMENT				SAPC RECOMMENDATION
					High	Med	Low	No Vote	
A	1	4.2.4	LOQ Requirements	Remove any reference to LOQ and replace with something more specific to CA regulatory agency needs (for example DLR for DW). ELTAC will work with SAPC		✓			ACCEPT
B	1	4.3.5	LOQ Requirements	Remove any reference to LOQ and replace with something more specific to CA regulatory agency needs (for example DLR for DW). ELTAC will work with SAPC		✓			ACCEPT
C	1	4.3.7 (and sub-sections)	LOQ Requirements	Remove any reference to LOQ and replace with something more specific to CA regulatory agency needs (for example DLR for DW). ELTAC will work with SAPC		✓			ACCEPT
D	2	2.0	Normative References	Delete or Include the Actual Requirements in the Regulations				✓	REJECT
	2	2.0	Normative References	Defer to SAPC		✓			ACCEPT
E	2	3.1	MDL Verification	Remove any reference to MDL as currently specified; work with SAPC to come up with solution that more adequately meets their needs		✓			ACCEPT
F	2	4.1.7.2 (e)	Requirements when Tech. Mgr. is absent > 15 days	Delete timeframe for notification, require an alternate when on leave	✓				ACCEPT
	2	4.1.7.2 (e)	Requirements when Tech. Mgr. is absent > 15 days	Delete and replace with current ELAP language	✓				
G	2	4.5	Subcontracting	Modify	✓				ACCEPT
H	2	4.14.5 (c)	Internal Audits	Remove				✓	REJECT
	2	4.14.5 (c)	Internal Audits	Modify - require internal audits during years ELAP is not performing assessment		✓			ACCEPT
I	2	5.2.6 (all)	Technical Manager Qualifications	Modify		✓			ACCEPT

BUCKET B
AGREE MINOR MODIFICATIONS ARE NECESSARY

Item	Module	Section	Summary	ELTAC RECOMMENDATION	ELTAC AGREEMENT				SAPC RECOMMENDATION
					High	Med	Low	No Vote	
J	2	5.4	Use of Non-Standard Methods	Delete		✓			REJECT
	2	5.4	Use of Non-Standard Methods	Modify		✓			ACCEPT
K	2	5.4	Requirements for calibration labs	Delete		✓			REJECT
	2	5.4	Requirements for calibration labs	Revise				✓	ACCEPT
L	2	5.4.6.1	Requirements for calibration labs	Delete		✓			REJECT
	2	5.4.6.1	Requirements for calibration labs	Revise				✓	ACCEPT
M	2	5.5	Requirements for calibration labs	Delete		✓			REJECT
	2	5.5	Requirements for calibration labs	Revise				✓	ACCEPT
N	2	5.6.2.1.1	Requirements for calibration labs	Delete		✓			REJECT
	2	5.6.2.1.1	Requirements for calibration labs	Revise				✓	ACCEPT
O	2	5.6.2.2.2	Requirements for calibration labs	Delete		✓			REJECT
	2	5.6.2.2.2	Requirements for calibration labs	Revise				✓	ACCEPT
P	2	5.9	Requirements for calibration labs	Delete		✓			REJECT
	2	5.9	Requirements for calibration labs	Revise				✓	ACCEPT
Q	2	5.9.3	LOQ Requirements	Remove any reference to LOQ and replace with something more specific to CA regulatory agency needs (for example DLR for DW). ELTAC will work with SAPC		✓			ACCEPT

