



**City of Modesto**  
**Utilities Department**  
**Wastewater Division**  
*1221 Sutter Avenue*  
*Modesto, CA 95351*

September 13, 2016

California State Water Resources Control Board  
Environmental Laboratory Accreditation Program  
1001 I Street  
Sacramento, CA 95814

Comment Letter – ELAP Regulations Development/Laboratory Standard

To the Members of the State Water Resources Control Board,

Recently the State Water Resources Control Board announced that there would be a workshop detailing changes to the laboratory accreditation program. However, the deadline for comments on the proposed changes is not even ten days after the announced proposal. This is very short notice and not nearly enough time to obtain a copy of the TNI standards, read the document thoroughly, and understand all of the impacts that these changes will have on the function of the lab. The City of Modesto would like to submit the following comments to the Board for consideration on this topic.

The number of changes that the adoption of TNI standards requires is insurmountable. The quantity of SOPs and written policies is very overwhelming and could discourage small laboratories from participating in the ELAP accreditation program; Thereby limiting not only their client base, but a competitive market for clients to choose from.

The costs associated with purchasing the TNI standard for review just to participate in a discussion of proposed changes is unreasonable and potentially excludes smaller laboratories from participating.

In summary, we respectfully request that the State Board extend the comment period and reschedule the workshop to a later date as to allow for a comprehensive review by all parties affected by this drastic proposal.

Sincerely,

A handwritten signature in blue ink, appearing to read "Angie Smigelski".

Angie Smigelski  
Water Quality Control Laboratory Supervisor

