

# Coalition of Accredited Laboratories



## VIA EMAIL

June 30, 2018

Christine Sotelo  
California State Water Resources Control Board  
Environmental Laboratory Accreditation Program  
P.O. Box 100  
Sacramento, CA 95814  
[Elapca\\_comments@waterboards.ca.gov](mailto:Elapca_comments@waterboards.ca.gov)

## **Subject: ELAP Preliminary Draft Regulations Comments**

The Coalition of Accredited Laboratories ("CAL") is an organization representing environmental laboratories in the State of California which are accredited by the Environmental Laboratory Accreditation Program ("ELAP"). CAL represents a wide range of laboratories, large and small, publicly and privately owned. We are grateful for the opportunity to submit these comments and look forward to working with the Division of Drinking Water ("DDW") and ELAP to improve laboratory accreditation.

On July 24, 2017, ELAP released preliminary draft regulations and requested public comments before the regulations were submitted to the Office of Administrative Law ("OAL") to begin the formal rule making process. CAL has submitted comments on this topic in the past and believes that they are still relevant. In particular, the members of CAL believe that the provisions in the preliminary draft regulations referencing the thousands of supplemental requirements found in The NELAC Institute ("TNI") are counter-productive and will create an unnecessary burden upon laboratories. We also believe that requiring the use of these supplemental requirements are inconsistent with the Administrative Procedures Act ("APA") by creating record keeping and reporting requirements that do nothing to improve laboratory data quality. We further believe, as documented in our previous letters on this topic, that such an effort is contrary to the legislative intent of the Environmental Laboratory Accreditation Act. CAL is principally concerned about the sheer number of requirements, rather than with any one requirement. Even the smaller laboratories would need to add over 1250 additional requirements and for larger laboratories, the numbers would be much higher. As data from the States of Florida and New York have shown, this enormous number of additional requirements impelled laboratories out of the accreditation programs after adoption of the TNI requirements, especially smaller laboratories and those in more remote locations.

With the release of the preliminary draft regulations, CAL has concerns regarding three topics are listed below.

- 1. The Letter and Spirit of the APA are compromised with Adoption of ELAP Regulations as Written.**

One of the proposed changes in the definitions section, Title 22. Social Security, Division 4. Environmental Health, Chapter 19. Certification of Environmental Laboratories, Article 1. Definitions, which states:

*“§ 64801. Definitions. The relevant definitions listed in the 2016 TNI Standard, Volume 1 apply throughout this regulation except as otherwise defined in this section.”*

This seems contrary to both the letter and spirit of the APA. Under the APA, it is written that; *“The proposed adoption, amendment, or repeal of a regulation shall be based on adequate information concerning the need for, and consequences of, proposed governmental action.”* (Government Code, § 11346.3 (a) (1))

Additionally, in the APA states that *“Analyses conducted pursuant to this section are intended to provide agencies and the public with tools to determine whether the regulatory proposal is an efficient and effective means of implementing the policy decisions enacted in statute or by other provisions of law in the least burdensome manner. Regulatory impact analyses shall inform the agencies and the public of the economic consequences of regulatory choices, not reassess statutory policy. The baseline for the regulatory analysis shall be the most cost-effective set of regulatory measures that are equally effective in achieving the purpose of the regulation in a manner that ensures full compliance with the authorizing statute or other law being implemented or made specific by the proposed regulation.”* (Government Code § 11346.3. (e))

As currently written, the regulation incorporates almost the entirety of The NELAC Institute’s (“TNI”) 2016 Standard documents, which constitute 180 pages, thus becoming the overwhelming majority of the text of this proposed regulation. However, the TNI documents are not publicly available. They can only be reviewed by purchasing the documents from TNI. Licensing requirements of TNI preclude parties that have purchased these documents from sharing them, and they are not available in public libraries or other similar venues. This means that parties wishing to review the proposed regulations and assess the impact of those regulations on themselves and others must buy a copy of the regulations from a third party. The goal of the APA is to achieve the best possible regulations through means of openness and transparency, and the requirement to purchase a copy of the regulations seems contrary to that objective. CAL believes that if the entirety of the TNI Volume 1 is to be used for regulatory compliance, it should be available in its entirety for public comment and review without having to purchase it.