BUCKET B
AGREE MINOR MODIFICATIONS ARE NECESSARY

Item	Module	Section	Summary	ELTAC RECOMMENDATION	ELTAC AGREEMENT				SAPC RECOMMENDATION
					High	Med	Low	No Vote	
R	2	5.10	Requirements for calibration labs	Delete		✓			REJECT
	2	5.10	Requirements for calibration labs	Revise				✓	ACCEPT
S	4	1.5.2.1	LOQ Requirements	Remove any reference to LOQ and replace with something more specific to CA regulatory agency needs (for example DLR for DW). ELTAC will work with SAPC		✓			ACCEPT
T	4	1.5.2.1.2	MDL Verification	Remove any reference to MDL as currently specified; work with SAPC to come up with solution that more adequately meets their needs		✓			ACCEPT
U	4	1.5.2.2	LOQ Requirements	Remove any reference to LOQ and replace with something more specific to CA regulatory agency needs (for example DLR for DW). ELTAC will work with SAPC		✓			ACCEPT
V	4	1.5.2.2.2	MDL Verification	Remove any reference to MDL as currently specified; work with SAPC to come up with solution that more adequately meets their needs		✓			ACCEPT
W	4	1.7.1	Calibration Requirements (for Chemistry Methods)	Delete last sentence of first paragraph 1.7.1		✓			ACCEPT
X	4	1.7.1.2	MDL Verification	Remove any reference to MDL as currently specified; work with SAPC to come up with solution that more adequately meets their needs		✓			ACCEPT
Y	4	1.7.2.4	Data Reduction	Modify - strike "such as use of linear regression"	✓				ACCEPT
	ELTAC HAS NOT VOTED ON THESE PROPOSED MODIFICATIONS								
Z	1	5.0	PT Frequency	Revise				✓	ACCEPT
AA	2	4.1.2	Reference to "International Standard"	Revise				✓	ACCEPT
AB	2	4.1.6	Staff Communication	Delete				✓	ACCEPT
AC	2	4.2.2.3	Reference to "International Standard"	Revise				✓	ACCEPT
AD	2	4.2.4	Staff Communication	Delete				✓	ACCEPT

BUCKET B
AGREE MINOR MODIFICATIONS ARE NECESSARY

Item	Module	Section	Summary	ELTAC RECOMMENDATION	ELTAC AGREEMENT				SAPC RECOMMENDATION
					High	Med	Low	No Vote	
AE	2	4.2.6	Reference to "International Standard"	Revise				✓	ACCEPT
AF	2	4.4	Review of Requests, Tenders and Contracts	Remove				✓	ACCEPT
AG	2	4.5.1	Reference to "International Standard"	Revise				✓	ACCEPT
AH	2	4.5.4	Reference to "International Standard"	Revise				✓	ACCEPT
AI	2	4.11.5	Reference to "International Standard"	Revise				✓	ACCEPT
AJ	2	4.14.1	Reference to "International Standard"	Revise				✓	ACCEPT
AK	2	5.2.6.1 (f)	Technical Manager Qualifications (for labs analyzing radon in air)	Remove				✓	ACCEPT
AL	2	5.4.1	Use of Non-Standard Methods	Modify				✓	ACCEPT
AM	2	5.5.1	Reference to "International Standard"	Revise				✓	ACCEPT
AN	2	5.8	Handling Samples	Remove and simplify and make more specific.				✓	ACCEPT
AO	2	5.10.7	Reference to "International Standard"	Revise				✓	ACCEPT

**BUCKET C
REJECTED MODS**

Item	Module	Section	Summary	ELTAC RECOMMENDATION	ELTAC AGREEMENT				SAPC RECOMMENDATION
					High	Med	Low	No Vote	
A	2	4.1.4	Conflicts of Interest	Delete		✓			REJECT
B	2	4.1.5 (b)	Undue Influence	Delete		✓			REJECT
	2	4.1.5 (b)	Undue Influence	Modify by removing "have arrangements to"		✓			REJECT
C	2	4.1.7.2 (d)	Shared Technical Management	Delete		✓			REJECT
D	2	4.6	Purchasing Procedures	Delete		✓			REJECT
E	2	5.6.3.4	Chemical Transport	Delete		✓			REJECT
F	2	5.8.9 (c)	Waste Disposal	Delete		✓			REJECT
G	4	1.7.2.3.3	Surrogates (for Chemistry Methods)	Delete		✓			REJECT
ELTAC HAS NOT VOTED ON THESE PROPOSED MODIFICATIONS									
H	2	4.1	Management System Improvement	Delete or Revise				✓	SAPC INPUT NOT REQUESTED
I	2	4.1.5 (d)	Impartiality	Delete				✓	SAPC INPUT NOT REQUESTED
J	2	4.1.5 (g)	Supervision of Staff	Delete				✓	REJECT
K	2	4.1.5 (i)	Direct Access to Management	Delete				✓	REJECT
L	2	4.1.7.1 (b)	QA Officer Functions	Delete				✓	REJECT
M	2	4.2.2	QA Manual Objectives	Delete or Revise				✓	REJECT

