

commentletters

From: Juli Adams <JuliA@mooretwining.com>
Sent: Thursday, September 15, 2016 1:27 PM
To: commentletters
Cc: Maria Manuel; Julio Morales; Rachel Portillo
Subject: Comment Letter - ELAP Regulations Development/Laboratory Standard



Jeanine Townsend,

While we generally applaud the efforts of the waterboard to improve the ELAP standards, we are concerned about the implementation of some requirements that may be burdensome to small- and even medium-sized laboratories. Specifically, we object to requiring Performance Testing (Evaluation) on a semi-annual, rather than annual basis. As a full-service, medium sized laboratory, the additional testing samples would cost over \$12,000 annually, which is a significant expenditure for a laboratory of our size. Further, there would be a labor expense associated with the additional administration of the PT samples. Please consider this when finalizing the new requirements, as the new quality system has already increased our ELAP fees considerably.

Thank you,



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