## **2. Application, Fees, and On-Site Assessments.**

Under current regulations, the certificate of accreditation is active for 24 months. During that period, each laboratory must undergo an On-Site Assessment (“OSA”) before accreditation is awarded. This clearly establishes a requirement that OSAs occur every 24 months. ELAP’s fees are supposed to support a staff who can regularly visit the approximately 660 laboratories accredited by ELAP. Since December 2015, ELAP’s fees have

approximately doubled but to date they have been unable to keep to a 24 month OSA cycle. In the preliminary draft regulations, it appears that ELAP is proposing that the OSA cycle be increased to 36 months, although the language is rather unclear in part because the certificate life remains at 24 months. The confusion arises from the fact that the OSA provisions of the proposed regulations are scattered about in several different sections and seem to contradict each other. For example, §64802.00 (a) (4) says that an OSA needs to be completed “*when required*” but it does not explain when that might be. In §64802.05 (a)(3) says that an OSA must occur within a “*three year interval*” but does not explain when that interval begins or ends or how it is associated with the issuance or termination of a certificate of accreditation. However, if the draft regulations mean the OSA cycle to be 36 months, this seems to be a problem for two reasons. First, it seems inequitable for ELAP to raise fees to support staff for a 24 month OSA cycle and then reduce their workload to a 36 month cycle. If ELAP wants to reduce the frequency of OSAs, the regulations need to state that clearly and their fees need to decrease accordingly. Second, the entire rationale for requiring TNI provisions was to improve laboratory performance. Reducing the frequency of OSAs seems to accomplish the opposite effect.

### **3. Fields of Accreditation (FOA) and Units of Accreditation (UOA).**

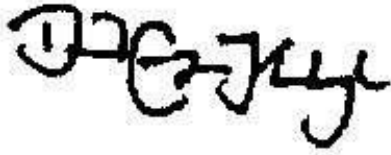
Preliminary draft ELAP regulations §64802.15 states that FOAs and UOAs will not be defined in statute or regulation but only by listing them on their website. The stated goal is to keep the list of methods and analytes regulated current with the needs of the various regulatory agencies requiring accreditation. While that goal is certainly desirable, the method seems unsound. This allows ELAP to change FOAs and UOAs without any due process or following the APA. ELAP can add or subtract methods, analytes, and FOAs at any time. Fees are tied to the FOAs and UOAs so fees can change whenever the webpage is changed. For example, inorganic tests for Safe Drinking Water Act compliance monitoring are grouped into FOA 2 / 102. Included in this FOA are methods for inorganic chemicals by Ion Chromatography (“IC”) but there are many other methods as well. ELAP could, with a few keystrokes, remove IC from this FOA and create an entirely new FOA. Fees for laboratories with this FOA could increase significantly. FOAs and UOA can impact other parts of accreditation. It is a very bad idea for them to be changed on the fly without due process. It is also of questionable legal basis, it is hard to see how FOAs and UOAs found on this webpage and nowhere else can be held up as legally defensible.

ELAP is currently struggling to do their job in a consistent and timely fashion as evidenced in the number of laboratories which have not had an OSA. We certainly agree that the current regulations are badly out of date and need to be overhauled but the current proposal only makes matters worse rather than better. It will require a great deal more work for ELAP staff, for the community of accredited laboratories, while providing less protection to public health, instead of more. Effective regulations can be developed which will not overly burden the laboratory community and create a more efficient accreditation program.

We recommend that the State Board allow ELAP to take its existing program and budget, develop better regulations, and make that work before considering taking on vastly more complex efforts

that will cost the laboratory community a great deal of money while providing no benefit to public health, no additional protection to the environment, and no sustained improvement to the quality of data being produced by accredited laboratories in California.

We thank you for your attention.



David Eugene Kimbrough, Ph.D. Chair, CAL

Concurrences:



Neal B. Allen, District Manager, Mt. View Sanitary District (ELAP# 2011)



Rojert G. Araghi, Laboratory Director, American Scientific Laboratories, LLC (ELAP# 2200)



Veronica Astells, Environmental Program Manager, Town of Windsor (ELAP# 2942)

A handwritten signature in black ink, appearing to read "Dale Armstrong".

Dale Armstrong, Laboratory Supervisor, Goleta Water District (ELAP# 1374)

A handwritten signature in black ink, appearing to read "Timothy Bailey".

Timothy Bailey, Laboratory Supervisor, Santa Fe Irrigation District (ELAP# 1553)

A handwritten signature in blue ink, appearing to read "Thomas Barkhurst".

Thomas Barkhurst, Laboratory Supervisor, Marina Coast Water District, (ELAP# 1617)

A handwritten signature in blue ink, appearing to read "Zenda L Berrada".

