



*Office of Laboratory Licensure,
Certification & Training*

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Jane Dee Hull, Governor
James R. Allen, MD, MPH, Director

DATE: January 21, 2000
TO: Laboratory Director and QA Manager
FROM: Wesley B. Press, Acting Bureau Chief
SUBJECT: Information Update #60
NOTE: If any problems occur with this web site, please call 1-800-952-0374 or (602) 255-3454 extension 205, 221 or 222. Thank You.

1. The Environmental Protection Agency (EPA) has made several revisions to drinking water regulations (Federal Register: December 1, 1999). This document can be accessed at this @ <http://www.epa.gov/fedrgstr/EPA-WATER/1999/December/Day-01/w30901.htm>. Several new methods have been approved. The older versions of the methods will not be withdrawn until June 01, 2001. The newly promulgated methods and the newly approved membrane filter medium for the simultaneous determination of total Coliforms and *E.coli* cannot be used for compliance testing of drinking water in Arizona until they are promulgated in Arizona through a rule change or through the Arizona Department of Health Services (ADHS) Director's approval.

Following are some of the amendments made to the drinking water regulation: 1) microbiological samples collected for the determination of coliforms or fecal coliforms in source water or for determination of heterotropic bacteria in distribution systems are to be shipped and held below 10° C; 2) minimum incubation time for reading the Colisure Test, for determination of total coliforms, was reduced from 28 hours to 24 hours; 3) the maximum holding time for nitrates was increased from 48 hours to 14 days for chlorinated, unacidified drinking water samples. Laboratories are not required to make the method changes until the changes are promulgated through the ADHS Director's approval. However if the laboratories adopt the changes listed in the above items 2) and 3), the final reports must be footnoted to reflect the deviation from the method; e.g., for nitrates if the holding time is extended past 48 hours, then the footnote should say "the holding time exceeded the method required 48 hours but was within USEPA required 14 days". The laboratories should make sure that the data user is made aware of the amendments to the drinking water regulation.

2. US EPA Region IX has delegated to ADHS (in a letter addressed to Wynand Nimmo, Chief, Office of Laboratory Licensing, Certification and Training dated October 26, 1999 from Nora McGee, Assistant Regional Administrator for Policy and Management) the oversight responsibility for determining laboratory proficiency for the following methods: Method 200.7, version 4.4; method 200.8; Method 200.9; Method 300.0; and Standard Methods for the Examination of Water and Wastewater, 19th Edition, 1995 (limited to the methods identified in Arizona Administrative Register, R9-14-610, July 11, 1997). Laboratories are approved by the Region to use the stated methods for National Pollutant

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JANE DEE HULL, GOVERNOR
CATHERINE R. EDEN, DIRECTOR

DATE: December 15, 2000
TO: Laboratory Director and QA Manager
FROM: Wesley B. Press, Bureau Chief
SUBJECT: Information Update #64
NOTE: If any problems occur with this web site, please call (602) 364-0720. Thank you.

1. Environmental Rules Changes:

The Governor's Regulatory Review Council approved the Department's Environmental Laboratory Licensure rules on December 5, 2000. These rules will be filed with the Secretary of State's Office on December 15, 2000 at which time they become promulgated. A copy of these new regulations are available on our website at: <http://www.azdhs.gov/lab/license/env.htm> or a hard copy can be sent to you by calling Marilyn Lancelot at (602) 255-3454 X 204. A fee of \$11.50 is required for this hard copy to be photocopied.

The major changes in these new rules are as follows:

- A. The definition of "records" has been altered to mean all written, recorded, and electronic documentation necessary to reconstruct all laboratory activities that produce data and includes all information relating to the laboratory's equipment, analytical test methods, and related activities. The laboratory will need to maintain the ability to reproduce all electronic data for at least 5 years from the date of compliance testing.
- B. A laboratory may apply as a small business (documents required) to pay laboratory method, instrument and proficiency evaluation fees in installments over the one year licensure period.
- C. All application, method, instrument and proficiency evaluation fees have been increased 30%.
- D. The Department has added or eliminated certain methods.
- E. Three new zone fees have been added for all out-of-state laboratories to help pay

for the cost of the time required for each inspector to travel to the laboratory.

