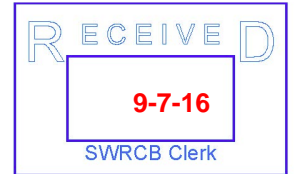


## commentletters

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**From:** Peter Wilde <pwilde@adhenvironmental.com>  
**Sent:** Wednesday, September 07, 2016 11:02 AM  
**To:** commentletters  
**Subject:** Comment Letter - ELAP Regulations Development/Laboratory Standard

Greetings,

I have a comment on the upcoming ELAP revamp.

This document: <http://www.nelac-institute.org/docs/meetings/denver2007/findingsdenver.pdf>, is a .pdf file of a Powerpoint presentation titled Common Laboratory Assessment Findings. On Page 21 of this presentation states "There is no documented procedure for validation of in-house software including LIMS, network, or spreadsheets." This presentation goes on critique other issues concerning the handling of documents, data, and records.

As a professional in the environmental consulting industry for the last 35 years, I have always wondered how an analytical laboratory with an ELAP certification can have poor quality control when it comes to what they actually produce for a client – laboratory reports and files of the results (usually Excel spreadsheets). I've even worked with laboratories that advertised an ELAP certification, but had no functioning LIMs. These laboratories produced the data files by hand, with the unsurprising results of errors and differences between the analytical results in the data files and the associated lab reports.

I suggest that part of the ELAP certification should be a functioning LIMS that can produce data files in a variety of California state required formats such as SWAMP and CEDEN that are produced automatically by the system.

Regards,

**Peter Wilde | Assistant Vice President**

'Twas brillig, and the slithy toves  
Did gyre and gimbel in the wabe.  
All mimsy were the borogoves,  
And the mome raths outgrabe.

**ADH Environmental**  
3065 Porter Street, Suite 101 | Soquel, CA 95073  
T (831) 477-2003 | F (831) 477-0895  
web [www.adhenvironmental.com](http://www.adhenvironmental.com)  
e-mail [pwilde@adhenvironmental.com](mailto:pwilde@adhenvironmental.com)

"Everyone is entitled to his (or her) own opinions... just not his (or her) own facts." -Daniel Patrick Moynihan

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