Zenda L. Berrada, Laboratory Director, San Mateo County Public Health Laboratory (ELAP# 1591)

A handwritten signature in black ink, appearing to read "Samantha Bialorucki".

Samantha Bialorucki, Laboratory Manager, City of Palo Alto (ELAP # 1087).

A handwritten signature in black ink, appearing to read "Steve Bigley".

Steve Bigley, Director of Environmental Services, Coachella Valley Water District (ELAP# 2472)

A handwritten signature in black ink, appearing to read "R. Blodgett".

Richard R. Blodgett, Laboratory Director, Water Environmental Testing Laboratory (WET Lab) (ELAP# 2082)

A handwritten signature in black ink, appearing to read "Lloyd Bracewell".

Lloyd Bracewell, Laboratory Director, Bracewell Engineering Inc. - Hollister Laboratory (ELAP# 1520)

A handwritten signature in blue ink, appearing to read "Nicki Branch".

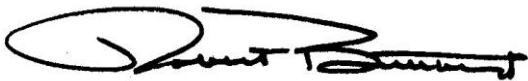
Nicki Branch, Laboratory Superintendent, City of Escondido (ELAP# 1625)

A handwritten signature in black ink, appearing to read "B. Burnett".

Betty Burnett, General Manager, South Orange County Wastewater Authority (ELAP# 1280)

A handwritten signature in black ink, appearing to be 'Sara Burke', with a long horizontal stroke extending to the right.

Sara Burke, Plant Chemist, Oro Loma Sanitary District (ELAP# 1764)

A handwritten signature in black ink, appearing to be 'Robert Butterfield', with a stylized, cursive script.

Robert Butterfield, President and Laboratory Director, A & L Western Agricultural Laboratories, Inc. (ELAP# 1657)

A handwritten signature in black ink, appearing to be 'Sharon Campbell', with a cursive script.

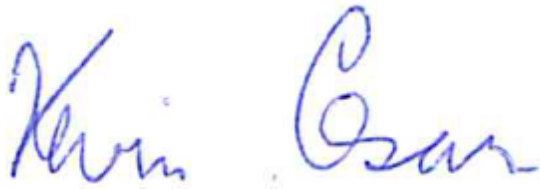
Sharon Campbell, Laboratory Director, City of Placerville (ELAP# 2285)

A handwritten signature in blue ink, appearing to be 'Allen Carlisle', with a cursive script.

Allen Carlisle, CEO/General Manager Padre Dam MWD (ELAP# 1045)

A handwritten signature in blue ink, appearing to be 'Sigourney Castel de Oro', with a cursive script.

Sigourney Castel de Oro, Laboratory Director, American Water Services (ELAP# 2817)



Kevin Cesar, Laboratory Source Control Supervisor, WPCP, City of Millbrae (ELAP# 1219)



Tom Chism, Wastewater Treatment Superintendent, City of Shasta Lake



Commodore Collins, Laboratory Supervisor, Valley Sanitary District, (ELAP# 1053)



Greg Coons, Chief Operating Officer, MobiLab Environmental Determinations USA LLC (ELAP# 2822)



Jeremy Corrigan, MS, PHM II, ELAP Director/Laboratory Manager, Humboldt County Public Health Laboratory (ELAP# 2033)



A handwritten signature in cursive script, appearing to read "Ana Corti".

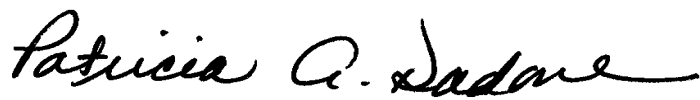
Ana Corti, Water Quality Analyst/Laboratory Director, City of Pittsburg (ELAP# 1479)

A handwritten signature in cursive script, appearing to read "Lena Cox".

Lena Cox, Laboratory Supervisor, Goleta Sanitary District (ELAP# 1374)

A handwritten signature in cursive script, appearing to read "Nikki Crumpler".

Nikki Crumpler, Laboratory Analyst, Big Bear Area Regional Wastewater Agency (ELAP #1828)

A handwritten signature in cursive script, appearing to read "Patricia A. Dadone".

Patricia A. Dadone, Director, Public Health Laboratory County of Santa Clara (ELAP# 1905)

A handwritten signature in cursive script, appearing to read "P. Dalla-Betta".

