

Proposed Framework for State Agency Requests to ELAP for New Analytical Methods and Lowered Reporting Limits

State agencies in California occasionally require new analytical methods, the analysis of new compounds under existing methods, or lowered reporting limits for promulgated methods, to achieve their regulatory goals. When new regulations are released that requires either new analytical methods or lower reporting limits, the regulated community must have access to certified laboratories that are capable of performing the methods to achieve regulatory compliance. As there have been occasions when new regulations have been adopted that required lower reporting limits prior to the capabilities being developed by California certified labs, the goal of this document is to provide a framework for State agencies to submit requests for new methods/lower reporting limits to the Environmental Laboratory Accreditation Program (ELAP), which regulates laboratory accreditation in California.

ELAP attends various meetings to coordinate with the State Water Board's Division of Drinking Water (DDW) on regulatory issues. On a weekly and monthly basis, ELAP management attends DDW Executive management meetings, which helps to ensure efficient, consistent, and effective implementation of DDW requirements and directions from upper management. The meetings include the DDW Deputy Director (DD) and Assistant DDs, program managers, Regional, and Branch Engineers. Additionally, ELAP resides under the Program Management Branch of DDW, which includes ELAP and the Technical Operations Section. The Regulations Unit resides within the Technical Operations Section that develop MCLs. Program Management Branch meetings are scheduled quarterly for additional coordination.

In addition to ELAP's engagements within the State Water Board, there are other opportunities for agency collaboration. Within the State and Regional Water Boards, a Roundtable is the coordinating body for a specific program (e.g., Surface Water Ambient Monitoring Program – SWAMP) within the State or Regional Water Board organization structure. It ensures efficient, consistent, and effective implementation of program requirements and directions from upper management. It consists of program managers and staff from each Water Board organization (Regional Water Board and State Water Board Division and/or Office) who have a direct role in the conduct and implementation of the program associated with the Roundtable.

Should DDW (either Executive Management meetings or Program Management Branch), State/Regional Water Board Roundtables, or other State agencies need lower analytical reporting limits or method development for new analytes, the following process should be followed:

1. submit their request in writing to Chief of ELAP.
2. the ELAP Chief will submit the request to the Environmental Laboratory Technical Advisory Committee (ELTAC), which was established to assist with technical matters that impact the laboratory community.
3. ELTAC will form a committee to evaluate the request, comprised of ELTAC members that have expertise in the analytical method.
4. should the ELTAC committee determine that the request should be achievable by CA certified laboratories, they will request that ELAP provide them with a list of

laboratories that are certified for the method (in the case of lower reporting limits) or for similar methods (in the case of methods for new analytes).

5. the ELTAC committee will draft a letter, to be approved by the ELTAC, that will be submitted to the labs identified by ELAP. The letter is to identify the problem, summarize the justification from the State agency, request a determination of current capabilities, request a timeline for the development of capabilities if they do not exist, and establish a timeline for a return response.
6. The ELTAC committee will review the responses from the labs and prepare a summary of the responses.
7. Should the labs be capable of achieving the State agency needs, then the summary of capabilities will be submitted to the ELAP Chief for distribution to the State agency.
 - a. Labs that are capable of achieving the State agency needs are to obtain accreditation for any new methods, which will require ELAP to add new methods to the appropriate FOTs.
8. Should the labs not have the current capabilities to achieving the State agency needs, then the summary identifying the current status along with a projected timeline for capabilities development will be submitted to the ELAP Chief for distribution to the State agency.