

June 13, 2017

The Honorable Scott Pruitt

Administrator

Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Pruitt:

I write today on behalf of the American Council of Independent Laboratories (ACIL) requesting a meeting with your Department to discuss the Clean Water Act Analytical Methods "Method Update Rule (MUR) - 2016" for your Agency's "Guidelines Establishing Test Procedures for the Analysis of Pollutants" (40 CFR 136) in the Federal Register. The MUR was signed by your Agency's former Administrator McCarthy on December 16, 2016. The ACIL, an association representing independent commercial scientific and engineering firms with over 1,000 facilities across the U.S. engage in testing, product certification, consulting, and research and development to enhance public health and safety, fully supports the immediate publication of the 2016 MUR by your Agency.

The method updates included in the 2016 MUR were designed to improve flexibility, update older methods, and allow laboratories to utilize newer technology when conducting compliance monitoring testing. The 2016 MUR approves method revisions and updates that result in improved data quality, approves new analytical methods, and changes the procedure for the determination of the Method Detection Limit (MDL). These revisions provide improved analytical test procedures to the regulated community, improve the produced data quality and operational efficiency for testing laboratories performing analysis per your Agency's regulatory methods, and address issues related to calculating the detection limit that will better account for intra-laboratory variability.

The proposed rule, when published for stakeholder review in 2016, received a very positive response from all sectors of the community.

The method updated and additions included in the 2016 MUR are extremely important as

they will increase laboratory productivity and reduce testing cost to the regulated community.

Thank you for your time and attention regarding this meeting request on behalf of ACIL and I look forward to your response to it. Please do not hesitate to call upon me.

Sincerely,

AMERICAN COUNCIL OF INDEPENDENT LABORATORIES

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Take Care,
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