

FREQUENTLY ASKED QUESTIONS (FAQ's)

1. Why did ELAP update the offerings in the FOT forms?

In 2017, the US EPA updated the approved test procedures in 40 Code of Federal Regulations (CFR) 136 with adoption of the Clean Water Act Methods Update Rule (MUR) – 2017. The changes included in the MUR were updates of method revisions published by the EPA and other voluntary consensus standard bodies and addition of methods previously accepted under the Alternate Testing Procedure (ATP) program in 40 CFR 136. ELAP updated the accreditation offerings in the FOT forms to align with the changes made to 40 CFR 136. These updates only affect offerings in the FOT forms for testing of samples required under the Clean Water Act.

2. How do the updates to the FOT forms affect me?

The changes to the FOT forms include updates of methods to newer revisions, addition of new method offerings, and removal of methods no longer approved in 40 CFR 136. ELAP has provided a crosswalk document on the MUR webpage, which can be located under the “Resources” tab of ELAP’s website that summarizes the changes to the FOT forms. Laboratories must compare the methods on their certificate of accreditation against the updated FOT forms to determine which methods the laboratory is required to update to be compliant with 40 CFR 136. If a laboratory identifies methods where newer method revisions are offered in ELAP’s FOTs, then the laboratory must update any laboratory documents affected by the change (e.g. Standard Operating Procedures (SOPs), reference methods, Quality Assurance Manual (QAM)) and implement any new method requirements prior to reporting with the updated method revision.

If the update on the FOT forms is an update to the revision of a method currently on the laboratory’s certificate of accreditation, then the laboratory may start reporting to the updated method revision as soon as the necessary laboratory documents (SOPs, reference methods, QAM) have been updated to reflect the change. However, all laboratories must update the necessary laboratory documents and be compliant with the updated FOT forms by **September 30, 2019**.

3. Do I need to submit an amendment application?

If a method is currently on the laboratory’s certificate of accreditation and has been updated to a newer method revision in the updated FOT forms, then the laboratory is not required to amend their certificate of accreditation. Laboratories may use and report with the updated method revisions as long as applicable laboratory documents (e.g. SOPs, reference methods, and QAM) have been updated to reflect the change. However, if a method (or analyte by a specific method) is not currently on a laboratory’s certificate of accreditation and the laboratory wants to add the method (or analyte), then the laboratory must submit an amendment application with applicable fees.

Due to a high volume of amendment applications expected, laboratories should expect delays in processing amendment applications. ELAP will process amendment

applications in the order received. Alternatively, a laboratory can wait until accreditation renewal to request methods (or analytes) be added to their certificate of accreditation. For application instructions, please visit ELAP's [Application Page](#)

4. What is an example of an “updated” method revision?

Methods that have been updated to newer method revisions in the FOT forms can be identified by a change in the method year (e.g. SM 9222 D-1997 to SM 9222 D-2006) or an update to a different iteration of a method (e.g. EPA 625 to EPA 625.1). The crosswalk document on the MUR webpage contains more examples of updates to method revisions. Addition of analytes to a method offering that was already on the FOT forms is **not** a method revision update. For example, ELAP previously offered accreditation in SM 9230 B-2007 for Fecal Streptococci analysis only, but ELAP will now offer accreditation in SM 9230 B-2007 for Fecal Streptococci and Enterococci analysis. This change is considered a new offering, so a laboratory that wants to add Enterococci analysis by SM 9230 B-2007 to their certificate of accreditation would be required to submit an amendment application.

Laboratories must compare the methods in their certificate of accreditation against the [updated FOT forms](#) to determine the updated method revisions that affect the laboratory and are required to update to be compliant with 40 CFR 136.

5. When can I report using the method revisions in the updated FOT forms?

Laboratories may begin reporting to the method revisions in the updated FOT forms as soon as new method requirements have been implemented and the necessary laboratory documents (SOPs, reference methods, QAM) have been updated to reflect the change. All laboratories must update the necessary laboratory documents and be compliant with the method revisions listed in the [updated FOT forms](#) by **September 30, 2019**.

