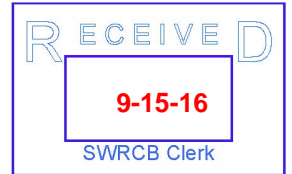


commentletters

From: Cheryl Watson <cwatson@alpha-labs.com>
Sent: Thursday, September 15, 2016 5:17 PM
To: commentletters
Subject: Comment Letter - ELAP Regulations Development/Laboratory Standard



September 15, 2016

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To Jeanine Townsend and the Members of the State Water Resource Control Board

We were unable to review all relevant modules of TNI 2016 before the comment deadline. Our organics and quality managers read Module 4: Quality Systems for Chemical Testing and prepared the following comments:

1. Section 1.5.2.1.2: Quarterly verification of the method detection limit (MDL) on each instrument will be costly and time consuming without adding quality. Daily sensitivity checks at the reporting limit are required by the methods for most instruments. TNI's 2009 standard required just annual MDL verification. We believe this is adequate to ensure quality data.
2. Section 1.5.2.2: States "The laboratory shall select an LOQ (Limit of Quantitation) for each analyte, consistent with the needs of their clients, and at least three (3) times the MDL." It is not always possible to meet both of these conditions. Reporting limits required for effluent discharge are often barely above verifiable MDLs, particularly for cyanide and organic analytes. We need more flexibility with reporting limits or the MDL/LOQ ratio.

Sincerely,
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