



*Division of Public Health Services*  
*Public Health Preparedness Services*  
*Bureau of State Laboratory Services*  
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JANICE K. BREWER, GOVERNOR  
WILL HUMBLE, DIRECTOR

**FAX TRANSMITTAL SHEET**

**DATE:** January 28, 2011

**TO:** Laboratory Director and QA Manager

**FROM:** Steven D. Baker, Assistant Bureau Chief  
State Laboratory Services

**Subject:** Information Update #107

**PAGES:** 3 (including cover)

**NOTE:** If any of the pages are missing, please call (480) 284-6869 or (602) 364-0720.

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***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***



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**Information Update**

**January 28, 2011**

**Update #107**

**1. New Program Manager :**

We welcome Mr. Isaac Robert as the new Program Manager for the Office of Laboratory Services to fill the position vacated by Barbara Escobar.

Mr. Robert has been with the Arizona State Health Laboratory since 1988. During that time, he served as the Supervisor of the Inorganics Section for 16 years. He has over twenty years of experience in the field of analytical chemistry. Isaac has considerable expertise in inorganic analysis, with hands on experience with the latest instrumentation, including atomic absorption spectrophotometers, auto analyzers, ion chromatographs, ICP and ICP-MS. He is knowledgeable with federal and state environmental regulations, test methods and the quality control requirements. Mr. Robert has been auditing laboratories with the Licensure Team since February 2010 and got USEPA Certified in June 2010.

Before joining the State Laboratory, Mr. Robert worked for Pioneer Metal Finishing, a subsidiary of Safeguard Scientific for four years. There he managed a quality assurance laboratory.

Please address all the future licensing related correspondence to the attention of:

Isaac Robert, Manager  
Office of Laboratory Services  
Bureau of State Laboratory Services  
250 N. 17<sup>th</sup> Avenue  
Phoenix, Arizona 85007-3231

Isaac's contact info:  
(602) 542-3221 Office  
(602) 616-1945 Cell  
[Isaac.robert@azdhs.gov](mailto:Isaac.robert@azdhs.gov)

## 2. Medical Marijuana Draft Rules – Comments

We have had some questions regarding the medical marijuana rules that will be coming out soon based on the recent November ballot vote. If you have any comments or questions that you would like to see addressed in the rules, please visit the Arizona Department of Health Services website <http://azdhs.gov/prop203/>. Additional public comments will be taken from January 31, 2011 – February 18, 2011 on the revised draft rules. The Proposition 203 120 day implementation period will end on April 13.

3. In the Information Update 105, dated July 16, 2010, it was announced that 21 Additional analytes were added to Method TO-15 dated January 1999 through Director Approval and the labs could request those additional analytes to be added to their TO-15 license. The supporting documents must be submitted along with the request; however, **it is not required to pay a fee of \$26.00 to get these additional analytes added.**
4. In the Information Update 106, it was announced that Fecal Coliform, IDEXX Colilert-18 was director approved for Wastewater for APP Permits. EPA Region IX is now granting approval to use the above method for AZPDES program, on an individual basis; the labs can request EPA Region IX for Alternate Test Procedure Protocol (ATP) approval. The contact for Region IX is Steve Remaley @ [Remaley.Steve@epamail.epa.gov](mailto:Remaley.Steve@epamail.epa.gov) (415-972-3802). Once the labs receive ATP approval from Region IX, they can request our Office to add the method to their license to test for AZPDES program.
5. A memo from James Michael, Chief, Waste Characterization Branch, USEPA Office of Solid Waste and Emergency Response, regarding “**Spiking (Prior to Vs. After Sample Drying) issue in SW-846 Organic Extraction Methods**”, dated August 5, 2010, will be posted on the ADHS website shortly. It can be accessed at <http://www.azdhs.gov/lab/license/tech/infoup.htm>

A section of that memo is copied below:

This letter is to inform you that the Office of Resource Conservation and Recovery (ORCR, formally OSW) is currently evaluating a quality control (QC) spiking inconsistency that commercial and EPA regional laboratories raised for the extraction of semivolatile and nonvolatile organic compounds in solids. In the interim, we are recommending that you not follow the cautionary notes in three SW-846 methods, specifically the notes in Section 9.3.1 of Method 3500C (for organic extraction and sample preparation), and Section 11.5 of Method 3545A (pressurized fluid extraction) and Section 11.3 of Method 3550C (ultrasonic extraction).