F. A detailed section on time frames has been added to clearly demonstrate what time frames are required to be met by the laboratories and the Department.

2. The Environmental Laboratory Advisory Committee's technical subcommittee on the Arizona's standardized Data Qualifiers had a meeting on December 11, 2000, to discuss the comments that were received from laboratories since they were posted on the ADHS web site (Information Update #63, August 29, 2000). All the comments received were considered by the committee members and consequently some changes were made to the original Data Qualifiers. These updated Data Qualifiers dated 12/11/2000, can be found at the Lab Licensures' [Information Update](#) page.

Please note that the implementation date for these Data Qualifiers is January 01, 2001.

3. In the Information Updates (#48, 50 and 51) we have discussed the applicability of using a hot block digester for the analysis of metals. We had recommended the use of methyl mercury chloride as a spiking compound while performing comparative studies prior to switching to this digestion system for mercury. However, laboratories can use an inorganic form of mercury for spiking if they so desire as long as the same compound is used for spiking during routine analysis. Laboratories must initially verify that they are able to achieve acceptable accuracy and precision using this digestion system before they run compliance samples.

Please remember all mercuric compounds are highly toxic and that appropriate safety precautions must be used while handling.

4. Technical Resources and Training is considering sponsoring a workshop on "Preparing To Be An Expert Witness" to be held in Phoenix. This workshop is appropriate for anyone who expects to testify as an expert witness at a trial. Some of the topics covered would be: case law governing expert testimony; federal rules of evidence; process of discovery; preparation for testimony; handling cross examination; effective communication with the jury; conduct before, during, & after a trial; and mini moot trial. The presenter is Mr. Lamar Miller, a private consultant in Florida. His past experiences include Chief Document Examiner, Alabama Department of Forensic Sciences, Auburn and Birmingham, Alabama (1974-1991) and Director of the Regional Laboratory, Alabama Department of Forensic Sciences, Enterprise, Alabama. If you would be interested in a workshop such as this please contact either:

Prabha Acharya - (602) 255-3454 ext. 221 or

David Winters - (602) 255-3454 ext. 205

5. The Office of Laboratory Licensure, Certification and Training will be moving to a different location in January. We will inform you as soon as we have a firm date and new phone numbers. The new mailing address would be: Arizona Department of Health Services, Office of Laboratory Licensure, Certification and Training, 1740 W. Adams, Phoenix, Arizona 85007.
6. Recently we received an inquiry regarding the use of Hach Method 8001 for compliance testing of Total Coliform in wastewater. This method is not approved for use in our rules. However, since Standard Method 9221B and Hach Method 8001 are technically equivalent to each other, laboratories can use the Hach reagents when running 9221B as long as all the quality control requirements in 9221B are met. The Office of Laboratory Licensure is not planning to add Hach Method 8001 to our rules.

7. If you have any questions regarding the Updates, or if you have any technical questions that need clarification, please call or send [e-mail](#) to Prabha Acharya, Program Manager, Technical Resources and Training at the Laboratory Licensure.

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JANE DEE HULL, GOVERNOR
CATHERINE R. EDEN, DIRECTOR

DATE: August 29, 2000
TO: Laboratory Director and QA Manager
FROM: Wesley B. Press, Bureau Chief
SUBJECT: Information Update #63
NOTE: If any problems occur with this web site, please call (602) 364-0720. Thank you.

