

Low Level Mercury Workshop  
Jacksonville, Florida



## Satisfying Certification Requirements of EPA Method 1631: One Experience in Certification

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# What's coming in this presentation?



- How mercury criteria got so low
- Method 1631 Background
- Instrumentation
- One experience in state certification
- Contributions from other labs



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# Where Are We?



- **1987 Clean Water Act**
  - States must implement water quality-based control strategies to ensure water quality is attained
  - Water quality controls reflect *water quality standards* designated by each state
    - Designated use(s) of water body or segment
    - WQC necessary to protect designated use(s)
    - Anti-degradation policy
- **1987 Great Lakes Initiative**
  - Joint EPA and Environment Canada agreement
  - Calls for virtual elimination of mercury while providing incentives and options for cost-effective implementation that consider mercury sources
- **National Toxics Rule**
  - Established numeric WQC for toxic pollutants
  - Brought non-compliant States into compliance with 1987 amendments to CWA Section 303(c)(2)(B)



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# Mercury - Water Quality Criteria



| <u>Criterion</u>   | <u>NTR<br/>(ng/L)</u> | <u>Great Lakes<br/>(ng/L)</u> |
|--------------------|-----------------------|-------------------------------|
| Freshwater Acute   | 2400                  | 1440                          |
| Freshwater Chronic | 12                    | 770                           |
| Marine Acute       | 2100                  | -                             |
| Marine Chronic     | 25                    | -                             |
| Human Health       | 140                   | 1.8                           |
| Wildlife           | -                     | 1.3                           |

**Circled values below approved methodology contract required detection limit.**



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# EPA Method 1631



- Developed by Nicholas Bloom at Frontier Geoscience labs
- Currently released in revision E
  - **Method 1631, Revision E: Mercury in Water by Oxidation, Purge and Trap, and Cold Vapor Atomic Fluorescence Spectrometry**  
August 2002.
  - **Guidance for Implementation and Use of EPA Method 1631 for the Determination of Low-Level Mercury (40 CFR part 136)**
  - **Method 1669: Sampling Ambient Water for Trace Metals at EPA Water Quality Criteria Levels**  
July 1996



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## 1631 Summary



- BrCl Oxidizer / Preservative
- $\text{NH}_2\text{OH HCl}$  prereduction for free Br & Cl
- $\text{SnCl}_2$  reduction of  $\text{Hg}^{2+}$  to  $\text{Hg}^0$
- Purge  $\text{Hg}^0$  from water with Ar or  $\text{N}_2$
- Trap  $\text{Hg}^0$  on Au coated sand
- Thermally desorb  $\text{Hg}^0$  into Ar stream
- Cold vapor atomic fluorescence spectrometer

