# **Cyanide Compliance**

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Anders Wistrom RWQCB July 2015 Training



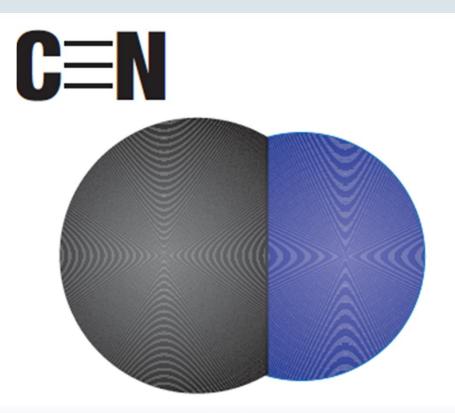
# Cyanide in WWTP Effluent

- Sample results showing the presence of cyanide may be "false" positives
- History of "random" cyanide in R7 goes back at least 10 years
- EPA has been aware of analysis problems when analyzing for cyanide in "complex" effluents such as domestic wastewater

 R7 desires to know whether there is indeed a threat to water quality

# Objectives

- Sources of Cyanide
- Cyanide species
- Analysis interferences
- 2012 40 CFR 136
- Representative samples and sampling strategies

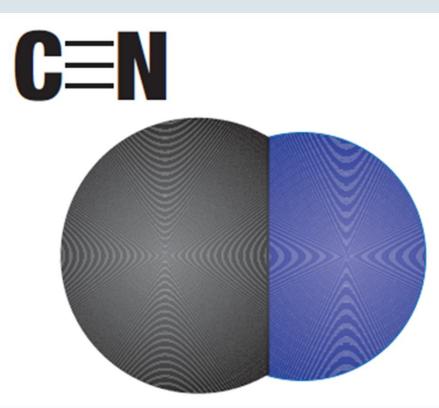


# Sources of Cyanide

- Carbon + Nitrogen
- Triple bond
- You can make cyanide:

 $\begin{array}{c} CH_4 + NH_3 \xrightarrow{T^\circ + Pt} \\ H - C \equiv N + 3H_2 \end{array}$ 

*T*<sup>o</sup> High temperature *Pt* Catalyst



### Sources of Cyanide

- Naturally occurring: lima beans, almonds; pits of apricot, apples, peaches
- Combustion products including cigarette smoke
- Cyanide salts in metallurgy for electroplating, cleaning and gold ore processing
- Cyanide gas used to eliminate pests and vermin in buildings and ships



# **Cyanide Species**

Cyanide (A); Cyanide and Thiocyanate –Total; Cyanide Complexed to Range of Compounds; Cyanide, Free Not Amenable to Chlorination; Cyanide in Bottom Deposits (dry weight); Cyanide Sludge Solid; Cyanide Filterable, Total; Cyanide, Free-Water plus Wastewaters; Cyanide Total (as CN); Cyanide, Total Recoverable; Cyanide, Weak Acid Dissociable; Cyanide, Dissolved (Std. Method); Cyanide, Free (Amenable to Chlorination); Cyanide Free.

Source: State Water Resources Control Board (SWRCB) Water Quality Enforcement Policy, May 20, 2010

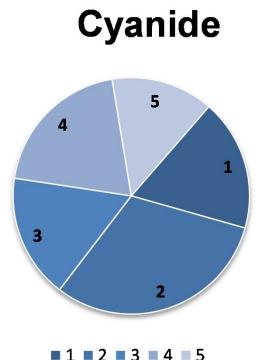
### Cyanide Species cont.

Schematic illustration of how different cyanide species are defined based upon the method of analysis used in the laboratory.

#### Analysis Methods:

- Total Cyanide = (1+2+3+4+5)
- Transition Metal Cyanocomplexes = (1+2+3+4)
- Cyanide Amenable to Chlorination = (1+2+3)
- Weak Acid Dissociable Cyanide (1+2)
- Free Cyanide\*\* = (1)

\*\* Only species toxic to aquatic life



#### 40 C.F.R. 136

- Before 2012 U.S. EPA approved methods for:
  - Total cyanide:
    - EPA 335.2; 335.3; 335.4, and
    - SM 4500-CN C, D, E and F
  - Available cyanide (weak acid-dissociable):
    - SM 4500-CN G

- Free cyanide

After 2012 U.S. EPA approved methods for:

