



MT. VIEW SANITARY DISTRICT

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VIA Email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

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

Subject: Comment Letter – ELAP Regulations Development/Laboratory Standard

To the Members of the State Water Resources Control Board,

By way of introduction, Mt. View Sanitary District (District) provides wastewater collection, treatment and disposal services for a portion of the City of Martinez and an unincorporated area of Contra Costa County. The District serves an estimated population of approximately 21,900 people with about 270 businesses. The District's treatment plant, provides advanced secondary treatment for an annual average effluent flow of 1.27 MGD. Treated effluent is discharged to a 21-acre constructed wetland, Moorhen Marsh (fresh water) and flows to Peyton Slough, McNabney Marsh (estuarine) and eventually Suisun Bay. The District owns 69 acres of McNabney Marsh wetland and, under a Conservation Easement Agreement with East Bay Regional Park District manages an additional 69-acre portion of McNabney Marsh.

The District partners with the Lindsay Wildlife Experience to provide a Wetlands Field Trip Program (WFTP) for elementary school children. Students from schools throughout Contra Costa County take advantage of the free outdoor science experience. With the WFTP and other environmental educational opportunities provided by the District, including field trips for college students and Public Workshops, the District provides environmental education for an annual average of 2618 students and adults.

I am writing this letter to express my deepest concerns about the proposed application of the 2016 The NELAC Institute (TNI) Standards to all laboratories accredited by the California Environmental Laboratory Accreditation Program (CA ELAP). I am convinced that the application of unnecessarily complicated and bloated TNI Standards would not significantly improve the overall quality of lab data, yet would place heavy burdens on small laboratories, driving many of them out of business, ultimately resulting in loss of timely public health water quality information and end with much higher laboratory testing costs. This ultimately results in a burden on the citizens of California. Protection of public health and the environment is a high priority for the District and best accomplished by maintaining our laboratory staffed by one full-time analyst.



Alternatively, I urge the Water Board to adopt a more simplified set of laboratory standards, ones that include only the essential data quality elements necessary to support high quality laboratory testing, while recognizing the limited resources of laboratories and organizations with only a few employees. This may be accomplished with a simpler set of standards for all laboratories, or with application of TNI or ISO Standards for commercial laboratories only, allowing exception for non-commercial laboratories. Moreover, I believe the complicated and detailed TNI standards will confound ELAPs efforts toward effective enforcement.

I am also very concerned about the lack of time allowed, amounting to less than 10 business days, for the affected public to read and comment on the newly published 2016 TNI Standards, which must be purchased from TNI for \$130 per single user. As these Standards were not made available for public access and review until early August 2016, and considering that the scope of the proposed changes will have enormous implications on laboratory operations and the communities they support, I request the SWRCB to significantly extend the public comment period from < 10 days to 30-45 days, which will allow time to those who wish to purchase, review and comment on the new 2016 TNI Standards.

In summary, updating ELAP lab standards is needed. However, implementing the 2016 TNI Standards to all ELAP accredited laboratories equally is unnecessary to achieve high data quality – and it will lead to lab closures, lost jobs, and higher analytical costs with loss of competition. Furthermore, the likely loss of local small laboratories would lead to less timely water quality information being provided to the public, risking the health of the general public and the environment. So I urge the Water Board to consider adopting new ELAP regulations that recognize the differences between commercial-for-profit and non-commercial non-profit laboratories: either a simplified single laboratory standard or a two-tier standard approach with consideration for both types of laboratory operations.

Thank you for your time and attention. If you or your staff have any questions regarding this matter, please contact me by phone at (925) 228-5635 extension 18 or via email at [lcrona@mvsd.org](mailto:lcrona@mvsd.org).

Sincerely,

Lilia M. Corona  
Assistant District Manager  
MT. VIEW SANITARY DISTRICT