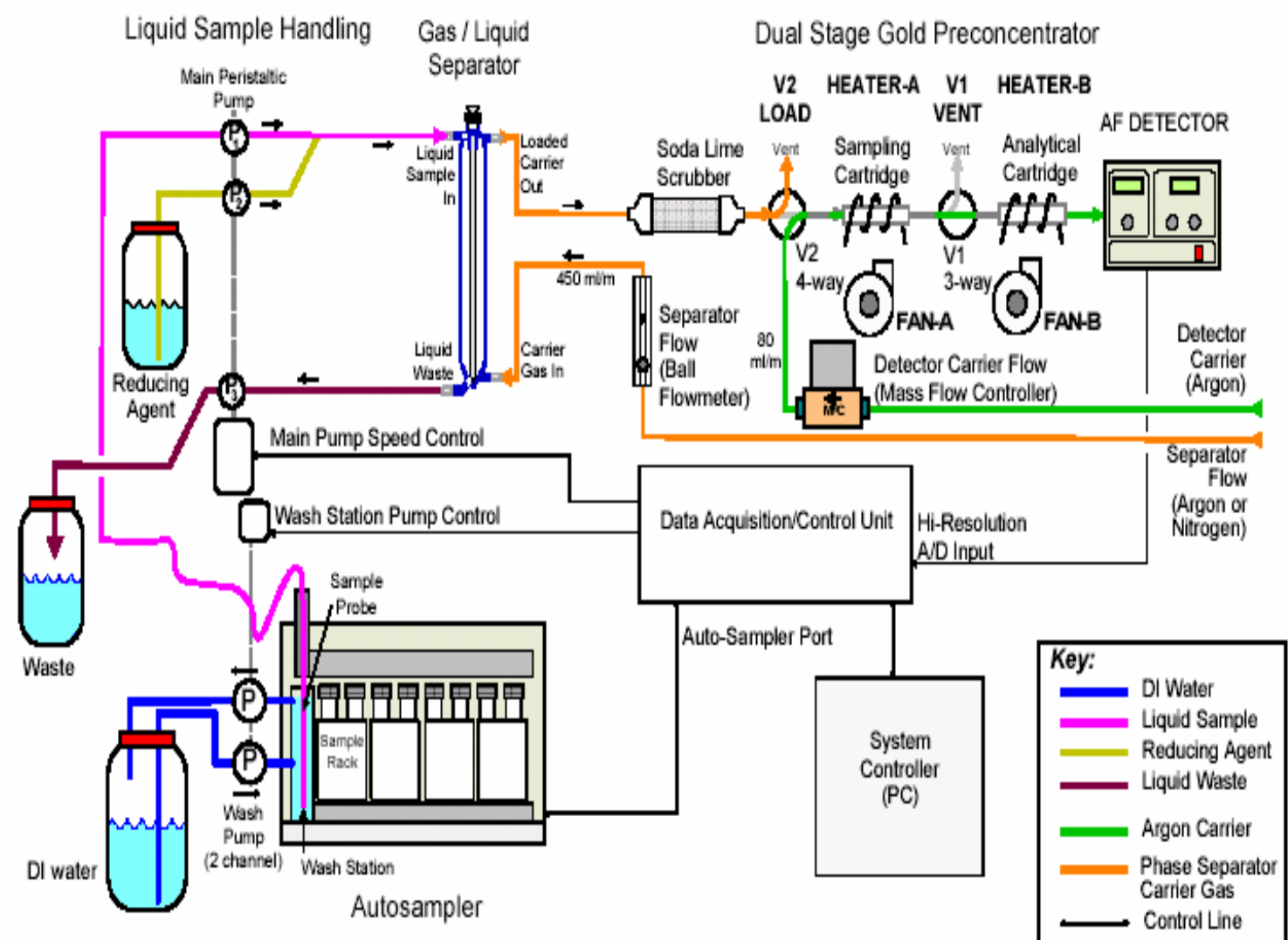


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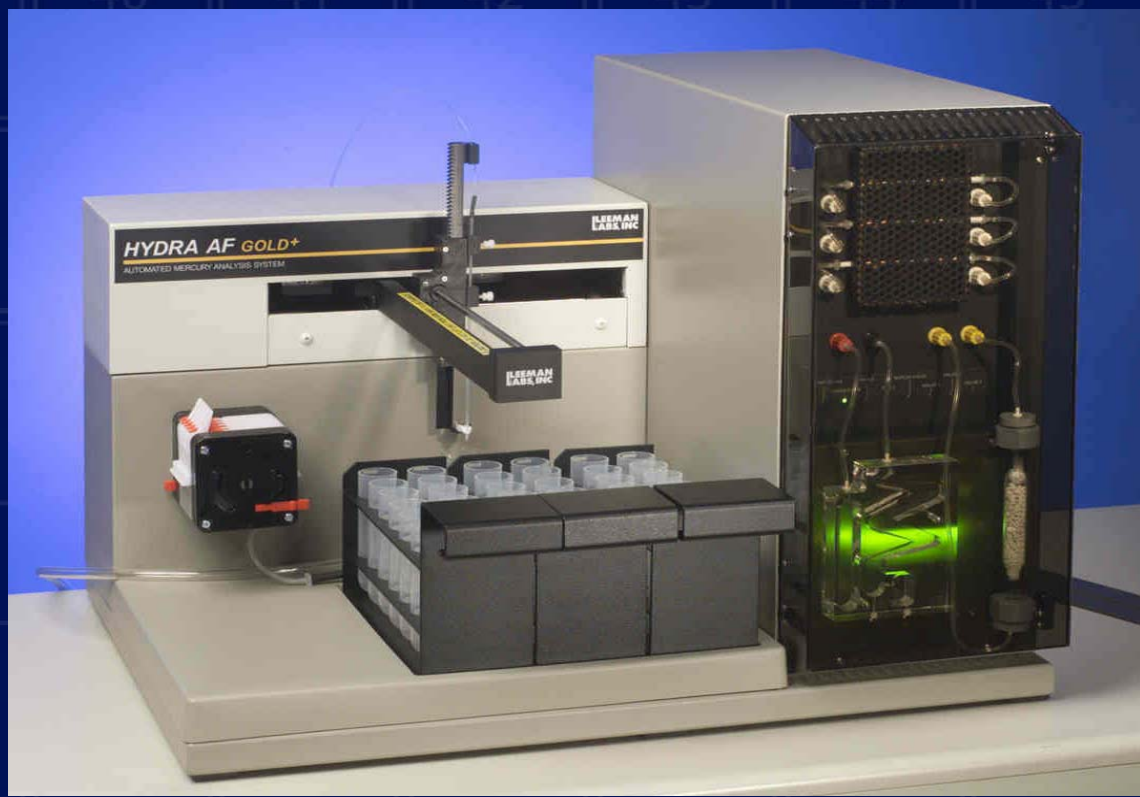
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# 1631E Flow Injection Schematic



# Hydra AF gold plus Automated Fluorescence Hg Analyzer

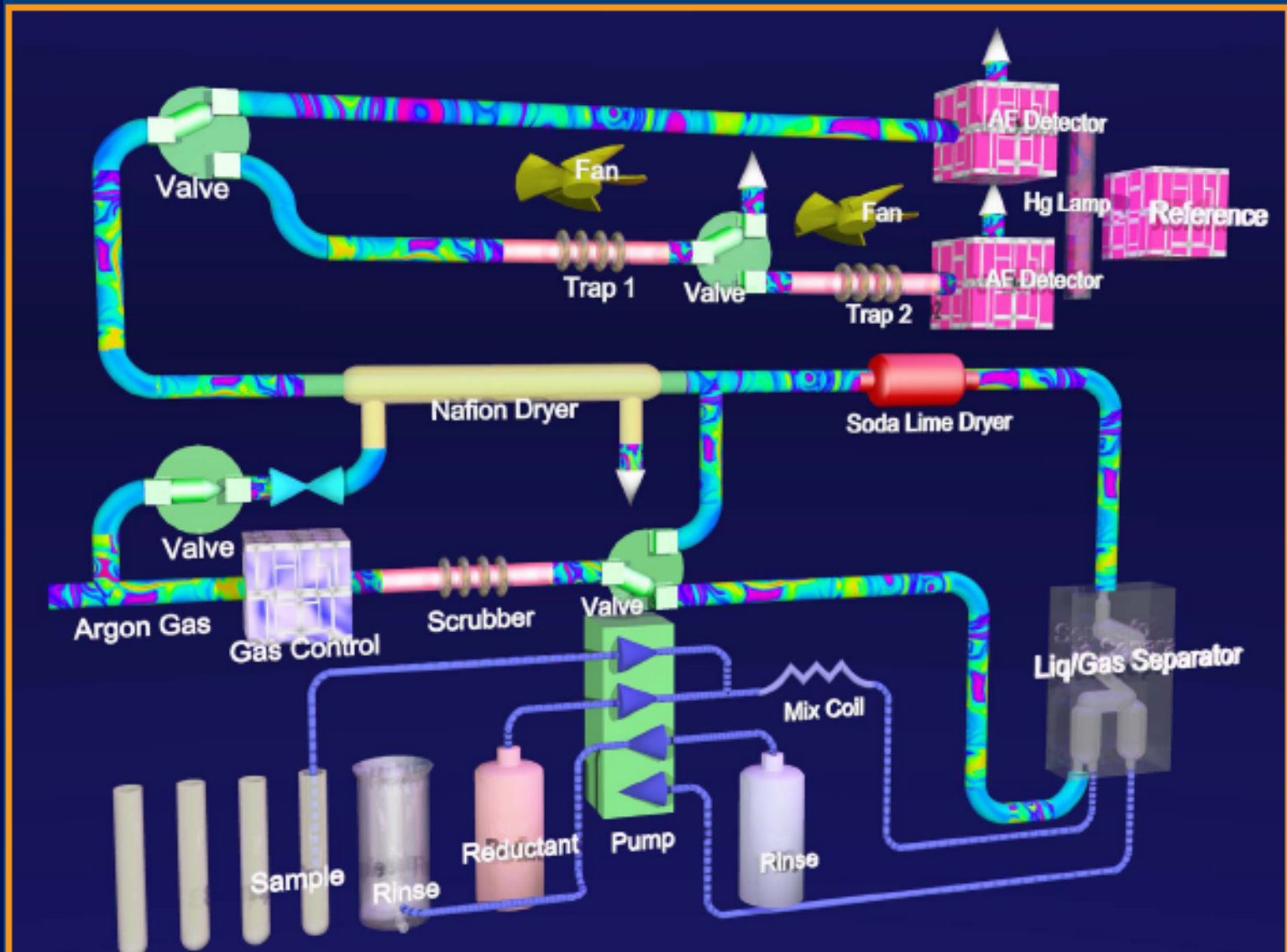


Designed to meet  
the demands of  
EPA Methods  
1631 and 245.7



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# Schematic for Hydra AF Goldplus



