



To Whom It May Concern,

My stance AGAINST the proposed adoption of the TNI 2016 Standards has become even stronger since I unfortunately already experienced the effects of them firsthand.

With the TNI Standards being brought to the forefront earlier this year as the favored laboratory accreditation standard, my [previous] employer, the Nevada County Sanitation District, opted to lay off myself, the Wastewater Laboratory Coordinator, and shut down the one-person wastewater analysis laboratory on August 19th, 2016. The layoff and closure were stated to be "in the interest of economy," and the following reasons were given to me:

1. With the upcoming adoption of new standards by ELAP, Nevada County did not foresee being financially able to keep the lab open. They anticipated the need to hire a second laboratory employee in order to transition to and uphold the new standards. They said they are unaware of how any small laboratory will be able to stay open.
2. It was calculated to be significantly cheaper to contract out samples to a commercial laboratory in Grass Valley than to keep their own ELAP-certified laboratory open.
3. They anticipated layoffs of other CA laboratory personnel to ensue after the adoption of new standards, and thought it was best to give me a running start at finding another job.

Even before adoption, these standards have already had a detrimental impact on both the laboratory community and the water treatment community. I thoroughly enjoyed working in this industry. I believe it is incredibly valuable for environmental and human health, and absolutely essential in ensuring our drinking water and waterways are clean. I would love to stay in this field, and I hope it will continue to be an option for me.

I do not agree that the TNI Standards are the best option for the reasons I list below. Many of these would have put a huge financial burden on my laboratory, and will undoubtedly put that burden on other small labs.

- 1) Fees to buy the standard. Fees for templates and guides to aid in implementation of the standard.
- 2) The requirement of 2 Proficiency Testing (PT) rounds per year instead of 1. **ELTAC recommended 1 PT per year.
- 3) The time and money necessary to transition to the new standards (an estimated 12-18 months), hiring more staff, writing new SOPs, etc.
- 4) Time and money necessary to uphold the standards after transitioning, ongoing training of personnel, annually reviewing documents and records, etc.
- 5) Hiring someone to perform annual internal audits.
- 6) Site visit audits that are 3-8 times longer than current ELAP audits. This puts a halt on our regular laboratory processes for multiple days, not to mention the extra staff and time ELAP will need in order to accomplish this.

7) Differences in laboratory director or technical director requirements from current ELAP requirements may force those employees out of their positions (for example, the employee not having the required amount of chemistry semester hours).

8) California Water Environment Association (CWEA) is not recognized to have any significance within the standard. Certifications cannot be used to qualify for employment positions, therefore, gaining a certificate and attending CWEA continuing education training and seminars would no longer be necessary and hence useless. Would this also mean employees will need to go through a whole new certification program under a new organization, retaking tests, etc.?

9) Multiple ELAP fee increases have already caused heavy financial burdens.

10) Quality and reliability of data has not been shown to be better under TNI.

11) The closure of smaller laboratories has increased since the adoption of TNI Standards was required in all labs in New York and Florida.

The closure of small laboratories is a loss for both the employees of these laboratories, and those communities they serve. Environmental testing services would then be farther away and more difficult for clients to get to. This also puts samples at risk: sample preservation may be compromised and hold times may not be upheld.

My water treatment plant had frequent visitors and classes on field trips, and many came through to tour the laboratory. The laboratory portion will no longer be a part of that tour.

Other Quality Management Systems (QMS) will generate data that is equally as reliable and legally defensible. Other QMS will ensure our clients are receiving those essential items the Agency Partner Group requested: Accurate Data, Consistency, a Quality Assurance Program, and Legal Defensibility. TNI does not satisfy these requests any more than the other QMS proposed.

It does, however, carry all of the heavy burdens listed above. It does, carry huge risks to the small laboratory community and may be extremely detrimental to environmental and human health as a whole. Is TNI able to satisfy the requests of the Agency Partner Group so much better than any other QMS that it is WORTH this huge risk?

Please, consider another Quality Management System. I have lost my dream job and my beloved laboratory, and do not want to see others endure the same losses. It is NOT worth it.

Thank you very much for your time.

Sincerely,

Tanya Johnston Mosier