

Committee Request for Board Action: None

Regular meeting: 42 attendees via Zoom representing 31 agencies, the Regional Water Board, and ELAP.

Q&A Session with ELAP Staff

Christopher Hand, Senior Environmental Scientist with the [Environmental Laboratory Accreditation Program](#) (ELAP), attended the meeting to answer questions about implementation of the TNI-2 standard and the Method Update Rule. He offered the following informal recommendations regarding the TNI-2 standard:

- ELAP staff are still discussing the process for labs to demonstrate compliance with the TNI-2 standard after 1/1/24. Chris strongly recommended that labs try to have a TNI-2 assessment before 1/1/24, but it is not a requirement. ELAP and third party assessors are offering TNI-2 assessments at this time (labs with sophisticated instrumentation must use the third party assessor). Attendees noted that your quality manual needs to be ready by 1/1/24, and could be requested by ELAP. Attendees requested that ELAP provide more information about how to show compliance with the TNI-2 standard (other than a TNI-2 assessment). If ELAP formally requests information, labs will have to provide it within 15 days.
- The group requested a copy of the checklist that ELAP is using for TNI-2 assessments, which could be a useful tool for laboratories. Following the meeting, Chris Hand noted that the current TNI checklists are the same ones from TNI, with [this one as the addendum for ELAP regulations](#). He also recommended relying on method checklists, checklists from other states such as Florida ([Florida](#)) or [North Carolina](#) or from other parties such as the California Society of Environmental Analysts (requires login).
- For rollout of the TNI-2 standard, ELAP is focused on providing assistance to laboratories. ELAP does not plan to take enforcement action as the first step in the path towards compliance with the TNI-2 standard. Instead, they would prefer to use the assessment process to resolve “findings.” However, ELAP would recommend enforcement action if an agency fails to comply with an information request.
- When there are repeat findings, third-party assessors are supposed to report back to ELAP.
- Labs cannot add information to an application that has already been submitted.
- ELAP is now able to issue certificates before the current one expires.

For the **Method Update Rule**, ELAP [recently posted documents](#) about updating Fields of Accreditation (FOAs).

- There is now an “amendment” application (Fee: \$1,000), and for labs that are only doing an amendment, the on-site assessment can be waived.
- There will be an overlap period: current FOAs containing old methods cannot be renewed after 2/1/24, but amendment applications can be submitted now for the new FOAs. Renewal applications will still be accepted with the old FOAs until 2/1/24.
- Proficiency tests (PTs) must be completed once per accreditation cycle year (not calendar year) and the same PT result can be used for renewal application **and** amendment application as long as it satisfies those requirements.

Assisted by Chris Hand, committee members discussed the timing of conducting proficiency tests (PTs) with respect to rollout of the MUR and developed the following examples:

- For a lab currently in Year 1 of its ELAP Certificate with an expiration date of September 2024: By September 2023, submit a PT for all FOAs for which the lab is currently accredited. The old methods will only be available until 2/1/24. Also, apply for an amendment application to update methods to new FOAs because this **cannot** be done as part of a renewal.
- In October 2023 or later, order new PTs and use those results for an amendment application. If the amendment application is approved by ELAP, the **same** PTs can be used again for the renewal application that is due 90 days before the Sept 2024 deadline, meaning it will be submitted by June 2024.

EPA has also proposed its next routine Methods Update Rule ([link](#)). Comments are due April 24, 2023.

Agency Reports and Group Discussion

- Brittany Rossi (Petaluma) shared a file noting differences between SM 5210 22nd and 23rd Editions.
- Attendees discussed keeping certification for Multiple Tube Fermentation when switching to Colilert.
- Attendees noted that it is best practice to include the initial correction factor of the reference thermometer (from calibration labs) in the working thermometer’s correction factor.
- USD is recruiting for a new QC chemist ([link](#)) and SFPUC will soon be recruiting 4 technicians.

BACWA Updates:

- The BACWA Annual Members meeting is May 5th ([Registration Link](#)).
- For compliance with the reissued General Order for Sanitary Sewer Systems, agencies should be prepared to sample for E. Coli for spills to freshwater; Sample for Enterococcus for spills to Bay segments; and also sample for total coliform OR fecal coliform for spills to Bay segments with SHELL beneficial use.

TNI Training and Implementation

- The next TNI training session will be April 25th and Diane Lawver will cover Part 2 Module 4. Recordings of previous sessions are available through the [BACWA website](#) (password required).

Next Regular Meeting : Tuesday, June 13, 2023, 10 AM on Zoom