1. Due to the difficulties in the analysis of 2-Chloro ethylvinyl ether (Information Update #62, June 16, 2000, item #4), the Arizona Environmental Laboratory Advisory Committee's (ELAC) technical subcommittee participants have agreed to delete that compound from the 8260AZ standardized list (Information Update #52, November 16, 1998, item # 4). Please note that this compound can be requested in addition to the standard list if it is required by specific projects.
2. For Total Kjeldahl Nitrogen Analyses, our office will accept the use of cupric sulfate catalyst, instead of mercuric sulfate, for wastewater as well as drinking water samples. Standard Methods, 19th edition, 4500-Norg (Section A.4), and EPA 351.2, Revision 2.0 (Methods for the Determination of Inorganic Substances in Environmental Samples, August 1993), Section 7.3, both allow the alternate mercury-free digestion solution because of the problems with disposal and toxicity of the mercury catalyst. As long as the laboratory has completed the Initial Demonstration of Performance and can show that the laboratory can achieve acceptable blank recoveries, precision and accuracy, then either catalyst may be used.
3. Kenyon Carlson, Manager, Quality Assurance Unit, Arizona Department of Environmental Quality (ADEQ) requested our Office to publish the following:

The ELAC has created a technical subcommittee to develop standardized data qualifiers to be used in qualifying analytical results for use in Arizona. The technical subcommittee comprised ADEQ QA (Quality Assurance) Unit and the Arizona Department of Health Services-Office of Laboratory Licensure, Certification and Training as well as members of local environmental laboratories.

In the absence of guidance provided by ADEQ, laboratories have been forced to develop their own data qualifiers. The purpose for developing a standardized set of data qualifiers is to assist ADEQ project managers in assessing data quality. The

ELAC technical subcommittee endeavored to ensure that each data qualifier was succinct and narrow in scope to eliminate broad or multiple interpretations when assessing the impact on data.

Additionally, a standardized set of data qualifiers will save valuable space in the ADEQ's databases and simplify the retrieval and display of data. A standardized set of data qualifiers will also improve the selection of data required to meet the ADEQ's Geographic Information Systems (GIS) project's needs.

Any qualified data submitted to ADEQ after January 1, 2001 must be designated using the Arizona Data Qualifiers as developed by the ELAC technical subcommittee. Because the data qualifiers are specific, there may be multiple qualifiers assigned to each analytical result. Any events that cannot be described by the data qualifiers must be documented in a case narrative which must be included with the final report. Using the Arizona Data Qualifiers does not automatically qualify the data as acceptable to the Agency.

These Data Qualifiers can be found at ADHS Internet address:

www.azdhs.gov/lab/license.htm

and the ADEQ address:

www.adeq.state.az.us/function/business/download/azdatqa.pdf

4. Chiou Chen of Water Quality Division, Water Permits Section, Industrial & Stormwater Unit, ADEQ, would like to request the following information from the Arizona licensed environmental laboratories performing thallium analysis in ground water:
 - a. What is the Reporting Limit achievable in a clean matrix and the method employed?
 - b. What is the Reporting Limit achievable in a matrix that contains a Total Dissolved Solids (TDS) concentration ranging from 2000 to 8000 mg/L?
 - c. Does a high TDS impact the Reporting Limit? If so, how high?
 - d. Can you achieve a Reporting Limit below 0.002 mg/L? If so, how low and what method was employed?

Please send your response to Prabha Acharya, Fax number: (602) 255-1070. Please include your laboratory's name and the contact person. Thank You.

5. If you have any questions regarding the Information Updates, or if you have any technical questions that need clarification, please call or send e-mail to Prabha Acharya, Program Manager, Technical Resources and Training, at the Laboratory Licensure numbers/address.

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Wesley Press AT (602) 542-0357.*

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Jane Dee Hull, Governor
Catherine R. Eden, Director

DATE: June 16, 2000

TO: Laboratory Director and QA Manager

FROM: Wesley B. Press, Bureau Chief

SUBJECT: Information Update #62

NOTE: If any problems occur with this web site, please call 1-800-952-0374 or (602) 255-3454 extension 205, 221 or 222. Thank You.

