



Division of Public Health Services

*Office of the Assistant Director
Public Health Preparedness Services
250 N. 17th Avenue
Phoenix, AZ 85007-3231
(602) 364-0720
(602) 364-0759 Fax*

JANET NAPOLITANO, GOVERNOR
SUSAN GERARD, DIRECTOR

FAX TRANSMITTAL SHEET

DATE: January 18, 2006

TO: Laboratory Director and QA Manager

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

Subject: Information Update #88

PAGES: 5 (including cover)

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Prabha Acharya AT (602) 364-0734.*

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Leadership for a Healthy Arizona



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JANET NAPOLITANO, GOVERNOR
SUSAN GERARD, DIRECTOR

Information Update

January 18, 2006
Update #88

1. The Office of Laboratory Licensure, Certification & Training has a new name; the Office is now called "Office of Laboratory Services", effective from December 2005.
2. **Clarification to an analytical batch referenced in methods:** Every field sample analysis, including both diluted and pretreated field samples, but excluding any LFM or duplicate field sample analysis which qualify as QC samples, must be applied to the maximum of field samples permitted in an analysis batch.

Thus, CCV's (IPCs) must be analyzed at the frequency as required by the method, counting all samples within the analytical batch as defined above.

3. **An Update on electronic signatures:** Arizona's Secretary of State has not made a final decision on how and what security measures are needed for receiving and sending documents with electronic signatures. ADHS is currently working with ADEQ's SDWIS (State Drinking Water Information System) Coordinator, Laurie Gehlsen to get laboratories on board with electronic reporting by the end of 2006. EPA has approved electronic reporting; the details are available @ <http://www.epa.gov/cdx/cromerrr/>
4. Our Office had a communication with the staff of EPA's MICE line regarding the multi-point calibration for surrogates for 8000 series methods. Their response was as follows:

"We do acknowledge that historically the surrogates have been included in the multi-point initial calibration at variable concentrations in order to evaluate the linear response as with any target analyte. However, with improvements in instrumentation and more reliance on the autosampler, consideration was given to allowing the autosampler to spike the initial calibration standards with surrogates in the same manner as the samples are spiked. This option makes sense because the surrogate standards in the initial calibration can be averaged to develop a response factor and an effective one point calibration with the sole purpose to measure the surrogate recovery using the same concentration for each sample analysis. In this case the surrogate linear response is less important, since multiple concentrations of surrogates are not being measured. Instead, the surrogate concentration remains constant throughout and the recovery of this known concentration can easily be attained without demonstrating if the response is linear."

Based on the above recommendation, ADHS will now accept the calibration curve consisting of a minimum five calibration standards with the surrogate spiked at the same concentration level or multi-level for 8000 series methods and the labs must specify the protocol selected in their SOPs.

5. Lower MCL for arsenic:

The current 40CFR 141.23 k (1) footnote 15 states that (obtained from the eCFR):

"Starting January 23, 2006, analytical methods using the ICP-AES technology, may not be used because the detection limits for these methods are 0.008 mg/L or higher. This restriction means that the two ICP-AES methods (EPA Method 200.7 and SM 3120 B) approved for use for the MCL of 0.05 mg/L may not be used for compliance determinations for the revised MCL of 0.010 mg/L. However, prior to January 23, 2006, systems may have compliance samples analyzed with these less sensitive methods."

The Office of Laboratory Services will not be removing these methods from its list of approved drinking water methods as they may be used for non-safe drinking water programs.

6. According to Standard Methods 1010C.1, duplicates are defined as being two samples taken at the same time and one location. SM 9020B.4.a.4 states to perform duplicates on 5% of all samples or on at least one sample per test run for general microbiology quality control.

7. The following items have been condensed from the minutes from EPA's 12/14/2005 QA call to the Regions. This addresses useful information regarding changes to EPA program contacts in Cincinnati.

Cincinnati contacts:

- Jennifer Best (513-569-7012) is the Micro Lead and is responsible for regulatory and technical questions for micro
- Michella Karapondo (513-569-7141) is the contact for Radiochemistry and for regulatory questions on chemistry
- Judy Brisbin (513-569-7883) is responsible for methods questions for chemistry.

ATP Website Status:

The site will be accessible from <http://www.epa.gov/safewater/methods/methods.html> when completed and approved. There will also be a link to the Office of Science and Technology (OST) webpage with a FAQ. OST has intentions of compiling a comparable listing for their office. Drinking water ATP listing is anticipated to be available in late January or early February.

Since Herb is retiring on January 3, 2006, Steve Wendelken, Ph.D., TSC, (ph: 513-569-7491) will be the drinking water coordinator for the ATP program. He will be responsible for chemistry methods. James Sinclair, Ph.D. (513-569-7970) will continue to be responsible for the micro ATPs for drinking water.