Pete Dalla-Betta, PhD, Laboratory Supervisor, City of San Mateo WWTP (ELAP# 1151)



Bradley Davis, Laboratory Manager, Burbank Water Reclamation Plant (ELAP# 1819)



Ray De Ocampo, Laboratory/ Environmental Compliance Supervisor, Carmel Area Wastewater District (ELAP# 1804)



Yeggie Dearborn, Ph.D., Principle-Laboratory Director, Cel Analytical Inc. (ELAP# 2647)



Gustavo A. Delgado, Ph.D., Chief Executive Officer, Forensic Analytical Laboratories, Inc. (ELAP# 1202)



Erich Delmas, Laboratory Supervisor, City of Tracy, (ELAP # 1481)



Gurpal Deol, Water Quality Manager, Zone 7 Water Agency (ELAP # 1403)

*Curtis B. Desilets*

Curtis B. Desilets, Laboratory Director, Enviro-Chem, Inc (ELAP# 1555)



Hojabr Dezfulian, Ph.D., President & Laboratory Director of Applied Industrial Microbiology, Inc.(ELAP# 2952)



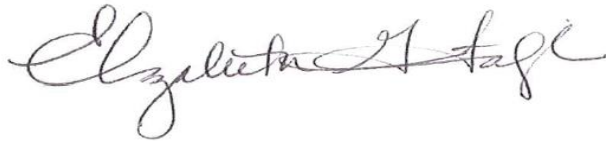
Kumudini Dharmawardana, Laboratory Supervisor, Water Resources Division, City of Livermore (ELAP# 2198)



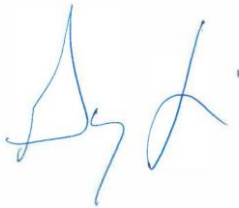
Mark Dysert, Laboratory Director, Dysert Environmental, Inc. (ELAP# 2764)

Mary Erland

Mary Erland, Chemist, City of Lompoc, Water Division (ELAP# 1064)

A handwritten signature in black ink, appearing to read "Elizabeth H. Falejczyk".

Liz Falejczyk, Environmental Services Supervisor, For Veolia Water at Novato Sanitary District (ELAP# 1092)

A handwritten signature in blue ink, appearing to read "Gaylen Fair".

Gaylen Fair, Laboratory Supervisor, City of Santa Barbara, PWD Water Resources Laboratories (ELAP# 1504)

A handwritten signature in black ink, appearing to read "Anne C. Fairchild".

Anne Fairchild, Laboratory Manager, City of San Luis Obispo (ELAP# 1498)

A handwritten signature in black ink, appearing to read "Donna Ferguson".

Donna Ferguson, Ph.D., Laboratory Director, Monterey County Health Department, Consolidated Chemistry Laboratory (ELAP# 1395)

A handwritten signature in black ink that reads "Emilio Flores". The signature is written in a cursive style with a horizontal line at the end.

Emilio Flores, Laboratory Supervisor, City of Yuba City Water/Wastewater Laboratory, ELAP# 1250

A handwritten signature in blue ink that reads "Chris Francis". The signature is written in a cursive style.

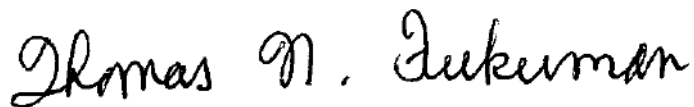
Christopher Francis, Interim Regulatory Compliance Manager, Napa Sanitation District, (ELAP# 2334)

A handwritten signature in blue ink that reads "Melinda Freitas". The signature is written in a cursive style.

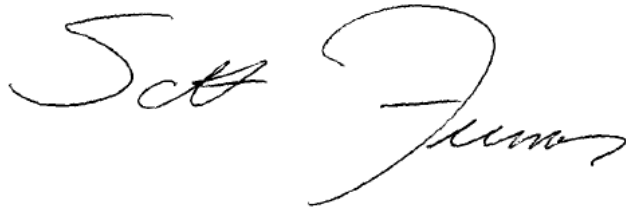
Melinda Freitas, Laboratory Manager, Sierra Dairy Laboratory (ELAP# 1384)

A handwritten signature in black ink that reads "Scott M. Fridlund". The signature is written in a cursive style.

Scott Fridlund, Laboratory Director, Dellavalle Laboratory, Inc (ELAP# 1595)

A handwritten signature in black ink that reads "Thomas N. Fukuman". The signature is written in a cursive style.