1. In the Information [Update #59](#) (October 15, 1999), the requirement and the process for the laboratories to have "current" MDLs (Method Detection Limits) for each analyte reported were discussed. To verify that the MDL is still current, a suggestion was made in the Update to analyze an LCS (Laboratory Control Sample) at the reporting limit periodically. Since then, questions have been posed by the laboratories as to what is considered current and what is the acceptance criteria for LCS? Our Office, after much discussion, has drafted the following policy to be used by the laboratories to decide if the MDLs are current. This is a DRAFT POLICY and we are inviting your comments. Please fax your comments to (602) 255-1070.

- a. By monitoring the instrumental response:

The laboratory could collect instrumental responses from 20-30 reporting limit standards (either primary or secondary) from analytical runs after an MDL study is completed. The acceptance criteria for the collected data points is established either by calculating $\pm 3SD$ of the instrumental responses or by calculating $\pm 50\%$ of the average of the instrumental responses.

- b. Changes to the sample preparation process:

Any time significant changes are made to the sample preparation process, a new MDL study must be performed. If any instrumental changes are made, but the criteria in item #a is met, then there is no need to perform a new MDL study.

- c. The reference method or regulation specifies a frequency:

If a reference method or a regulation (Drinking Water Certification Manual requires an annual MDL) specifies a frequency for performing an MDL study, that frequency must be met.

The laboratories should look for a trend in the above control chart (item a). The laboratories can then

take corrective actions to bring the responses to within the acceptance limits. If unsuccessful, a new MDL study should be performed for the failed analyte.

It is highly recommended that an LCS (a reference material that has gone through the entire sample preparation process) be analyzed periodically and the percent recoveries monitored.

2. We received a clarification on the TTHM (Total Trihalomethanes) analytical requirement on the water systems and the appropriate DWAR (Drinking Water Analysis Report) form to be used for reporting from the Arizona Department of Environmental Quality (ADEQ):
 - a. The TTHM form that should be used by all the water systems who are currently monitoring for TTHMs is on the [ADEQ web page](#) (DWAR 7, revised 2/8/00)
 - b. The second form with TTHM and HAA5 (Haloacetic Acids) was being used by systems in Arizona which served >10,000 people (which fell under Interim Enhanced Surface Water Treatment Rule) during the interim monitoring period only. Those systems will start to use the DWAR 7 form for TTHM after the interim monitoring period is over.
 - c. On 12/16/2001, systems serving >10,000 people will start to monitor for both TTHM and HAA5 and will use the form that is currently being modified with stakeholders input. The other systems will continue to use DWAR 7 form TTHM, until 12/16/2003. At that time all systems that disinfect will have to monitor for both TTHM and HAA5 and will report on the form that is being modified.
3. The following methods have now been approved in Arizona for compliance testing:
 - a. Method 1631, Revision B, "Mercury in Water by Oxidation, Purge and Trap, and Cold Vapor Atomic Fluorescence Spectrometry, USEPA, EPA-821-R-99-005, May 1999", for analysis of wastewater compliance samples.
 - b. Method 1657, "The Determination of Organo-Phosphorous Pesticides in Municipal and Industrial Wastewater" contained in "Methods for the Determination of Nonconventional Pesticides in Municipal and Industrial Wastewater, Volume 1, USEPA, Office of Water, Revision 1" for analysis of wastewater compliance samples.
 - c. Method 1613, Revision B, "Tetra-through-Octa-Chlorinated Dioxins and Furans by Isotope Dilution HRGC/HRMS", 40 CFR, part 136, App. A, 7-1-98 Edition for analysis of wastewater compliance samples.
4. Questions have been posed in the past regarding the appropriate preservation technique for 2-chloroethyl vinyl ether in water samples. Concerns were raised on the effect of acid on this analyte and the recovery of this analyte from acidified samples. The Merck Index says "Even dil(ute) acids produce hydrolysis to acetaldehyde and ethylene chlorohydrin (2-chloroethanol)". Recently similar concerns were raised by the QA Unit of ADEQ. EPA's Solid Waste Methods Information Communication and Exchange (MICE) stand on this issue is as follows:

