



Florida Department of Environmental Protection
Environmental Assessment Section

JOINT MEMORANDUM

Florida Department of Health
Environmental Laboratory Certification Program

TO: All Laboratories and Sample Collection Organizations

FROM: Steve Arms, Administrator, Florida Department of Health, Environmental Laboratory Certification Program (DoH ELCP)

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DATE: May 7, 2007

SUBJECT: Interim Strategy for Implementing the Environmental Protection Agency (EPA) approved test method updates published in the Federal Register on March 12, 2007 (pp. 11200 – 11249 of Vol. 72, No. 47) and March 26, 2007 (pp. 14220 – 14233 of Vol. 72, No. 57)

The Environmental Protection Agency (EPA) recently published changes to the Code of Federal Regulations (CFR) that affect Clean Water Act and Safe Drinking Water Act programs for drinking water, ambient water, waste water and sewage sludge. Affected EPA regulations are found at 40 CFR Parts 136, 141 143, 430, 455, 465 and 503.

The full text of the changes may be found at:

<http://www.epa.gov/fedrgstr/EPA-WATER/2007/March/Day-12/w1073.pdf>

and

<http://www.epa.gov/fedrgstr/EPA-WATER/2007/March/Day-26/w1455.pdf>.

Interim Implementation Strategy

The following is applicable to organizations that report data to DEP programs and include both field and laboratory activities that are used to provide data, directly or indirectly, to DEP programs.

Implementing Updates to Laboratory Analytical Method Reporting Requirements for DEP Regulations

Until new reporting and certification requirements are mandated in the revised DEP program rules, laboratories may report methods for regulatory compliance as listed in the rules and tables for the applicable regulatory programs found in the following references:

40 CFR, July 2006 edition (or anticipated July 2007 edition)

Federal Register, March 12, 2007 (pp. 11200 – 11249 of Vol. 72, No. 47)

Federal Register, March 26, 2007 (pp. 14220 – 14233 of Vol. 72, No. 57)

Laboratories will not be required by DEP to update their certifications in accordance with the March 2007 Federal Register changes cited above until the deadline to be established in the anticipated revisions to the DEP QA rule, 62-160, FAC becomes effective. Until the appropriate

changes in DEP rules occur, the following interim policy concerning certification will be implemented:

A laboratory must hold a current DoH ELCP certification in the applicable matrix for any analyte reported. For certification in the non-potable water matrix, the certification for the analyte may be the reported method or a method equivalent to the reported method. For certification in the potable (drinking) water matrix, the laboratory must be certified in the method reported to DEP. A certification held for a method that has been withdrawn by EPA and no longer appears in the references cited above will still be accepted by DEP for these interim requirements.

Some of the tables in the above references list equivalent methods by analytical technique, as in the following example:

TABLE IB.—LIST OF APPROVED INORGANIC TEST PROCEDURES							
Parameter	Methodology ⁵⁰	Reference (method number or page)					
		EPA ^{35, 52}	Standard methods (18th, 19th)	Standard methods (20th)	Standard methods online	ASTM	USGS/AOAC/other
4. Ammonia (as N), mg/L	Manual distillation (at pH 9.5) ⁵⁰ followed by: Nesslerization	350.1, Rev. 2.0 (1993)	4500-NH ₃ B	4500-NH ₃ B	4500-NH ₃ B-97		973.49 ³
	Titration		4500-NH ₃ C (18th only) 4500-NH ₃ C (19th) and 4500-NH ₃ E (18th)	4500-NH ₃ C	4500-NH ₃ C-97	D1426-98, 03 (A)	973.49 ³ , I-3520-85 ²
	Electrode		4500-NH ₃ D or E (18th) and 4500-NH ₃ F or G (18th)	4500-NH ₃ D or E	4500-NH ₃ D or E-97	D1426-98, 03 (B)	
	Automated phenate, or	350.1 ⁵⁰ , Rev. 2.0 (1993)	4500-NH ₃ G (19th) and 4500-NH ₃ H (18th)	4500-NH ₃ G	4500-NH ₃ G-97		I-4523-85 ²
	Automated electrode						See footnote 7

Contact DEP for further clarification concerning equivalent method designations.

Implementing Updates to Required Sample Collection, Preservation and Holding Time Procedures and Impact on Laboratory Sample Receipt

Samplers should collect grab or composite samples for specific analytes or analyte groups as directed by DEP permitting authorities.

Until new sample preservation and holding time requirements are mandated in the revised DEP Quality Assurance (QA) rule, sample preservation and holding time procedures listed in any of the above cited references may be used.