The OW representative to Standards Methods will be Steve Wendelken and Judy Brisbin, Ph.D., will be the EPA representative for NEMI.

PT Providers/NIST Oversight

There are currently 10 PTPs accredited by NIST with the majority accredited thru 9/30/2006. The website is updated quarterly and does not reflect the current accreditation period for some of the PTPs.

8. **Disinfectant Byproduct final rule 1/4/2006**

EPA has promulgated final rule on the Stage 2 Disinfectants and Disinfection Byproducts Rule (DBPR), contains maximum contaminant level goals for chloroform, monochloroacetic acid and trichloroacetic acid; National Primary Drinking Water Regulations, which consist of maximum contaminant levels (MCLs) and monitoring, reporting, and public notification requirements for total trihalomethanes (TTHM) and haloacetic acids (HAA5); and revisions to the reduced monitoring requirements for bromate. This document also specifies the best available technologies for the final MCLs. EPA is also approving additional analytical methods for the determination of disinfectants and DBPs in drinking water. For additional details go to <http://epa.gov/EPA-WATER/2006/January/Day-04/> and click on the document.

9. Our Office is considering including the laboratory's e-mail address also on the document that consists of a compiled list of licensed laboratories, which is made available to the general public when requested. Please send your response to the following questions by fax (602) 364-0759 or by email wangsnk@azdhs.gov by February 10, 2006. Thank you for your assistance.

A. Would you be willing to have the e-mail listed?

B. Would you prefer to have the listing of the e-mail to be an option that can be selected when filling out the application?

C. Would you prefer to use another e-mail, which is more public, rather than the one listed on the application form?

D. Additional Comments:

10. Our Office is currently looking into implementing e-Licensing and to accept payments by credit card. We would like to know if you are interested. Please respond by fax (602) 364-0759 or email wangsnk@azdhs.gov by February 10, 2006. Thank you for your assistance.

11. Our Office in conjunction with ADEQ is contemplating hosting one-day training on DMRQA. The speakers would be from Utility Support Group and Environmental Resource Associates. The content tentatively includes 1) An Overview of DMR, 2) An Overview of Analytical Tests Required by DMR, and 3) DMR-QA Requirements. The estimated fee per person would be \$149 and approximately 6 PDHs may be offered by ADEQ. If you have any suggestions for the training, please submit your thoughts to Joe Harmon. Since a minimum number of individuals would be needed in order to have the training (at the specified cost), we would like to request that anyone interested please contact Joe Harmon at harmonj@azdhs.gov or (602) 364-0673 by February 3, 2006.

12. The Training program is offering the following:

A. Shipping and Handling of Infectious Materials workshops:

January 18th 2006 in Phoenix

February 2006 in Tucson
April 2006 and May 2006 in Phoenix
June 2006 in Flagstaff

- B. A Ground Water/Surface Water Sampling Workshop is tentatively planned for March 28-30, 2006.

For more information about these classes or questions concerning additional training, please contact Joe Harmon at harmonj@azdhs.gov or (602) 364-0673.

- 13. The Training program has two web casts that they are hosting at the State Health Lab, 250 N. 17th Avenue, Phoenix, AZ. The web casts are being recorded and if technically possible, copies will be made available for those interested. If you would like to attend either web cast, please contact Joe Harmon at harmonj@azdhs.gov or (602) 364-0673 as soon as possible.
 - A. Overview of Two Recently Promulgated Rules: Stage 2 Disinfectants & Disinfection By Products Rule (Stage 2 DBPR) and Long Term 2 Enhanced Surface Water Treatment Rule (LT2ESWTR).
Date and Time: Tue, 01/17/06 at 1:00 PM EST (11:00 AM MST)
Duration: 4 hours
 - B. Implementing the Stage 2 DBPR & LT2ESWTR Compliance and Assistance Tools for Systems
Date and Time: Thu, 01/26/06 at 1:00 PM EST (11:00 AM MST)
Duration: 3 hours
- 14. Please contact Prabha Acharya @ (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>



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JANET NAPOLITANO, GOVERNOR
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FAX TRANSMITTAL SHEET

DATE: May 15, 2006

TO: Laboratory Director and QA Manager

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

Subject: Information Update #89

PAGES: 6 (including cover)

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JANET NAPOLITANO, GOVERNOR

SUSAN GERARD, DIRECTOR

Information Update

May 15, 2006

Update #89

1. **Clarification:** In the Information Update #88, we forgot to mention that the specified EPA contacts in Cincinnati, were for DRINKING WATER questions only.

