



February 28, 2014

Mr. Lemuel Walker  
U.S. Environmental Protection Agency  
Clean Water Act ATP Coordinator  
Engineering and Analysis Division  
Office of Science and Technology  
Office of Water [4303T]  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Dear Mr. Walker,

The Environmental Laboratory Advisory Board (ELAB or Board) is a standing Federal Advisory Committee Act board that advises the U.S. Environmental Protection Agency (EPA or Agency). The Board's Charter states that it is to provide consensus advice, information and recommendations on issues related to EPA measurement programs and facilitate operation and expansion of a national environmental accreditation program.

In December 2013, ELAB sent a letter to the Agency's Forum on Environmental Measurements requesting to be proactively involved in the Method Update Rule (MUR) process. ELAB would like to extend its willingness to partner with EPA, and you directly, to provide insight, advice and comments during the development phase of the next MUR.

Additionally, there are several topics that the Board would specifically like to see addressed in the next MUR:

- Inclusion of the 2009 The NELAC Institute (TNI) Standard as an alternative to the quality assurance and quality control (QA/QC) elements included in the previous 40 CFR 136.7 revisions adopted in the 2012 MUR. The 2009 TNI Standard is now recognized by the American National Standards Institute. Adoption of the 2009 TNI Standard in this format would provide an alternative microbiology as well as chemistry issues.
- Addition of clarifying language to Section 136.7 of the 2012 MUR to further guide laboratories in defining and implementing the QA/QC elements.
- Addition of microbiology QA/QC requirements to 40 CFR 136.7.
- Inclusion of the TNI method detection limit procedure per the Board's letter dated January 31, 2014.

- Inclusion of the updated methods on which the Board provided comments directly to EPA (i.e., Methods 624, 625 and 608).
- Further development of method harmonization between 40 CFR 136-approved methods and methods from the Office of Ground Water and Drinking Water or SW-846 methodology (as per the Board's comments on EPA Methods 624 and 625).
- A requirement to utilize the most current version of *Standard Methods for the Examination of Water and Wastewater*, unless the laboratory has overriding reasons to not do so.

The Board's offer to collaborate with the Agency, however, is certainly not limited to these items.

Thank you for your consideration. ELAB looks forward to your comments and feedback on these topics. Please know that you are welcome to attend any of the Board's monthly calls to discuss these topics in detail.

Respectfully,

A handwritten signature in cursive script that reads "P Root".

Patsy Root  
Chair, Environmental Laboratory Advisory Board

cc: ELAB Board