Sample collectors may elect not to acidify water samples for metals analyses (as indicated in the March 2007 Federal Register changes to Table II at 40 CFR Part 136). However, if water samples for metals analyses are received unacidified, laboratories must document the date and time of the acid addition, the lot number used, and the amount added. Additionally, labs must document verification that the sample pH was <2 for at least 24 hours after the addition of the acid and prior to the preparation of the sample for analysis. Samples collected for the analysis of boron, chromium VI (hexavalent chromium) or mercury require different preservation than the above and must be preserved and stored as indicated in Table II of 40 CFR Part 136.

Summary of Changes to EPA-Approved Test Methods for DEP Regulatory Programs

EPA has withdrawn many of the older EPA inorganic test methods. However, methods equivalent to the withdrawn procedures have been retained or added.

EPA has listed additional and revised methods that can be used for the applicable regulatory compliance reporting for drinking water, waste water and sewage sludge, as described in the federal register pages cited above.

EPA has re-titled Table IA at 40 CFR Part 136 to clarify that the listed biological test methods may be used for wastewater and sewage sludge.

EPA has moved methods for the microbiological testing of ambient waters from Table IA to a new table (IH) at 40 CFR Part 136.

EPA has listed methods for the testing of water samples associated with discharges from pesticide manufacturers in a new table (IG) at 40 CFR Part 136 in support of regulations at 40 CFR Part 455.

EPA has included a new section at 40 CFR Part 136.6 describing circumstances and specifying requirements allowing for the modification of test methods without prior EPA approval.

Summary of Changes to Sample Collection, Preservation and Holding Times

EPA has updated the list of analytes and analyte groups that must be collected as discrete grab samples for the applicable regulations at 40 CFR Part 122.

Table II of 40 CFR Part 136, Required Containers, Preservation Techniques, and Holding Times, has been amended for several parameters. Of note:

- An additional 2 hours of laboratory preparation time has been added to the 6-hour transport holding time for water samples collected for bacterial analyses.
- Immediate acid preservation of water samples for metals analyses (except boron, chromium VI, and mercury) is not required if nitric acid is added to bring the sample to a pH of < 2 at least 24 hours prior to sample preparation and analysis. Samples collected for the analysis of boron, chromium VI (hexavalent chromium) or mercury require different preservation than other water samples for metals analyses and must be preserved and stored as indicated in Table II.

Summary of Anticipated DEP Actions to Adopt the EPA Updates to Test Methods and Revised Sample Preservation Techniques and Holding Times

Laboratory certification requirements in the DEP Quality Assurance Rule, Chapter 62-160, F.A.C. will be revised as soon as possible and will include a provision for obtaining certification for test methods in the updated lists cited above by a specified date after adoption of the revised QA rule. Certification requirements for laboratories as specified in DEP rules are only applicable to laboratories and other entities reporting data to DEP. See the discussion above concerning the interim reporting of approved analytical methods and current laboratory certification status.

The DEP regulatory programs will update program rule citations to the above Federal Register notices or the July 2007 edition of the CFR as soon as possible.

The DEP QA Rule will be revised to incorporate by reference the updated tables for required sample containers, preservation techniques and holding times in FS 1000 of the DEP Standard Operating Procedures for Field Activities (DEP-SOP-001/01) in order to adopt the March 2007 Federal Register changes in Table II at 40 CFR Part 136.

Summary of DoH ELCP Actions to Accommodate Method Update Changes to Laboratory Certification

The DoH ELCP will process applications relevant to the Federal Register method updates in the following manner:

- Any laboratory that needs to add methods to its scope because approval was withdrawn for one or more methods for which it holds certification may do so by submitting an application (including the fee) to the DoH ELCP, including a cover letter that indicates that the purpose of the application is to comply with the EPA Methods Update Rule. If the requested method(s) on the application are of the same NELAC technology as the currently certified method, and the laboratory is otherwise in good standing with regards to its certification, the DoH ELCP will process the application administratively without the need for another on-site assessment, additional proficiency testing or documentation. The laboratory must make any necessary changes in its standard operating procedures, documentation, and quality control procedures prior to its next regular on-site assessment.
- If a laboratory applies for method(s) that include additional analytes and/or methods of a different technology than those for which it is already certified, then the usual processes for completing an application, including the requirements for additional PT and an on-site assessment, will be followed.
- An out-of-state laboratory that has been granted reciprocal certification must first obtain certification for the Fields of Accreditation needed from its primary NELAP-recognized accrediting authority and then apply to the DoH ELCP following the usual process.

Contact Information

Should you have questions concerning your certification, please contact Steve Arms at steve_arms@doh.state.fl.us. If your questions concern acceptability of a given method by a DEP regulatory program or concern the new sample preservation procedures, please contact Silky Labie at silky.labie@dep.state.fl.us.

cc: DEP Division Directors for Water and Waste Programs
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