

Summary to ELTAC of Proposed Modification Comments from Stakeholders

November 2, 2016

Section	Comment	#
General Comment	Modify lab director qualifications	4
General Comment	Modify internal audit requirement	2
General Comment	Modify data review requirement	1
General Comment	Modify documentation reqs to be less burdensome to small laboratories	10
General Comment	Exempt municipal labs if following agency procedures for contracts, purchasing, hiring/termination of employees	1
General Comment	Exempt municipal labs from requirement for separate technical manager for multiple facilities	1
General Comment	Exempt NPDES facilities. TNI requirements are redundant to NPDES requirements	1
General Comment	Include EPA ATP as acceptable instead of TNI method validation requirement	1
General Comment	Exempt municipal labs from customer accountability requirements	1
Module 7 - 1.6.1	Remove Demonstration of capability requirement	1
Module 7 -1.7.1.6	Modify requirements for circumstances that organisms are not cultured in the lab	1
Module 7 -1.7.1.6	Change AND to OR - "...samples may be used for renewal up to seventy-two (72) hours after first use except as prescribed by the method and OR approved by the regulatory agency having authority for program oversight."	1
Module 1 - 4.1.3	rewrite - requires vol 3 of std	1
Module 1 - 4.2.1	rewrite - labs dilute samples to be within curve	1
Module 1 - 5.1.1a & b	rewrite - only 1 PT per year	1
Module 1 - 5.2.1.1	rewrite - only 1 PT per year	1
Module 1 - 5.2.1.2	rewrite - only 1 PT per year	1
Module 1 - 7.2 and all that mention AB	CA is not seeking Accreditation Body	1
Module 2 - 4.1.5f	rewrite - city govt can't change job descriptions. Union concerns too	1
Module 2 -4.1.7.1b	delete - 4.1.7.1c should be sufficient or "whenever resources permit, independent of the activity audited" - 4.14.1+c Sometimes we have to step in and analyze due to smaller sizes and multitasking	1
Module 2 - 4.1.7.2e	rewrite - 15 consecutive calendar days -rewrite to include Title 22, Div. 4 Ch. 19 Article 9 e. We work for a city and receive between 2-5 weeks of vacation annually at a minimum which is included in our contracts and can take consecutive	1
Module 2 - 4.2.8.1a	delete - confidential - public sector is subject to public records request	1
Module 2 - 4.6	delete - we run qc checks on purchased supplies, keep records of purchases	1
Module 2 - 4.7.1 & 2	delete - "Customer" are different than commercial lab customers. Ours are public	1

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Module 2 - 4.7.2a	delete - "Customer" are different that commercial lab customers. Ours are public	1
Module 2 - 4.14.5a	delete - "clients" are different than commercial lab clients. Ours are the public. We adhere to public notification based on tier violations not if we made a standard incorrectly or have a corrective action to do	1
Module 2 - 5.2.6.1a & b & c	rewrite - to include current Title 22, Div. 4, Ch. 19, article 9: Laboratory Personnel to allow for Bachelor degrees in Sciences and AWWA/CWEA certs.	1
Module 4 - 1.5.2.2.1a	rewrite - 3 batches on 3 separate days totaling a minimum of 7	1
Module 4 - 1.7.1.2f	rewrite - can continue if second calibration verification sample is analyzed and the results is within acceptance - could be a bad or cross contaminated sample.	1