

Dear City of Rialto,

Veolia is writing to formally request the addition of a new staff member for our laboratory. We cite new regulatory requirements and process control needs.

Reasons for Justification

TNI Standard:

The laboratory is certified by CA ELAP which has adopted a new set of standards (2016 TNI Standard) the laboratory must adhere to starting 2024. The laboratory will be audited against this standard this year. In 2023, a third party auditor performed a gap assessment to identify necessary changes for compliance with the new standard. Based on the findings, the lab is required to perform additional internal audits and reviews on a regular schedule, implement new procedures for document review and equipment verifications, and provide additional training to staff. It is also strongly recommended for all laboratory data to undergo a secondary review by an experienced person. The time required for our Lab Supervisor to perform these functions will take away from time that is currently spent on laboratory analysis.

The TNI standard also mandates the lab to designate a Technical Manager to oversee laboratory operations and monitor quality control and validity of laboratory results. This person must meet specific educational and experience requirements. Our Lab Supervisor is designated to fill this role, however “if [the Technical Manager is] absent for a period of time exceeding fifteen (15) consecutive calendar days shall designate another staff member meeting the qualifications of the technical manager(s) to temporarily perform this function” (2016 TNI Standard Rev. 2.1, Volume 1, Module 2, Section 4.1.7.2).

Process Control:

The laboratory is working to analyze more process control samples in-house that were previously sent to a sublab for analysis. The standard turnaround times for sublabs is 10 business days whereas in-house analysis allows for same day results. This gives the operators real-time data to make informed decisions and allows them to take a more proactive approach handling wastewater operations.

Critical Gaps:

The additional staff member would fill the role as the primary analyst for the lab, allowing our Lab Supervisor sufficient time to ensure the new TNI requirements are met to maintain our certification. They will also be trained to serve as the back-up for the Technical Manager role.

The additional staff will also allow for cross-training with the IPP coordinator. This will allow the program to have an adequate transfer of knowledge and a back-up in place, which is currently not in place.

Proposed Role and Impact:**Laboratory Technician:**

Performs routine and non-routine procedures, including analysis and sampling according to specified methodology as described in the SOP

Follows QA/QC procedures as outlined in the Laboratory Quality Program Manual and performs corrective action when needed.

Performs monitoring, preventive maintenance, and calibration of on-line meters.

Serves as the Technical Manager for the lab in the absence of the Lab Supervisor (when designated)

Financial Considerations:

- We have carefully analyzed the potential cost of adding this position and believe the ability to maintain our laboratory certification and meet regulatory requirements without compromising on sample analysis will outweigh the additional expense.

Conclusion:

Adding a lab technician to our team will give us the labor needed to meet the new requirements of the TNI Standard while also performing process control analyses that help our operators make critical decisions for the plant.

Please let me know if you have any questions or require further details.

Sincerely,

Soheil L. Sadighi
General Manager
Veolia