

US EPA ARCHIVE DOCUMENT



March 8, 2018

David P. Ross, Assistant Administrator
Office of Water
United States Environmental Protection Agency
Ariel Rios Building (MD 4101M)
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Recommendations for Drinking Water Cyanide Testing

Dear Assistant Director Ross:

The Environmental Laboratory Advisory Board (ELAB or Board), a standing Federal Advisory Committee Act board that advises the U.S. Environmental Protection Agency (EPA or Agency), is pleased to acknowledge receipt of Mr. Shapiro's letter dated July 31, 2017, in response to ELAB's letter on the difficulties of testing drinking water for cyanide. The Board also appreciates the discussions ELAB members have had with Mr. Dan Hautman of the Office of Water at the National Environmental Monitoring Conference meeting in August and since.

In its letter, EPA agreed that some approved drinking water cyanide methods and their required preservation can lead to false positives for some samples in which cyanide forms in the sample or during testing. This is a significant problem because detected results must be reported in the public water supply's (PWS) Consumer Confidence Report (CCR). Although ELAB appreciates that EPA should not overstep state regulations that may be more stringent than the corresponding federal regulations, the Board believes that this issue should be addressed by EPA sooner than the next Six-Year Review of Drinking Water Standards. The Board appreciates EPA's desire to avoid regulation by guidance; however, the Agency already has issued CCR guidance documents to states and PWSs, and these could be updated to address the issue.

Alternatively, EPA could prepare a Frequently Asked Questions page or update *Cyanide Clarification of Free and Total Cyanide Analysis for Safe Drinking Water Act (SDWA) Compliance* (EPA 815-B-16-012). This guidance also should inform laboratory certification officers, PWSs and their laboratories of the flexibility afforded by section 4.5 in Method 335.4: "*Other compatible procedures for the removal or suppression of interferences may be employed provided they do not adversely affect the overall performance of the method.*" This guidance was provided by EPA in a letter dated June 10, 2016, to the Minnesota Department of Health. EPA guidance also should note the flexibility allowed in the Standard Methods and other approved methods (i.e. **Standard Methods, USGS, ASTM, etc.**).

ELAB requests that EPA confirm that the “at or above” language in 40 CFR 141.151(d) (*“For the purpose of this subpart, detected means: at or above the levels prescribed by §141.23(a)(4) for inorganic contaminants”*) means that unless a state has adopted a stricter required minimum reporting limit, states and EPA should accept laboratory results with reporting limits at or above the “detection limits” stated in 40 CFR 141.23. Laboratory certification officers, PWSs and their laboratories would benefit significantly from this information, as it would preclude the need to report results below EPA’s stated Practical Quantitation Limit for cyanide of 100 micrograms per liter. This is the approved practice in California.

ELAB appreciates the opportunity to continue this discussion with the Agency. Please let the Board know if you need additional information or clarification.

Respectfully,



Henry Leibovitz, Ph.D.
Chair, Environmental Laboratory Advisory Board

cc: Daniel Hautman, Deputy Director TSC, Office of Ground Water and Drinking Water

Thomas O'Farrell, Ph.D., ORD, Office of Science Advisor

ELAB members