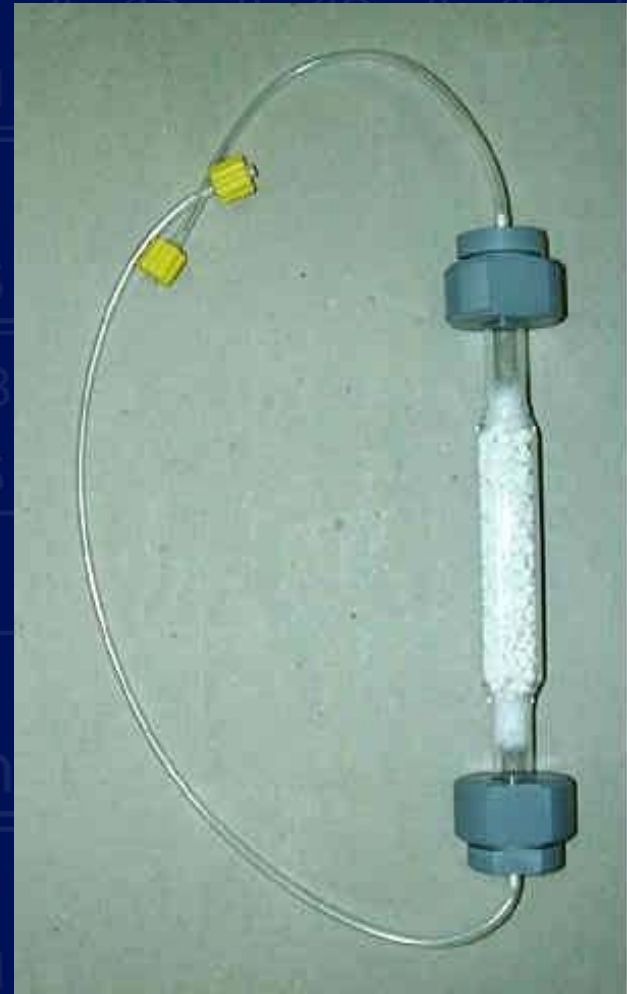
2-stage  
Drying

2 Detectors

Prescreen  
capability

## Soda Lime Dryer

- **Contains:**
  - Calcium oxide
  - Sodium hydroxide (5-20%)
  - Water (6-18%)
- **Demonstrated superior liquid phase removal**



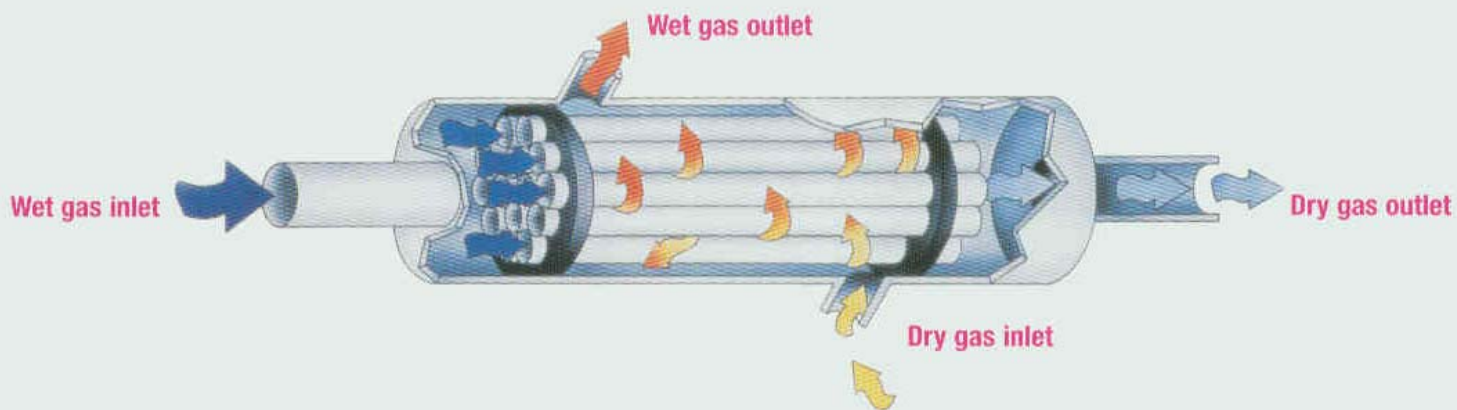
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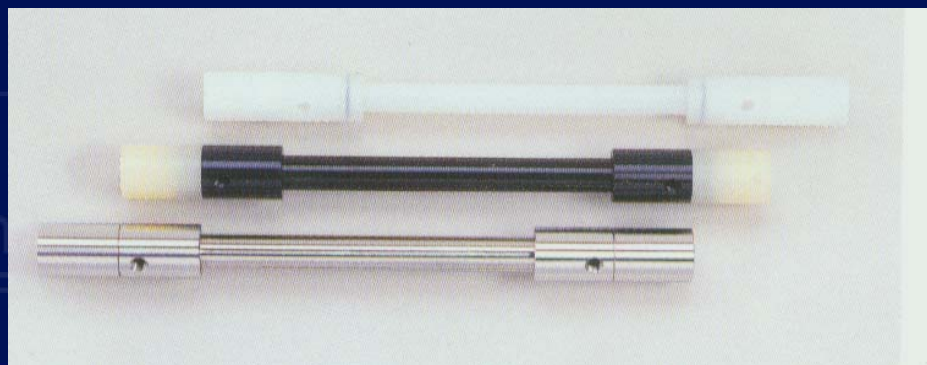
## Nafion Dryers