Thomas N. Fukuman, Manager of Analytical Services, Chem Pro Laboratory, Inc. (ELAP# 1265)



Scott Furnas, President, California Laboratory Services, (ELAP# 1233)



Diane Griffin, Laboratory Supervisor, Dublin San Ramon Services District (ELAP# 1272)



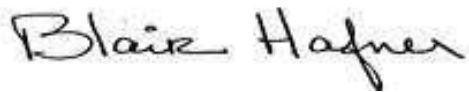
Heather Grove, Wastewater System Superintendent, City of Manteca WQCF (ELAP# 1098)



Michael Hansen, Deputy Public Works Director-Utility Operations, City of Eureka Public Works (ELAP# 1360)



Richard Hansen, General Manager, Three Valleys Municipal Water District (ELAP# 1581)

A handwritten signature in black ink that reads "Blair Hafner". The script is cursive and fluid.

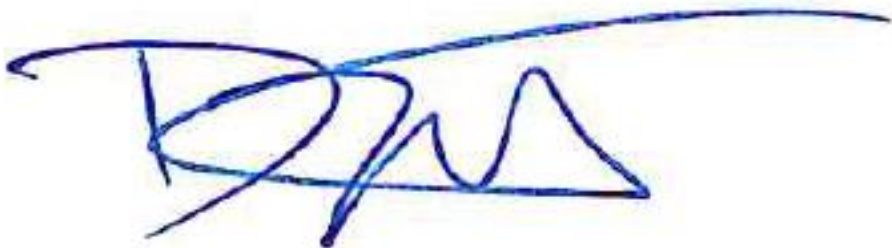
Blair Hafner, Laboratory Director, Mammoth Community Water District (ELAP# 1453)

A handwritten signature in black ink that reads "Tom F. Hashemi". The script is cursive and elegant.

Tom F. Hashemi, Director, Reference Laboratories (ELAP# 2809)

A handwritten signature in blue ink that reads "Andrew Hata". The script is cursive and somewhat stylized.

Andrew Hata, Laboratory Manager, JMR Environmental Services, Inc. (ELAP# 2468)

A handwritten signature in blue ink that reads "David Huff". The script is cursive and features a large, sweeping initial 'D'.

David Huff, Laboratory Director, City of Turlock, (ELAP# 2150)

A handwritten signature in black ink that reads "Giti Heravian". The script is cursive and clear.

Giti Heravian, Laboratory Manager, Fairfield-Suisun Sewer District, (ELAP# 2067)

A handwritten signature in blue ink that reads "Florence B. Jay". The script is cursive and fluid.

Florence B. Jay, Laboratory Supervisor, Ventura Water (ELAP# 1193)

A handwritten signature in black ink that reads "Julie Jeleti". The script is cursive and clear.

Julie Jeleti, Laboratory Coordinator, South San Joaquin Irrigation District (ELAP# 2646)

A handwritten signature in blue ink that reads "Steve Jepsen". The script is cursive and somewhat stylized.

Steve Jepsen, Executive Director, Southern California Alliance of Publically Owned Treatment Works

A handwritten signature in black ink that reads "Mark Jerpbak". The script is cursive and bold.

Mark Jerpbak, Laboratory Director, TEG-Northern California (ELAP# 1671 & 2012)

A handwritten signature in black ink that reads "Jayne Joy". The script is cursive and elegant.

Jayne Joy, Director of Environmental and Regulatory Compliance, Eastern Municipal Water District, (ELAP# 1379)



A handwritten signature in blue ink that reads "Erin Kebbas". The script is cursive and fluid.

Erin Kebbas, Water Quality Manager, City of Napa, (ELAP# 2413)

A handwritten signature in blue ink that reads "Joan Kelly". The script is cursive and clear.

Joan Kelly, Laboratory Director, City of Ukiah WWTP, (ELAP# 4263)

A handwritten signature in blue ink that reads "Jina Ryu Kim". The script is cursive and somewhat stylized.

Jina Ryu Kim, Laboratory Director, JK Bioscience, Inc. (ELAP# 2968)

A handwritten signature in blue ink that reads "Kati King". The script is cursive and elegant.

Kati King, Laboratory Director, City of Scotts Valley Wastewater Reclamation Facility (ELAP# 1062)

A handwritten signature in black ink that reads "Olga Kist". The script is cursive and bold.

