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**State Water Resources Control Board**  
Division of Drinking Water

September 1, 2016

Valued Committee Members,

Thank you for your hard work and participation over the past months helping California's Environmental Laboratory Accreditation Program (ELAP) chart a new path forward. Of course, the most challenging and divisive issue that ELAP asked for your help on is what laboratory standard should be used by our accredited laboratories.

After considering the discussions and opinions from both of our advisory bodies and the stakeholder community, ELAP will recommend to the State Water Resources Control Board (State Water Board) the adoption of the 2016 NELAC Institute Standard, Volume 1 (TNI) as California's laboratory standard. We will additionally inform the State Water Board Members that revisions to portions of the standard deemed problematic for California laboratories may be considered and that we will coordinate input on what is considered most problematic through you, the Environmental Laboratory Technical Advisory Committee (ELTAC).

The elements we based our decision on are as follows:

- Accelerated adoption of a standard that is applicable to our broad scope of environmental testing laboratories
- Efficiency to use an established, vetted, and accepted national standard
- Legal defensibility for sound enforcement
- Accessibility to TNI's ongoing consensus building process to refine standards for sustainability
- Readily available TNI educational and training resources for ELAP staff and the laboratory community
- State Agency Partners Committee recommendation to adopt the TNI Standard

We will continue to ask for ELTAC's assistance as we develop the regulations and eventually request that the State Water Board adopt them. Most specifically, we are asking you to individually identify portions of the TNI Standard you feel pose the greatest challenge to successful implementation in California. Please adhere to the rules of the Bagley-Keene Open Meeting Act and email the portions you have identified directly to me in the next three weeks.

Subsequent to receiving those suggestions, ELAP hopes to engage a subset of ELTAC in prioritizing the elements for considered revision. Your Chairperson will coordinate this effort. We will then bring that prioritized list to ELTAC and to the State Agency Partners Committee for feedback at their next meetings.

We want you to know that we have taken to heart the comments and concerns about the impact adoption of the TNI standard would have on the small laboratory community in California. ELAP knows that these laboratories contribute in the mission to protect public health and the environment, and the State Water Board has already expressed their commitment to assisting laboratories in California. ELAP is working to secure compliance assistance tools to aid in this transition. These include:

- *TNI Quality Assurance Manual Template*
- *Standard Operating Procedure Templates*
- *TNI Small Laboratory Handbook*
- *Internal Audit Checklist*
- *TNI Workshops* – ELAP-sponsored training workshops for California laboratories
- *TNI Webinars and Webcasts* – Hosted by TNI and geared toward implementation of every section of the standard
- *ELAP's Assessor Training Contract* – ELAP aims to establish a training contract with an entity familiar with the standard. The entity's experienced assessors will train ELAP staff and laboratories at on-site assessments during the multi-year contract term. The goal of this contract will be to train ELAP's assessors and assist laboratories with the new standard
- *Dedicated ELAP Staff* – ELAP will commit staff to work directly with laboratories on a one-on-one basis to address their concerns, questions, and needs
- *Compliance Date* – ELAP will propose to the State Water Board an extended implementation period with consideration of additional time for small municipal laboratories depending on the final form of the regulations

ELAP will send formal notice of the State Water Board Workshop and opportunity for public comment to our email subscribers.

We appreciate your time and consideration on this topic. ELAP believes that with a laboratory community like California's, and a technical advisory committee like you, we can successfully adopt and implement a new standard in California that serves ELAP's stakeholders' needs. We look forward to hearing from you and seeing many of you at the October 6<sup>th</sup> State Water Board Workshop on California's proposed laboratory standard.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christine Sotelo". The signature is fluid and cursive, with the first name being the most prominent.

**Christine Sotelo, Chief**  
California ELAP  
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