### Counter-current gas flow design

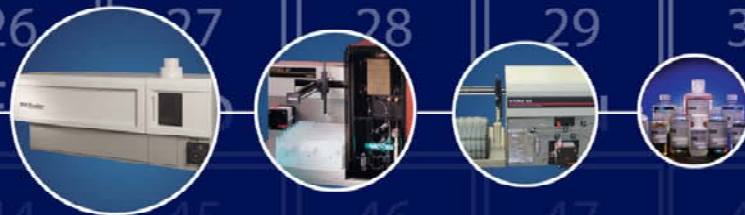


Available in various lengths, materials, and shapes

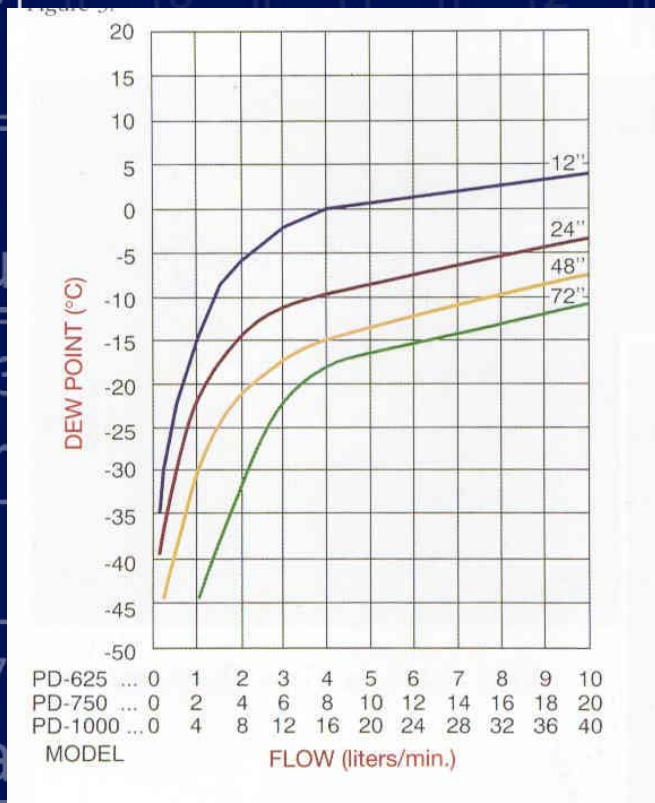


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# Nafion™ Performance

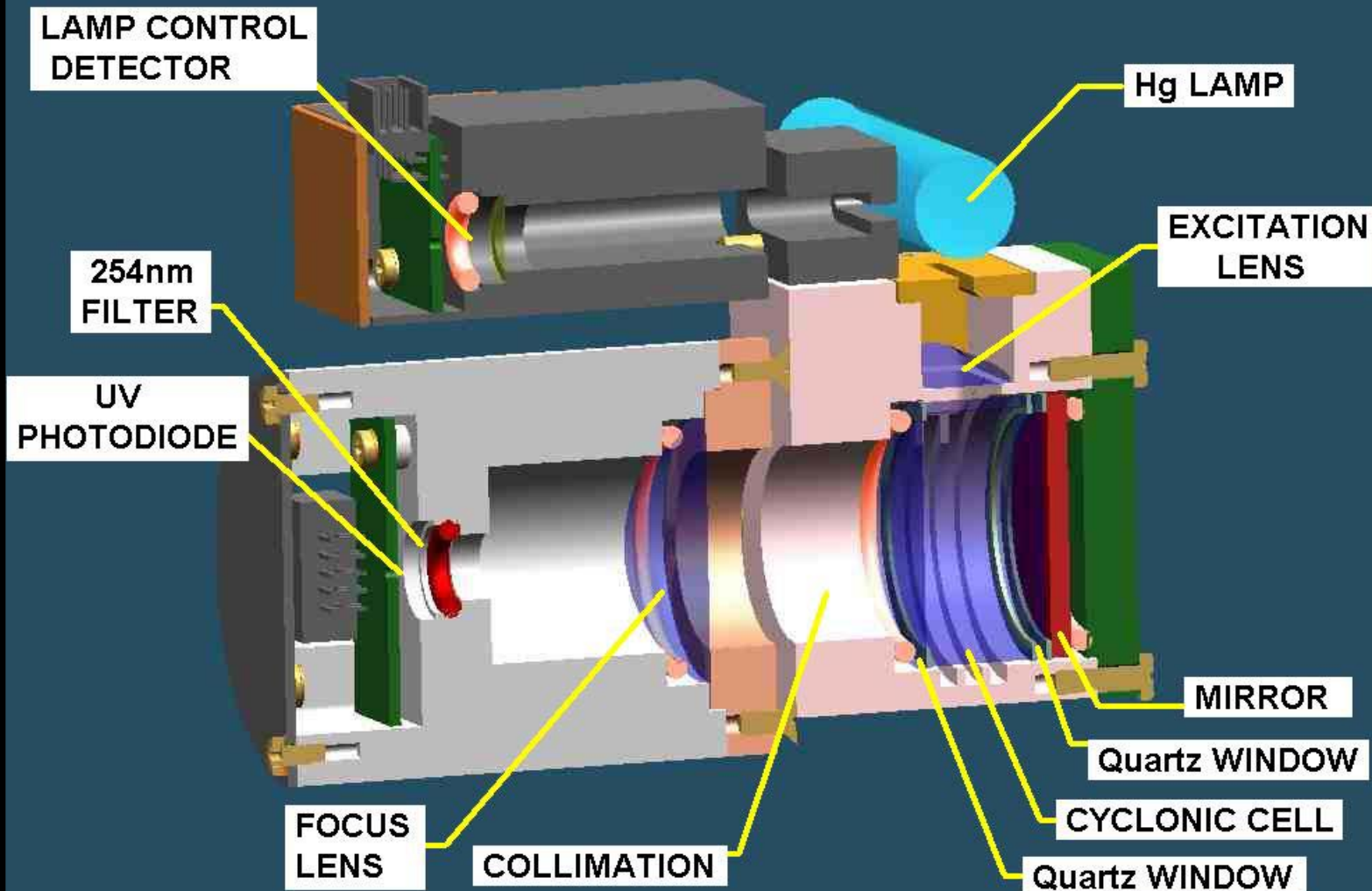


- No moving parts
- No required maintenance
- Dew points as low as  $-45^{\circ}\text{C}$  (75ppm  $\text{H}_2\text{O}$ )



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# Fluorescence Detector Design



# One Experience in State Certification



- **Oxford Lab**

- **Wilmington, NC**

- **NC State announced that effective Sept 1, 2003, determination using 1631 for all permits where effluent concentration is less than 0.2ppb.**

- **Oxford Lab management decided to offer method 1631 and wanted to be certified by North Carolina before the method ruling was implemented.**

- Literature search
- Facilities modification
- Instrument & accessories purchase