# Analysis and Interferences

- Total and Available Cyanide methods
   Overestimate the toxicity of the effluent
- Interferences
  - Sample preservation in NaOH (high pH)
  - Nitrate, nitrite, sulfides in the wastewater
  - Chlorination and UV disinfection
  - Sample holding time
- Problem
  - False positives = added expenditures
  - Under-reporting = threats to WQ not identified

# New Methods for Free Cyanide\*\*

ASTM Standard Practice	Amperometric (Automatic – FIA):
D7237-10	Passive diffusion of cyanide at pH 6 to pH 8.
	Approximate range: 2 to 500 µg/L
OIA-1677	Amperometric (Automatic – FIA):
	Passive diffusion of cyanide at pH 6 to pH 8
	Approximate range: 2 to 5,000 µg/L
ASTM Standard Practice	Calorimetric (Manual):
D4282-02	Passive diffusion of cyanide at pH 6
	Sample is chlorinated + reagent for color
	Approximate range: 10 to 150 µg/L

\*\* CFR 40 Part 136 May 2012

# Cyanide "hits" - Rats! What do I do now?

# Cyanide "hits" - What to do?

- The goal is to collect data that is representative of effluent quality.
- Four areas of investigation (not necessarily in order)
  - 1. Source control
  - 2. Laboratory
  - 3. Sample collection/preservation
  - 4. Sampling for representative results
  - Prepare documentation for reporting purposes

# Source Control

- Source control verify that your community does not have a:
  - Gold mine and/or ore processing facility,
  - Artist's photography studio sepia toning,
  - Metal/chrome plating facility w. discharge to sewer,
  - Pest exterminator using cyanide gas,
  - Laboratory using reagents containing cyanide, or
  - Facility producing nylon or plastics
- Review permits, CUPA\*\*, business licenses, etc.
  - Document and report results

\*\*Certified Unified Program Agency (CUPA) for Hazardous Materials Management

### Laboratory

- Verify that laboratory is using the method of analysis you want\*\*
- Laboratory to do triplicate analysis (for free) to investigate laboratory variability
- Document and report results

\*\* e.g. Free Cyanide





### Sample Collection/Preservation

- Collect sample before and after disinfection
- If there is reason to believe that effluent solids do not contain cyanide particulates (source control) filter sample
- Treat sample for potential nitrate and sulfide interference – work with lab to refine sample collection

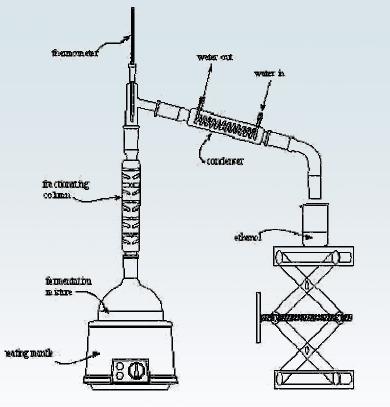
cont.

 Preserve sample in NaOH pH>10 (not pH>12) – work with lab to prepare appropriate sample bottles

# Sample Collection/Preservation (cont.)

- Laboratory to collaborate/ assist with sampling study
  - Before/after disinfection
  - Holding times
  - Before/after preservation
- ASTM D7365-09a

   Flexible approach for sample handling and managing interferences



# Sampling for Representative Results

- Sample early in sampling "period" to make sure you have time to verify results
- Collect multiple grab samples on the sample day
- Analyze sequentially

# Multiple daily grabs

- Procedure:
  - Collect sample and preserve as required
  - Analyze the first sample
    - Criteria: Chronic 5.2 µg CN/L (free cyanide).
    - If < 5.2 µg stop</li>
    - Else, analyze 2<sup>nd</sup> sample,
    - Repeat

Analyze results through a ranking process

- Analysis using a Ranking Process:
  - Rank sample results
  - Determine median value
  - Assess results = compliance/violation

- Example 1:
  - $-1^{st}$  sample = 4.2 µg
  - Stop
  - Permittee is in compliance



- Example 2:
  - $-1^{st}$  sample = 18 µg
  - $-2^{nd}$  sample = ND
  - Ranking: 18: ND
  - Result: ND
  - Permittee is in compliance



- Example 3:
  - $-1^{st}$  sample = 18 µg
  - $-2^{nd}$  sample = 5.0 µg
  - Ranking: 11.5 µg>5.2 µg
  - Permittee is in Violation
  - $-3^{rd}$  sample = ND
  - Ranking: 5.0 µg
  - Permittee is in compliance



