

Addition of Analytical Methods to California's Accreditation Program

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STATE WATER RESOURCES CONTROL BOARD

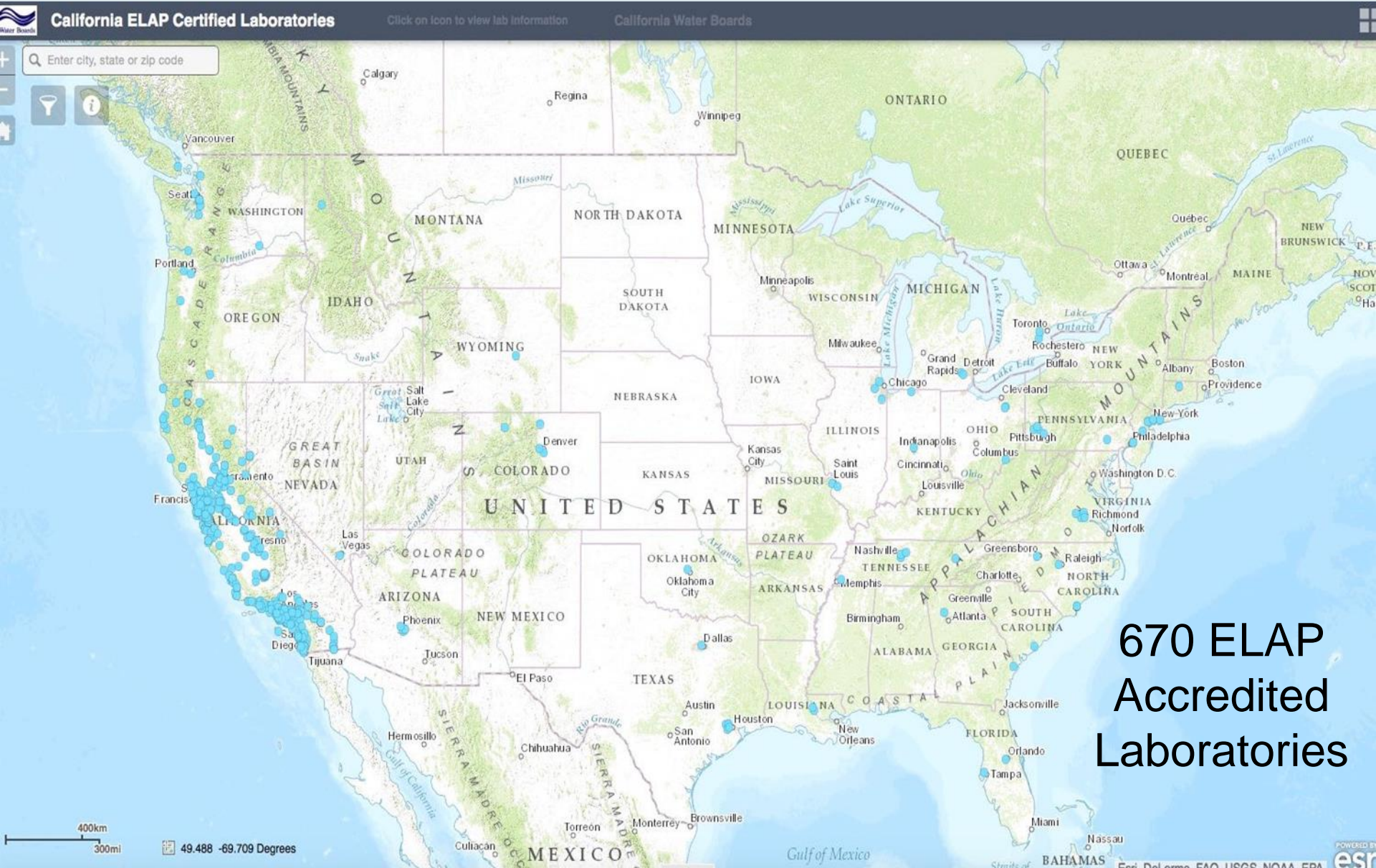


Outline

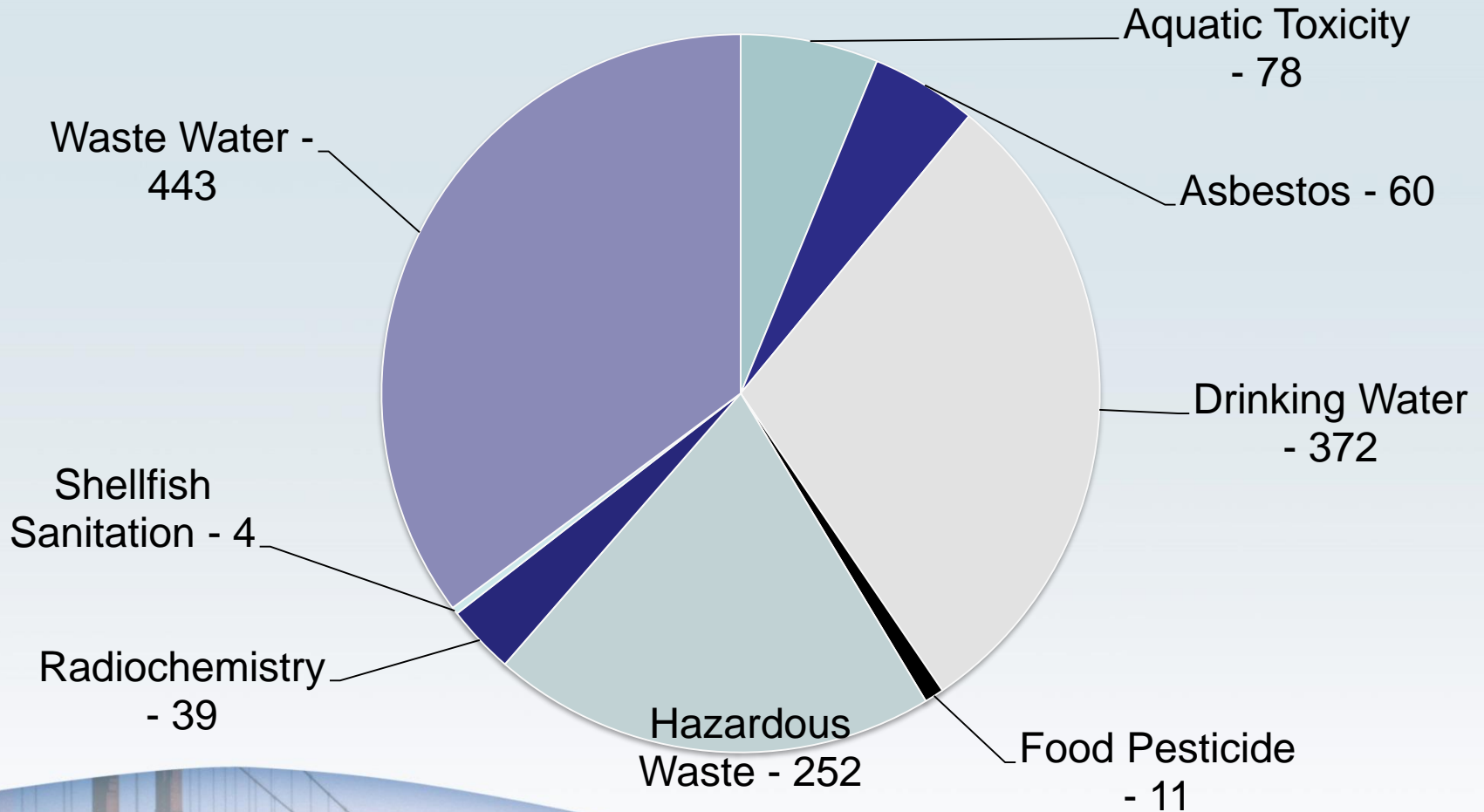
- Background
- ERP findings and recommendations
- Mechanisms to add validated methods to FOTs
- Next steps



ELAP Size & Scope



Fields of Testing



Current Methods in FOTs

- Drinking Water and Wastewater EPA promulgated methods (40 CFR part 136 and 141)
- Hazardous Waste methods
 - EPA promulgated
 - Guidance Manual (SW846-3rd Revision)
- Shellfish Sanitation methods
 - APHA
 - AOAC
 - WPCF



ERP Findings

- Analytical methods referenced in existing regulations are outdated or not relevant
- State lacks a defined procedure for approving new methods



ERP Recommendations

- Ideal solutions
- Short term solutions



Ideal Solutions

- Remove references to specific methods in the regulations
- Compile and publish a comprehensive list of all approved methods
- Allow laboratories to seek accreditation via every method
- Accredite laboratories comprehensively – and even to accredit to methods yet to be contemplated



Short Term Solutions

- Develop a comprehensive list of all approved methods
- Actively involve regulatory program clients in the development of this list
- Allow laboratories to seek accreditation via every method
- Advertise it and the new process to the laboratory community



ELAP Can't Offer All Methods

- Limited technical resources
- ELAP must build internal capacity to assess
- Update FOTs and notify community



ELAP Goals

- Meet our primary responsibility to CA regulatory agencies
 - Integrate more comprehensively with agency quality systems
 - Close the loop on data quality



Mechanism to Add Validated Methods

- Health and Safety Code allows adding Drinking Water and Wastewater promulgated methods (40 CFR part 136 and 141) without rule making process
- Not the same for Hazardous Waste methods
 - DTSC has to authorize non-promulgated methods
 - SW846 methods



Mechanism to Add Validated Methods

- Agencies request that we accredit for a method
- Laboratories request for a method under ATP for Wastewater
 - ATP letter from EPA
 - Until approved in 40 CFR Part 136
 - Laboratories request for method specified in a CA permit



New Methods and Lower DLRs

- State Agency written request to ELAP
- ELTAC will be consulted to determine existing capability
- Labs with capabilities will be accredited
- ELAP notify State Agency with status of labs without capabilities and timeline for that development



Next Steps

- Adopt new regulations
- Remove references to specific methods in the regulations
- Compile and publish a comprehensive list of all approved methods
- Accredite laboratories comprehensively



Questions?