"2-chloroethyl vinyl ether has long been known to break down rapidly in an acidified water sample. (SW 846, Chapter 4,) Table 4-1 does not differentiate the preservation techniques based on the specific analytes of interest for a given project. (EPA's) OSW (Office of Solid Waste) views those

details as a critical part of the sampling and analysis plan and quality assurance project plan for any given effort. If 2-chloroethyl vinyl ether is, in fact, a target analyte for a given project, then the only way to obtain useful data for that analyte is to collect an unpreserved water sample and analyze it. If other analytes are involved, one generally collects a second aliquot of the sample and acidifies it to preserve the other analytes, thus two analyses are conducted."

To comply with Arizona Regulations (A.A.C. R9-14-615, G3a) which require "Actual scientifically valid and defensible results" to be reported on compliance testing, this degradation issue will need to be dealt with by each laboratory.

5. **Please complete the drinking water MDLs and Reporting limits (RL) survey** for SOCs (Synthetic Organic Chemicals) if it is applicable to your facility. The response received will be used to demonstrate to ADEQ that the proposed RL requirement by ADEQ may not be practical to achieve. Toxaphene reporting limit (RL) values differ for a single sample and composite sample. ADEQ lists a composite MDL value for toxaphene in R18-4-219, ADEQ Safe Drinking Water Rules. Please fax your response to (602) 255-1070.
6. If you have any questions regarding the Updates, or if you have any technical questions that need clarification, please call or send [e-mail](#) to Prabha Acharya, Program Manager, Technical Resources and Training at the Laboratory Licensure. A [table of contents](#) to all the Information Updates published is also available.

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Jane Dee Hull, Governor
James L. Schamadan, MD, Acting Director

DATE: March 27, 2000
TO: Laboratory Director and QA Manager
FROM: Wesley B. Press, Bureau Chief
SUBJECT: Information Update #61
NOTE: If any problems occur with this web site, please call 1-800-952-0374 or (602) 255-3454 extension 205, 221 or 222. Thank You.

1. The USEPA, Office of Ground Water and Drinking Water, Cincinnati, Ohio, has published the January 2000 issue of *Labcert Bulletin*. Several important issues were covered:
 - A. The EPA has addressed the *Colilert* and *Colisure* certification. In Arizona these two tests are separated by regulation, therefore, they need individual certification. EPA has also addressed the critical elements specific to *Colisure* test:
 - i. that the *Colisure* medium must be refrigerated until use and brought to room temperature before adding the sample;
 - ii. the samples must be incubated for 24 hours; and
 - iii. a positive total Coliform test is indicated by a magenta color.
 - B. Three regulations affecting drinking water certification, were passed recently:
 - i. Stage 1 Disinfectants and Disinfection By-Product (DBP) Rule;
 - ii. the Unregulated Contaminant Monitoring Rule (UCMR); and
 - iii. the Methods Update Federal Register Notice (MUFNRN) discussed in the [Information Update # 60](#), dated January 21, 2000.
 - C. Approval of Method 314 for perchlorate analysis and description of laboratory approval process. Final revisions to the Unregulated Contaminant Monitoring Rule (UCMR) 64 FR 50556, September 17, 1999 was discussed. Details can be found at www.epa.gov/safewater/regs.html.
 - D. Questions and answers on Proficiency Testing (PT) were presented.
 - E. The EPA's requirement for laboratories to successfully analyze a PT sample once a year for each method used for compliance data reporting was outlined. This requirement does not extend to methods used for confirmation.

This *Labcert Bulletin* can be accessed at www.epa.gov/ogwdw000/certlab/labcert0100.html.

