

Environmental Laboratory Accreditation Program (ELAP) Update

(struggle for existence...)

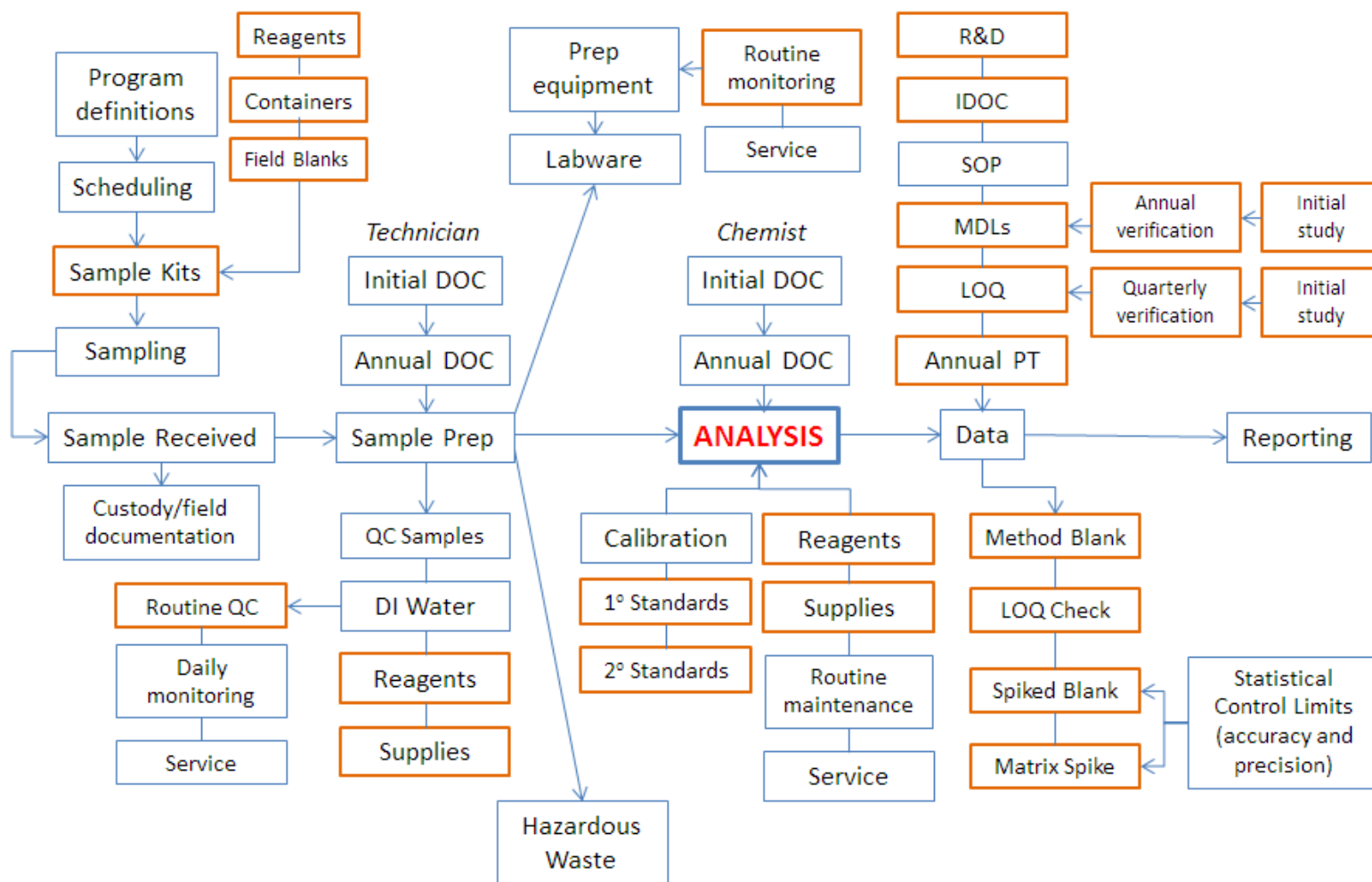
BACWA Annual Meeting

11 January 2019

- **What does an analysis entail?**
- **Regulated environmental labs**
- **ELAP's proposed 3rd draft regulation**
- **TNI, CA QMS**
- **What does your lab need?**

Before TNI

What goes into an 'analysis'?



Must analyze and/or meet QC requirements.

