

commentletters

From: Marshall Chaffee <marshall@jonesenv.com>
Sent: Monday, November 23, 2015 2:24 PM
To: commentletters
Subject: Comment - 12/1-2/15 BOARD MEETING Item 7



After watching the fee workshop last week, I would like to point out that ELAP's proposed fee structure unfairly discriminates against companies that operate mobile laboratories. With the current state of affairs, each our our four mobile labs is charged in addition to our stationary laboratory (so five separate sets of base fees) even though we are one company. Someone larger, like a Test America, will only be charged one base fee even though they have dozens of employees (compared to our 15), and process several hundred samples in a given week (compared to a couple dozen for us). ELAP should consider thinking of mobile laboratories as part of the same larger laboratory when assessing fees. This would greatly correct the imbalance.

When the new structure is enacted, we will see ~57% increase for each of our five laboratories as opposed to a larger lab only seeing one 57% increase.

Perhaps base fees could be assessed on a per-instrument basis, as this would be a better metric for assessing fees at small laboratories vs large laboratories.

Please feel free to contact me if you need further clarification on this issue.

Thank you for your time,
-Marshall

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