Cincinnati contacts:

- Jennifer Best (513-569-7012) is the Micro Lead and is responsible for regulatory and technical questions for micro
- Michella Karapondo (513-569-7141) is the contact for Radiochemistry and for regulatory questions on chemistry
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2. **ADHS Revising Rules for Environmental Laboratory Licensure**

ADHS is working on revising the rules for environmental laboratory licensure, 9 A.A.C. 14, Article 6. ADHS has formed an Environmental Laboratories Rulemaking Work Group to provide input on the rulemaking and held the first Work Group meeting on May 10, 2006.

After the Department works through the draft rules with the Work Group, the Department will present the draft rules to the Environmental Laboratory Advisory Committee (ELAC), authorized under A.R.S. § 36-495.16, to obtain ELAC's recommendations.

The draft rules and Work Group meeting information are available on the ADHS website at http://www.azdhs.gov/diro/admin_rules/envlabs.htm

Anyone interested in commenting on the draft rules may attend the Work Group meetings or submit written comments to Sarah Harpring, Rules Analyst, as follows:

E-mail: harpris@azdhs.gov

Fax: 602-364-1150

Mail: ADHS Office of Administrative Rules
1740 W. Adams St., Suite 202
Phoenix, AZ 85007

3. There is now a new "Search the State Lab website" option on the ADHS website: <http://www.azdhs.gov/lab/index.htm>. This search engine will only search pages within the State Lab website and therefore will have fewer hits. This is a good tool to search the past Information Updates, Licensure program's rules, various policies, audit check sheets, and so on.

4. **Collision cell for 200.8 in wastewater:** We were informed by EPA recently that the use of a collision cell is allowed in waste water testing because it overcomes interference. The usual conditions apply; i.e., all QC tests must be performed and all QC acceptance criteria must be met with the collision cell as an integral part of the method.

EPA's Office of Ground Water and Drinking Water is considering allowance for use of the collision cell but a decision has not yet been made. So, at present, the allowance applies to wastewater only.

5. **Desorb time for volatile analysis in wastewater:** We were informed by EPA recently that ADHS could allow alteration of purge-and-trap conditions and materials in wastewater methods for determination of organic volatiles if some conditions are met. EPA's concern about altering purge-and-trap conditions and materials is that if samples are analyzed by internal standard only, a decrease in recovery will be compensated by the internal standard and will, therefore, not be detectable. Therefore, any change in purge-and-trap conditions and materials should be tested using the external standard technique. EPA provided a set of tests for evaluating purge-and-trap performance in Section 7 of EPA Method 1624. These tests, or similar tests, should be performed to demonstrate good recovery of the analytes under altered purge-and-trap conditions. After good recovery is demonstrated, the initial precision and recovery tests and other QC tests required by the method should be performed using the internal or external standard technique specified in the method. The alternate purge-and-trap conditions and/or materials can be used if all tests are performed and all QC acceptance criteria are met.
6. **Desorb time for volatile analysis in drinking water:** In the past ADHS has allowed an alternate desorb time for 524.2 due to a less stringent language in the method. As a result of recent communications with EPA, it has come to our attention that drinking water program of EPA is very adamant about the 4 minute desorb time due to the reason given in the above wastewater item #5. The labs should follow EPA's criteria specified in 524.2. The labs will have to repeat MDL and IDOC studies with the new desorb times as prescribed in the reference method before running compliance samples.
7. **Please make a note;** Konelab analyzer is not approved for drinking water compliance testing.
8. **Reminder:** The labs must have all the items, requested in the preaudit agenda, ready before the on-site audit begins, for an efficient review of data by the surveyors. If a lab fails to comply with the above requirement, the subsequent audit will either be scheduled for a longer duration or the copies of all requested items would be required to be sent to our office.
9. When a compliance testing is performed by a method that is a) not in the licensure rules, b) not promulgated by EPA, or c) analyte is not part of the method compound list, one of the appropriate data qualifier must be used in the final report. Suggested flags are listed below:

T1 = Method approved by EPA, but not yet licensed by ADHS.

T2 = Cited ADHS licensed method does not contain this analyte as part of method compound list.

T3 = Method not promulgated either by EPA or ADHS.
10. **EPA 524.2-** A summary of communication with EPA Cincinnati for your information:

- Tune should be run at less than 25 ng on column.
- It is allowable to evaluate BFB in CCV.
- Calibration standards and QC samples must be analyzed at pH<2, regardless of type of water.
- LRB must be analyzed at pH<2 also.

11. Some helpful pointers on 552.2, from EPA Cincinnati:

Method 552.3 has different columns and surrogates suggested. The link to the method is at www.epa.gov/safewater/methods/methods.html

DB 1701 30m X 0.25 mm X 0.25 um primary column
DB 5.625 30 m X 0.25mm X 0.25 um for confirmation.

