

TNI standards in California and Small Utility Labs

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4 Questions

- *How many small utility labs are there in California?*
- *What will it take for them to get certified under ELAP TNI-derived standards?*
- *Do we really need a single standard?*
- *How can the State Water Board help?*

How many small labs are there?

- *How small is “small”?*
- 1 or 2 FTE's
- Value of these labs to public health and environmental protection
- *How many are there?*
- No one knows
- **ELAP should do a baseline census**
- Wastewater labs are required to be certified under California state regulations.



What will it take?

- Money, Time, Commitment & Education
- Benicia's experience so far:
 - Tried to implement 7 clauses in August (4.9, 4.10, 4.11, 4.12, 4.14, 4.15, 4.16)
 - Audit in January: 21 findings
 - 3-4 months to correct before 2nd audit

What will it take?

FUNDING

- Permanent budget increase
- Increased costs during transition
- Extra staff or contract out work
- Software (LIMS, document tracking)??
- Consultant support – sustained and on-site



What will it take?

TIME

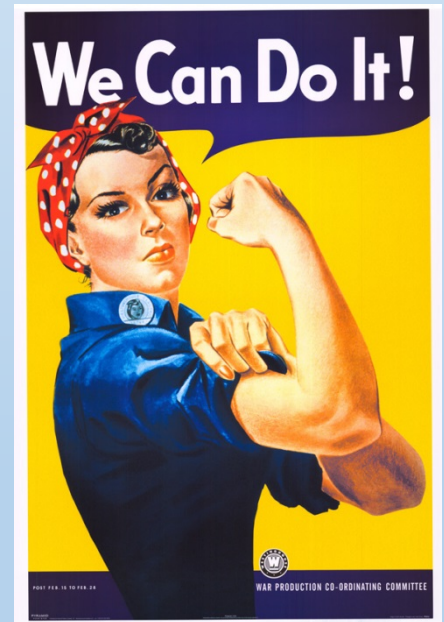
- 12 – 18 months standard
 - One FTE dedicated to transition
 - Complete change in work culture and processes
 - Can't just hire consultant to re-write quality manual.
 - *If a lab has 3 years, what is the optimal sequence to implement the TNI standards?*
- **Consider phased implementation and milestones**



What will it take?

COMMITMENT & EDUCATION

- Commitment comes from an assessment that the transition is worth-while.
- Not all agencies may choose to remain certified.
- Power of examples
- On-site consultant assistance is critical.



Do we need a single standard?

- *Consider small wastewater lab:*
(TSS, BOD, pH, Cl₂ residual, defined-substrate bacterial tests.)
- California drinking water regulations [22 CCR 64415(b)] allow certified operators to report data from field analyses (color, odor, pH, turbidity, Cl₂ residual)
- Consider reduced certification requirements for WW with method-based checklists?
- Certified laboratory analysts can run basic analyses?

How can the SWRCB help?

- *Conduct baseline census and track progress*
- *Consider different standards for small WW labs*
- *Roadmap for phased implementation with milestones*
- *Financial assistance for small labs during transition*
- *Create positive examples of small lab success*
- *Include on-site, sustained consultant support in education and training program*