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JANICE K. BREWER, GOVERNOR
WILL HUMBLE, INTERIM DIRECTOR

FAX TRANSMITTAL SHEET

DATE: **April 02, 2009**

TO: **Laboratory Director and QA Manager**

FROM: **Steven D. Baker, Assistant Bureau Chief**

State Laboratory Services

Subject: **Information Update #102**

PAGES: **4 (including cover)**

NOTE: **If any of the pages are missing, please call 1-800-952-0374, (480) 284-6869 or (602) 364-0733.**

THIS MESSAGE AVAILABLE IN ALTERNATIVE FORMAT UPON REQUEST, BY CONTACTING:

***Prabha Acharya at* (480) 284-6869**

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Leadership for a Healthy Arizona

Arizona Department of Health Services

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Information Update

April 02, 2009
Update #102

1. Allowed/disallowed method modifications to EPA Method 1664A: Changes to the chemistry of the method, the determinative step (e.g., the detector), the quality control, or those not expressly permitted in 1664A are not allowed. Richard Reding's memo, which is posted on the ADHS website, http://www.azdhs.gov/lab/license/tech/infoup.htm describes several modifications that are within the flexibility of 1664A, a solvent change that is not allowed, and a special modification approved only in one EPA region. Please see Richard Reding's memo that answers several questions about allowed modifications to Method 1664A.

   Please see the clarification memo on the **solvent exchange** from Lemuel Walker of EPA to Barbara Escobar dated March 31, 2009, which was received following Mr. Reding's memo above:

   As you know, Oil and Grease is a method-defined analyte and use of any co-solvents, alternate solvents or any substance that can introduce the target analyte into the final extract is not allowed per 40 CFR Part 136.6. However, a methanol rinse may be allowed to remove water residual if:

   1. *The methanol rinse is immediately discarded to waste.*
   2. *The SPE filter is sufficiently air dried with vacuum to remove any traces of methanol remaining in the SPE filter so as to ensure that no methanol will collocate or be collected with the n-hexane extractions.*
   3. *And, it is the laboratory's responsibility to demonstrate and document the appropriate operating conditions (1 & 2) above to allow this use of methanol.*

   Given this, the use of methanol to condition the SPE filter or rinsing bottles with another solvent is allowed provided that solvent is sent to waste and not collected into the collection vessel with the final n-Hexane elution.

2. EPA Region 9 Supplemental Guidance to HACH Method 10360, Luminescence Measurement of Dissolved Oxygen in Water and Wastewater, Revision 1.0, April 2008, is posted on ADHS website: http://www.azdhs.gov/lab/license/tech/infoup.htm. The use of the LDO was not globally allowed within EPA Region IX, the individual permittee should get approval from Region IX.

3. "Should" and "Must": Please note the definition of "should" and "must", which is copied below from the Drinking Water Certification Manual, 5th edition; the Arizona Laboratory Licensure does not differentiate between these two terms, they are equally enforced.

   Generally the term "must" in this manual refers to elements that are required by the National Primary Drinking Water Regulations or the approved drinking water methods. This manual uses the term "should" to describe criteria and procedures that in OW's judgement are necessary for laboratories to produce data that are scientifically valid and defensible, and are of known and acceptable precision and accuracy.

4. EPA Method 548.1, endothall: The method requires triplicate preparation of calibration standards, but it doesn't instruct how to use those triplicates; ADHS requires the labs to prepare the calibration standards in triplicates and specify in their SOPs the laboratory's decision of how to use those replicates, for e.g., if the average of the three responses are used to build the curve or any other protocol. Please note the arbitrary selection of one replicate from each concentration, which best fits the curve, is not allowed.

5. The following methods have been Director Approved (See part E of the web application); if labs would like to add these methods to their license, please write to us with the necessary documentation (SOP, IDOC/MDL and acceptable PE study, where applicable) attached along with the additional method fees.

   - Methods IO-3.5 and IO-3.1 for the preparation and determination of metals in ambient air
   - SW846 Method 8330B, Nitroaromatics, Nitramines and Nitrate Esters by High Performance Liquid Chromatography (HPLC).

6. LFB @ MRL: Drinking Water Certification Manual, 5thEdition, requires that a LFB @ MRL concentration must be analyzed on each analysis day (Chapter IV, Sections 7.2.6 & 7.2.12). It was confirmed by communicating with Region IX that in lieu of preparing another LFB @ MRL on the day the calibration curve is processed, performing the mathematical calculation is acceptable for those methods where the calibration standards are processed using the same procedures as the samples. The low calibration standard would need to be at the MRL concentration.

7. BOD Results/Dilutions - Samples reported out for BOD must meet the requirement for achieving at least two dilutions per sample (Standard Methods 5210B, 4f) with DO depletions of 2.0 mg/L and a DO retention of at least 1mg/L. The sample reports must be properly qualified if the above criteria is not met.

8. DMRQA Study 29: EPA has offered the states the opportunity to choose from multiple options on how the DMRQA study will work. After careful review of the options and discussion between the Arizona Department of Health Services and the Arizona Department of Environmental Quality, the following changes and/or allowances will be made to DMRQA Study 29:

   a. Laboratories licensed by the state of Arizona, that perform work for Arizona permit holders and facilities (permit holders), which are not currently licensed by the state of Arizona, and perform the 15 minute or immediate tests (pH, turbidity, total residual chlorine), will be allowed to use a WP proficiency study anytime between **January 1st and August 24th, 2009**, as long as the close date is before or on August 30th.

b. Facilities (permit holders) will be required to contact their contract laboratories for a copy of the graded results of a WP study that meets the above timeline. Copies of the graded WP study from the contract laboratory must be obtained by **September 23, 2009**.

c. Facilities will take the graded results from their proficiency testing and from their contract laboratories and submit the information to the state DMRQA coordinator and ADEQ. The state coordinator will accept pdf copies of the information.