2. It is acceptable to use Environmental Express Pro Weight Glass-fiber filter disks for the analysis of *Total Dissolved Solids Dried at 180° C*. (It is listed as an acceptable Glass-fiber filter disks in the method 2540C in the *Standard Methods, Examination of Water and Wastewater*, 20th edition)
3. EPA has published the Federal Register dated January 19, 2000, "Effluent Limitations Guidelines, Pretreatment Standards, and New Source Performance Standards for the Landfills Point Source Category; Final Rule." In this final rule EPA has added 17 new compounds to Method 625 and 8 new compounds to Method 1625B. The Arizona Department of Health Services is in the process of determining how to approve these additional compounds as part of the existing methods. This document can be accessed at <http://www.epa.gov/fedrgstr/> and clicking on January 19, 2000 then click on the HTML or PDF link under "Water Pollution; Effluent guidelines for point source categories: Landfills, 3007-3051."
4. The Surface Water Ground Water Sampling and Analysis Workshop is being held on April 4, 5, 6, 2000 in Phoenix. If interested in attending, please call (602) 255-3454 @ extension 205, 208 or 221.
5. Technical Resources and Training is tentatively planning to present a one- day workshop on "Subsampling for Laboratories" this summer in Phoenix. Some of the topics covered would be
 - i. causes of subsampling errors,
 - ii. mitigating subsampling errors,
 - iii. quality control for subsampling.

There is a limit of 25 students and it will cost the program ~ \$5000.00. That works out to be \$200.00 registration fee per person. The presenter for this workshop would be Charles Ramsey, the founder of EnviroStat, Inc., a company providing training and consulting services in the areas of sampling and statistics. Please call Prabha Acharya @ (602) 255-3454 x221, if you are interested in this workshop. We will proceed with the preparation for the workshop if we have enough commitments to cover our cost.

6. The next quarterly Environmental Laboratory Advisory Committee meeting is being held on March 30, 2000 at Casa Grande, Arizona. If you need further information, please call Kim Kozup @ (602) 255-3454 ext. 202.
7. If you have any questions regarding the Updates, or if you have any technical questions that need clarification, please call or send [e-mail](#) to Prabha Acharya, Program Manager, Technical Resources and Training at the Laboratory Licensure. A [table of contents](#) to all the Information Updates published is also available.

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Discharge Elimination System (NPDES) compliance monitoring, upon satisfactorily meeting ADHS licensing requirements and completing a proficiency demonstration.

The letter from EPA Region IX is attached.

3. The United States Environmental Protection Agency (USEPA), Office of Ground Water and Drinking Water, has recently published a Labcert Bulletin, document # EPA-815-N-99-002a (the hard copy that our Office received is dated June 1999, copy on the web page is dated April 1999). It has the information on errata for the 4th Edition of the Lab Cert Manual. It can be downloaded from <http://www.epa.gov/ogwdw/labcert4.html>.
4. The National Institute of Standards and Technology (NIST) has accredited the first group of proficiency test (PT) providers for Water Supply (WS), Water Pollution (WP), and Discharge Monitoring Report-Quality Assurance (DMRQA) studies. The accreditation is valid through September 30, 2000. The listing of PT providers can be found @ <http://ts.nist.gov/ts/htdocs/210/214/214.htm>. In the future PT samples must be ordered from one of the accredited providers.
5. The quarterly Environmental Laboratory Advisory Committee (ELAC) meeting was held on January 13, 2000. The topics discussed were: the United States Environmental Protection Agency Region IX's approval of alternate test methods for NPDES compliance monitoring in Arizona; status on the updating of Rules; Standardization of Footnotes Sub-Committee status report; Federal Register December 01, 1999 notice on the promulgation of new methodologies and some changes to the existing methods; and Arizona Department of Environmental Quality Drinking Water Analytical Report forms. The next meeting is scheduled for March 30, 2000 @ Casa Grande.
6. It was brought to our attention that some material was missing from the [Information Update #42](#) on our web page and also we noticed some editorial errors on some of the other Updates. This presumably occurred during the process of being posted on our web page. They have been corrected since then.
7. If you have any questions regarding the Updates, or if you have any technical questions that need clarification, please call or send [e-mail](#) to Prabha Acharya, Program Manager, Technical Resources and Training at the Laboratory Licensure. A [table of contents](#) to all the Information Updates published is also available.

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