6. Please contact Prabha Acharya @ (480) 284-6869/(602) 364-0720 or [acharyp@azdhs.gov](mailto: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:** July 15, 2011

**TO:** Laboratory Director and QA Manager

**FROM:** Steven D. Baker, Office Chief

State Laboratory Services

**Subject:** Information Update #108

**PAGES:** 3 (including cover)

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**Information Update**

**July 15, 2011**

**Update #108**

**1. The following methods were director approved:**

- ASTM D516-02, Sulfate (Turbidimetric) in Wastewater
- ASTM D6888, Cyanide in Drinking Water and Wastewater
- HACH TNT plus 830/831/832 Ammonia Method 10205, Ammonia in Wastewater

For a complete list of director approved methods, visit the Office application site, <http://www.azdhs.gov/lab/license/application.htm>, and click on Part E.

**2. Calibration Training**

The ADHS Calibration Training is now available on the web at <http://www.azdhs.gov/lab/license/tech/calibration-training/index.htm>. The page is set up similar to the disc that was provided to licensed laboratories. Each lesson has an online video with audio and a handout to provide assistance with training on calibration models and compromisers.

**3. Data Qualifier Changes**

ADEQ and the Office is interested in determining if there are any changes needed to the current data qualifier list ([http://www.azdhs.gov/lab/license/tech/azdqrev3\\_10.08.pdf](http://www.azdhs.gov/lab/license/tech/azdqrev3_10.08.pdf)). If you have any suggestions regarding adding or deleting data qualifiers, please contact Prabha Acharya at [prabha.acharya@azdhs.gov](mailto:prabha.acharya@azdhs.gov).

#### **4. Inspection Appraisal Form**

The Inspection Appraisal Forms for both announced and unannounced inspections is now available in an online format located on the Office's home page

<http://www.azdhs.gov/lab/license/env.htm>. The Office appreciates your feedback on the inspections performed as it provides us the opportunity to improve our services.

#### **5. ERLN Membership**

We are encouraging laboratories to apply for the EPA's Environmental Response Laboratory Network (ERLN). The current deadline to apply is July 29, 2011. The ERLN recruitment announcement is targeted to state, federal, local, and commercial laboratories that can support response efforts in addressing biological, chemical, and radiological threats via consistent, reliable and high-quality laboratory analyses. ERLN is a nationwide network of laboratories with environmental testing capabilities and capacities can be leveraged, as needed, to support a major environmental event. Application, contact, and additional program information can be found at EPA's ERLN website <http://www.epa.gov/erln/>.

6. Please contact Prabha Acharya @ (480) 284-6869/(602) 364-0720 or [acharyp@azdhs.gov](mailto: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:** October 05, 2011

**TO:** Laboratory Director and QA Manager

**FROM:** Steven D. Baker, Office Chief  
State Laboratory Services

**Subject:** Information Update #109

**PAGES:** 5 (including cover)

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## **Information Update**

**October 05, 2011**

### **Update #109**

#### **1. Email Notification Option:**

The Office of Laboratory Licensure and Certification now has an option for laboratories to be notified when Information Updates are posted on the web. To automatically receive future updates by email, sign up for our mailing list. Visit our [social media page](http://www.azdhs.gov/socialmedia.htm) (<http://www.azdhs.gov/socialmedia.htm>), click on the "email" link. Enter your email address and choose "Environmental Lab Info Updates." If this is a success, we are looking at adding other pages that will allow laboratory staff to be notified of key updates.

#### **2. Data Qualifier subcommittee:**

The above subcommittee met last week to review and discuss some additions to the Data Qualifier list, Revision 3.0; the original document can be found at the following website:

[http://www.azdhs.gov/lab/license/tech/azdqrev3\\_10.08.pdf](http://www.azdhs.gov/lab/license/tech/azdqrev3_10.08.pdf)

If you have any suggestions, please email them to [acharyp@azdhs.gov](mailto:acharyp@azdhs.gov)

#### **3. MDL Procedure:**

Recently our Office posed a question to the drinking water program of EPA to determine if the alternate approaches to MDL determinations were acceptable, such as pooling data from multiple instruments or using long term blank evaluation when the instrument routinely produces a positive response for blanks; EPA's response was that alternate approaches were not acceptable.

