

**commentletters**

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**From:** Roger Westergard <RWestergard@anaheim.net>  
**Sent:** Friday, September 16, 2016 12:01 PM  
**To:** commentletters  
**Cc:** Roger Westergard  
**Subject:** Comment Letter - ELAP Regulations Development / Laboratory Standard

**Jeanine Townsend, Clerk to the Board;  
and Honorable Board Members –**

Hello and Good Day to all of you.

I regret that with the brief written comment deadline I have been unable to put together a robust comprehensive comment letter.

With that said, I have provided just a few comments for your consideration:

- I have been working in the drinking water and waste water laboratory field for over 23 years; with 21 of those years in a California ELAP certified lab. Occasionally over the years I have perused the TNI/NELAP standards with the idea that it would be a nice 'feather in the cap' for my lab operation to not only have ELAP but also TNI/NELAP accreditation. However, I never pursued it because in my opinion the work and cost involved far outweighed any meaningful benefit. I believe this would be the case for the majority of ELAP certified labs in California.
- I agree that ELAP certainly needs some enhancements; but I do not think that changing the standards to a more stringent, costly, burdensome level is the solution.
- Based on my experience, in my opinion, what is needed is more consistency with inspectors and their inspection/enforcement protocol with regard to the current standards. And I believe that over the years ELAP has been understaffed to the point where that has been very difficult to achieve.

Thank you for your time and consideration.

Respectfully,  
Roger A. Westergard

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