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California State Water Resources Control Board

**September 15, 2016**

Subject: Comment Letter – ELAP Regulations Development/Laboratory Standard

On September 2, 2016 Helix Water District laboratory was informed that ELAP plans to recommend that the State Board adopt the 2016 TNI standard as its basis for regulating the laboratory community. In this ELAP notice, a Workshop on proposed changes to the laboratory accreditation regulations was announced. The deadline for submittal of comments is Friday September 16, 2016.

Our laboratory immediately (September 2, 2016) signed up for TNI membership at a cost of \$200 for three years, in order to review the TNI proposed standard, which will be an additional discounted cost. Due to a cumbersome TNI process requiring receipt of check prior to being able to download the standard, we are still unable to download the standard, although the check was mailed to TNI nine days ago and I have had a follow-up email with them requesting access to the standard with no response.

We strongly urge the State Board to significantly postpone this workshop (early 2017) and greatly extend the comment period. It is **extremely** important that the laboratory community read and understand the proposed standard in order to comment intelligently on the potentially major changes it may bring to laboratory regulations, especially as to how it would impact small municipal laboratory operations. It would also be helpful if the proposed documents that would form the core of ELAP's new regulations be made publicly available. Not having access to the standards is a major problem and until all laboratories and others affected by these standards are able to review them, it is impossible to participate in the process.

Respectfully yours,

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