



Department of
Toxic Substances
Control

Perspective from State Agency Partner Committee

SWRCB Meeting October 2, 2018

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State Agency Partners Committee (SAP)

Provides Input to ELAP

- ELAP is for State Agencies
- Agencies require, receive, and use lab data
- Need data of known, consistent, and documented quality



“If you can’t cite it, you can’t write it”

- **TNI Provides Necessary Clarity**
- **Deficiencies noted during current lab assessments are despite not because of current ELAP regs.**



Data Must be Defensible

*“Say what you’ll do; Do what you say;
Document what you did”*

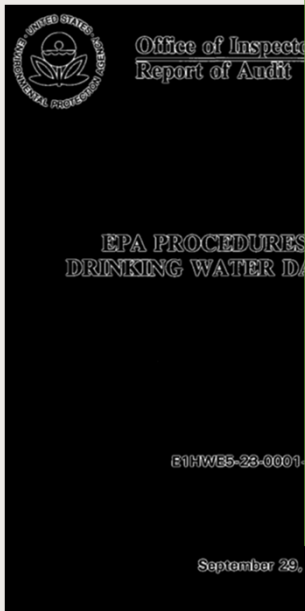
- Lab activities that could affect the quality of the results = TNI
- Documentation
- Records



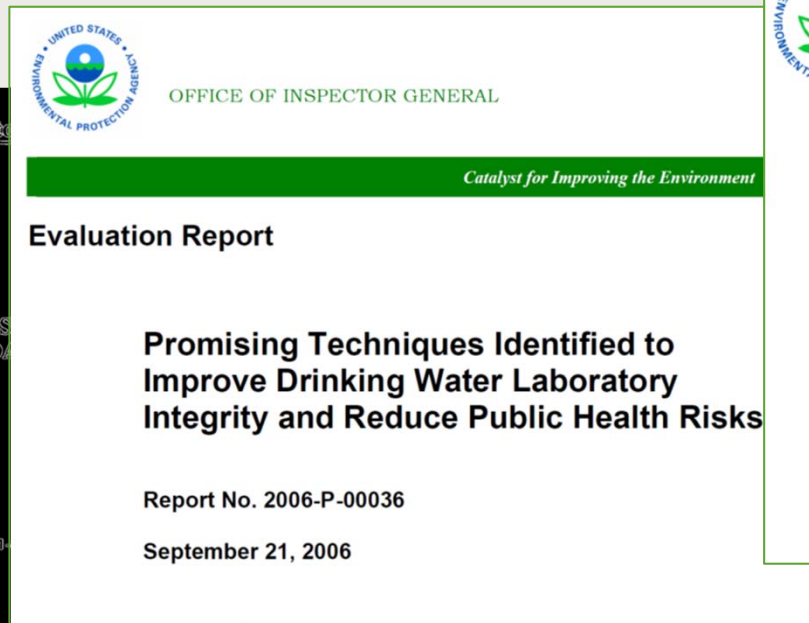
Not a new Issue

EPA Office of Inspector General Reports

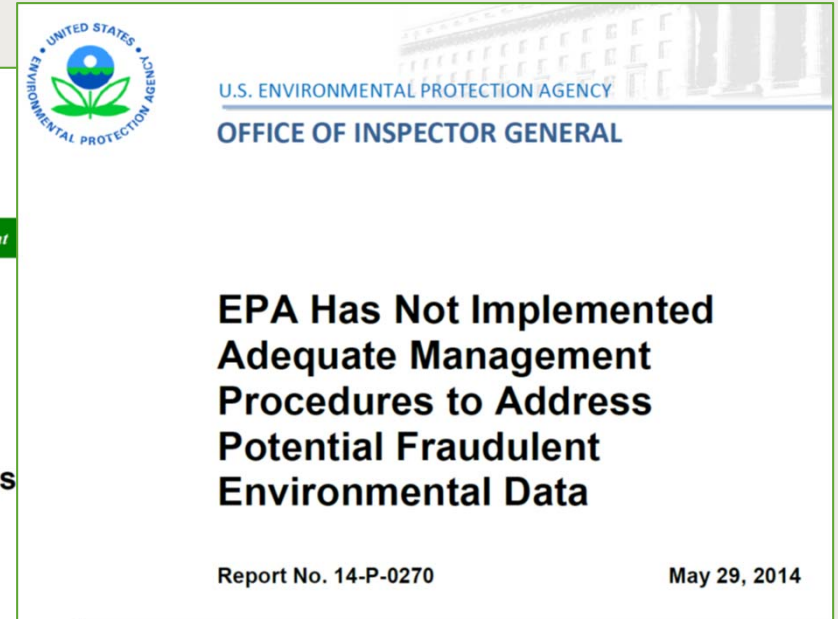
1995



2006



2014



CalEPA Environmental Data Quality Report

Environmental Data Quality Team

Sept 1997

- Identified NELAC (TNI) Accreditation as a Best Practice



California as the Leader:

Require TNI

“Straight-Face” Test: Try stating the opposite....

“Allow some labs to do less than the best practices the Expert Review Panel identified as critical for confidence in the data”

“Have less robust quality system requirements than those which federal agencies and other states identified as necessary”

“California should not follow EPA’s recommendation that drinking water labs have an ISO 17025/ TNI quality system”*

[*Supplement 1 to the Fifth Edition of the Manual for the Certification of Laboratories Analyzing Drinking Water, 2008]



Help California Move to TNI Standard

- **ELAP Has Made Substantial Progress**
- **Finalize New Regulations Without Further Delay**
- **Help Labs Comply**
 - **Don't lower the Standard**
 - **Don't make it optional**