About your labs



- **80:80 vs.100:100**
- **What is regulated: how to accept samples, how to analyze samples, how to report results, how to dispose of samples**
- **Documentation: must be able to trace samples and what happens to samples**

About your labs



- **GLP: Good Laboratory Practices**
- **Methods are regulations**
- **Supporting information: Federal, State Regulations, permits etc.**
- **ELAP Regulations: How to be licensed to work for California agencies**
- **In addition: TNI-2016 (light) Standards**

ELAP regulations update



- **Need for new ELAP regulations**
- **ELAP regulations third preliminary draft published on December 19, 2018**
- **Comments due January 18, 2019**
- **Adoption expected in summer/fall 2019**
- **From date of adoption, labs have three years to become compliant**
- **Workshops: ELAP presentation and oral comments from public, January 15 & 17**

ELAP workshop



- **Sacramento – Tuesday, January 15, 2019, 10am-5pm**
Central Valley Regional Water Quality Control Board,
Board Room
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670
Webcast available (audio and video only)
- **Los Angeles – Thursday, January 17, 2019, 10am-5pm**
Junipero Serra State Building, Carmel Room
320 W 4th Street
Los Angeles, CA 90013

California QMS (Quality Management System)



- Initiative from Southern California
- Supported by Clean Water Summit Partners: BACWA, CASA, CWEA, CVCWA, SCAP
- Removes paperwork intensive parts of TNI standards that are least applicable to small labs
- On December 13, 2018 ELTAC voted 8:5 to explore alternatives to ELAP proposed regulations
- ELTAC advisory only; fate depends on ELAP and *agency partners*

- **Employee training requirements**
- **Management reports**
 - *4.2.3 Top management shall provide evidence of commitment to the development and implementation of the management system and to continually improving its effectiveness.*
 - *4.15.1 In accordance with a predetermined schedule and procedure, the laboratory's top management shall periodically conduct a review of the laboratory's management system and testing and/or calibration activities to ensure their continuing suitability and effectiveness, and to **introduce necessary changes or improvements**. The review shall take account of:*
 - *4.15.2 Findings from management reviews and the actions that arise from them **shall be recorded**. The management **shall ensure that those actions are carried out within an appropriate and agreed timescale**.*

TNI/ISO Conundrum

**Corrective
action**

**Preventive
action**

**Root cause
analysis**

FACE Inc.
Northern California Laboratory
Quality Assurance Plan

Section: 8
Revision: 1
Date: 02-12-95
Page: 6 of 6

Exhibit - 8.2

Non-Conformance Report (NCR)

SAMPLE ID:	
ANALYSIS:	
ANALYSIS DATE:	
REACT APPLIED:	
OTHER SAMPLES AFFECTED:	

ITEM

LIST OF OUT-OF-CONTROL EVENTS

1	Calibration Error
2	Container Labeling/Mislabeling (CEN)
3	Laboratory Method Blank (LMB)
4	Laboratory Control Sample (LCS)
5	Laboratory Control Sample (LCS) (LCS)
6	LCS/CSD Precision (PCC)
7	Matrix Spike/Spiked, Spike Duplicate, Precision (MS/MSD)
8	MS/MSD Precision (PCC)
9	Substrate Purity/Quality
10	SPCC (CEN) Error
11	EQC (CEN) Error
12	Interference Check Standard (IC/ICP) Error
13	IC/ICP (CEN) Breakdown (CEN) Error
14	None

EXPLANATION OF OUT-OF-CONTROL EVENT

ANALYST/G.L. DATE

ACTIONS TAKEN TO RESOLVE OUT-OF-CONTROL EVENT

Analyst Date
Group Leader Date

The cost conundrum



- **ELAP is supposed to be a fee supported entity**
- **Ability to hire independent auditors to meet the audit cycle**
 - Example: three person labs that perform general chemistry, microbiology, metals by ICP
 - One auditor with the expertise
 - Document review, travel, on-site audit, final report: \$5000 - \$7000
 - On time report, professional auditors
- **Compared this with nutrient removal cost... insignificant**

- **We support each other**
- **Continue to comment on the draft regulations**
- **Monthly meetings, each meeting focuses on one TNI segment**
 - **There is no ‘one size’ solution; each agency is unique**
- **ELTAC representation**

Labs need your support



- **Labs are capable of complying with TNI with adequate support**
 - **Information Management System, staffing, time to attend BACWA lab committee meetings, time and budget to attend training**
- **Now is the time to give the support**
 - Either TNI with two requirements changed**
or
TNI with some requirements removed (California QMS)

Struggle for existence and the survival of the...

**Strongest?
Biggest Lab?**



**Swiftest?
Lab with the
biggest
budget?**

MOST ADAPTABLE

There is hope for all of us labs

Thank you



ELTAC

TNI

QMS

NELAC

AB

VIM1



ISO 17025
SCAP

ELLA

PT

ISOR

Questions?