



commentletters

From: Andy Eaton <AndyEaton@eurofinsUS.com>
Sent: Monday, November 23, 2015 12:46 PM
To: commentletters
Subject: 12/1-2/15 BOARD MEETING Item 7.Consideration of a proposed Resolution adopting amendments to the Environmental Laboratory Accreditation Program Fee Schedules In Title 22, California Code of Regulations Section 64806

Thank you for the opportunity to comment on the subject resolution. Eurofins Eaton Analytical is a very large commercial laboratory that performs potable water analysis for clients across California. We recognize that ELAP fees are currently too low to support the program and have not been adjusted since the early 2000s. We also recognize that because this is an emergency fee increase request there are not a lot of options available to ELAP and the Board in terms of fee restructuring. It is our understanding that ELAP intends to request an across the board increase of approximately 57% in both the base Fee and the FOT fees.

We would strongly encourage the Board to instead significantly increase the base fee and only do a minor increase in the FOT fees in lieu of proportionally increasing the fees for both the base and the individual FOTs.

We believe that the majority of the work that ELAP needs to do in evaluating laboratories is associated with review of the basic information that all labs need to provide each year, regardless of the number of FOTs they hold. This includes review of the QA Manual and the overall laboratory management and operations. Additionally timely review of Proficiency Testing results, which is now a major focus for ELAP, requires a significant effort, regardless of the number of PT parameters being evaluated.

It is also worth noting that many of the larger laboratories such as ourselves are now utilizing third parties such as the Oregon Environmental Lab program to conduct audits and evaluations, relieving much of the backlog that ELAP had had with onsite assessments, which are then being accepted by ELAP, eliminating many of ELAP's direct costs especially for labs with multiple fields of testing.

We also recommend that prior to future fee changes, ELAP should do an internal review of costs associated with each activity they perform to determine where costs are being incurred and then structure fees accordingly.

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