



Montecito Sanitary District

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Public Comment
ELAP Regulations Development/Laboratory Standard
Deadline: 10/20/16 12:00 noon

September 26, 2016

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
commentletters@waterboards.ca.gov
1001 I Street, 24th Floor
Sacramento, CA 95814



Dear Ms. Townsend,

SUBJECT: Comment Letter – ELAP Regulations Development/Laboratory Standard

I'm writing to express my support in favor of the adoption by ELAP of the TNI Standard, Volume 1 as the approved standard for accredited environmental laboratories in California.

As the Laboratory Manager at a small wastewater treatment plant, it is my opinion that adopting the TNI Standard, or a variation appropriate for California laboratories, is the best choice to ensure that our state's environmental labs are held to the same high standards as other states, regardless of size. The number of employees should not be a determining factor for quality assurance requirements and record-keeping.

Even without being required to do so, I have referred to the 2009 TNI Standard for several years as a resource when making sound quality assurance improvements. It is my impression that the TNI Standard has stood the test of time and has only benefited from years of expert collaboration by the NELAC members and is very applicable to California laboratories of all sizes.

California has historically been a leader of progressive environmental protection and I would hate to see ELAP allow this reputation to diminish. All labs should be held to high standards regardless of the number of analysts they employ.

Sincerely,

Carole Rollins
Laboratory & Pretreatment Manager
Montecito Sanitary District