



January 15, 2019

Christine Sotelo
Program Manager
Environmental Laboratory Accreditation Program
California State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Third Draft Proposed ELAP Regulations Comment Period Extension Request

Dear Ms. Sotelo,

We hope you had a relaxing holiday season and wish you a prosperous new year. As you know, ELAP released the 3rd draft proposed ELAP regulations on December 13, 2018, right in the middle of the holiday season. The period from December 24, 2018 through January 4, 2019 represents a time when many individuals are on vacation. In fact, engagement with ELAP staff was minimal due to vacation time taken by ELAP staff during this period.

The holiday season coupled with the truncated time to prepare comments prior to and after the ELAP the workshops creates the need for a time extension allowing for more thoughtful constructive comments so that a more robust regulation can be formulated. The number of business days from the release of the regulations and the first workshop was twenty-two days with four of those days half or full official holidays leaving just over two weeks for meetings to be coordinated for review of the regulations. At the workshop held on January 15, 2019, there were four speakers, representing industry groups and the general public, who requested additional time to provide comments. One speaker noted that it would be more helpful for ELAP for additional comment time as the conversation that occurred at the workshop identified clarification that would need to be incorporated in the draft letters. This point further identified the short turnaround time for the workshop that will occur in Los Angeles where participants would have less than one business day to turn around their comments.

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We therefore respectfully request a two-week extension to the comment period to reflect the one week loss of time due to the official holidays during that period and an additional week to incorporate clarification comments gleaned at the workshops.

If there are any questions or if additional correspondence is desired, please reach me at 760.479.4112 or sjepsen@scap1.org

Thank you for your consideration.

Sincerely,

Steve Jepsen, Executive Director

Southern California Alliance of Publicly Owned Treatment Works

Cc: Darrin Polhemus
Robert Brownwood