

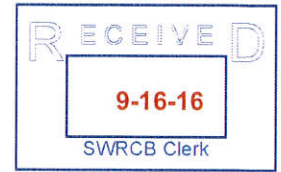


A CALIFORNIA
SPECIAL DISTRICT

September 16, 2016

VIA ELECTRONIC MAIL

Public Comment
ELAP Regulations Development/Laboratory Standard
Deadline:10/20/16 12:00 noon



Jeanie Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000
1001 I street 24th Floor, Sacramento, CA 95814

SUBJECT: COMMENT LETTER - ON THE PROPOPOSED ADOPTION OF NEW
ELAP STANDARDS

Dear Members of the State Water Resources Control Board:

The September 6, 2016 notice states that "ELAP staff has made a preliminary determination to develop regulations incorporating the 2016 NELAC Institute (TNI) Standard, Volume 1: Management and Technical Requirements for Laboratories Performing Environmental Analysis as the laboratory standard".

The 2016 NELAC Institute (TNI) Standard Volume 1 is ~ 176 pages at cost of \$130 for a single version and \$320 for a network version. The laboratories were given ~ 10 days to come up to speed on a very detailed oriented document, as well as determine what changes were likely necessary in their operations and provide meaningful comments to the State Water Resources Control Board.

This task is overwhelming in general and in particular to the small municipal laboratories such as Delta Diablo. I respectfully request that the State Water Resources Control Board extends the public comment period from less than 10 days to 30-45 days, which allows for times for those who wish to purchase, review and comment on the new 2016 TNI Standards Volume

If you have any questions, please contact me at (925) 756-1915.

Sincerely,

Darrell Cain
Laboratory Manager