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## State Water Resources Control Board

**TO:** Stephen Clark, Outgoing Chairperson  
Environmental Laboratory Technical Advisory Committee (ELTAC)

**FROM:** Christine Sotelo, Chief  
California Environmental Laboratory Accreditation Program

**DATE:** September 21, 2019

**SUBJECT: RESPONSE TO ELTAC RECOMMENDATION**

At the August 22, 2019 ELTAC meeting, a motion passed to recommend that the Environmental Laboratory Accreditation Program (ELAP) include an alternative proposal developed by an ELTAC Subcommittee into the regulations text as part of the rulemaking process. This notice serves as ELAP's formal response to this recommendation.

**Response:** ELAP sincerely appreciates the hard work of the Subcommittee. However, ELAP rejects the recommendation because the program does not support the alternative proposal. ELAP will continue with the proposal to incorporate the 2016 TNI Standard with two exceptions into the regulation text as the accreditation standard for all ELAP-accredited laboratories in California.

Although Ms. Baylor expressed at the meeting that she believes ELAP is not listening to the municipal laboratory community, it is important to understand that ELAP must consider the input of more than one stakeholder group when making a recommendation to the State Water Board on the proposed regulations. ELAP is the largest accreditation program in the nation and is responsible for regulating over 650+ environmental testing laboratories that range from commercial, municipal, public, and academic agencies that employ 1-2 people to 100+ staff and located inside or outside the State of California. Therefore, ELAP's mandate is to recommend an accreditation standard to the State Water Board that is applicable to the entire laboratory population and addresses the concerns of the State agencies that rely on the data being produced.

ELAP appreciates all comments, discussion, and hard work that has gone into making the proposed regulations clear, concise, and well-reasoned. As stated during recent meetings, ELAP has included discussion of the alternative proposal in the draft regulations package for consideration during the rulemaking process. Considering alternate proposals is an important part of the rulemaking process to ensure ELAP considered all options. In addition, this does not in any way preclude people from providing alternative proposals and ideas to the State Water Board during the public comments period on the rulemaking package.

cc: ELTAC Current and Outgoing Members