

Bedford County Public Service Authority
1723 Falling Creek Road
Bedford, VA 24523-3137
(540) 586-7679 (phone)
(540) 586-5805 (fax)
e.handy@bcpsa.com



Hearing of the Joint Commission on Administrative Rules
Regarding Environmental Laboratory Certification Regulations

Summary of Comments of Elmer Handy on behalf of
Virginia Rural Water Association

December 12, 2007

1. The voluntary national "NELAC" laboratory standards program has not achieved the nationwide standing as was anticipated in the beginning.
2. Small municipal wastewater systems cannot absorb the additional cost associated with this type of regulation.
3. This cost will come not only from the additional day-to-day requirements of the regulations, but also in the additional personnel that may be required.
4. Smaller municipal wastewater systems that can successfully meet existing Proficiency Testing and Quality Assurance standards, may not have the understanding and competence for the elaborate and burdensome regulation before you now.
5. Smaller municipal wastewater systems that do most of their testing in-house may not be able to continue doing so given the cost and paperwork involved with these standards. These smaller systems may be forced to contract with outside labs, at a higher cost, for testing they can now do quite adequately.
6. Smaller municipal water systems that now have their labs inspected by DEQ and pay a single permit fee to DEQ would have dual fees when these regulations go into effect to pay for the DCLS/NELAC inspections.