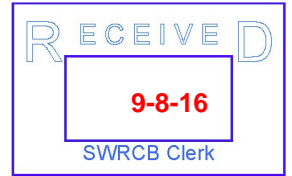


commentletters



From: Fairchild, Anne <afairchild@slocity.org>
Sent: Thursday, September 08, 2016 11:31 AM
To: commentletters
Cc: Hix, Dave; Mattingly, Carrie
Subject: Do not support ELAP's recommendation- TNI Standards

Dear Jeanine Townsend

I do not support ELAP's recommendation to make 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.

As proposed, the TNI documents place a huge number of unnecessary and burdensome requirements upon laboratories in particular the smaller laboratories. As demonstrated with Florida and New York, when all accredited laboratories are required to comply with TNI, many of the smaller labs were forced to drop their accreditation, because of the associated financial and staffing burdens.

As proposed, there are no benefits to using TNI in terms of quality or reliability of data (compared to current ELAP standards) so there is no reason for the State of California to require all laboratories to use TNI.

Please consider offering a very limited or "light" TNI version as discussed during the last Webinar, or have an exemption based on hardship.

Thank you for your time and consideration

Anne Fairchild
Laboratory Manager



**CITY OF
SAN LUIS OBISPO**

Public Utilities
35 Prado Road, San Luis Obispo, CA 93401-7314
E afairchild@slocity.org
T 805.781.7242
C 805.602.2802
slocity.org