



September 14, 2016

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000

RE: Comment Letter – ELAP Regulations Development/Laboratory Standard

To the Members of the State Water Resources Control Board,

On September 6, 2016 the State Board gave notice that they would be holding a workshop on proposed changes to the laboratory accreditation regulations. The deadline for submittal of comments is Friday September 16, 2016. The focus of the proposed changes is the Environmental Laboratory Accreditation Program's (ELAP) proposal to use Volume 1 of The NELAC Institute's (TNI) 2016 documents as the basis for laboratory accreditation. Casitas Municipal Water District (CMWD) would like to respectfully submit the following comments to the Board for consideration on this topic.

- The 2016 TNI document is nearly 200 pages long. It will not be possible to purchase, read, and prepare comments for such a large document in just a few days. We would strongly urge the State Board to postpone this workshop and greatly extend the comment period. It is also extremely important that the proposed documents be made publically available at no cost.
- CMWD has an ELAP accredited laboratory with only two full time staff members. The paperwork and documentation requirements alone under TNI would be extremely difficult to sustain, and burdensome TNI requirements do not necessarily directly relate to better or more reliable data.
- Implementing TNI requirements will increase the cost of maintaining a certified water quality laboratory.
- The Environmental Laboratory Technical Advisory Committee (ELTAC) voted not to endorse TNI, and instead encouraged a "California Plus" model that would add to and improve current regulations and procedures already in place.
- Implementing the 2016 TNI Standards to apply to all ELAP accredited laboratories may result in the closure of small laboratories, with resulting higher analytical costs for water utilities. Furthermore, the loss of small laboratories could lead to less timely water quality information being provided to the public, and could put the health of the general public at risk. Please consider supporting new ELAP regulations that recognize the differences between commercial-for-profit and non-commercial non-profit laboratories, by supporting either a simplified single laboratory standard or a two-tier standard approach that focuses on the actual needs for both types of laboratory operations.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan McMahon".

Susan McMahon
Water Quality Supervisor
Casitas Municipal Water District
1055 Ventura Avenue
Oak View, CA 93022