



NEVADA IRRIGATION DISTRICT

1036 W. Main Street, Grass Valley, CA 95945-5424
(530) 273-6185 ~ Fax: (530) 477-2646 ~ www.nidwater.com

September 14, 2016



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000

RE: Comment Letter – ELAP Regulations Development/Laboratory Standard

To the Members of the State Water Resources Control Board,

This is in reference to the State Board proposed changes to the Environmental Laboratory Accreditation (ELAP) Program's use of Volume 1 of the NELAC Institute's (TNI) 2016. We are a water system with a small ELAP accredited laboratory (#1572) and would like to urge the board to not make the extreme move to the TNI Standards. The extra paperwork and documentation alone under TNI would make it extremely difficult for a small laboratory to maintain, especially when we have so few fields of testing. The increased cost for the additional and unnecessary performance testing would be prohibitive to the considerable number of small labs in the state. This also unfairly targets smaller labs, because many larger labs already also comply to the TNI standards.

I am confident that ELAP administration, who has professionals working in its division, can, along with the aid of ELTAC come up with reasonable updates to the ELAP standards without imposing the massive, cumbersome, expensive, and overwrought standards of the TNI.

I am not suggesting that no changes need to be made, just a more reasonable solution than a massive cookie cutter approach that may make your job easier, but definitely doesn't fit the needs of California in protecting the value of laboratory testing.

I urge the members of the State Water Resources Control Board, in this comment letter, to not adopt the TNI Standard. At the very least I urge you to extend the comment period so this matter can be more thoroughly examined.

Thank you,

Fred Waymire
Treated Water Superintendent