**BUCKET C
REJECTED MODS**

Item	Module	Section	Summary	ELTAC RECOMMENDATION	ELTAC AGREEMENT				SAPC RECOMMENDATION
					High	Med	Low	No Vote	
N	2	4.2.8.1	Data Integrity System and Data Integrity Investigations	Delete				✓	REJECT
O	2	4.2.3	Management Improvement	Delete				✓	REJECT
P	2	4.7.1	Client Service	Remove				✓	REJECT
Q	2	4.7.2	Client Service	Remove				✓	REJECT
R	2	4.9.1	Nonconforming Work	Delete or Revise				✓	REJECT
S	2	4.16	Data Integrity System and Data Integrity Investigations	Delete				✓	REJECT
T	2	5.2.3	Employment	Remove				✓	REJECT
U	2	5.2.1	Staff Competence	Remove				✓	SAPC INPUT NOT REQUESTED
V	2	5.2.2	Personnel Training Requirements	Remove				✓	SAPC INPUT NOT REQUESTED
W	2	5.2.7	Data Integrity Training	Remove or Revise				✓	REJECT
X	2	5.2.5	Authorized Personnel	Remove				✓	REJECT
Y	2	5.3	Laboratory Facilities	Remove or Modify				✓	REJECT
Z	2	5.4.2	Selection of Methods	Remove				✓	REJECT
AA	2	5.5.1	Instrument Calibration	Remove				✓	REJECT
AB	2	5.5.2	Instrument Calibration	Remove				✓	REJECT

**BUCKET C
REJECTED MODS**

Item	Module	Section	Summary	ELTAC RECOMMENDATION	ELTAC AGREEMENT				SAPC RECOMMENDATION
					High	Med	Low	No Vote	
AC	2	5.5.3	Instrument Calibration	Remove				✓	REJECT
AD	2	5.6.1	Measurement Traceability	Remove				✓	SAPC INPUT NOT REQUESTED
AE	2	5.9.1	Data Monitoring	Remove				✓	REJECT
AF	2	5.9.2	Quality Control Data	Remove				✓	REJECT
AG	2	5.9.3 (including all sub-sections)	Quality Control Procedures	Remove				✓	REJECT
AH	5	1.7.3.7 (a)	Laboratory Facilities (for Microbiology Methods)	Delete				✓	REJECT
AI	5	1.7.3.7 (b)(i)	Temperature Measuring Devices (for Microbiology Methods)	Delete				✓	REJECT
AJ	5	1.7.3.7 (b) (iii)	Volumetric Equipment	Delete				✓	REJECT

**BUCKET D
STILL UNDER CONSIDERATION**

Item	Module	Section	Summary	ELTAC RECOMMENDATION	ELTAC AGREEMENT				SAPC RECOMMENDATION
					High	Med	Low	No Vote	
A	2	5.6.4.2	Documentation and Labeling of Standards, Reagents, and Reference Materials	Delete sentence that precedes subsection (a)		✓			PENDING
B	2	5.6.4.2 (f)	Expiration of Standards	Modify			✓		PENDING
C	2	4.1.5 (c)	Customer Information	Delete		✓			REJECT
D	4	1.5.2.1.1 (Notes)	MDL Procedures	Modify	Vote not recorded				PENDING
E	4	1.7.1.1 (f)	Calibration Standards	Modify	Vote not recorded				PENDING
F	4	1.7.3.2 (b)	Marginal Exceedance for LCS	Delete			✓		PENDING
	4	1.7.3.2 (b)	Marginal Exceedance for LCS	Delete				✓	PENDING
ELTAC HAS NOT VOTED ON THESE PROPOSED MODIFICATIONS									
G	All	Notes	Notes provide clarification of the text	Revise				✓	PENDING
H	1	5.2.1.1	PT Assessments	Revise				✓	PENDING
I	2	3.1	Definition of MDL	Remove or Modify				✓	PENDING
J	2	3.1	Definition of Verification	Remove or Modify				✓	PENDING
K	2	4.1.5 (j)	Management Deputies	Delete				✓	PENDING
L	2	4.1.7.1 (c)	QA Officer Impartiality	Delete				✓	PENDING
M	2	5.1.1	Calibration and Test Items	Delete or Revise				✓	PENDING
N	2	5.4.3	Lab Developed Methods	Remove				✓	PENDING
O	2	5.4.4	Lab Developed Methods	Remove				✓	PENDING