It is not permitted to buy pre-methylated standards. The derivitization reaction in that method is not complete for several analytes, therefore, it is essential that the lab "correct" for their level of derivitization by methylating their own standards. If the pre-methylated standards are used, the lab would under report the compounds in their samples.

12. Reminder: If there is a change in the laboratory name, directorship or ownership or an appointment of an acting laboratory director, the license automatically expires unless within twenty business days after the change the department is notified in writing of the change and an application for a new license is submitted to the department.

13. Laboratory use of Freon: In the Information Update 87, we had the following information:

"Methods' Update from EPA:

Freon, regardless of source or date manufactured, cannot be used for the uses specified at 40 CFR 82.13, appendix G, including determination of oil and grease, and TPH, in wastewater. In the April 6, 2004 method update, EPA proposed to withdraw Freon-based methods. That rule is scheduled to go final some time this summer. After the rule is published, there will be no approved Freon-based methods at part 136.

The laboratories must switch over to 1664A from the Freon based methods."

The above information still holds; the method update rule is projected to go into effect in a couple of weeks. Once the rule goes into effect, the laboratories can no longer use Freon based methods.

The general exemption for Freon use is not applicable for testing of oil and grease, and total petroleum hydrocarbons in water. This information can be found in the following publications:

14. **Clarification regarding duplicate analyses for microbiological samples:**
- The laboratory must perform duplicates at a 5% frequency of quantifiable micro methods that reference Standard Methods. At minimum one duplicate per month must be performed if less than 20 samples are analyzed per month.
 - The sample received must be >200 mls and split into two 100 ml samples; cannot split a 100 ml sample into two 50 ml samples. The samples must have at least 2.5 cm of air space so that they can be shook vigorously 25X before splitting. The laboratory may use field duplicates samples which are at >100 mls.
15. **Director approved method:** The Director of ADHS has approved “EPA manual 821-R-02-012 for Acute Toxicity in Wastewater”.
16. **Training Survey:** There is a training survey attached to this Update to get your input on the workshop topics. A quick response would be appreciated.
17. Please contact Prabha Acharya @ (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>

Request for your input on Laboratory Training Topics:

In an ongoing effort to provide training topics of interest to the Arizona Laboratory community, we are discussing the option of offering fee based instruction through a training vendor who specializes in laboratory related topics. We would like to ask for your feedback on the following topics, specifically pertaining to your interest level and ability/desire to attend.

Information about the vendor and the coursework can be found online at:

<http://www.accta.com/onsite.html>

The proposed topics at this time include the following 1/2 day sessions. Any two can be combined into a full day session. If you prefer full day session what combination you would like and the number of people interested in attending;

1 Integrating Chromatographic Peaks (1/2 day)

people would like to attend _____

2. Analytical Calibration Techniques (1/2 day)

people would like to attend _____

3. Practical Laboratory Statistics (1/2 day)

people would like to attend _____

4. A full day seminar; # people would like to attend _____

What combination would you prefer? _____

The cost (per person) for the class is projected to be:

1/2 Day seminar: \$160/person (assuming a minimum class of 20)

Full Day seminar: \$280/person (assuming a minimum class of 20)

Students could register for either a single half a day topic, or two half day (i.e., full day) topics.

If you find **other topics of interest** at this site, please list them below.

1.

2.

Please fax your response to 602.364.0759 to the attention of Joe Harmon. Thanks, we appreciate your help.



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FAX TRANSMITTAL SHEET

DATE: August 11, 2006

TO: Laboratory Director and QA Manager

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

Subject: Information Update #90

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JANET NAPOLITANO, GOVERNOR

SUSAN GERARD, DIRECTOR

Information Update

August 11, 2006

Update #90

1. Update on Environmental Laboratories Rulemaking;

The Environmental Laboratories Rulemaking Work Group (Work Group) met on May 10, July 12, and July 25 and considered three different versions of the draft rules for Licensing of Environmental Laboratories, 9 A.A.C. 14, Article 6 (draft rules). Through those meetings, ADHS and the Work Group were able to reach consensus on the contents of the draft rules.

On July 27, ADHS presented Revision 2 of the draft rules for consideration at the Environmental Laboratory Advisory Committee (ELAC) meeting, along with a list of changes that had been identified for Revision 3 of the draft rules. After recommending several additional changes, ELAC unanimously recommended that ADHS go forward with Revision 2, as revised by the list of changes and the additional changes identified during the ELAC meeting.

