



Subject: Comment Letter – ELAP Regulations Development/Laboratory Standard

To the Members of the State Water Resources Control Board,

My name is Graham Payne, Water & Sewer Plant Supervisor for the State of California and I am a client of Mammoth Community Water District Laboratory in Mono County. We use this facility to analyze bacteriological drinking water samples required by the State Water Resources Control Board for 6 California State Parks located on the Eastern Sierras. This lab is also our emergency testing facility for samples when any of our water systems fail.

If we lose this facility due to the excessive requirements of the proposed Environmental Laboratory Accreditation Program's (ELAP) certification requirement, to use Volume 1 of the NELAC Institute's (TNI) 2016 documents as requirement for laboratory accreditation, the extra time and money required to analyze our samples would increase costs and possible endanger public health. The logistics of finding another laboratory and getting the samples to them in a timely manner would be nearly impossible. The current hold time for the collection and processing of raw water samples is 8 hours and currently it takes me 7 hours from the time of collection of my first sample from within the Lake Tahoe basin and delivering them to Mammoth Community Water District.

We have explored other laboratories for water testing of samples and with the current hold time, it is not possible with winter driving conditions in the Eastern Sierras, highway construction and operators work hours.

When the State mandated the LT2 testing, Mammoth Community Water District Laboratory was not certified to perform these tests. We were required to get a waiver from the State Health Department allowing us to collect the samples from our facility in Mono County and hold them to deliver them to an accredited lab in Nevada County.

Please consider the value of the small rural laboratory when considering this proposal by Environmental Laboratory Accreditation Program.

Please feel free to contact me if you have any questions.

Thanks much

Graham Payne
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