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9. A two-day workshop titled "Wastewater Workshop, AzPDES Permit Requirements" will be held on May 20-21, 2009 at State laboratory, 250 N. 17th Avenue, Phoenix, offered by AZ Water Association, ADEQ and ADHS. The topics covered would be, AzPDES- Part II requirements;, Quality Control, QA Plan; Instrument Calibration; DMRQA; Low Level Chlorine; Whole Effluent Toxicity; E. Coli and Fecal Testing; BOD; Working With Your Commercial Lab; and Audit Findings. You can find more details and register on-line at www.awpca.org

10. Please contact Prabha Acharya @ (480) 284-6869 or acharyp@azdhs.gov for any technical or method related questions. The earlier Information Updates can be accessed @ http://www.azdhs.gov/lab/license/tech/infoup.htm

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JANICE K. BREWER, GOVERNOR
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FAX TRANSMITTAL SHEET

DATE: **June 25, 2009**

TO: **Laboratory Director and QA Manager**

FROM: **Steven D. Baker, Assistant Bureau Chief**

State Laboratory Services

Subject: **Information Update #103**

PAGES: **3 (including cover)**

NOTE: **If any of the pages are missing, please call 1-800-952-0374, (480) 284-6869 or (602) 364-0733.**

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JANICE K. BREWER, GOVERNOR
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Information Update

June 25, 2009
Update #103

1. **ADHS has a new email address where application questions and requests may be directed. Any questions/comments regarding initial, renewal, or updating your list of licensed parameters may be sent to envapp@azdhs.gov.**

2. **The following documents have been added to the EPA Clean Water Act (CWA) webpage;**
   a. **QA/QC Requirements in Methods Not Published by EPA**
   b. **Proposed rule changes to the Waste Water methods**

   Please remember to review EPA CWA website periodically for valuable information that is updated frequently; the CWA webpage can be accessed at http://www.epa.gov/waterscience/methods/

3. **The following air/vapor methods have been Director Approved:**

   a. **Compendium Method IO-3.4*, Determination of Metals in Ambient Particulate Matter Using Inductively Coupled Plasma Spectroscopy (ICP);***
   This method can be found as an EPA Document EPA/625/R-96/010a, June 1999 at the following website: http://www.epa.gov/ttn/amtic/inorg.html

   b. **VOCs in Vapor by 8260B AZ Method, Revision 0, 04/14/2009; this method can be accessed at http://www.azdhs.gov/lab/license/tech/infoup.htm**

4. **Information Update 102, item #7, Correction:**

   It was confirmed with the Standard Method Joint Editorial Board that it is not required for more than one dilution per sample to achieve DO depletions of 2.0 mg/L and DO retention of at least 1mg/L, for BOD reporting (Standard Methods 5210B, 4f).

5. **LFB at MRL drinking water requirement:**

   Further clarification for item #6 in the Information Update 102; for the analytical methods where the calibration standards are extracted with each sample batch (for e.g., EPA methods 504.1 and 515.4), it is not required to extract an additional LFB at MRL; the

response from the MRL calibration standard can be plugged back into the curve to determine acceptability.

6. **ADHS will accept the maintenance of sample refrigerator temperatures to be within 1-5ºC which is within the acceptance limits of the EPA DW Manual, 5th edition and the EPA's Method Update rules from 3/12/07 & 3/26/07. This would be applicable to both micro and chemistry samples.**

7. **The autoclave Datalogger, which is NIST traceable and accurate to 0.5^0 C is acceptable for measuring autoclave temperatures for both drinking water and wastewater analytical procedures.**

8. **The use of hydroxide eluents (either manually prepared or electrolytically generated) in EPA Methods 300.0 and 300.1 is acceptable for compliance monitoring under Clean Water Act and Drinking Water Act and applies to all revisions of the methods.**

9. **The wastewater microbiology holding time language will change when the next Methods Update Rule is published. The following clarification regarding the upcoming rule was received from EPA; ADHS has already been enforcing this:**

   "The Federal Register, at 40 CFR Part 136.3, Table II, Footnote 22 states "Sample analysis should begin immediately, preferably within 2 hours of collection. The maximum transport time to the laboratory is 6 hours, and samples should be processed within 2 hours of receipt at the laboratory."

   This means that there are 2 time periods that are completely separate from each other. The first time period is to get the sample to the lab. That time is within 6 hours. The second, separate time period, which is completely separate from the first time period, is 2 hours for sample processing. The two times cannot be merged and redivided between getting the sample to the lab and processing the sample. The following are examples that may apply to you.

   1. If the sample arrives later than 6 hours after collection, it has not met the requirement.
   2. If the samples are not processed within 2 hours of the sample being received at the laboratory, it has not met the requirement.
   3. If the sample arrives at the lab earlier than the maximum 6 hour time, it does NOT extend the time for sample analysis. For example, if the sample arrives at the lab within one hour of collection, the lab still has 2 hours (not 7) to process the samples."

10. **Please contact Prabha Acharya @ (480) 284-6869/(602) 364-0734 or acharyp@azdhs.gov for any technical or method related questions. The earlier Information Updates can be accessed @ http://www.azdhs.gov/lab/license/tech/infoup.htm**