ADHS is now in the process of creating a Notice of Proposed Rulemaking to begin the formal rulemaking process. ADHS intends to file the Notice of Proposed Rulemaking with the Office of the Secretary of State by August 25, 2006. The Notice of Proposed Rulemaking would then be published in the *Arizona Administrative Register* on September 15, 2006, commencing a formal public comment period. During the public comment period, ADHS will accept written comments on the proposed rules and will hold three oral proceedings to accept oral comments and provide an adequate discussion on the proposed rules. ADHS anticipates holding those oral proceedings on October 17 (Flagstaff), October 19 (Phoenix), and October 20 (Tucson). Information on how to provide written comments and the times and locations for the oral proceedings will be included in the Preamble to the Notice of Proposed Rulemaking. The Notice of Proposed Rulemaking will be available at http://www.azdhs.gov/diro/admin_rules/envlabs.htm shortly after it is published on September 15, 2006. Meanwhile, ADHS is making available at that site a list of the changes made from Revision 2 to Revision 3 and Revision 3 itself, which ADHS intends to use in creating the Notice of Proposed Rulemaking.

If you have any questions or comments about this rulemaking, please contact Sarah Harpring at harpris@azdhs.gov or (602) 542-1513.

2. To facilitate the lab-training requirement in R9-14-616, 5. g, in the draft rules, a Calibration Training DVD is in the process of production. To discuss the content and receive input on the DVD, ADHS is holding Public Meetings on the following dates: August 31, 2006, September 29,

2006, October 26, 2006, and November 30, 2006. It will be held from 10:00am to Noon, at the Bureau of State Laboratory Services, 250 N 17th Avenue, Phoenix, AZ 85007. If you need directions, please contact Michelle Melendez at (602) 364-0744.

3. Please make a note that the SW 846 methods 7000B, 7010 and 8000C will be implemented in the upcoming ADHS Rules.
4. The EPA approved the SimPlate method as a stand-alone method. The IDEXX insert is the actual approved method; no method QC is required but a blank is recommended. The laboratories must adhere to all general microbiological requirements specified in the Manual for the Certification of Laboratories Analyzing Drinking Water, 4th ed. For example, pipets must be verified to be within 2.5% accuracy and the laboratory must maintain the traceability of the plates to the analysis (lot #s and dates used) per ADHS rules. Heterotrophic Bacteria must be analyzed within 8 hours of sampling (Part 40 CFR 141.74(a)(1)).
5. Arizona Department of Environmental Quality, effective immediately, is discontinuing the use and request of Freon methods based on the latest directive from EPA.

Existing permits listing methods 418.1, 413.1 or 413.2 should be replaced with EPA Method 1664. Please contact the Julie Hoskin - ADEQ QA/QC and Laboratory Services Manager at (602) 771-4866 if you have any questions.

6. EPA has withdrawn the reactivity interim threshold levels and reactive cyanide and sulfide methods from Chapter Seven of SW-846 and from certain conditional delistings found in appendix IX to 40 CFR Part 261.

EPA concluded that the guidance had significant problems: You can find the details at the following website;

<http://a257.g.akamaitech.net/7/257/2422/01jan20051800/edocket.access.gpo.gov/2005/pdf/05-10197.pdf>

7. Please make a note that ADHS Surveyors are now requesting that all electronic data be sent to the Department at least two weeks prior to the audit.
8. Our Office received the following communication from MICE:

First off, it is important to note that petroleum hydrocarbons, in particular GROs and DROs, are not specifically regulated under CERCLA and RCRA. Given this the carbon ranges as noted in Method 8015 are merely suggested ranges for the volatile and non-volatile components. The fact is total petroleum hydrocarbons can be present between the carbon range of C4 to C40, and it would be perfectly acceptable for a local regulator or State to require alternative carbon ranges for quantitation using Method 8015.

It is therefore acceptable to report C6-C10, C10 –C22 and C22-C32 carbon ranges for water samples to match the ranges specified in 8015AZR1, without flagging the data. However, the labs must run and utilize the appropriate marker compounds for quantitation of different carbon ranges. To find more details on the marker compounds and their proper usage, please see the Method 8015AZR1 at the following web-site;

<http://www.azdhs.gov/lab/license/tech/8015azr1.pdf>

9. **Please note:** The Office of Laboratory Services is changing its policy of mailing the application forms for license renewals. The Office will continue to mail out a reminder letter 30 days in advance for in-state labs and 60 days for out-of-state labs. However, the Office will discontinue mailing out the application and will instead provide a link to the application on the Office's web site. If a laboratory does not have access to the web site or has problems downloading the application, please contact our office and we will send you an application. We will begin implementing this practice on October 1, 2006.
10. A reminder for the labs to use all the available digits during the calculation for an analysis, until the final concentration step; for e.g., the section 12.1.3 of EPA method 525.2, Revision 2.0, specifies the following:

Calculations should utilize all available digits of precision, but final reported concentrations should be rounded to an appropriate number of significant figures (one digit of uncertainty).