#### **4. AZ 8260 Fuels list:**

ADEQ is working on putting together an "AZ 8260 Fuels List" consisting of the following compounds:



**As Target Compounds:**

Benzene  
1,3-Butadiene  
sec-Butyl benzene  
n- Butyl benzene  
tert- Butyl benzene

Carbon disulfide  
Cumene (isopropyl benzene)  
Dicyclopentadiene  
1,2-Dichloroethane  
Dibromoethane (ethylene dibromide)  
Ethyl benzene

n-Hexane  
p-Isopropyl toluene  
Methyl ethyl ketone (2-Butanone)  
Methyl isobutyl ketone (4-Methyl-2-Pentanone)  
Methyl tert-butyl ether  
Naphthalene

n-Propyl benzene  
Toluene  
1,2,4-Trimethyl benzene  
1,3,5-Trimethyl benzene  
m,p-Xylenes  
o-Xylene

**As TIC:**

4-Ethyl toluene  
Propylene

**AZ Target Compound or TIC:**

Cyclohexane, if either Cyclohexanone or Methyl cyclohexane are target compounds  
Cyclohexanone, if either Cyclohexane or Methyl cyclohexane are target compounds  
Methyl cyclohexane, if either Cyclohexanone or Cyclohexane are target compounds

The labs interested in running this list please provide the following information to Jeanene Hanley of ADEQ @ [Hanley.Jeanene@azdeq.gov](mailto:Hanley.Jeanene@azdeq.gov)

- A. If your lab is already reporting, do you report all or part of the above list?
- B. What would be the cost to run this list?
- C. How will you handle proficiency study?
- D. If you are not set up to run these compounds, how long will it take for your lab to set up?

**5. Director Approved:**

Picric acid has been added to SW846 Method 8321A.

If your lab is already licensed for 8321A method;

- A. Perform IDOC, MDL and update SOP to include the additional compound;
- B. Have the above documents available for either the next onsite audit or if our office requests a copy to be sent to us;
- C. Perform proficiency sample if available;
- D. Start reporting the additional compound.

**6. Luminescence Dissolved Oxygen (LDO):**

We had informed the Arizona labs in the Information Update 102 that the use of the Hach Method 10360, Luminescence Measurement of Dissolved Oxygen in Water and Wastewater, Revision 1.1, January 2006, LDO was not globally allowed within EPA Region IX, the individual permittee should get approval from Region IX. Once a lab gets approval from Region IX, the labs can send a request to our Office for adding the method to their license. The above method under Calibration has 30 minute stabilization periods specified, however, this requirement is not given in the Hach Manual. Since the original method specifies to wait for 30 minutes, this requirement cannot be skipped. For field testing, calibration of the instrument can be done before the samples are taken and verification standards can be started earlier as well. To obtain ATP approval from Region IX, please contact Steve Remaley at (415-972-3802) or [Remaley.Steve@epamail.epa.gov](mailto:Remaley.Steve@epamail.epa.gov)

When the revised Methods Update Rule gets approved perhaps later this year, the ATP approval process from Region IX can be skipped; the labs can get licensed directly from our office.

**7. Paint Filter Test:**

The Technical Guidance to Paint Filter Test can be found at the following website:

[http://yosemite.epa.gov/osw/rcra.nsf/ea6e50dc6214725285256bf00063269d/621A5AF3A2C495BA8525670F006BECFB/\\$file/11784.pdf](http://yosemite.epa.gov/osw/rcra.nsf/ea6e50dc6214725285256bf00063269d/621A5AF3A2C495BA8525670F006BECFB/$file/11784.pdf)

**8. Alkalinity:**

Since our office was unsure about the quality control requirements that were practicable to be enforced for the alkalinity test, we posed that question to the national assessor's group; we received the following responses:

- A. National Consultant/New Hampshire/Kentucky/Florida/Missouri/Louisiana/Oklahoma requires a blank, LCS (purchased), 5% field duplicates;
- B. Kentucky in addition recommends MS/MSD;
- C. New Jersey requires duplicates, blank, quarterly standardization of the titrant;
- D. National Consultant in addition requires standardization of titrant and Class A Burette

E. Wisconsin/W. Virginia requires blank, LCS, annual PT, 3x/4x a year blind sample

Based on the above survey results, our Office is considering requiring blank, field duplicates, LCS (purchased) and annual PT. There will be no requirements for an MDL study.

