

September 14, 2016

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P. O. Box 100, Sacramento, CA 95812-2000  
1001 I Street, 24<sup>th</sup> Floor, Sacramento, CA 95814



Subject: **Comment Letter – ELAP Regulations Development / Laboratory Standard**

Dear Members of the State Water Resources Control Board:

I would like to express my concern for the proposed application of the 2016 The NELAC Institute (TNI) standard to all laboratories accredited by the California Environmental Laboratory Accreditation Program (CA ELAP). The Castaic Lake Water Agency (CLWA) water quality laboratory is a small government agency lab and has only one management staff (myself), three chemists, and one field technician. The TNI standard would only add a burden of documentation and unnecessary effort to our small laboratory with little change to overall data quality.

As examples of the unnecessary efforts, TNI has the following requirements that would not apply (or only minimally apply) to most government and operations support labs:

- “Review of Requests, Tenders, and Contracts”: Government labs typically do not perform external contract work or rarely make changes to their external work. This TNI section only adds additional policy requirements that would rarely be needed.
- “Subcontracting of Environmental Tests”: This section of TNI applies to commercial labs that must subcontract tests they would otherwise perform themselves. CLWA does not subcontract tests as a laboratory; CLWA sends samples required by our drinking water monitoring to commercial laboratories for tests that are not performed in-house.
- “Purchasing Services and Supplies”: CLWA has been purchasing supplies for laboratory testing for over 20 years and each critical item has been proven to be acceptable. This section of TNI only adds a burden of documentation for an action that has already been successfully completed.
- “Service to the Client”: This is another section of TNI that was written for the commercial laboratory. While CLWA does perform testing for a small number of other drinking water retailers most of the requirements of this section are unnecessary.
- “Complaints”: Yet another example of a section of TNI focusing on the needs of commercial labs which have little application to small and medium sized government labs.
- “Management Reviews”: This section of TNI assumes the laboratory has a large management staff (like many commercial labs) consisting of a lab director, QA manager, and multiple technical (or department) managers. This section makes no sense for labs with a single management person.

(These comments are based on the 2009 TNI standard. The 2016 TNI was only made available in late August 2016 with a purchase price of \$130.)

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I believe forcing the requirements of the 2016 TNI standard upon the many small and medium sized government laboratories ignores the reality that CA ELAP certifies many different types of laboratories. Since many of these smaller laboratories support treatment plant operations in both the drinking water and wastewater sectors the application of the TNI standard adds an unnecessary burden of effort that does not improve data quality or improve the service of those labs to their operations support function.

CA ELAP should focus on developing a quality standard that makes sense for all laboratories rather than trying to force one standard upon all laboratories, ignoring the negative impacts of increased costs, unnecessary efforts, and potential laboratory closures.

CA ELAP could adopt a more streamlined set of laboratory standards which includes the essential data quality elements necessary to support high quality laboratory testing and which would work for the almost half of California certified laboratories that are small and have few employees (sometimes one or two employees). The TNI standard could be used for medium and larger commercial laboratories where their application fits with the needs of commercial labs.

Thank you for your attention to this matter. If you or your staff has any questions regarding this matter, please contact me by phone at (661) 513-1223 or via email at [jkoelewyn@clwa.org](mailto:jkoelewyn@clwa.org).

Sincerely,

A handwritten signature in black ink that reads "Jeffrey Koelewyn". The signature is fluid and cursive.

Jeffrey Koelewyn  
Laboratory Director  
Castaic Lake Water Agency