

Bureau of Mining Regulation and Reclamation

GUIDANCE DOCUMENT

CLARIFICATION OF ANALYTICAL PROCEDURES

Per request by the Nevada Mining Association in 2014, the Nevada Division of Environmental Protection, Bureau of Mining Regulation and Reclamation (Division) clarified that all water quality analyses conducted for compliance in Water Pollution Control Permits (WPCP) fall under the requirements of the Clean Water Act (CWA), which is the basis of the Mining Regulation program. This was done in an effort to eliminate the potential for future misunderstandings regarding analytical requirements for data to be submitted to the Division.

Per Nevada Administrative Code (NAC) 445A.0622.4, the only methods certifiable for CWA analyses are located in Title 40 C.F.R. 136.3, Table 1B, which is located at the Federal Register's website [Title 40 Code of Federal Regulations](#). All analyses must be performed by a laboratory certified by the State of Nevada for the appropriate methods.

These analytical requirements pertain to any groundwater, surface water, process solution, or any other water that may be affected by mining activities, that are specifically identified in a WPCP, will be included in a permit application, or will be submitted to the Division in response to an enforcement action.

Additionally, any extracts derived from environmental test work or preparatory procedures, (e.g., Meteoric Water Mobility Procedure, humidity cell tests, and other leachate exams), utilized for compliance, permitting, or enforcement related activities, must also be analyzed per CWA requirements. All samples being analyzed under CWA must be properly digested per method requirements prior to analysis, unless previously approved by the Division.

Note that weak acid dissociable (WAD) cyanide is not listed in 40 C.F.R. Part 136.3 Table 1B. Per NAC 445A.383, the Division requires WAD cyanide analysis by ASTM D2036-82, Part 31. NAC 445A.383 has been updated to include the most recent version of ASTM 02036, Method C, Parts 16.2, 16.3, and 16.4 or SM4500-CN-I, as the only allowable analytical procedures. Unless authorized by the Division, the lower reporting limit for WAD cyanide shall be no greater than 0.010 mg/L.

If you have any questions regarding this document, please contact the Division at (775) 687-9400.