Our office would like to hear your comments if our proposed QC requirements are reasonable and if you would like to propose more QC or less QC; please provide your comments to [acharyp@azdhs.gov](mailto:acharyp@azdhs.gov)

9. Please contact Prabha Acharya @ (480) 284-6869/(602) 364-0720 or [acharyp@azdhs.gov](mailto:acharyp@azdhs.gov) for any technical or method related questions. The earliest Updates can be accessed @ <http://www.azdhs.gov/lab/license/tech/info.htm>



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JANICE K. BREWER, GOVERNOR  
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**FAX TRANSMITTAL SHEET**

**DATE:** November 04, 2011

**TO:** Laboratory Director and QA Manager

**FROM:** Steven D. Baker, Office Chief  
State Laboratory Services

**Subject:** Information Update #110

**PAGES:** 4 (including cover)

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## Information Update

November 04, 2011

### Update #110

**1. Director Approved:**

- A. Bromate by EPA 302.0 in Drinking Water**
- B. Additional compounds to Method TO15 list:**

In addition to the original 21 compounds that were added to TO15 target list the following 10 compounds were also added recently per ADEQ's request:

Methyl cyclohexane, n-octane, nonane, isopropyl benzene (cumene), n-propyl benzene, tert-butyl benzene, sec-butyl benzene, n-butyl benzene, naphthalene and ethanol.

Please see Information Update 105 for a list of original 21 compounds that were added at the website [http://www.azdhs.gov/lab/license/tech/101\\_110/infoup105.pdf](http://www.azdhs.gov/lab/license/tech/101_110/infoup105.pdf)

The protocol for adding and getting licensed for additional compounds has changed from the instructions given in the Update 105; the new protocol is as follows:

If your lab is already licensed for TO15 method;

- 1) Perform IDOC, MDL and update SOP to include the additional compound(s) your lab would like to report for compliance testing;
- 2) Have the above documents available for the next onsite audit or if our Office requests a copy to be sent to us;
- 3) Perform proficiency sample if available;
- 4) Start reporting the additional compounds.

## 2. Alkalinity:

Since our office was unsure about the quality control requirements that were practicable to be enforced for the alkalinity test, we posed that question to the national assessor's group and also received comments from Arizona licensed labs. Based on the responses we received our Office will enforce the following requirements:

A blank, field or lab duplicates, LCS (purchased) and an annual PT; there will be no requirements for an MDL study.

## 3. Preservation of Phenol samples by EPA 420.1:

Clarification on the preservation by Lemuel Walker of EPA's Wastewater Program:

*Method 420.1 is from the old MCAWW manual and is based on Standard Method 510 from the 14th Edition of Standard Methods (1975). Standard Method 510 stated: "Domestic and industrial waste-waters may contain such interferences as phenol decomposing bacteria, oxidizing and reducing substances and alkaline pH values. Biological degradation is inhibited by the addition of CuSO<sub>4</sub> to the sample. Acidification with H<sub>3</sub>PO<sub>4</sub> assures the presence of copper ion and eliminates any chemical changes from the presence of strong alkaline conditions."*

*More recently, methods for analysis of specific phenolic compounds and other organic aromatic compounds were developed and it was determined that preservation to a pH of less than 2 was sufficient to inhibit biological degradation while also preventing any chemical changes resulting from the presence of strong alkaline conditions. As a result, the addition of copper sulfate was no longer necessary. For practical reasons, Table II was revised to specify that samples collected for determination and measurement of phenols were to be preserved by acidification to pH of less than 2 with H<sub>2</sub>SO<sub>4</sub>. The acid was changed from phosphoric acid to sulfuric acid in response to many complaints that it was burdensome to have to take phosphoric acid into the field to preserve samples collected for phenols in addition to the sulfuric acid that was specified for pH adjustment of samples to be measured for most of the inorganic parameters in Table 1B and the nitric acid that was specified for samples to be measured for the metals in Table 1B.*

