

commentletters



From: Nat Dellavalle <ndellavalle@dellavallelab.com>
Sent: Tuesday, September 27, 2016 2:24 PM
To: commentletters
Subject: RE: Comment Letter - ELAP Regulations Development/Laboratory Standard

September 27, 2016

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000 (mail)
1001 I Street, 24th Floor, Sacramento, CA 95814 (hand delivery)

RE: Comment Letter – ELAP Regulations Development/Laboratory Standard

On September 6, 2016 the State Board gave notice that they would be holding a Workshop on October 6 on the proposed changes to the laboratory accreditation regulations. The focus of the proposed changes is the Environmental Laboratory Accreditation Program's (ELAP) proposal to use Volume 1 of The NELAC Institute's (TNI) 2016 documents as requirement for laboratory accreditation. Dellavalle Laboratory, Inc. supports comments made by the Pasadena Water & Power and fifty two other public laboratories. Please consider us co-signors of that submission.

The referenced TNI volume vastly increases documentation requirements without any improvement of laboratory quality, increased assurance or transparency. We see no benefit to us, our clients, or the people of the State of California. We do see a costly exercise which produces no recoverable value. In order to recover those costs, substantial fee increases would be required. Should the market we serve not support those fee increases, our choice would be to discontinue those services. As many as fifteen laboratory technicians, samplers and support staff would loose livelihoods.

Dellavalle Laboratory, Inc urges you to reject these onerous requirements.

Nat B. Dellavalle, CPAg/SS
Dellavalle Laboratory, Inc.
1910 West McKinley, Suite 110
Fresno, California 93728-1298
559 233 6129
FAX 559 268 8174
Cell 559 647 5316
ndellavalle@dellavallelab.com
www.dellavallelab.com

www.soils.org/smithsonian