

UPDATES TO CALIFORNIA ELAP FIELD OF TESTING FORMS

The US EPA updated the list of approved analytical methods in Title 40 of the Code of Federal Regulations (CFR), Part 136 with changes adopted in the Clean Water Act Methods Update Rule (MUR) - 2017. The US EPA also revised the procedure for determining the Method Detection Limit (MDL) as part of the 2017 MUR. The California Environmental Laboratory Accreditation Program (ELAP) updated the accreditation offerings in the Field of Testing (FOT) forms to comply with the 2017 MUR. Changes to the FOT forms include updates of methods to newer method revisions, addition of new method offerings, and removal of methods no longer approved in 40 CFR 136.

All ELAP-accredited laboratories must compare the methods on their certificate of accreditation against the methods in the updated FOT forms to determine which method revisions the laboratories must use to be compliant with 40 CFR 136. Additionally, all laboratories must implement the 2016 revision of the MDL procedure for applicable testing under the Clean Water Act.

COMPLIANCE SCHEDULE:

- On **May 31, 2019**, ELAP will begin accepting accreditation applications and assessing laboratories to the method revisions in the updated FOT forms and the 2016 revision of the MDL procedure.
- All laboratories must be compliant with the method revisions in the updated FOT forms and the 2016 revision of the MDL procedure by **September 30, 2019**.
- Laboratories participating in Proficiency Testing studies that close after **September 30, 2019** must report data using the method revisions in the updated FOT forms.

INFORMATION FOR LABORATORIES:

- Laboratories are not required to amend their certificate of accreditation if a method currently held by the laboratory is updated to a newer method revision in the FOT forms. Certificates of accreditation will be updated at accreditation renewal. However, all other updates (e.g. adding new methods or additional analytes to methods) will require the laboratory to submit an amendment application or request a change at the time of accreditation renewal.
- Laboratories may begin reporting to customers, State of California regulatory agencies, and Proficiency Testing providers using the method revisions in the updated FOT forms before their certificate of accreditation is updated and re-issued. However, the laboratory must first update any laboratory documents affected by the change (e.g. Standard Operating Procedures, reference methods, Quality Assurance Manual) and implement any new method requirements prior to using the updated method revisions.
- ELAP expects a large volume of amendment applications, so laboratories should expect delays in the processing of applications. ELAP will process all applications in the order received.
- California ELAP has provided MUR and MDL technical information on the MUR webpage under the "Resources" tab (www.waterboards.ca.gov/elap).

For questions regarding the MUR, email elapca@waterboards.ca.gov and include **MUR Question** in the subject line.

Approved: 05/31/2019



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