MEMORANDUM

To: All approved/certified laboratories providing analytical services for mine compliance
From: Karl McCrea
Date: 1 February 2021
Subject: Metals digestion specific to mine-compliance and related samples

There has apparently been some confusion regarding the need to digest filtered or unfiltered samples for metals analysis. The Bureau of Mining Regulation and Reclamation (BMRR) is the ultimate end-user of these data, either for compliance, characterization, or modeling purposes. In order to protect waters of the State of Nevada and to ensure that all data generated by the approved/certified mining laboratories are comparable, effective immediately, BMRR is requiring that all solutions for metals analysis must be digested separately prior to aspiration via ICP-AES or ICP-MS (e.g., EPA 200.7/200.8, SW 6010/6020, or SM 3120/3125). This includes samples collected for the purpose of compliance analyses or generated through any one of the various characterization procedures, regardless if for dissolved (Profile 1) or total recoverable metal content (Profile III). This applies to all instrument–related metals analysis regardless of method reference. Analysis of samples under Water Pollution Control Permits issued by BMRR are performed in accordance with the Clean Water Act (CWA) and do not include monitoring, sampling, or analysis for compliance with the Safe Drinking Water Act (SDWA).

If you have any questions, please feel free to contact me at (775) 687-9407 or via email at kmccrea@ndep.nv.gov.