6. What if I cannot find a method in the updated FOT's forms?

There were several methods removed from the FOT forms as a result of the 2017 MUR. If a method was removed from an FOT form because the method is no longer accepted in 40 CFR 136, then ELAP will no longer offer accreditation in the method. Laboratories currently accredited for methods removed in the updated FOT forms may continue to use and report results with the methods until the expiration date on the laboratory's certificate of accreditation. However, the laboratory will not be able to renew accreditation for these methods during the accreditation renewal process.

ELAP only accredits for analytical test methods approved for regulatory purpose. If a method is not on the FOT form and not in 40 CFR 136, then laboratories must contact their customers and discuss selection of methods which are appropriate for the tests it undertakes and request approval for intended use with the appropriate State Regulatory Agency. The State Regulatory Agency will make a formal request to ELAP to update our accreditation offerings.

If a method is not in the updated FOT forms, but is still approved in 40 CFR 136, then please contact ELAP at elapca@waterboards.ca.gov so that the FOT forms can be updated.

7. *When do the laboratories need to be compliant to the updates to the FOT forms?*

ELAP will publish the updated FOT forms on ELAP's website on **May 31, 2019**. ELAP will begin accepting accreditation applications and assessing laboratories to the method revisions in the updated FOT forms after May 31, 2019, however, all laboratories must be compliant with the method revisions in the updated FOT forms by **September 30, 2019**.

8. *Will Proficiency Testing studies that reported using old revisions still be accepted?*

Proficiency Testing studies using older method revisions will be accepted until September 30, 2019. Laboratories participating in Proficiency Testing studies that close after **September 30, 2019** must report data using the new method revisions.

9. *Where can I find what has changed in the FOT forms?*

ELAP has created a crosswalk document that lists the changes being made to the FOT forms. Visit the MUR webpage to see the crosswalk document. Laboratories must compare the methods on their certificate of accreditation against the [updated FOT forms](#) to see what changes affect the methods the laboratory uses. Laboratories must implement any necessary changes by **September 30, 2019**.

There are additional programmatic changes to the FOT forms that were also included in the updates. These changes do not require an amendment application:

- Boron has been moved from FOT 108- "Inorganic Constituents in Non Potable Water" to FOT 109 - "Metals and Trace Elements in Non Potable Water".
- FOT 119 has been merged with FOT 113 and renamed "Environmental Toxicity Methods"
- FOTs 106, 112 & 118 have been separated to be individual FOT forms.

10. *Why do the FOT forms look different?*

In addition to updating the content of the FOT forms, ELAP modified the formatting. The formatting changes include changes to the column header, font, subgroup codes/analyte codes, and list order. These format changes were made to make the FOT forms easier to use and read.

A major structural change was made to FOT 110 –"Volatile Organic Constituents in Non-Potable Water" and FOT 111 –"Semi-Volatile Organics Constituents in Non-Potable Water." These FOT forms have been revised to list the method and all the individual analytes that are approved in 40 CFR 136 to be analyzed by that method. Previously, these FOT forms were listed by method and the analyte group (for example, EPA 624 for

Volatile Organic Compounds). Laboratories are not required to amend their certificate of accreditation to reflect the structural change in these updated FOT forms and can continue to report using the methods. However, at the time of renewal, acceptable Proficiency Testing scores will be required for each individual analyte the laboratory is seeking accreditation for.

11. Why do I have to use a different Method Detection Limit (MDL) procedure?

As part of the 2017 MUR, the US EPA revised the procedure for the determination of MDL of analytical test procedures. This 2016 revision of the MDL procedure was promulgated during the 2017 MUR and therefore required to be used in analytical testing procedures required under the Clean Water Act. Tools for implementation of the 2016 MDL procedure can be found on the MUR webpage.

12. Which methods require the use of the 2016 revision of the MDL procedure?

The 2016 revision of the MDL procedure is required for analytical methods listed in 40 CFR 136. For analytical methods not listed in 40 CFR 136, laboratories should follow the MDL procedure specified in the analytical method.

13. When do I need to comply with the new MDL procedure for 40 CFR 136 methods?

ELAP will begin assessing laboratories to the 2016 revision of the MDL procedure starting on **May 31, 2019**. However, all laboratories must be compliant with the 2016 revision of the MDL procedure by **September 30, 2019**.