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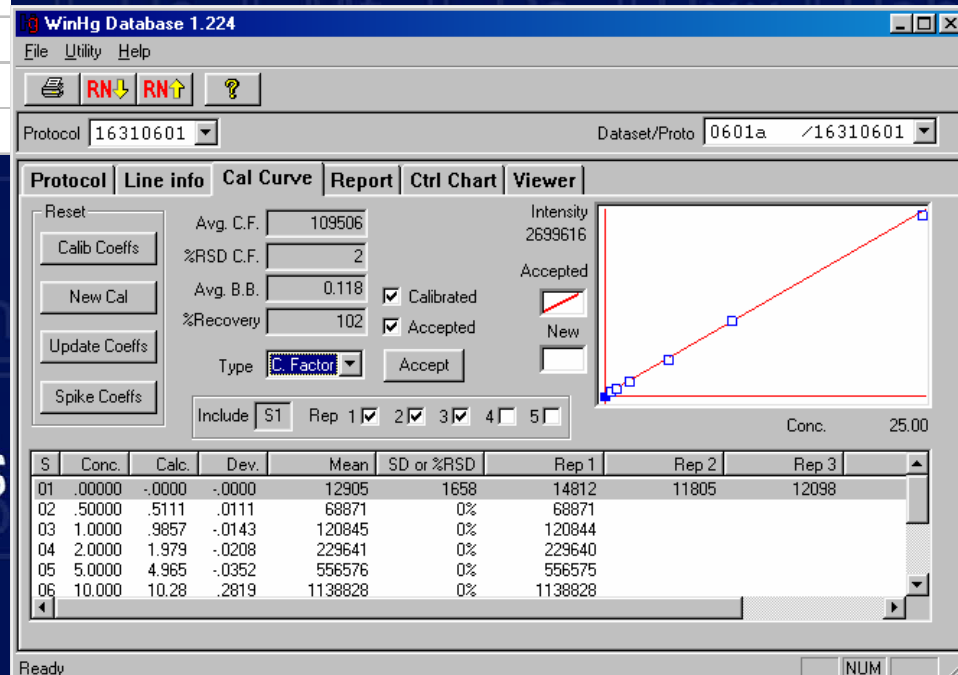
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# 1631 Calibration

| Conc ng/L | Peak area | Blk subtracted area | Cal Factor | Calc conc ng/L | %R   | QC check |
|-----------|-----------|---------------------|------------|----------------|------|----------|
| 0         | 28266     | avg blk             |            | 0.20           |      | Pass     |
| 0         | 28901     | 28584               |            | 0.21           |      | Pass     |
| 0.5       | 110243    | 81660               | 163319     | 0.59           | 118% | Pass     |
| 1         | 167870    | 139287              | 139287     | 1.01           | 101% |          |
| 2         | 287869    | 259286              | 129643     | 1.88           | 94%  |          |
| 5         | 663325    | 634742              | 126948     | 4.60           | 92%  |          |
| 10        | 1389643   | 1361060             | 136106     | 9.86           | 99%  |          |
| 20        | 2685733   | 2657150             | 132857     | 19.25          | 96%  |          |
|           |           | avg CF              | 138027     |                |      |          |
|           |           | %RSD                | 10%        |                |      | Pass     |



Common failures?  
 System blank  
 CF %RSD.  
 0.5ppt %Rec.  
 Usually caused by contamination!



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# Not So Blank Blanks



## *Reagents*

Water

HCl

KBr

KBrO<sub>3</sub>

SnCl<sub>2</sub>

NH<sub>2</sub>OH HCl

Ar

## *Analyst*

gloves

lab coat

dental work

## *Environment*

air - vapor/particulates

thermometer, manometer, barometer

bench top

ventilation hood

## *Equipment*

sample bottle

autosampler vial

hoses & tubes

gas/liquid separator

gas supply line

pipet tips



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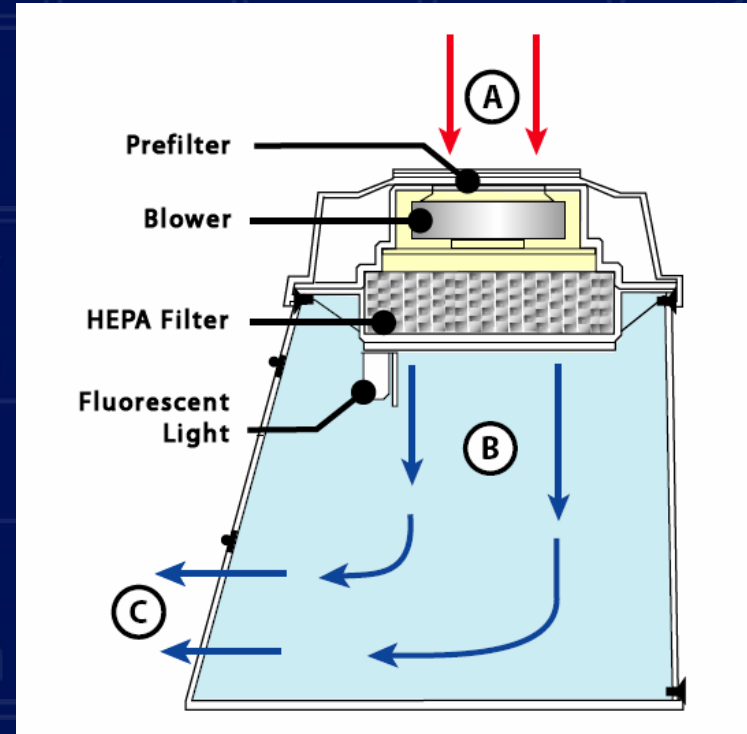
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# System Enclosures



## AirClean System's 600 Series



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**Oxford Labs bought two hoods**

- One for sample and reagent preparation
- One for analyzer

## Attractive Features of AirClean System 600



- Variable blower control
- Automatic face velocity controller
- Two sash opening levels (8 & 16")
- All polypropylene construction
- High efficiency HEPA filter for particulates.
- Qualifies as a class 100 clean bench



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## Other Lab Facility Changes



- Freshly painted walls (S-Doped)
- Limited Access
- Sticky pad at doorway
- Air brought in from outside
- Installed local de-ionized water supply



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# Not So Blank Blanks



## *Reagents*

Water  
HCl  
KBr  
KBrO<sub>3</sub>  
SnCl<sub>2</sub>  
NH<sub>2</sub>OH HCl  
Ar

## *Analyst*

gloves  
lab coat  
dental work

## *Environment*

air - vapor/particulates  
thermometer, manometer, barometer  
bench top  
ventilation hood

## *Equipment*

sample bottle      autosampler vial  
hoses & tubes      gas/liquid separator  
gas supply line      pipet tips



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## Laboratory Reagents



- H<sub>2</sub>O, De-ionized water system provided by Eagle Water, Durham, NC. with additional Barnstead International Ultrapure filter added (D8911).
- HCl, sub-boiled distilled HCl (O2SI, 060100-03-1L) used for 1% HCl and BrCl solution.
- HCl, EM Omnitrace (VWR, EM-HX0607-2) used for 2% rinse.
- SnCl<sub>2</sub>, J.T. Baker (VWR, JT3980-1)
- Hydroxylamine hydrochloride, J. T. Baker (VWR, JT2196-01)
- BrCl solution, (O2SI, 160073-0).