**BUCKET D
STILL UNDER CONSIDERATION**

Item	Module	Section	Summary	ELTAC RECOMMENDATION	ELTAC AGREEMENT				SAPC RECOMMENDATION
					High	Med	Low	No Vote	
P	2	5.4.5	Lab Developed Methods	Remove				✓	PENDING
Q	2	5.5.1	Calibration and Test Items	Delete or Revise				✓	PENDING
R	2	5.7	Sample Collection	Remove				✓	PENDING
S	2	5.8	Calibration and Test Items	Delete or Revise				✓	PENDING
T	2	5.10	Calibration and Test Items	Delete or Revise				✓	PENDING
U	2	5.10	Reporting the Results	Remove				✓	PENDING
V	4	1.5.2.1	MDL	Remove or Modify				✓	PENDING
W	4	1.5.2.1.1	MDL	Remove or Modify				✓	PENDING
X	4	1.5.2.1.2	MDL	Remove or Modify				✓	PENDING
Y	4	1.5.2.1.2	Ongoing verification of MDL	Remove or Modify				✓	PENDING
Z	4	1.5.2.1.3	MDL	Remove or Modify				✓	PENDING
AA	4	1.5.2.2.1	Initial verification of LOQ	Remove or Modify				✓	PENDING
AB	4	1.5.2.2.2	Ongoing verification of LOQ	Remove or Modify				✓	PENDING
AC	4	1.5.2.3	Verification of MDL/LOQ	Remove or Modify				✓	PENDING
AD	4	1.7.1.1	Initial Calibration	Remove				✓	PENDING
AE	4	1.7.1.1 (n)	Initial calibration verification	Remove or Modify				✓	PENDING
AF	4	1.7.1.2	Continuing calibration verification	Remove or Modify				✓	PENDING

**BUCKET D
STILL UNDER CONSIDERATION**

Item	Module	Section	Summary	ELTAC RECOMMENDATION	ELTAC AGREEMENT				SAPC RECOMMENDATION
					High	Med	Low	No Vote	
AG	4	1.7.2	Sample Specific Controls	Remove				✓	PENDING
AH	4	1.7.2.3.1	Matrix Spike/Matrix Spike Duplicates (for Chemistry Methods)	Remove				✓	PENDING
AI	4	1.7.2.3.2	Matrix Duplicates (for Chemistry Methods)	Remove				✓	PENDING
AJ	4	1.7.2.3.3	Surrogate Spikes	Remove				✓	PENDING
AK	4	1.7.3	Data Acceptance/Rejection Criteria	Remove				✓	PENDING
AL	4	1.7.3.1	Negative Controls	Delete				✓	PENDING
AM	4	1.7.3.2 (a)	Positive Controls	Delete				✓	PENDING
AN	5	1.7.5.1	Sample Handling – Thermal Preservation	Delete				✓	PENDING
AO	5	1.7.5.2	Sample Handling - Dechlorination	Delete				✓	PENDING

ITEM 6

Unfinished Business

Fee Structure

Determining an equitable fee structure

- We presently have a fixed budget
 - Maybe this could change in the longer term, but that's not the discussion for today
- Our discussion today is about how we allocate that fixed budget across accredited laboratories

Three conceptual models

- Model 1 – Everyone pays equally
 - Total Budget = \$3,347,000
 - Number labs Accredited = 714
 - Cost per lab = \$4,688
- Model 2 – Per Field of Testing (or Per Method) Fee
 - Total number FOTs/methods ELAP accredits – 2432/12,098
 - Cost per FOT/method - \$1,376/\$277
- Model 3 – Base + Per Field of Testing (or Per Method) Fee

Four workforce cost sectors

- Administrative
 - Relatively unaffected by size of program
- Assessment
 - Highly affected by number of accredited laboratories
- Monitoring (Proficiency Testing)
 - Moderately affected by number of labs
- Enforcement
 - Independent of program size

Unfinished Business – Fee Structure

ITEM 7

Close

TENTATIVE ELTAC CALENDAR

Key

Meeting Date	
Event	
Lab Accreditation Standard	
FOT Worksheets	
Fee Structure	
Communications Update	
Enforcement Briefing	
Other	

MARCH

S	M	T	W	Th	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

APRIL

S	M	T	W	Th	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29

NOVEMBER 2016

S	M	T	W	Th	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

2 ELTAC Meeting
Lab Accreditation Standard

MAY

S	M	T	W	Th	F	S
30	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

DECEMBER 2016

S	M	T	W	Th	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

JUNE

S	M	T	W	Th	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	

January 2017

S	M	T	W	Th	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

4 ELTAC Meeting
Lab Accreditation Standard
Fee Structure
Jan 31 – Feb 2 Expert Review
Panel Meeting

JULY

S	M	T	W	Th	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29

FEBURARY

S	M	T	W	Th	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28				

Jan 31 – Feb 2 Expert Review
Panel Meeting

AUGUST

S	M	T	W	Th	F	S
30	31	1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		