



California  
Department of  
Health Services

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Director

State of California—Health and Human Services Agency  
**Department of Health Services**



**ARNOLD SCHWARZENEGGER**  
Governor

March 30, 2007

## **IMPORTANT NOTICE**

Dear Laboratory Director:

### **US EPA METHODS UPDATE RULE (MUR)**

This notice is being sent to all certified/accredited Drinking Water and Waste Water testing laboratories in the Environmental Laboratory Accreditation Program (ELAP).

On Monday, March 12, 2007 the USEPA issued Guidelines for Establishing Test Procedures for the Analysis of Pollutants under the Clean Water Act; National Primary Drinking Water Regulations; Analysis and Sampling Procedures; **Final Rule**.

**This Rule becomes effective April 11, 2007 and will impact your certification and may require changes to your laboratory procedures as of that date.**

### **Summary:**

This rule makes significant changes in test procedures for the analysis and sampling under both the Clean Water Act (CWA) and Safe Drinking Water Act (SDWA). A large number of methods of analysis have been deleted for use in regulatory compliance testing and have been replaced by alternate more up-to-date versions. In addition, a number of new test methods have been added and procedures for the preservation of samples and holding times for several analytes have been changed.

**It is your responsibility to read, understand and comply with the provisions of the MUR. In addition, changes as described in this notice describe most of the information as listed but it is not inclusive of all changes as listed in the MUR.**

1. Please refer to the ELAP website for the following important information:  
(<http://www.dhs.ca.gov/ps/ls/elap/html/news.htm>)
  - The Federal Register Notice (3-12-2007)  
<http://www.epa.gov/fedrgstr/EPA-WATER/2007/March/Day-12/w1073.htm>  
Print Version (PDF) <http://www.epa.gov/fedrgstr/EPA-WATER/2007/March/Day-12/w1073.pdf>

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- Deleted Methods Table, Equivalent, and new Methods
- New Test Methods Table
- Holding Time and Preservation Changes Table
- FOT/FOA Forms (Currently under development)

If you are unable to access the ELAP website please contact us for additional information.

2. Procedures for the changing of removed test methods to equivalent approved test methods:

If your laboratory is currently approved for one of the test methods to be removed (refer to Deleted Methods Table and New Equivalent Methods) you must change to the new equivalent method by **April 11, 2007**.

You are not required to notify ELAP of the effective implementation of the changes and you will not receive a revised certificate that reflects these changes until your certificate is renewed.

The following records are to be maintained at your facility and be readily available to ELAP upon request:

- Method Standard Operating Procedure
- Method Demonstration of Capability
- For Standard Methods test procedures, please refer to Section 1000 and the appropriate 020 section for additional quality control requirements
- Bench Sheets must be updated to reference the approved method
- The approved test method must be referenced in the Final Report
- PT sample analyses should reference the approved method

3. You must pass a PT sample using the new approved method prior to April 11, 2008. If you plan to retain any of the old methods you are still required to pass a PT sample annually for those methods in addition to the new methods.

4. Exceptions based on NPDES Permits (or other regulatory mandates):  
The EPA office of Water has allowed the continued use of the removed methods if they are specified in a permit, for the life of the permit. What this means is:

- If your laboratory is performing analyses for an existing NPDES permit that specifies the analytical method or are under other regulatory requirements to use one of the outdated (removed) methods, you may continue to use these methods **ONLY** for those specific situations.

- The laboratory should obtain copies of the permits/regulatory mandate and maintain on file.
  - Any other use of the removed methods is prohibited.
  - The accreditation for your laboratory will remain as it is (with the removed methods) until the renewal period for your laboratory. At that time if you still need to be accredited for a specific regulatory need, you will need to provide documentation to ELAP with the renewal application. (e.g. copy of a current NPDES permit that shows the outdated method for which you are performing analyses).
5. **New Test Methods:** For new test methods as listed in the MUR, a formal amendment application, fees and PT sample analysis will be required. If you are requesting to add a method to your certificate that is not an equivalent technology to a deleted method for which you are currently certified, you must file an amendment application and pay the appropriate fees. If you are not sure whether a method is equivalent, please contact ELAP.
  6. **Holding Times and Preservation Changes:** Please refer to the ELAP web site for details.
  7. **Hazardous Waste Test Methods:** Please note that this rule DOES NOT apply to the Solid/Hazardous Waste Methods or Fields of Accreditation at this time. This includes any holding time changes. Please note that the holding time for Hexavalent Chromium will be 24 hours if an SW 846 method is used.
  8. **Microbiological Test Methods:** The USEPA has just released the Monday, March 26, 2007 Federal Register Notice, Guidelines, Establishing Test Procedures for the Analysis of Pollutant; Analytical Methods for Biological Pollutants; Final Rule. ELAP is currently in communication with USEPA Region 9 concerning this important notice pertaining to microbiological test methods. Stay tuned!
  9. **Freon Test Methods:** Under the MUR **all** Freon based test methods will be removed from the CFR. This includes EPA 413.1. Labs currently approved for EPA 413.1 but not for EPA 1664 must submit an amendment application if they wish to switch test methods. Once again, if a permit stipulates the use of 413.1, you may continue to perform the test method for that specific permit. Removal of EPA 418.1 (Total Recoverable Hydrocarbons) is under discussion with State Regulatory Agencies. An announcement will be forthcoming.
  10. The changes discussed here apply to both ELAP certified and NELAP accredited laboratories.

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Please make sure that all the information provided is thoroughly reviewed, understood and complied with by the **effective date** of the Final Rule **April 11, 2007**.

Should you have any questions, please contact your current auditor.

Thank you.

Sincerely,

George Kulasingam, Ph.D.  
Chief  
Environmental Laboratory Accreditation Program