

TRUESDAIL LABORATORIES, INC.

EXCELLENCE IN INDEPENDENT TESTING



Established 1931

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November 24th, 2015

State Water Resource Control Board
California ELAP



Subject: SWRCB Proposition to Increase ELAP Fee Schedules

Dear Dr. Weisberg, Ms. Phelps, Ms. Larsen and Ms. Sotelo,

Truesdail Laboratories has been in business for over 80 years, operating as a small business in environmental testing and servicing a wide array of analytical testing needs for the clients that we serve. With our inability to raise testing fees due to the landscape of environmental testing, and with the increase in cost of wages from year to year, small businesses like our own need to run as efficiently as possible in order to stay viable.

With the proposition of the State Water Resource Control Board raising FOT fees across the board by 57% in 2016, the burden of this monetary increase will surely affect our ability to feasibly operate within the status quo. Aside from Truesdail, there are many other small labs like ourselves in the same predicament who feel helpless in light of this proposed drastic fee increase.

We feel that this proposed increase disproportionately affects laboratories like our own who are small, yet offer a large variety of testing. We feel that a more reasonably structured fee increase would be fairer to full service laboratories throughout California. Our recommendation would be that the SWRCB implement a larger increase on the ELAP accreditation base fee, while maintaining or minimally increasing the fee based off of number of FOT's that a lab is accredited to.

The adverse effect to the currently proposed increase structure is that many smaller labs will be forced to reduce the number of FOT's that they can currently offer clients in order to maintain viability, which would adversely reduce the amount of revenue generated from this proposed increase. Relatively, this will also affect the municipalities which use these laboratories for its regulated testing needs, as less and less labs begin to offer certain fields of testing. Again, raising the ELAP accreditation base fee, while maintaining or minimally increasing the FOT fees would help prevent this from occurring.

We understand that the need for restructuring of the current ELAP operation comes at a cost. Suggestions for efficient operation include, automated PT evaluation software



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which will help streamline the process and cut down on manpower. Formation of a voluntary committee of inter-laboratory members, whom are actively willing to provide workshops for ELAP staff in order to increase technical depth of all staff members. Finally, a well-structured remote auditing process, that would remain effective as well as cut down on the amount of time and resources required for onsite inspection.

We appreciate the opportunity to express our opinions on this subject which can greatly affect our company and hope that our concerns are not vacantly dismissed.

Sincerely,

TRUESDAIL LABORATORIES, INC.

Michael Ngo
QA/QC Manager