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Public Comment
ELAP Regulations Development/Laboratory Standard
Deadline:10/20/16 12:00 noon

Jeanine Townsend,
Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000



**Re: COMMENTS REGARDING CALIFORNIA ENVIRONMENTAL LABORATORY
ACCREDITATION PROGRAM (ELAP) RECOMMENDATION FOR LABORATORY STANDARD**

Dear Ms. Townsend:

Calleguas Municipal Water District (Calleguas) is a public wholesale water agency responsible for supplying potable water to over twenty local agencies and private companies in cities and unincorporated areas in Ventura County. Three-quarters of Ventura County residents depend on Calleguas for all or part of their water supply, as the District supplies more than 630,000 people in the communities of Bell Canyon, Camarillo, Camarillo Heights, Lake Sherwood, Las Posas Estates, Moorpark, Oak Park, Oxnard, NAWS-Point Mugu, NCBC-Port Hueneme, Newbury Park, Port Hueneme, Santa Rosa Valley, Simi Valley, Somis, and Thousand Oaks. Despite its very large service area, Calleguas' accredited laboratory is manned by only one full time employee.

We appreciate the opportunity to comment on the California Environmental Laboratory Accreditation Program's (ELAP) recommendation for laboratory standards. **Calleguas supports the ELTAC's recommendation not to adopt the TNI laboratory standards.** While Calleguas agrees laboratory standards should lead to quality data through a transparent process, we disagree that TNI is the approach ELAP should take to attain these goals. TNI is a very regulatory intensive standard. The additional record keeping and tracking required by TNI would be very burdensome to small laboratories. Furthermore, TNI's requirements would not improve water quality data, which should be the ultimate goal of any laboratory standard.

Thank you for the opportunity to comment on the recommended laboratory standards. Calleguas encourages ELAP and its staff to continue to work with ELTAC members, who represent public water laboratories. If you have any questions regarding this matter, please contact Amy Maday at amaday@calleguas.com or at 805.579.7117.

Sincerely,

Amy Maday, P.E.
Regulatory Compliance Supervisor
Calleguas Municipal Water District