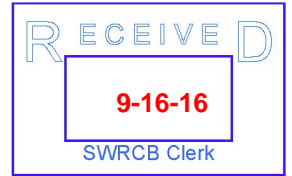


commentletters



From: Sara Burke <sara@oroloma.org>
Sent: Friday, September 16, 2016 11:23 AM
To: commentletters
Subject: ELAP recommendation to SWRCB re: new lab standard

Jeanine Townsend, Clerk to the State Water Board,

Please accept this comment letter regarding the proposed adoption of TNI 2016 Standard by ELAP.

I oppose the adoption of the 2016 TNI Standard by ELAP for wastewater labs for the following reasons:

1. The timeline for pushing through this proposed change in regulations has been too short. The comment period should be much longer, considering the standard was not published until about a month ago, it is over 100 pages long and difficult to read, and must be purchased to review. The period for written comment should have been longer, not just the 9 or so days the stakeholders have been given, and the standard should have been made publicly available to review.
2. ELTAC voted for another option and yet TNI was recommended to the State Board. Many people feel ELAP working with the ELTAC was just a box to check to say it was done and pushing the TNI 2016 through was a forgone conclusion. And I feel that was a waste of many people's/agencies time and money.
3. The standard was not written for small municipal labs. It contains way too many things that will not improve data quality from these labs, will put undue monetary and personnel stress on the labs and may cause lab closures. This will lead to a decline in the effluent quality of wastewater plants due to much less lab work at the plants being done. Ironic since the decree came from the SWRCB.

I am a one-person lab in the bay area. My lab is only certified for a few things. I strongly oppose the adoption of TNI 2016 Standard by the SWRCB as the new lab standard for ELAP. Applying all the requirements in that standard to my lab would be like asking a single person to cook a Thanksgiving dinner for 30 every night of the year.

Well, thanks for listening. Have a great day and let's enjoy our waterways.

Sara Burke
Plant Chemist
Oro Loma Sanitary District