



# STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

Date: December 12, 2012

To: All Nevada Certified Laboratories

From: State of Nevada, Laboratory Certification Program

Re: Footnote 5 in Table II in both Method Update Rules (dated 3/12/07 & 4/17/12) applies only to **cyanide**.

Because footnote 5 was also unintentionally applied to organic and biological parameters, certain laboratories certified by the State of Nevada have made a change to the dechlorination agent used for organic methodologies. The correct interpretation of footnote 5, Table II, *Required Containers, Preservation Techniques and Holding Times* (40CFR136.3 7-1-06 Edition) only refers to **cyanide**. Unfortunately, footnote 5 was listed with several other parameters in Table II.

In reference to USEPA Method 624; Unless a laboratory has obtained a variance from the USEPA Region 9 Regional Administrator, for the use of an alternate preservative, sodium thiosulfate is the only acceptable dechlorination agent to be used with EPA Method 624. Ascorbic acid may not be used. Improperly preserved compliance samples may **not be accepted by the State of Nevada Division of Environmental Protection for compliance monitoring.**

EPA Method 624 only requires the acidification of samples when testing for the purgeable aromatic hydrocarbons (e.g., benzene, toluene, and ethylbenzene) and in that instance the method says a separate sample should be collected, acidified and analyzed when the aromatics are to be determined.

Any laboratory wishing to modify what is in Table II for the organic tests may request a variance from their permitting authority as specified at part 136.3 (e). Labs and or permittees wishing to use an alternate dechlorinating agent should consult with their Regions and/or permitting authorities and provide a rational explanation why they are requesting the variance.

It would not be unreasonable for the Regions or permitting authorities to grant variances when requested until the situation can be resolved through a new MUR.

If you have any questions or are in possession of a Region 9 Variance please contact Donald LaFara, Laboratory Certification Program Manager at (775) 687-9491 or [dlafara@ndep.nv.gov](mailto:dlafara@ndep.nv.gov).

Thank you for your cooperation.