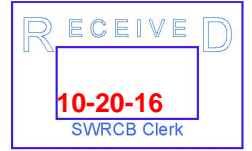


commentletters

From: Danielle Bonham <Danielle.Bonham@cityofvallejo.net>
Sent: Thursday, October 20, 2016 10:26 AM
To: commentletters
Cc: Jason Frink
Subject: Comment Letter - ELAP Regulations Development / Laboratory Standard
Attachments: TNI comments_ HighPriority.xlsx

Follow Up Flag: Follow up
Flag Status: Flagged



Danielle Bonham
Water Quality Analyst
City of Vallejo | Public Works Water Division
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Note – this is my NEW email address. Please update your address book. Thank you!

Think like a proton & stay positive

| Requirement | Value | Action | Reason |
|----------------------------|-------|---------|---|
| Module 1 | | | |
| 4.1.1 | High | Rewrite | requires vol 3 of std |
| 4.2.1 | High | Rewrite | labs, dilute samples to be within curve |
| 5.1.2a & b | High | Rewrite | only 1 P/T year |
| 5.2.1 | High | Rewrite | only 1 P/T year |
| 5.2.1.3 | High | Rewrite | only 1 P/T year |
| 7.2 and all lab methods AB | High | Rewrite | COA Accrediting Accreditation Body |
| Module 2 | | | |
| 4.1.5f | High | Rewrite | City gov can change job descriptions. Union concerns too. |
| 4.1.7.1b | High | Delete | 4.1.7.1a should be sufficient or "whenever resources permit, independent of the activity audited" 4.1.7.1c. Sometimes we have to stop in and analyze due to smaller sites and malfunctioning. |
| 4.3.7.2a | High | Rewrite | 15 consecutive calendar days--rewrite to include current Title 22, Division 4, Chapter 39, Article 9 e. We work for a city and receive between 2-5 weeks of vacation annually at a minimum which is included in our contracts and can take consecutive |
| 4.6 | High | Delete | confidential public source is subject to public records request. |
| 4.6.1a | High | Delete | any time we send samples, keep records of purchase |
| 4.6.1b | High | Delete | "Customer" are different than commercial lab customers. One are the public |
| 4.7.1 & 2 | High | Delete | "Customer" are different than commercial lab customers. One are the public |
| 4.7.2a | High | Delete | "Customer" are different than commercial lab customers. One are the public |
| 4.7.2b | High | Delete | "Customer" are different than commercial lab customers. One are the public |
| 4.14.5a | High | Delete | "Customer" are different than commercial lab customers. One are the public |
| 5.2.6.1a & b & c | High | Rewrite | rewrite to include current Title 22, Division 4, Chapter 39, Article 9 Laboratory Personnel; that allows for facilities degrees in Science; if instead of the TM worker that remains extremely specific. Science background and APWA/CWEA certs. You can be a Biologist and still be compliant to not oversee the chemical analysis |
| Module 3 | | | |
| 5a | | | |
| Module 4 | | | |
| 1.5.2.2.1a | High | Rewrite | 8 batches on 3 separate days totaling a minimum of 7 |
| 1.7.1.2.f1 | High | Rewrite | can continue if second calibration verification sample is analyzed and the result is within acceptance-- could be a bad or cross contaminated sample. |
| Module 5 | | | |
| 5a | | | |