



Dedicated to Preserving the Napa River for Generations to Come

September 16, 2016

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



SUBJECT: California Environmental Laboratory Accreditation Program (ELAP)
Regulations Development and Preliminary Staff Recommendation for a
Laboratory Standard

Dear State Water Resources Control Board:

The Napa Sanitation District (NSD) appreciates the opportunity to submit the following comments on the recommendation to adopt the 2016 NELAC Institute Standard (TNI 2016). The NSD Laboratory is one of the many small laboratories serving their community with wastewater treatment monitoring, regulatory analysis and environmental protection. On September 1, 2016 the Environmental Laboratory Accreditation Program (ELAP) informed the Environmental Laboratory Technical Advisory Committee (ELTAC) that ELAP will recommend to the State Water Resources Control Board (SWRCB) the adoption of the 2016 NELAC Institute Standard (TNI 2016).

The Napa Sanitation District is opposed to the adoption of the 2016 TNI standard for accreditation of environmental laboratories. NSD believes that these standards will be unnecessarily burdensome and costly to public agencies that operate certified laboratories. For example, if the proposed standard were implemented, staffing requirements for NSD would be approximately 1 additional full-time employee (FTE) for 12-18 months, and continued compliance with the standard would require an additional 0.5 FTE. Cost implementation for NSD would be approximately \$138,000 for the first year and a half. As indicated by ELAP, there are approximately 560 small labs of the 700 ELAP certified labs in California, so this type of impact would be widespread. This cost is too high for addressing the programmatic concerns of ELAP.

The Napa Sanitation District is concerned that due to the cost of this onerous TNI standard, small laboratories throughout California will subcontract all regulatory monitoring. This would result in delayed results and affect agency response time for effective water quality management. In short, this standards implementation would cause increased water quality impacts to public health and the environment.

The Napa Sanitation District is also concerned that ELAP disregarded the formal recommendation of ELTAC, which voted against the full TNI standard on multiple occasions and voted in favor to strengthen California's current lab accreditation regulations. NSD, as many other laboratories, prefers a strengthening of California's program. However,

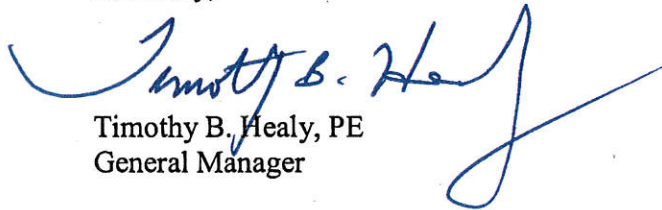
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considering the ELAP proposal, NSD would be willing to consider only those amended elements within Module 2 of the TNI standard applicable to California certified labs, with modifications certain sections such as subcontracting (section 4.5.1) and internal audits (section 4.14.5). A strategic standard, specifically addressing data quality, documentation and management of California's environmental protection and public health is of primary importance.

The Napa Sanitation District Laboratory appreciates the opportunity to comment on the proposal that is before you today. We understand and agree that significant improvement needs to be addressed for ELAP, but it needs to be conducted in a cost effective way since most utility laboratories including the Napa Sanitation District are already producing high quality data.

If you have further questions, please contact me.

Sincerely,



Timothy B. Healy, PE
General Manager