



September 18, 2018

Felicia Marcus – Chair and Board Members  
California State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

Dear Chairperson Marcus and Board Members:

We are reaching out to you to share some information about our organization and a couple of thoughts for you to consider as you move forward with your proposed rule for the accreditation of environmental laboratories.

The NELAC Institute (TNI) is a 501(c)3 organization whose mission is to foster the generation of environmental data of known and documented quality through an open, inclusive, and transparent process that is responsive to the needs of the community. To accomplish its mission, TNI created four core objectives:

- Development of consensus standards to be used by the states in implementing accreditation programs,
- Peer recognition of participating state agencies by a thorough evaluation of their ability to operate an accreditation program,
- Establishment of a Proficiency Testing (PT) program whose goal is to ensure laboratories receive an equal challenge when analyzing PT samples, and
- Development of tools to assist laboratories and accreditation bodies with implementation.

TNI has been very successful in achieving these objectives. Fourteen states participate in the program as recognized Accreditation Bodies and many more states participate indirectly by accepting a NELAP accreditation in lieu of their own. Over 1500 laboratories in 49 US states and territories, including 39 laboratories in California, have been accredited to the TNI standard and the program is viewed as rigorous, but fair.

We have been very interested in the recent developments in California to reinvent your program and congratulate you and the ELAP staff on your remarkable progress to date. We would like to inform you of the resources TNI has that could help both ELAP and California laboratories implement the TNI standard. TNI

The NELAC Institute  
PO Box 2439  
Weatherford, TX 76086  
817-598-1624  
<http://nelac-institute.org>

strongly believes that removing the perceived barriers to accreditation through by providing resources necessary to create a truly national environmental laboratory accreditation program. The table appended to this letter list the types of resources TNI has developed. We believe these resources, which are based on our standard provide California laboratories the support they need to fully comply with the standard.

We would also like to mention that our 2016 standard represents the consensus opinion of federal agencies, state agencies, laboratories and other stakeholders of a set of requirements we believe are:

- **Flexible:** Allow laboratories freedom to use their experience and expertise in performing their work and allow for new and novel approaches. Specify the *What* and avoid where possible the *How To*.
- **Auditable:** Sufficient detail included so that the assessors can evaluate laboratories consistently.
- **Practical and Essential:** Necessary policies and procedures that do not place an unreasonable burden upon laboratories.
- **Widely Applicable:** Applicable to laboratories regardless of size and complexity.
- **Appropriate:** Ensure that data is of known quality and that the quality is adequate for the intended use.

We would like to have the opportunity to visit with the Water Board in more detail about how we can assist the you in effectively implementing this program in California.

Sincerely,

A handwritten signature in black ink that reads "Jerry Parr". The signature is written in a cursive, flowing style.

Jerry Parr  
Executive Director

CC: Christine Sotelo

## **Resources and Support for Laboratory Accreditation from TNI**

**September 17, 2019**

The NELAC Institute (TNI) is a 501(c)3 organization whose mission is to foster the generation of environmental data of known and documented quality through an open, inclusive, and transparent process that is responsive to the needs of the community. TNI operates a number of programs to support this mission, including the National Environmental Laboratory Accreditation Program (NELAP). To support this program, TNI provides resources for both laboratories and the organizations that accredit laboratories. This document was prepared to summarize some of the resources available from TNI.

### **Tools for Accreditation Bodies**

TNI has developed and maintains a number of resources in helping Accreditation Bodies (ABs) implement their program. These include:

- A database of over 3000 analytes and an easy system for adding new analytes,
- A database of over 4000 methods and a Methods Compendium that allows access to a copy of the method,
- A Laboratory Accreditation Management System that allows ABs to upload information about their accredited laboratories and also allow the general public access to search for laboratories,
- An annual Assessment Forum, where laboratory assessors can share information,
- Training courses on ISO 17011 and the TNI standard for ABs,
- Fields of Proficiency Testing (PT), tables of analytes required for proficiency testing with concentration ranges and acceptance limits,
- A listing of PT Providers accredited to the TNI standard for PT providers, and
- A listing of third-party contract laboratory assessors.

### **Tools for Laboratories**

TNI has also developed and maintains a number of resources in helping laboratories become accredited. These include:

- A database of over 3000 analytes and an easy system for adding new analytes,
- A database of over 4000 methods and a Methods Compendium that allows access to a copy of the method,
- Guidance documents that go into more detail about specific requirements,
- Fields of Proficiency Testing (PT), tables of analytes required for proficiency testing with concentration ranges and acceptance limits,
- A listing of PT Providers accredited to the TNI standard for PT providers,
- A Small Laboratory Handbook, a document that explains the TNI standard in plain English,
- A Quality Manual Template, a document that allows a laboratory to easily develop their own Quality Manual,
- A listing of consultants that assist laboratories in becoming accredited,
- An annual Mentor Session where information to help laboratories is shared, and
- A series of downloadable webcasts (see the text box below) to help train laboratories on specific aspects of the TNI standard.

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### **Webcasts Available from TNI**

- Corrective Action Process and Root Cause Analysis
- Records and Record Keeping
- Theoretical and Practical Consideration for Establishing Sensitivity of Measurements
- Internal Audits and Management Review
- Ethics Training for the Environmental Professional
- Establishing a Data Integrity Plan
- Defining Organizational Responsibilities
- Method Selection, Validation and Demonstration of Capability
- Developing the Quality Manual as a Useful Management Tool
- Document and Document Control
- Understanding Whole Effluent Toxicity testing
- Small Laboratory Implementation Series, including:
  - Part 1 - You Can Do It!
  - Part 2 - The Management Requirements
  - Part 3 - Management of Ethics
  - Part 4 - Personnel
  - Part 5 - Sample Handling
  - Part 6 - Equipment
  - Part 7 - Methods
  - Part 8 - Quality Control
  - Part 9 - Reporting Results
  - Part 10 – It's More Than Running the Right Method
- New Regulatory Limits of Hexavalent Chromium (CA) in Drinking Water - What is next?
- Good Laboratory Practice Series: Glassware
- Implementing and Assessing the Environmental Laboratory Standard Interpretations
- Implementing the TNI Standard
- Technical Training Series
  - Wastewater
  - Microbiology
  - Drinking Water
  - General Chemistry
  - Soil
- Testing Requirements in EPA Regulations
- The 2017 EPA Method Update Rule
- The New MDL Procedure
- The New TNI Radiochemistry Standard
- What Does QC Data Tell Me... and Why Should I Care?