

commentletters



From: Alfredo E. Pierri <Alfredo.Pierri@wecklabs.com>
Sent: Wednesday, November 25, 2015 11:26 AM
To: commentletters
Subject: 12/1-12/2 Board Meeting – Item 7 Proposed Increase in ELAP Fees

We appreciate the opportunity to comment on the subject of reference. Weck Laboratories has been providing analytical services in the Los Angeles area for over 50 years and is primarily involved in the analysis of potable water, wastewater, soil and hazardous waste for regulatory compliance purposes in California.

We appreciate the efforts that are being made to reorganize ELAP and improve its services and understand that fees may be too low to cover its current budget, however we completely oppose to the proposed increase of approximately 57% across the board for base fee and FOT fees.

We think that a more reasonable approach would be to significantly increase the base fee and apply a very small increase to the FOT fees and we strongly encourage the Board to apply this approach.

The reasoning behind the approach listed above is that ELAP uses most of its budget in administrative tasks reviewing basic information about laboratories for their annual accreditation and not in laboratory audits which is associated with FOTs, so applying the majority of the increase to the base fee would spread the cost more fairly over all laboratories involved in the program.

This situation affects us particularly, and possible many other laboratories, because we need to seek NELAP accreditation outside the State since ELAP doesn't offer that any longer, representing additional costs to the laboratory.

Weck Laboratories also supports the findings and recommendations of the CA Expert Review Panel to the ELAP Program and hopes that they will be implemented as soon as possible, especially the recognition of third party accreditation.

Respectfully submitted



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