


EPA 2016 Overview of ELAP Drinking Water Laboratory Certifications




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40 CFR 142.10 FEDERAL REGULATION REQUIRING STATE DRINKING LABORATORY CERTIFICATION WATER PROGRAMS

Primary enforcement responsibility for public water systems under the Safe Drinking Water Act requires the establishment and maintenance of a State Drinking Water Laboratory Certification Program.



EPA REGION 9 OVERSIGHT OF CA ELAP

- Annual onsite program reviews from the late 1980's through 2013.
- Staff interviews and review of 10 ELAP certification files for labs certified in the past year.
- Review based on EPA's Manual for the Certification of Laboratories Analyzing Drinking Water, 5th Ed.
- Documentation required includes:
 - Qualifications of lab personnel.
 - Current PT's for all certified Drinking Water methods and analytes.
 - Checklist and/or report showing that lab documentation is available for technical method requirements and other lab cert manual requirements marked 'QC'.
 - Data review from login to final report.
 - Corrective actions for all report findings.

2016 ELAP DW LAB CERTIFICATION OVERVIEW

- Conducted 11/16-18, 2016 in ELAP's Sacramento and Richmond offices.
- Consisted of interviews with management and staff, and review of files for 22 labs certified in the past year.

FINDINGS

- Program restructuring has resulted in improvements.
 - Functions have been separated so individual auditors are not responsible for all aspects of certification.
 - Applications, PTs and billing are now done by separate staff.
- Areas of concern
 - Documentation of audits.
 - PT review.
 - Certification by reciprocity.
 - Loss of laboratory certification officers.

AUDIT DOCUMENTATION

- ELAP has moved to an electronic filing system.
 - This is particularly useful given offices in three locations. Files can be shared and reviewed from any location.
- Inconsistent file contents for recently certified labs.
 - SOP should list contents required before certification.
 - Files should contain a checklist and/or report covering method QC requirements.
 - For deficiencies, there should be documentation of corrective actions prior to certification.

PROFICIENCY TESTING

- Current PTs were available for all lab files examined.
- Recommendations
 - ELAP needs procedures for downgrading based on PT failures.
 - PT results are manually entered into ELAP's database. Given the size of the program, an electronic system is warranted.

CERTIFICATION BY RECIPROCITY

- EPA encourages reciprocity as a means to conserve resources and minimize duplication of efforts.
 - ELAP's secondary certifications should be clearly identified, and cite the primary certification body.
 - Secondary certification should not occur after, or extend beyond, the expiration date of the primary.
 - Loss of primary certification should result in loss of secondary certification.

CERTIFICATION OFFICER TRAINING

- ELAP has fewer EPA-trained auditors than in 2013.
- There is a small backlog of labs which have not been audited in more than 3 years.
- One auditor completed over 80 certifications last year, including 40 onsite.
- EPA's Lab Certification Officers training course will be held in June, 2017.
- EPA encourages LCOs to audit the course every 5 years.