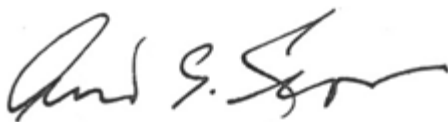
Olga Kist, President and Laboratory Director, Analytical Labs San Francisco, Inc. (ELAP# 1050)

A handwritten signature in black ink that reads "Jeff Koelewyn". The signature is written in a cursive, slightly slanted style.

Jeff Koelewyn, Laboratory/Regulatory Affairs Supervisor, Castaic Lake Water Agency (ELAP# 2104)

A handwritten signature in black ink that reads "Angie Koski". The signature is written in a cursive, slightly slanted style.

Angie Koski, Laboratory Technician III, City of Healdsburg Water Reclamation Facility (ELAP# 2726)

A handwritten signature in black ink that reads "Arnold Leff". The signature is written in a cursive, slightly slanted style.

Arnold Leff, M.D., REHS, Environmental Health Director/Health Officer, County of Santa Cruz (ELAP#, 2394)

A handwritten signature in blue ink that reads "Kim Lim". The signature is written in a cursive, slightly slanted style.

Kim Lim, CEO, Ultimate Labs, (ELAP# 2783)

A handwritten signature in black ink that reads "Stephen Linsley". The signature is written in a cursive, slightly slanted style.

Stephen Linsley, Environmental Compliance Supervisor, West County Wastewater District (ELAP# 2537)

A handwritten signature in black ink, appearing to read "Justin Livesay". The signature is fluid and cursive, with a large loop at the end.

Justin Livesay, Laboratory Director, Antelope Valley-East Kern Water Agency (ELAP# 1460)

A handwritten signature in black ink, appearing to read "Ty Maddux". The signature is cursive and somewhat stylized.

Ty Maddux, Water Quality Technician, Walnut Valley Water District (ELAP# 1460)

***Timea Marsalko Majoros***

Timea Marsalko Majoros Ph.D., President/Laboratory Director, Delta Environmental Laboratories, (ELAP# 57)

A handwritten signature in black ink, appearing to read "Santos Marquez". The signature is cursive and somewhat stylized.

Santos Marquez, Laboratory Supervisor, City of Thousand Oaks, (ELAP# 1158)

***Beverli A. Marshall***

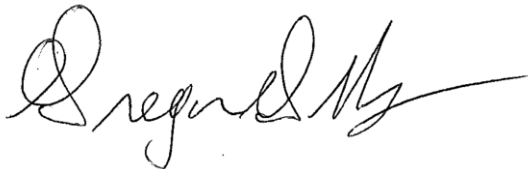
Beverli A. Marshall, General Manager, Sewer Authority Mid-Coastside, (ELAP# 1306)



Susan McMahon, Water Quality Supervisor, Casitas Municipal Water District, (ELAP# 1696)



Cheryl McMillien, Laboratory Director, CERCO Analytical, Inc. (ELAP# 2153)



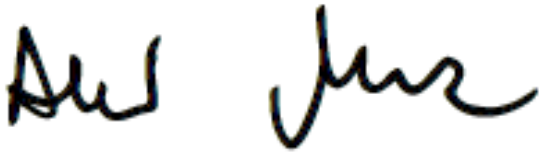
Gregor G. Meyer, Public Works Director, City of Woodland , (ELAP# 2464)



Rod Miller, Laboratory Director, Water Quality Division Laboratories, San Francisco Public Utilities Commission (ELAP # 1449, # 1721, # 1720, # 2207, # 2341, # 2335)



Jack Miyamoto, Chemist, City of Santa Monica (ELAP# 2975)



Andrew Moroz, Laboratory Director, Analytical Chemical Labs Inc., (ELAP# 2505)



Fanny Mui, Superintendent/Chief Plant Operator, South San Luis Obispo County Sanitation District (ELAP Cert # 1413)



Salam Nael, Laboratory Supervisor, City of Redlands, (ELAP # 1513)



Mary Pedersen, Laboratory Analyst, Lake Arrowhead CSD Laboratory (ELAP# 1415)



Mark Noorani, Laboratory Director, Orange Coast Analytical, Inc. (ELAP# 2576)

A handwritten signature in black ink that reads "Debra Palacio". The script is cursive and fluid.

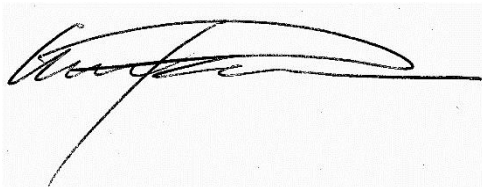
Debra Ann Palacio, Director, Santa Barbara County Public Health Laboratory (ELAP# 1818)

A handwritten signature in purple ink that reads "Nimisha Patel". The script is cursive and fluid.