The Department understands that some laboratories adjust their reporting limits for each sample based on initial sample volume/weight, dilutions, and dry weights, and data users should recognize that this is an acceptable practice.

11. Concerning Thermo Electron Corporation (formerly ThruPut Systems) Target and Target DP Software:

During a recent audit, the Department became aware that a licensed laboratory was required by another state's licensing authority to set the Target chromatography software system configuration calibration mode for environmental applications to "By Amount". This is contrary to the statement in Target's User's Manual, which states that the calibration mode should be set to "By Response" for environmental applications.

For linear and quadratic regression models all calculations have been determined by the Department to be appropriate; however, for review of the calibration graph, the mode should be set to "By Amount" because the software plots response (y-axis) versus concentration (x-axis), as required by EPA Method. The setting to "By Response" inappropriately plots concentration (y-axis) versus response (x-axis). Therefore, Target software system configuration should be setup for environmental applications to "By Amount" for linear and quadratic regression models.

Although "By Amount" setup is acceptable for calculations involving linear and quadratic regression calibration models, it is not appropriate for calibrations using a response or calibration factor (RF/CF). To address the problem with RF/CF, the method configuration should be selected to "Force Calibration Mode to 'By Response' for Average RF".

Laboratories should also be advised to verify all calculations in any software that is utilized by the laboratory, and should include the equations for quantitation in appropriate documentation.

12. Please contact Prabha Acharya @ (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>



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FROM: Steven D. Baker, Office Chief
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(602) 364-0759 Fax

JANET NAPOLITANO, GOVERNOR

SUSAN GERARD, DIRECTOR

Information Update

September 05, 2006

Update #91

1. Seeking laboratories input:

For the last couple of years, the Environmental Laboratory Advisory sub-Committee has been working on the requirement of low reporting limits in ADEQ's permits that were not achievable by any approved method. The sub-committee collected reporting limits from 17 laboratories licensed by Arizona and they were compared to the Arizona's Water Quality Standards (WQS) before coming up with the proposed limits. The sub-committee submitted the proposed maximum allowable reporting limits to the Directors of ADHS and ADEQ on March 17, 2006. The limits haven't become final; it is still being discussed within ADEQ. If you would like a copy of the proposed limits, please send an e-mail to acharyp@azdhs.gov.

There is another group of analytes that are in ADEQ's permits; they are not part of 40CFR, Part 136 analytes and therefore have no promulgated wastewater methods. ADEQ has asked the sub-committee to recommend alternate methods and quality control criteria for these analytes.

The sub-committee met on August 29th and came up with the following proposal. The sub-committee would like to hear from the licensed labs, especially drinking water labs since this will affect them the most. The sub-committee would like to present our recommendations at the next ELAC meeting, which is scheduled for September 21st. We would like to hear from you by September 13th. Thank you in advance.

The following is the guidance for using alternate methods:

1. When the DW method is used, the WW sample will be diluted 20 fold and analyzed like a DW sample and will follow the procedure as written, with all the QC criteria required to be met. The resulting reporting limits will be 20 times the DW limits. Would you like to use the 20 fold the 40CFR limits for semi volatiles in WW also?
2. When alternate wastewater or solid-waste methods are used, the samples will be run straight and all the method QC must be met.
3. For analytes that have more than one method listed, any listed method can be chosen.
4. How would you like to analyze asbestos? Like a DW sample after 20 fold dilution?

Analytes of concern

Methods

- Cis 1,2 DCE, xylenes and styrene: EPA 624
- EDB and DBCP: EPA 504.1/SW 8011
- Dinoseb, picloram and 2,4,5-TP: EPA 515/SW 8151
- Alachlor: EPA 625/608/525.2/555
- Endothall: EPA 548.2
- Glyphosate: EPA 547
- Methoxychlor: EPA 608
- Carbofuran and oxamyl: EPA 531.1/632
- Atrazine, simazine and Di-(2-ethyl hexyl adipate) EPA 625/525.2/608
- Diquat: EPA 549.2
- 1,2 Diphenyl hydrazine EPA 625
- Asbestos: (Would like to hear from asbestos labs)

2. Please contact Prabha Acharya @ (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>



Division of Public Health Services

*Office of the Assistant Director
Public Health Preparedness Services
250 N. 17th Avenue
Phoenix, AZ 85007-3231
(602) 364-0720
(602) 364-0759 Fax*

JANET NAPOLITANO, GOVERNOR
SUSAN GERARD, DIRECTOR

FAX TRANSMITTAL SHEET

DATE: October 10, 2006

TO: Laboratory Director and QA Manager

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

Subject: Information Update #92

PAGES: 2 (including cover)

NOTE: If any of the pages are missing, please call 1-800-952-0374, (602) 364-0734 or (602) 364-0733.

