

## commentletters

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**From:** Lawrence Lem <LarryLem@eurofinsUS.com>  
**Sent:** Friday, September 16, 2016 10:41 AM  
**To:** commentletters  
**Subject:** California SWRCB Proposes to Use TNI Standard for Accreditation

Sirs –

Eurofins Calscience, Inc. (ECI) fully supports the the proposal to implement the TNI 2016 standard as the basis for Environmental Laboratory accreditations either as a modified version or as is in its entirety (preferable). It is a consensus based standard drawing upon the expertise of many industry / regulatory / accrediting professionals over many years. It is constantly being improved by its many committees as they work to the next revision.

[http://www.waterboards.ca.gov/drinking\\_water/certlic/labs/documents/100616\\_notice\\_elap\\_wrkshp\\_comment.pdf](http://www.waterboards.ca.gov/drinking_water/certlic/labs/documents/100616_notice_elap_wrkshp_comment.pdf)

ECI would also propose the following recommndations:

- Do not implement the once a year Proficiency Testing (PT) study schedule, return to twice a year. It is too long a time between monitoring at once a year to properly monitor a testing laboratory. Small municipal laboratories would not be impacted financially to a great extent as their scope of methods performed is limited. Large commercial laboratories likely already do them twice a year for primary TNI or Department of Defense (DoD) accreditations.
- Allow third party auditors (ANAB, PJLA, A2LA, etc.) to serve as certified accrediting bodies for the CA program. Many large laboratories have multi-state, multi-program accreditations and allowing these experienced third party auditors to serve as an adjunct to the state auditors would ease the costs to the ELAP program both in monetary and personnel resource time. The costs for the large laboratories would be eased as well as the the audits can be combined to meet many programs simultaneously, example: DoD / TNI / CA SWRCB ELAP certification can all be evaluated together as the requirements are essentially a matter of degree.
- Evaluate whether implementation of the standard without modifications is really such an onerous task for small labortories. The structure of the TNI standard is such that laboratory efficiency and data validity is standardized between small and large laboratories. The initial implementation would be agreed as taking more personnel resources, but once up an in place would be an asset to the data users. The data quality they produce should not be less important. California is a leader in many environmental policies and programs, let's not go to a "half baked" or "lite" program. That would be a disservice to everyone especially the citizens of California who expect their government bodies to look out for their well being and protection, witness: Exide lead contamination, Flint Michigan DW contamination.

Thank you for this opportunity to comment.

Regards,

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