## Ashley Romero

In regards to section WAC 173-50-070, Proficiency Testing (PT), provision 2, the paragraph is amended to require applying accredited laboratories "to analyze a minimum of two PT samples per applicable parameters per year. After which an accredited laboratory submits two satisfactory PT sample results, and no unsatisfactory results in an accreditation year, the laboratory is required to submit only one satisfactory PT sample results in subsequent accreditation years. This applies as long as there are no intervening unsatisfactory PT sample results." This would require newly applying bioassay environmental laboratories to conduct two rounds of PT testing in the first accreditation year. PT studies for bioassay labs are extensive studies which involve many considerations that make it difficult for labs to run more than one study in a year. Multiple test solutions are needed for multiple species (i.e. vertebrate, invertebrate) for various test durations (i.e. acute, chronic). It is often difficult to schedule these multiple tests amongst an already full testing schedule for clients conducting compliance WET testing. In addition, a significant amount of time and effort is needed to prepare, conduct, and analyze the results of all testing to ensure all requirements of the PT tests are met. Furthermore, if an unsatisfactory PT result occurs, an opportunity to identify areas of improvement are afforded and only the unsatisfactory test is re-run to validate the implementation of the corrective actions. Therefore, the requirement to conduct two initial PT studies, especially if one PT study yields satisfactory results for all species, is excessive and unnecessary.