Nimisha Patel, Laboratory Director/Environmental Compliance Manager, Sewerage Agency of Southern Marin (ELAP# 1538)

A handwritten signature in black ink that reads "Ryan P. Peralta". The script is cursive and fluid.

Ryan Peralta, Laboratory Coordinator. City of San Clemente, (ELAP# 1703)

A handwritten signature in black ink that reads "Tony Pirondini". The script is cursive and fluid.

Tony Pirondini, Water Quality Manager, City of Vacaville Utilities Department (ELAP# 1952)

A handwritten signature in black ink, appearing to read "Mike Pittman".

Mike Pittman, Senior Analyst, City of Redding, Stillwater WWTP (ELAP# 1962)

A handwritten signature in black ink, appearing to read "Terry Powers".

Terry Powers, Laboratory Director, South Tahoe Public Utility District (ELAP# 1569)

*Cassandra Prudhel*

Cassandra Prudhel , Laboratory Director, City of Calistoga (ELAP # 2766)

A handwritten signature in blue ink, appearing to read "Marc Oliver D. Quijano".

Marc Oliver D. Quijano, Laboratory Manager, West Basin Water Quality Laboratory (ELAP# 2111)

*Carol Reilly*

Carol Reilly, Laboratory Supervisor, City of Chico (ELAP #1476)



Pablo Ramudo, Laboratory Director/Water Quality Supervisor, North Marin Water District (ELAP# 1574)



Victor Santa Cruz, Biologist, Inland Empire Utilities Agency (ELAP# 1808)



Lori Sarti, Water Quality Analyst, City of Antioch (ELAP# 1383)

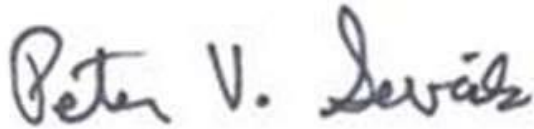


Mark W. Scandalis, Laboratory Director, City of Paso Robles (ELAP# 2972)



John Seo, Interim Laboratory Director, Union Sanitary District (ELAP# 1324)



A handwritten signature in black ink that reads "Peter V. Sevcik". The signature is written in a cursive, slightly slanted style.

Peter V. Sevcik, PE, Director of Engineering and Operations, Nipomo Community Services District (ELAP# 2797)

A handwritten signature in black ink that reads "Al Sexton". The signature is written in a cursive, slightly slanted style.

Al Sexton, Laboratory Supervisor, City of Simi Valley WQCP (ELAP# 1337)

A handwritten signature in blue ink that reads "Peter Shen". The signature is written in a cursive, slightly slanted style.

Peter Shen, Laboratory Director, Carlsbad Desalination Plant Laboratory (ELAP# 6170)

A handwritten signature in black ink that reads "Hyrum Slade". The signature is written in a cursive, slightly slanted style.

Hyrum Slade, Laboratory Supervisor, GeoAnalytical Laboratories, Inc. (ELAP # 2585)

A handwritten signature in blue ink that reads "Ellen Simm". The signature is written in a cursive, slightly slanted style.

Ellen Simm, Water Agency Coordinator – Laboratory Services, Sonoma County Water Agency (ELAP# 2292 & 2293)



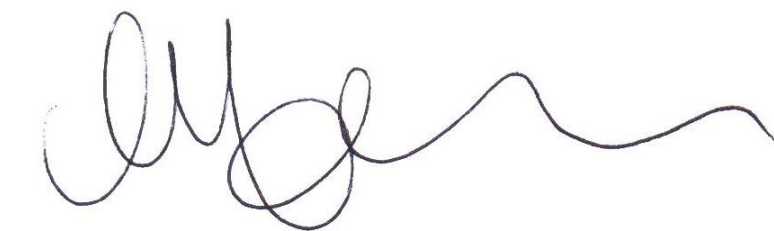
Sharon Simoni, Laboratory Manager, Clean Earth Environmental Laboratory (ELAP# 2622)



