

commentletters

From: Erland, Mary <m_erland@ci.lompoc.ca.us>
Sent: Wednesday, October 19, 2016 4:21 PM
To: commentletters
Subject: Adoption of TNI regulations



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board

Dear Ms. Townsend,

Thank you for the opportunity to review the TNI standards under consideration for adoption by ELAP. I appreciate how comprehensive the management requirements are, but I am concerned with the amount of writing necessary to produce such a large document myself. It would be most helpful if ELAP could provide a template to aid in the preparation of a smaller scaled laboratory plan.

The California Department of Pesticide Regulation has a document for public use called "Generic Guidelines for Development of a Respiratory Protection Program in Accordance with Department of Pesticide Requirements". It allows a manager to read important health and safety information and fill in data specific to their operation. Something like this would be a great time saver and would ensure easier compliance and review.

A template would also help with statistical analysis. I assume I am not alone in not being great at limits of detection and quantitation. It would be very helpful to have clear and simple equations provided. I would also like to suggest that checklists for internal audits and management reviews would make annual updating simpler than writing out a lengthy document detailing each yearly review.

I am glad that ELAP has already discussed keeping one proficiency testing cycle per year. I spend several months adding in all of the extra PT samples to my regular analyses. I would be quite stressed doing it twice a year. I know that when I re-read the TNI documents again I will have more questions and ideas, but I appreciate being able to get my current concerns out.

Thank you again for extending the comment period.

Sincerely,

Mary Erland

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