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Prabha Acharya AT (602) 364-0734.*

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Leadership for a Healthy Arizona



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Public Health Preparedness Services*
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Phoenix, AZ 85007-3231
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JANET NAPOLITANO, GOVERNOR
SUSAN GERARD, DIRECTOR

Information Update

October 10, 2006

Update #92

1. Update on Environmental Laboratories Rulemaking

A Notice of Proposed Rulemaking to revise the rules for Environmental Laboratory Licensing was published in the *Arizona Administrative Register* on September 15, 2006. This commenced a formal public comment period that will last until 5:00 p.m. on October 20, 2006. ADHS will accept written comments on the proposed rules during the entire public comment period. ADHS has also scheduled the following three oral proceedings to accept oral comments and provide an adequate discussion on the proposed rules:

Date	October 17, 2006	October 19, 2006	October 20, 2006
Time	Noon	Noon	Noon
Location	ADHS Training Room 1500 E. Cedar Ave., #22 Flagstaff, AZ 86004	State Laboratory Dome 250 N. 17th Ave. Phoenix, AZ 85007	State Building, Room 5 400 W. Congress Tucson, AZ 85701
Nature	Oral Proceeding	Oral Proceeding	Oral Proceeding

Information on how to provide written comments is included in the Preamble to the Notice of Proposed Rulemaking. The Notice of Proposed Rulemaking is available at http://www.azdhs.gov/diro/admin_rules/envlabs.htm.

If you have any questions or comments about this rulemaking, please contact Sarah Harpring at harpris@azdhs.gov or (602) 542-1513.

2. Please contact Prabha Acharya @ (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>



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(602) 364-0720
(602) 364-0759 Fax*

JANET NAPOLITANO, GOVERNOR
SUSAN GERARD, DIRECTOR

FAX TRANSMITTAL SHEET

DATE: December 08, 2006

TO: Laboratory Director and QA Manager

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

Subject: Information Update #93

PAGES: 5 (including cover)

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Office of the Assistant Director

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Phoenix, AZ 85007-3231

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JANET NAPOLITANO, GOVERNOR

SUSAN GERARD, DIRECTOR

Information Update

December 08, 2006

Update #93

1. The rules for licensing of environmental laboratories were approved by the Governor's Regulatory Review Council on December 5, 2006, and became effective the same day. For updated information on the rules, including a link to an unofficial copy of the rules, please go to:

http://www.azdhs.gov/diro/admin_rules/envlabs.htm

A number of methods that were approved under the old rules, to analyze environmental compliance samples for the State of Arizona, are no longer approved in the revised rules. Those obsolete methods will be removed from the individual lab's list of licensed parameters. These deletions were mainly based on the recently approved Methods Update Rule for the 40 CFR, Parts 122, 136, 141, 143, 430, 455, and 465.

<http://www.epa.gov/waterscience/methods/update2003/index.html>

Please compare your list of licensed parameters against Exhibit I to determine which methods are no longer approved. Laboratory submitted changes received prior to 12/5/2006 will be made as time permits and will be certified as of 12/5/2006. All others will be certified as of the date they are received.

2. The following are the common questions we have recently received from the laboratories based on the rule change:

Q: In the drinking water section of Exhibit 1, only Total Coliforms by Colilert and Colisure are listed, and E. Coli is no longer listed. Will our lab still be certified for Total Coliforms and E. Coli by Colilert (or Colisure)?

A: An error was made in leaving out the E.coli portion for those methods. The Department has done a Director Approval to include E. Coli to those methods, so that labs remain certified for the equivalent method.

Q: In the wastewater section of Exhibit 1, the *Escherichia coli* (NPDES) by Colilert MPN by 9223B, is specified in conjunction with SM 9221B and 9221C.

A.: Since the original ADHS Director Approval did not state, in conjunction with SM 9221B and 9221C, this requirement will be removed from the application form, to eliminate any confusion.

Q: Under Hazardous Waste, 8260B is not being updated to 8260C; are we supposed to use 8000B or 8000C for our QC reference?

A: You would refer to 8000C. Since the analytical methods don't specify the version for the QC method, you would use the most current method approved by ADHS. In our new rules, 8000C is specified.

Q: Under Waste Water Program, why EPA methods are no longer approved for Residue, nonfilterable (TSS), only SM2540D or HACH8158 are allowed?

A: For WW, the EPA residue methods were deleted (except for 160.4) from the EPA's Methods Update Rule (<http://www.epa.gov/waterscience/methods/update2003/index.html>), the reason why we no longer have them listed in our new application form.