*EPA Method 420.4, which is an automated method based on the same chemistry as Standard Method 510 and EPA Method 420.1, was written in 1993. In this method the preservation requirements state: "Samples must be preserved at time of collection with H<sub>2</sub>SO<sub>4</sub> to a pH of <2 and cooled to 4°C. Similarly, Standard Method 5530 A (the phenols method found in the 21st Edition of Standard methods) specifies that samples are to be acidified with 2 ml of concentrated H<sub>2</sub>SO<sub>4</sub>.*

*Footnote 26 to Table II states: "Just prior to distillation, adjust the sulfuric-acid-preserved sample to pH 4 with 1 + 9 NaOH." and EPA Method 420.4 states: "Measure 500 mL sample into a beaker. Adjust the pH to approximately 4 with 1+9 NaOH (Section 7.9) or 1+9 H<sub>2</sub>SO<sub>4</sub> (Section 7.10), and transfer to the distillation apparatus."*

*The addition of CuSO<sub>4</sub> prior to distillation is not necessary.*

*The MUR excerpt enclosed below explains that the sample collection, preservation and holding time requirements listed in Table II take precedence over what is in the method.*

*F. Proposed Revisions in Table II at 40 CFR 136.3(e) to Required Containers, Preservation Techniques, and Holding Times EPA is proposing revisions to Table II at 136.3(e) to clarify how to resolve conflicts between instructions in this table and instructions in an approved method or other source, and to amend some of the current requirements in Table II. 1. The introductory text to Table II at 136.3(e) specifies that the instructions in the table take precedence over other sources of this information. EPA publishes holding time and related instructions in Table II to provide a consistent set of instructions, and for other reasons. Not all methods contain complete instructions, and some otherwise equivalent methods (or methods for the same parameter) have conflicting instructions. For example, Table II instructions specify the 48 hour BOD holding time while some Part 136 methods recommend 24 hours. In this instance Table II instructions take precedence. EPA recognizes that there may be cases where new technologies or advancements in current technologies may produce approved methods with instructions for a specific parameter that differ from Table II instructions, and provide better results. Cyanide determinations and some automated methods may fall into this category.*

*Therefore, EPA is proposing to revise the text at 136.3(e) to allow a party to submit documentation to their permitting or other authority that supports use of an alternative approach. EPA is proposing to revise the introductory text to the table to read as follows: "Information in this table takes precedence over instructions provided in specific methods or elsewhere unless a party documents the acceptability of an alternative to the Table II instructions. The nature, timing and extent of the required documentation (i.e. how to apply and review as well as the amount of supporting data) are left to the discretion of the permitting authority (State Agency or EPA Region) or other authority and may rely on instructions, such as those provided for method modifications at 136.6." Thus, an alternate sample container, preservation and/or holding time may be considered at the discretion of the permitting authority or other authority.*

*Hope this is not too confusing!*

*Lem*

#### **4. Status on Methods Update Rule:**

EPA anticipates the (2010 Proposed Methods Update Rule) final rule being published by the end of the year; latest by January 2012. EPA will replace 1664, Revision A to Revision B at that Rule making.

Method 1664, Revision B: n-Hexane Extractable Material (HEM; Oil and Grease) and Silica Gel Treated n-Hexane Extractable Material (SGT-HEM; Non-polar Material) by Extraction and Gravimetry, will be promulgated when MUR is finalized. The method can be accessed at the following website:

[http://water.epa.gov/scitech/methods/cwa/upload/1664B-Oil\\_Grease.pdf](http://water.epa.gov/scitech/methods/cwa/upload/1664B-Oil_Grease.pdf)

5. Please contact Prabha Acharya @ (480) 284-6869/(602) 364-0720 or [acharyp@azdhs.gov](mailto: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>