

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 31 2017

OFFICE OF WATER

Henry Leibovitz, Ph.D.
Chair, Environmental Laboratory Advisory Board
Rhode Island Center for Environmental Sciences
State Health Laboratories
50 Orms Street
Providence, Rhode Island 02904

Dear Dr. Leibovitz:

I would like to thank you and the Environmental Laboratory Advisory Board for your June 26, 2017, letter on the subject of "Recommendations for Drinking Water Cyanide Testing." The Environmental Protection Agency's Office of Water appreciates the concerns that you have raised and values the ELAB's input.

In suggesting that the EPA consider your recommendations "when it proposes revisions to 40 CFR 141," we understand that ELAB recognizes that a number of the recommendations would require regulatory action to implement. This would include, for example, changing the public water system requirements for reporting results under the Consumer Confidence Report Rule (e.g., to establish when detections should be reported or to set a level of 100 ug/L, below which free cyanide results would not be reported [as suggested by ELAB]). At a minimum, OW will consider the recommendations as the Office of Ground Water and Drinking Water undertakes the next "Six Year Review" of the drinking water regulations. We will also consider earlier opportunities should such occur.

We acknowledge that analytical methods have some degree of false-positive/high-bias (or false negative/low-bias) risk. In the case of cyanide, the false-positive/high-bias risk appears to be greater when a treated drinking water sample matrix containing a chloramine residual is quenched with ascorbic acid (and to a lesser degree sodium thiosulfate), then preserved with sodium hydroxide. Though we have not studied the various approved methods enough to evaluate the relative risk, that risk is logically greater with some methods than with others. Accordingly, it would be appropriate for those experiencing a problem to consider using a different approved method (e.g., a water system that practices chloramination may wish to have their laboratory use an analytical method that does not rely on ascorbic acid for quenching). OGWDW meets with the regional drinking water Certification Officers on a monthly basis and will share this observation with them, encouraging them to share it with their state COs as well. We will investigate opportunities to share this information with the laboratory- and water-treatment communities as well.

We also acknowledge that proficiency testing samples, prepared using free cyanide salts, can be effectively used to assess methods for both free and total cyanide and agree that states' certification should specify whether the laboratory is approved to measure free cyanide and/or total cyanide (noting the particular methods and analytes for which they are certified). We will also discuss this at our next monthly call with the regional COs.

We applaud the efforts of ELAB to assist the agency in improving our programs and we welcome your comments and suggestions. Should you have any questions, please contact Dan Hautman of our Technical Support Center at 513-569-7274 or hautman.dan@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Shapiro", is written over a light red rectangular background.

Michael H. Shapiro
Acting Assistant Administrator

cc: Lara Phelps, ORD/OSA
Daniel Hautman, OW/OGWDW/SRMD/TSC