Q: Most of the methods referencing Standard Methods will now require the 20th edition, except for metals. Do we have to have a copy of the 20th ed as well as the 19th ed, or can we simply go to the 21st ed, since it is easier to get a copy of that edition?

A: The 21st ed. is not currently promulgated by EPA for either DW or WW, so it was not included in the ADHS revised rules. The lab will have to maintain a copy of the method from the edition of the SM that is referenced in the new rules. The Exhibit 1 of the rules specifies the 19th ed. of SM as Reference C, while the 20th ed. of SM is specified as Reference C2. Please ensure that the applicable QC sections are also maintained from the appropriate edition.

- 3. Since the Office of Lab Licensure is now requesting the electronic data to be mailed to our Office, at least two weeks prior to the audit, several laboratories have asked us to explain in greater detail what we mean. by an “electronic data”; it means all the data taken directly from the instrument, in the software the laboratory uses to generate the data. This would be in the form of method and data files for both Organic and Inorganic methods, i.e., .m and .d files using Enviroquant. The Department has the ability to pull up data from the softwares such as Enviroquant, Peaknet, Target, Turbochrome, Chromeleon and many more.**
- 4. Please see attached a memorandum from USEPA regarding the allowable modifications to Method 625.**
- 5. Please contact Prabha Acharya @ (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>**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MEMORANDUM

SUBJECT: **Recommended Approved Modifications to EPA Method 625**

OFFICE OF
WATER

FROM: Richard Reding, ^{Chief}
Engineering & Analytical Support Branch, EAD, OST

TO: Quality Assurance Managers
ATP Coordinators
NPDES Coordinators

DATE: November 1, 2006

The 304(h) methods branch recommends allowing several modifications to EPA Method 625 for environmental permitting and compliance monitoring under the EPA's Clean Water Act (CWA) programs. This memorandum does not address laboratory certification requirements that states have mandated.

The text in "Protocol for EPA Approval of Alternate Test Procedures for Organic and Inorganic Analytes in Wastewater and Drinking Water" Section 1.3.2 allows flexibility in the modification of "front end techniques" of the test method provided all criteria in this section and **all QC in the method are met and documented**. This protocol can be downloaded at <http://www.epa.gov/waterscience/methods>.

Recommendations on Method Modifications to EPA Method 625 when Capillary Columns are used:

1. Combining sample extracts before analysis

If the analytes can be reliably identified and quantified in the combined extracts, the extracts may be combined. If, however, the identification and quantitation of any analyte is adversely affected by another analyte, a surrogate, or an interferant, the extracts must be analyzed separately. If there is ambiguity, the extracts must be analyzed separately.

2. Reverse order of pH extraction

The pH extraction sequence may be reversed to better separate acid and neutral components. Neutral components may be extracted with either acid or base components.

Previously, neither of these modifications has been used with Method 625 primarily because of limitations of the resolving power of the packed columns used. In 1985, EPA Region 3 Central Regional Lab requested a modification to method 625 as an alternate test procedure (ATP). Although the approval was for limit use by EPA's Region 3, Central Regional Laboratory only, this modification has come to be used throughout the laboratory community (see attached memo).

Why allow these modifications? Following the base-neutral than acid extraction sequence of method 625 in some cases demonstrated the decomposition of some analytes under basic conditions. Organochlorine pesticides may dechlorinate; phthalate esters may exchange; phenols may react to form tannates. These reactions increase with increasing pH. Reversing the extraction pH sequence may better separate acid and neutral waste components.

Other Recommended Modifications to Method 625

A smaller sample volume may be used to minimize matrix interferences provided matrix interferences are demonstrated and documented.

Alternate surrogate and internal standard concentrations other than those specified in the method are acceptable provided that method performance is not degraded;

An alternate calibration curve and a calibration check other than those specified in the method;

A different solvent for the calibration standards to match the solvent of the final extract.

Other Method Flexibility News

We are revising the "Guidance on Evaluation, Resolution, and Documentation of Analytical Problems Associated with Compliance Monitoring" often referred to as the "Pumpkin Book". Many of the recommendations in the revised "Pumpkin Book" cover ways to mitigate matrix effects.

More explicit flexibility to make changes in approved methods without prior EPA approval is now described at 40 CFR Part 136.6. Such changes are only allowed if the modified method produces equivalent performance for the analyte(s) of interest, and the equivalent performance is documented. It is essential to consult the full text at 40 CFR 136.6 before undertaking method modifications.

Please feel free to forward this information. If you have any questions regarding this memorandum, please contact Lemuel Walker of EASB/EAD/OST by email at walker.lemuel@epa.gov.

cc Lemuel Walker
ATP Coordinator