**Rinse solution and reductants purified by sparging.**



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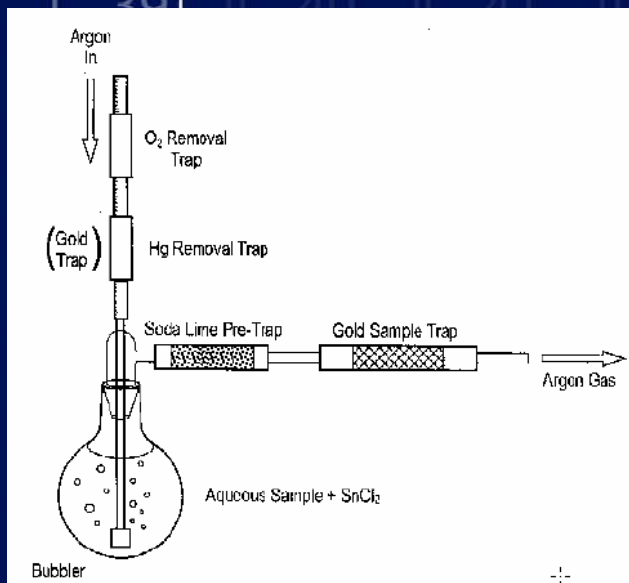
# Sparging Process

- Teflon tube extension
- Gas flow: ~5 LPM
- Time: >30 min



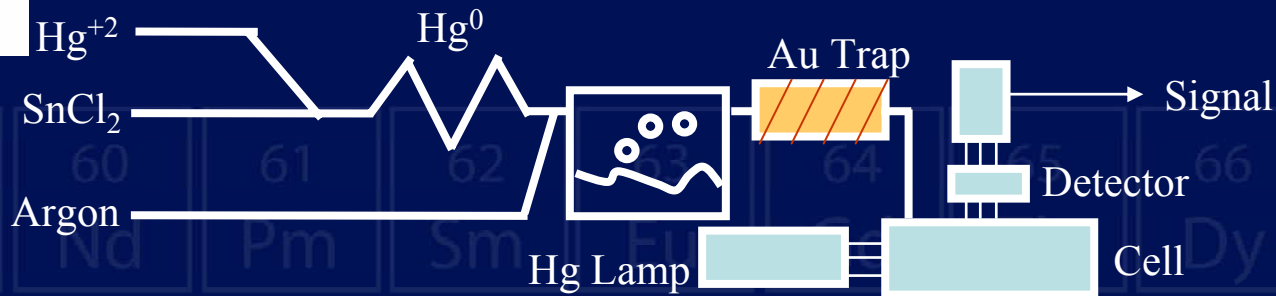
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# System vs. Bubbler Blanks



- Clean all three input reagent streams

- Sparge  $\text{SnCl}_2$  solution
- Sparge rinse solution
- Run rinse as sample

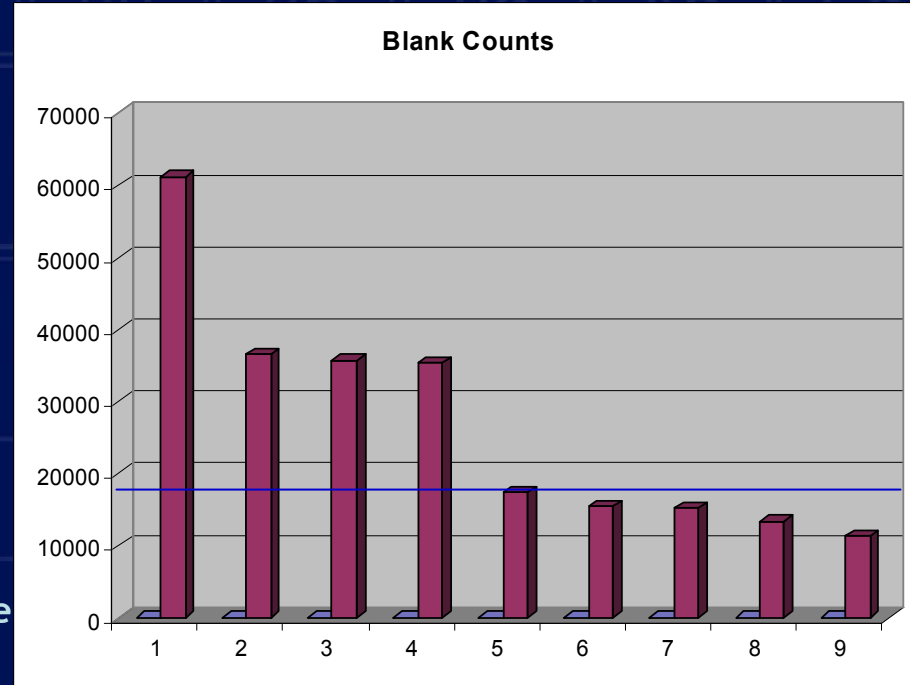


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# Effect of Acid Source @ 240 sec. uptake



|   | Rinse              | Sample     | Reduct            |
|---|--------------------|------------|-------------------|
| 1 | Production         | Production | Still #7          |
| 2 | OmniTrace          | OmniTrace  | Still #7          |
| 3 | OmniTrace          | Ultrex     | Still #7          |
| 4 | Ultrex             | Ultrex     | Still #7          |
| 5 | Ultrex             | Ultrex     | Ultrex            |
| 6 | Ultrex             | Ultrex     | Ultrex            |
| 7 | OmniTrace          | OmniTrace  | Ultrex            |
| 8 | OmniTrace          | OmniTrace  | OmniTrace         |
| 9 | Omni/ultrex<br>mix | Omni       | Sparged<br>Ultrex |



**Blue line represents 0.5 ppt signal**

Typically blank counts must be <15,000 counts to pass system blank



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# Water Sources



| Source                    | Counts |
|---------------------------|--------|
| Default de-ionized water  | 49,105 |
| Filtered de-ionized water | 6,300  |
| Tap water                 | 20,951 |

**Waters run as samples with sparged reductant and rinse solutions.**



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# BrCl



- BrCl solution added to samples and standards at 5mL/L.
- Check mercury content by multiple additions

| Volume Multiple | Counts |
|-----------------|--------|
| 1               | 10,140 |
| 2               | 12,667 |
| 4               | 14,180 |

About 1000  
counts/volume  
added

New solution prepared and counts rose to:  
43,451; 23,897; 43062 most likely due to contaminated glassware  
Second solution prepared and 3 blanks returned counts of 11,067;  
11207; 10,752.



