

September 16, 2016

Ms. Felicia Marcus, Chair  
Members of the State Water Resources Control Board  
Christine Sotelo, Chief of Environmental Laboratory Accreditation Program



Dear Ms. Marcus, members of the SWRC Board, and Ms. Sotelo,

ACIL is the national trade association for independent scientific, testing, and engineering firms, representing 150 laboratories with over 1,500 laboratory locations. Our member laboratories perform more than 60% of all the laboratory tests conducted for drinking water and regulatory compliance purposes in California.

ACIL would like to commend the California ELAP Chief for her decision to recommend adoption of one laboratory standard—the 2016 TNI Standard—for all laboratories in California. ACIL member labs, especially those conducting business in California, strongly support this recommendation to the Board. ACIL also urges ELAP and the Board to adopt the 2016 TNI Standard without modification.

The TNI Standard has been successfully adopted and implemented throughout the country by small and large labs in both the commercial and public sectors. Some of the best examples of full TNI implementation are Florida and New York—where all laboratories conducting environmental testing follow the Standard. Not only is TNI recognized in over 25 states, it has full reciprocity in 23 states. The TNI Standard has a proven track record.

Concerns from smaller labs and some larger public agency labs over implementing the Standard in its entirety may be well-meaning, however, there is little evidence to support the validity of such concerns. It would appear that many of those concerns stem from a lack of familiarity with and understanding of TNI. These fears are readily addressed by the resources available through TNI. The majority of evidence available indicates that small laboratories are indeed capable of implementing the full TNI Standard.

ACIL contends that if the goal of CA ELAP and the stakeholder agencies is to ensure that the data produced by CA ELAP accredited laboratories is of known and documented quality, then adoption of the 2016 TNI Standard is the answer. Modification of the Standard would be incompatible with this goal because size of laboratory or population served should have no bearing on the quality and reliability of the laboratory or the laboratory's test results.

In conclusion, ACIL member labs are pleased with the recommendation of the 2016 TNI Standard and support adoption of the Standard **without modification**. ACIL remains committed to the successful reform of the California Environmental Laboratory Accreditation Program. We are ready and willing to work in a partnership with ELAP to improve efficiency and quality in the

accreditation process and ultimately, the goal of production of data of known and documented quality.

Sincerely,



Bruce Godfrey, PhD  
Montrose Environmental  
ACIL Representative to ELTAC

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