

**Virginia Division of Consolidated Laboratory Services (DCLS)  
Virginia Environmental Laboratory Accreditation Program (VELAP)**

**PRELIMINARY INFORMATION NOTICE CONCERNING  
CLEAN WATER ACT METHODS UPDATE RULES, 2021 and 2023  
August 20, 2024**

The US Environmental Protection Agency (EPA) periodically publishes a **Clean Water Act (CWA) Methods Update Rule (MUR)**. CWA MURs update the methods used for compliance for Clean Water Act testing, often by providing additional options and/or revised methods that improve quality or clarity. This Information Notice provides details on how VELAP will implement two MURs published at 40 CFR 136 for compliance testing in Virginia and how certification and accreditation will be addressed during the period prior to full implementation. This notice also addresses how VELAP's Clean Water Act MUR implementation plans impact laboratories that use these same methods under the Safe Drinking Water Act for analysis of samples for drinking water compliance.

Refer to the [EPA website](#) for information on the 2021 and 2023 Methods Update Rules.

**Virginia Summary of 2021 MUR and 2023 MUR Status**

<b>2021 MUR</b>	<b>2023 MUR</b>
Compliance is voluntary at this time	Compliance is voluntary at this time
Compliance is acceptable to VA DEQ at this time	Compliance is acceptable to VA DEQ at this time
A relatively small number of methods were updated	A relatively large number of methods were updated
Method updates were typically substantial	Method updates were typically minor and/or editorial
<b><i>Laboratories should report results by the revision used</i></b>	<b><i>Laboratories should report results by the revision used</i></b>
Parallel <b>SM 23rd Edition</b> drinking water methods approved in 40 CFR 141 may be used	Parallel <b>SM 24th Edition</b> drinking water methods approved in 40 CFR 141 may be used
Laboratories making updates should notify VELAP so that the certificate can be revised	Although the revised methods may be used at any time during the interim period, VELAP will not revise certificates until the formal implementation date

Virginia 2021 MUR and 2023 MUR Implementation:

Because Virginia had not implemented MUR 2021 prior to MUR 2023 becoming final, and because of potential confusion for laboratories, VELAP is addressing the 2021 and 2023 MURs together. This will allow laboratories to move directly to the method revisions required by the 2023 MUR in lieu of moving stepwise to the 2021 MUR and then to the 2023 MUR. When the 2021/2023 MUR formal implementation date is established and announced, VELAP will provide revised instructions for this update process.

Implementation Date Information:

As of the date of this notice, neither the 2021 MUR nor the 2023 MUR has been officially implemented (required) in Virginia. Full implementation will occur at a future date after the Virginia Department of Environmental Quality (DEQ) has completed necessary regulation updates associated with the 2023 MUR. After that time, VELAP will establish and communicate implementation information.

Compliance With MUR 2021 and/or MUR 2023 Before Required Implementation:

Laboratories are encouraged to become familiar with the changes that will be required for their own scope of accreditation or certification. Laboratories should prepare for these changes and move toward compliance during the interim period prior to a formal implementation date. By doing so, laboratories will have more time to make necessary changes before the formal implementation date.

Revised Certificates:

VELAP will revise certificates for changes made in accordance with the 2021 MUR as laboratories complete these changes and request the updated certificate. Certificates reflecting changes made in accordance with the 2023 MUR will be issued for all laboratories at the same time. These changes will be made at the time of the formal implementation date. ***VELAP will not issue certificates with 2023 MUR revisions in advance of the formal implementation date.***

Reporting Laboratory Results Prior to the Formal Implementation Date:

**Laboratories are expected to report results to their customers and to their proficiency testing providers in accordance with the revision of a method in use at the time of the testing.** In some cases, this revision will not align with the VELAP certificate. ***This difference in method revision between certificates and actual practice will be acceptable during the transition period prior to the formal implementation date.***

Knowing Which Methods Will Require Update:

VELAP has prepared a cross-reference chart summarizing methods currently in the VELAP database that will be impacted by MUR 2021/2023 updates. The chart lists the current Field of Certification or Accreditation (i.e., Analyte / Matrix / Method combination) and the corresponding MUR 2021 and MUR 2023 method

updates. **Laboratories should move to the method revision listed in the MUR 2023 column of the cross-reference chart.** If a method is not listed in this chart, no MUR-related update is required. The chart does not address additional options or new methods offered by the 2023 MUR. Refer to the [EPA website](#) for additional information on approved methods. The VELAP cross-reference chart is available on the [VELAP Toolbox Page](#) under the heading MUR 2023.

#### Drinking Water Testing:

VELAP's Clean Water Act MUR implementation plans might impact laboratories that use some of the same methods for analysis of samples for drinking water compliance. When a formal implementation date is established for MUR 2021/2023 compliance in Virginia, VELAP will also communicate the need for drinking water method updates to those impacted laboratories so that all method updates can be made at one time.

#### **Summary / Key Points**

- *An announcement is forthcoming that will give the specific date by which full MUR compliance is required for Virginia's accredited and certified laboratories.*
- *It is acceptable to become compliant with the 2023 MUR immediately.*
- *Laboratories are encouraged to be proactive in planning for MUR compliance.*
- *Certificates reflecting 2023 MUR compliance will be issued at the implementation date.*

Please direct all questions about this matter to [Lab\\_Cert@dgs.virginia.gov](mailto:Lab_Cert@dgs.virginia.gov).