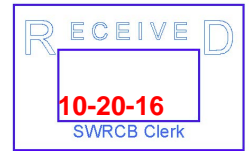




THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager



October 20, 2016

Ms. Jeannine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California

Sent via electronic mail

Subject: Comment Letter – ELAP Regulations Development/Laboratory Standard

Dear Ms. Townsend:

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to provide comments on the Environmental Laboratory Accreditation Program (ELAP) Regulations Development and Preliminary Proposed Laboratory Standard. Metropolitan provided oral comments at the State Water Resources Control Board (SWRCB) workshop on October 6, 2016. This letter reiterates concerns and recommendations provided as part of our testimony. Metropolitan operates one large full service laboratory and five small process laboratories at each of our treatment plants. Metropolitan has remained engaged throughout the efforts of the SWRCB to update the laboratory standards program with a representative on the Environmental Laboratory Technical Advisory Committee (ELTAC), and will continue to participate in this forum to provide additional input into the review of ELAP. We support these ongoing efforts and foresee this collaborative effort producing an effective and efficient laboratory accreditation program for the state of California.

Metropolitan recognizes the importance of establishing ELAP regulations and standards that are clear, cost effective, and efficient for large and small sized laboratories in both the public and private/commercial sectors. Metropolitan encourages the SWRCB to modify the existing laboratory standards program with practical, feasible, and economically viable elements from the 2016 NELAC (National Environmental Laboratory Accreditation Committee) Institute (TNI) standard. Allowing ELTAC and other stakeholders to identify and implement specific provisions from the 2016 TNI Standard will help ensure that the program is appropriately applicable to different types and sizes of laboratories.

Prior to moving forward with adoption of the 2016 TNI standard, Metropolitan offers the following comments and recommendations:

- First, Metropolitan agrees with the Expert Review Panel that ELAP should adopt updated laboratory accreditation standards. The portions of the 2016 TNI Standard that are adopted should improve laboratory performance and data quality. Also, the administrative burdens contained in the standard should be eliminated, such that the adopted, revised standard is more efficient and cost effective, especially for smaller laboratories. A cost-benefit analysis of options associated with the laboratory accreditation standards program should be conducted to understand the real impacts and to ensure that the selected option meets the needs and limitations of all stakeholders.
- Second, the majority of representatives on ELTAC rejected adoption of the full 2016 TNI Standard. Metropolitan is pleased that SWRCB will be holding additional ELTAC meetings to facilitate consensus among its members and to discuss elements of the 2016 TNI Standard that are appropriate for inclusion in the ELAP regulations. Additionally, Metropolitan thanks SWRCB for establishing an email box to receive detailed comments on ELAP and the 2016 TNI Standard from laboratory stakeholders beyond those participating on ELTAC. Metropolitan plans to submit additional comments to this new email box through mid-December, and will also continue providing input through ELTAC.
- Third, the 2016 TNI Standard has several sections that might be more suitable for commercial laboratories, but not for laboratories owned and operated by public agencies, such as Metropolitan. For example, the 2016 TNI Standard requires laboratories to have policies and procedures to ensure the protection of customers' confidential information and proprietary rights, including procedures for protecting the electronic storage and transmission of results. As a public agency, Metropolitan is required to disclose information to the public under the Public Records Act (PRA), unless there is a legal basis not to do so. Thus, any requirement to alter existing ELAP laboratory standards must address this issue.

Thank you again for the opportunity to comment. Metropolitan appreciates SWRCB's willingness to extend the comment deadlines, to continue to work with ELTAC, and to engage additional laboratory stakeholders in the process to modify the existing laboratory standards program. Metropolitan will be providing input through the various forums that SWRCB has established, and will also continue to work with statewide associations, such as the Association of California Water Agencies (ACWA) and California Municipal Utilities Association (CMUA) on this important issue.

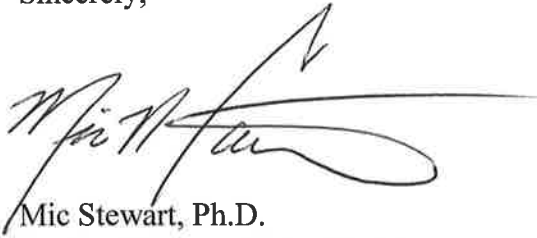
Ms. Jeannine Townsend

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If you have any questions, please contact me via email at mstewart@mwdh2o.com or via phone at 213 217-5696.

Sincerely,

A handwritten signature in black ink, appearing to read "Mic Stewart", with a large, sweeping flourish extending to the right.

Mic Stewart, Ph.D.

Section Manger, Water Quality

JB:reg

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