



September 16, 2016

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

SUBJECT: Comment Letter – ELAP Regulations Development/Laboratory Standard

Dear Members of the State Water Resources Control Board

The City of Sunnyvale would like to respectfully submit the following comments to the Board in response to the proposed 2016 TNI standard that ELAP is recommending to adopt for accreditation of Environmental Laboratories in California. We are deeply concerned about the ramifications of implementing the NELAC standard in our laboratory in terms of additional resources in costs and staff time because:

1. The quality of laboratory testing and data will not necessarily improve from adoption of the TNI standard. The analyst will be spending critical time away from the bench to document the extensive requirements of the TNI standard which may have an impact on the time available to perform the analysis with proper care and attention
2. Adoption of the TNI standard will undoubtedly increase costs for all labs by two to three fold. The City of Sunnyvale Environmental Laboratory estimates the need for 1.0 Full Time Employee (FTE) to support the implementation of the TNI standard. The City will not support adding any additional staff to the laboratory at this time or in the near future.
3. We strongly believe that the current standard in California is not deficient; it is similar to TNI and may need to be more standardized and well written out.
4. Lack of resources in the lab to implement and maintain the TNI certification will force laboratories to send critical analysis to a commercial laboratory that may already be overburdened with samples from many such similar labs resulting in a longer turn-around-time for the results to be reported. Consequently, laboratory information critical for process control and compliance at the Treatment Plant will not be available in a timely manner to protect the public health and environment.
5. We are also concerned about the short amount of time we were given to review the TNI standard and provide comments. We request extension of the comment period to fully review and understand the new standard as it applies to our laboratory.

We will greatly appreciate your consideration of these factors in making a decision about the selection of the new standard for the California Environmental Laboratory Accreditation Program.

Please contact me @ (408) 730-7704 or akauravlla@sunnyvale.ca.gov for any questions concerning the comment letter.

Sincerely,

Alo Kauravlla

Alo Kauravlla
Laboratory Manager
City of Sunnyvale

**ADDRESS ALL MAIL TO: P.O. BOX 3707 SUNNYVALE, CALIFORNIA 94088-3707
WPCP Main: (408) 730-7260 | TDD: (408) 730-7501 | www.sunnyvale.ca.gov**