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# Not So Blank Blanks



## *Reagents*

Water  
HCl  
KBr  
KBrO<sub>3</sub>  
SnCl<sub>2</sub>  
NH<sub>2</sub>OH HCl  
Ar

## *Analyst*

gloves  
lab coat  
dental work

## *Environment*

air - vapor/particulates  
thermometer, manometer, barometer  
bench top  
ventilation hood

## *Equipment*

sample bottle      autosampler vial  
hoses & tubes      gas/liquid separator  
gas supply line      pipet tips



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# Reagent Containers

## 1% HCl Solution



| Container Type  | Counts |
|-----------------|--------|
| Teflon          | 5206   |
|                 | 2353   |
|                 | 2588   |
| Fluorinated LPE | 17901  |
|                 | 19388  |

1% HCl solutions run as samples with sparged reductant and rinse solutions.



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# Sample Glassware



## Technical Background



[Certification/  
Quality Control](#)

[Automation](#)

[Preparation &  
Cleaning  
Procedures](#)

[Operational  
Advantages](#)

### - ESS CONTAINER CLASS DEFINITIONS -

#### UC CLASS

UnCertified™ containers with Teflon®-lined\* closures attached.

#### PC CLASS

PreCleaned Certified™ containers with Teflon®-lined\* closures attached. Certification is provided with each case.

#### QC CLASS

Quality Certified™ precleaned containers with Teflon®-lined\* closures attached are analyzed by independent, certified laboratories. Analytical test results are provided with each case of QC Class containers, which are excellent for use in litigation applications.

\* Not all HDPE/LDPE products are available with Teflon®-lined closures.

[Home](#) | [Technical Background](#) | [Company Background](#) | [Products](#) | [Contact ESS](#) | [What's New](#)

*ESS. We Sell Experience With Every Container.*



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# Sample Containers



Method 1631 Section 6.1.2.4 and Method 245.7 Section 6.1.1.4 state:

“As an alternative to cleaning by the laboratory, bottles may be purchased from a commercial supplier and each lot certified to be clean. Bottles from the lot must be tested as bottle blanks ...and demonstrated to be free of mercury at the ML of this method.”

We have used pre-cleaned, quality-certified 16 ounce glass bottles from Environmental Sampling Supply\* and found not appreciable mercury (Method 1631)

- Each bottle individually double bagged
- Teflon-lined screw caps
- Clear Boston round, narrow mouth design
- PN 0500-0100-LP



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**ESS**  
9601 San Leandro St.  
Oakland, CA  
800-233-8425

## Autosampler Cups



- Polypropylene acceptable for analysis only
  - Short residence time in cup
  - Glass and Teflon™ cups also permitted



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# Optimized Analysis Conditions



**WinHg Database 1.5**

File Utility Help

RN↓ RN↑ ?

Protocol 1631b Dataset/Proto

**Protocol** | Line info | Cal Curve | Report | Ctrl Chart | Viewer

Sample Introduction  
Gas 0.50 LPM  
Pump 12 mL/min

Pump Times  
Rinse 10 secs  
Uptake 240 secs

Cup Frequencies  
UI C1 10 C4  
US C2 10 C5  
C3 C6  
C7

Title  
EPA 1631 ultra low level

Analysis Type  
Concentrations

Report Spec  
Method Macro  
@RUNHG

When Check Standard Fails  
Continue

Data Collection  
Replicates 1 Full Scale 60 Integration 0.70 secs

Fluorescence  
Method  
 CVAFS  
 CVAFS with trap  
 Prescreen

Furnace 1 Temp 450 Deg C  
Furnace 2 Temp 450 Deg C  
High Level Threshold 10 ppt

Dry Time 5 secs  
Desorption Time 70 secs  
Stabilize Time 10 secs

Calculations  
Use Weight   
Use Volume

Apply

Ready

**Gas Flow: 0.50 LPM**  
**Pump Speed: 12 mL/min.**  
**Rinse Time: 10 secs**  
**Uptake Time: 240 secs.**

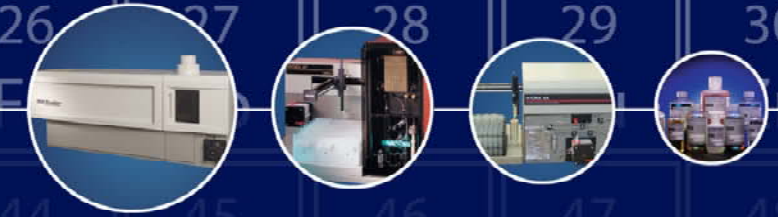


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## Ready to Begin?

- EPA QC Requirements

- Bubbler or system blank (0.25, 0.5ppt)
- Calibration Factor precision (RSD <15%)
- Low standard recovery (75-125%)
- Initial Precision & Recovery (IPR) (79-121%)
- On-going Precision & Recovery (OPR) (77-123%)
- Method Detection Limit (0.2 ppt)
- Matrix Spikes (71-125% recovery)
- Relative Percent Difference (24%)



- State requirements; in this case NC

- 3 blanks
- Calibration curve
- Initial Precision & Recovery check (IPR)
- QCS
- 7 x 1ppt for detection limit
- Method blank
- 4 OPR checks
- Sample
- Sample spike
- Sample spike duplicate
- Method blank
- OPR



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Does not include a variety of blanks

# State requirements, NC



3 blanks

Calibration curve

Method Blank

Initial Precision & Recovery  
check (IPR)

QCS

7 x 1 ppt for detection limit

Method blank

4 OPR checks

Sample

Sample spike

Sample spike duplicate

Method blank

OPR

| Seq. | Content | Counts  | Avg.   |
|------|---------|---------|--------|
| 1    | Blank   | 13,438  | 14,968 |
| 2    | Blank   | 17,029  |        |
| 3    | Blank   | 14,439  |        |
| 5    | 1       | 50,822  |        |
| 6    | 5       | 172,712 |        |
| 7    | 10      | 331,330 |        |
| 8    | 15      | 425,569 |        |
| 9    | 30      | 973,459 |        |



