



CITY OF REDDING  
777 CYPRESS AVENUE, REDDING, CA 96001  
P.O. BOX 496071, REDDING, CA 96049-6071



**PUBLIC WORKS DEPARTMENT  
FIELD OPERATIONS**

MAILING: PO Box 496071, REDDING, CA 96049-6071  
SHIPPING: 20055 VIKING WAY, BLDG. #3, REDDING, CA 96003  
530.224.6068  
530.224.6071 FAX

September 16, 2016  
W-010-000-000

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Subject: **Comment Letter – ELAP Regulations Development/Laboratory Standard**

Dear Members of the State Water Resources Control Board:

The City of Redding (City) greatly appreciates the opportunity to comment on the Environmental Laboratory Accreditation Program (ELAP) recommendation of the adoption of the 2016 NELAC Institute Standard, Vol.1 (2016 TNI) as the California laboratory standard.

The City owns and operates two wastewater treatment plants which discharge pursuant to National Pollutant Discharge Elimination System permits. Both of these treatment plants have ELAP certified laboratories which perform analyses for wastewater treatment process control and regulatory reporting, and also perform general chemistry and microbiological analyses in support of the City's Water Utility. The Clear Creek Wastewater Treatment Plant laboratory employs two California Water Environment Association (CWEA) certified laboratory technicians and the Stillwater Wastewater Treatment Plant employs one CWEA certified laboratory technician.

**Request for an extension of the public comment period**

The City requests that the comment period for stakeholder input be extended until at least October 7, 2016, and that the associated workshop be rescheduled appropriately. Due to the fundamental role of these laboratories in meeting the City's regulatory obligations and in the protection of human health and the environment, the City is extremely concerned with the preliminary staff recommendation for adoption of the 2016 TNI as the California Laboratory Standard. It is clear that the adoption of the 2016 TNI would have significant impacts on the City's operation of these two laboratory facilities, but the extent and type of these impacts have not been fully determined due to the extremely short public comment period and the fact that the 2016 TNI are not even publicly available.



The scope of the proposed changes is enormous, and the 2016 TNI document is nearly 200 pages long. ELAP is proposing to completely change how it accredits laboratories, and such a momentous endeavor should be addressed with great care and thoroughness. Experience in other states where accredited laboratories were required to meet similar standards has shown that the result was the closure of many smaller laboratories. If for no other reason, this experience should give pause to the State Board in how it moves forward with any proposal to significantly modify California's accreditation standards.

Sincerely,



Josh Keener  
Wastewater Compliance Coordinator