

From: [Cassandra Prudhel](mailto:Cassandra.Prudhel@ssf.net)  
To: [commentletters](mailto:commentletters@ssf.net)  
Subject: Fwd: 5/2-3/17 BOARD MEETING/WORKSHOP - ITEM #8  
Date: Sunday, April 30, 2017 9:35:47 PM

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**Please ignore the previous email sent from [cassie.prudhel@ssf.net](mailto:cassie.prudhel@ssf.net) this is my official comment letter.**

**Subject: 5/2-3/17 BOARD MEETING/WORKSHOP  
- ITEM #8**

I work as a consultant for two small wastewater treatment plants.

Both of these plants have no dedicated lab personnel. The plant operators perform the limited number of laboratory analyses that they are ELAP Certified for.

Approval of the TNI Standard as the only applicable standard for California laboratories is a huge mistake. I, along with many of the laboratory community, do not believe that this will improve data quality or increase the protection of the environment.

The requirements of this standard will place an unnecessary burden of cost and time for the small and very small laboratories.

These labs perform pH, dissolved oxygen, chlorine residual, temperature, and turbidity.

Is it really necessary to spend \$50,000 and up to two years to implement TNI for these analyses? Once again I would like to emphasize that it will not increase data quality.

I strongly recommend that you consider approving a two tier system.

At the very least I recommend that you have a single individual at ELAP implement TNI at a very small wastewater lab to actually see the amount of unnecessary work that is involved.

Additionally, I would like to point out that ELTAC made many recommendations that were totally ignored by ELAP. What is the point of having an advisory board if

you are going to ignore them?

Thank you for your careful consideration of this item.

Cassandra Prudhel

Sent from Cassie's iPad