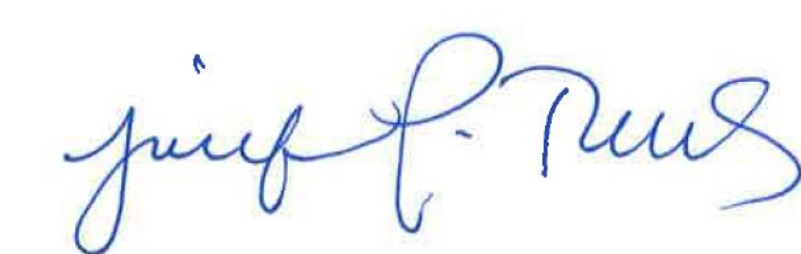
Angie Smigelski, Environmental & Water Quality Lab Supervisor, City of Modesto (ELAP# 1362 and 2674)



Justin Stepanian, President - Laboratory Director, Strata-Analysts Group, Inc (ELAP #2052)



Marie Stillway, ATL Laboratory Manager, Aquatic Health Program Laboratory (ELAP# 2243)



Josie Tellers, Water Quality Coordinator, City of Davis (ELAP# 2645)



Amanda Thompson, Water Quality / Regulatory Affairs Supervisor, Palmdale Water District, (ELAP# 1776)



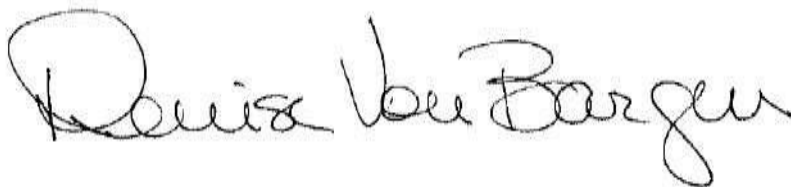
Tai Tseng, Operations Manager, Long Beach Water Department, (ELAP# 4206)



Tony Umphenour, Laboratory Director, Burbank Water and Power, (ELAP# 1464)



Dan Verdon, Laboratory Director, EnviroMatrix Analytical, Inc. (ELAP# 2564)



Denise Von Bargen, Laboratory Director, Ventura County Public Health Laboratory (ELAP# 1910)



Musau WaKabongo, Ph.D., PHM, HCLD/CC(ABB), Laboratory Director, Placer County Public Health Laboratory, (ELAP# 2004)



Bob Wandro, Laboratory Director, Silicon Valley Clean Water (ELAP# 1688)



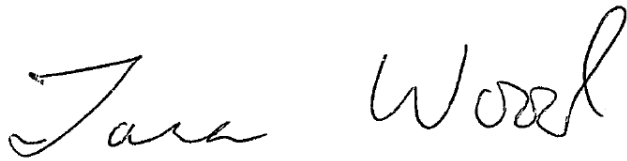
Daniel Webster, Senior Laboratory Technician, City of Redding (ELAP# 1401)



Janet Williams-Harmon, Laboratory Director, Veolia - Rialto Water Services (ELAP# 1751)



Roger A. Westergard, Water Quality Laboratory Supervisor, City of Anaheim Public Utilities (ELAP# 1514)

A handwritten signature in black ink that reads "Tara Wood". The letters are cursive and fluid.

Tara Wood, Laboratory Director, City of Crescent City (ELAP #1465\_

A handwritten signature in black ink that reads "Lee Yoo". The signature is written in a cursive style.

Lee Yoo, Laboratory Director, Orange County Water District (ELAP# 1114)

A handwritten signature in black ink that reads "Larry Zhang". The signature is written in a cursive style.

Larry Zhang, Ph.D., President and Laboratory Director, C&E Laboratories, Inc. (ELAP# 2268)

A handwritten signature in black ink that reads "Ken Zheng". The signature is written in a cursive style.

Ken Zheng, Laboratory Director, A & R Laboratories, Inc. ( ELAP# 2789 and 2790)

A handwritten signature in black ink that reads "Zhongrui Zhou". The signature is written in a cursive style.

Zhongrui Zhou, Laboratory Director, Elite Analytical (ELAP # 2416)

A handwritten signature in blue ink, appearing to read "C. Ziernicki". The signature is fluid and cursive, with the first letter of the last name being a large, stylized "Z".

Cindy Ziernicki, Senior Chemist, Helix Water District (ELAP# 1610)

A handwritten signature in blue ink, appearing to read "Bill Zolan". The signature is fluid and cursive, with the first letter of the last name being a large, stylized "Z".

William Zolan, Supervising Chemist, Mel Leong Treatment Plant, San Francisco International Airport  
Commission (ELAP# 1705)