



March 3, 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 (FEM) requesting to be proactively involved in the Method Update Rule (MUR) process. ELAB would like to extend our willingness to partner with the Agency, and you directly, to provide insight, advice and comments during the development phase of the next MUR. There are several topics the Board would specifically like to see addressed in this next MUR, as well:

- Inclusion of the 2009 TNI Standard as an alternative to the QA/QC elements included in the previous 136.7 revisions adopted in the 2012 MUR. The 2009 TNI Standard is now recognized by ANSI. (Adoption of the 2009 TNI Standard in this format would provide an alternative not only for chemistry but also microbiology issues.)
- Addition of clarifying language to the Section 136.7 of the 2012 Method Update Rule to further guide laboratory's in defining and implementing the QA/QC elements.
- Addition of microbiology QA/QC requirements to 136.7.
- Inclusion of the TNI MDL procedure per our letter dated January 31, 2013.
- Inclusion of updated methods that the Board provided comments directly to the agency on (i.e. 624, 625 and 608).

- Further developing 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 Boards 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.

Our offer to collaborate with the Agency, however, is certainly not limited to only these items.

Thank you for your consideration, we look forward to your comments and feedback on these topics. Please know you are welcome to attend any of our monthly calls to discuss these topics in detail.

Respectfully,

A handwritten signature in black ink, appearing to read "P Root", with a stylized flourish at the end.

Patsy Root
Chair, Environmental Laboratory Advisory Board

cc: ELAB Board