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**%RSD C.F. 9**

**Avg. Blank 0.473**

**%Rec. 113**

# Requirements, cont.



- 3 blanks
- Calibration curve
- Method Blank**
- Initial Precision & Recovery check (IPR)**
- QCS**
- 7 x 1 ppt for detection limit**
- Method blank
- 4 OPR checks
- Sample
- Sample spike
- Sample spike duplicate
- Method blank
- OPR

| Seq | Content  | Conc. (ppt) |
|-----|----------|-------------|
| 10  | Blank    | 0.254       |
| 11  | IPR      | 4.82        |
| 12  | QCS (10) | 8.51        |
| 13  | 1        | 1.17        |
| 14  | 1        | 1.15        |
| 15  | 1        | 1.05        |
| 16  | 1        | 1.02        |
| 17  | 1        | 0.977       |
| 18  | 1        | 1.03        |
| 19  | 1        | 1.06        |

**Std. Dev.**  
0.07 ppt

**Avg. Recovery**  
106.5%

**MDL**  
0.2 ppt

**Rec./MDL**  
(**<10**)  
4.8



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# Requirements, cont.

- 3 blanks
- Calibration curve
- Method Blank
- Initial Precision & Recovery check (IPR)
- QCS
- 7 x 1 ppt for detection limit
- Method blank
- 4 OPR checks
- Sample
- Sample spike
- Sample spike duplicate
- Method blank
- OPR

| Seq | Content  | Conc. (ppt) |
|-----|----------|-------------|
| 20  | Blank    | -0.1        |
| 21  | OPR      | 5.35        |
| 22  | OPR      | 5.25        |
| 23  | OPR      | 5.43        |
| 24  | OPR      | 5.39        |
| 25  | Sample   | 1.11        |
| 26  | Samp spk | 13.7        |
| 27  | Samp spk | 14.0        |
| 28  | Blank    | 0.17        |
| 29  | OPR      | 4.90        |

OPR:  
 $sd = 0.077$   
 $Avg. = 5.35$   
 $\%Rec. = 107$

Matrix Spike (12.5ppt)  
 $Avg. Rec. = 102\%$   
 $RPD = 2.17\%$



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Results submitted to state by 10:00AM. Certification confirmed by 2:00PM same day, Aug. 27, 2003.

## 1631 Certification in NC



- **Minimum of 6 labs certified for method 1631.**
  - NC State now requires determination using 1631 for all permits where effluent concentration is less than 0.2ppb.
- **Oxford Lab has improved its reagent clean-up procedures and routinely achieves system blanks under 0.25 ppt.**
- **There are 3 instrument manufacturers providing systems claiming to meet method 1631 requirements: Leeman Labs, PSAAnalytical, & Tekran.**
- **Reagents for EPA method 1631 are available from several sources including Leeman Labs & O2SI.**



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## What We Learned at Oxford Labs



- Clean before use all reagents that can be cleaned.
- Test all reagents before use.
- Segregate glassware used for method 1631
- Glass containers can remain clean for months.
  - At least for 1% acid
- Don't recycle soda lime.



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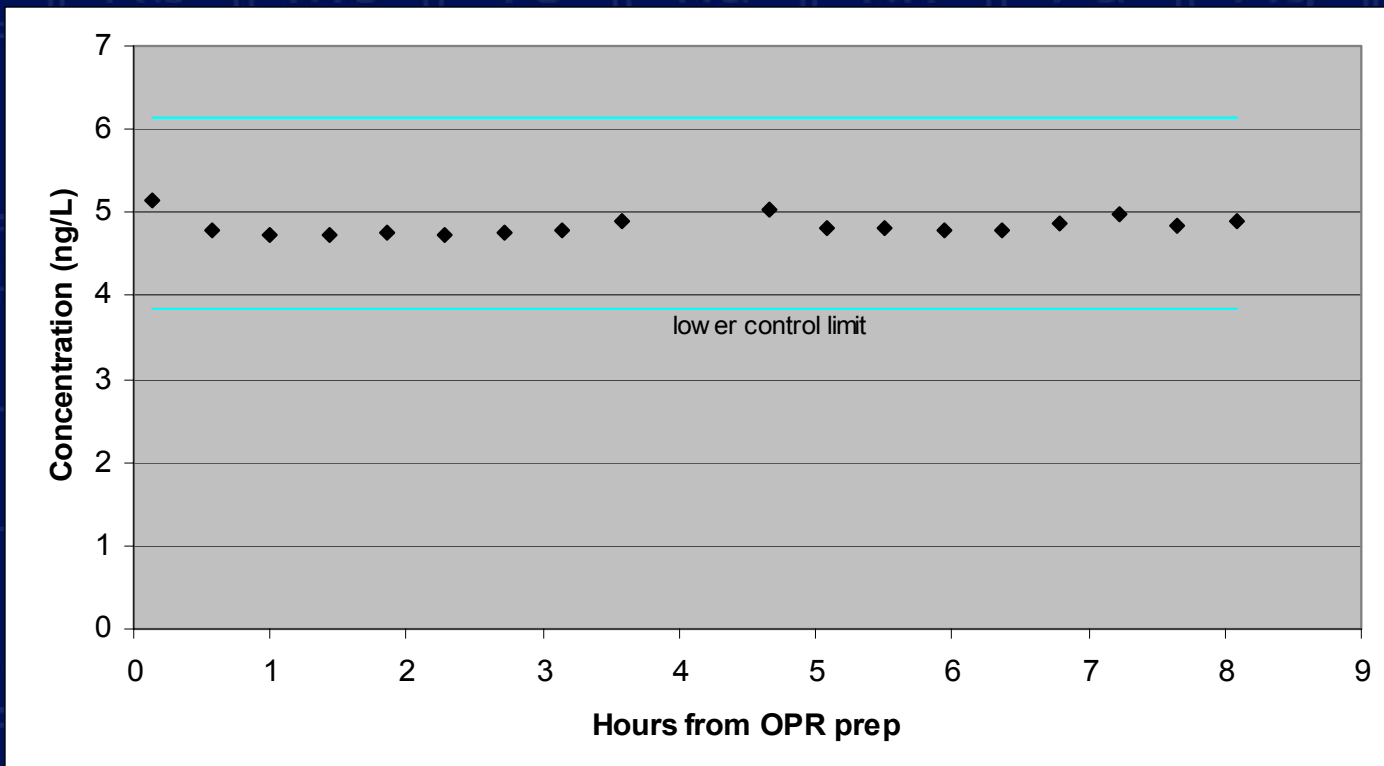
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## Contributions from Other Labs



### 5 ppt standard read back over eight hours



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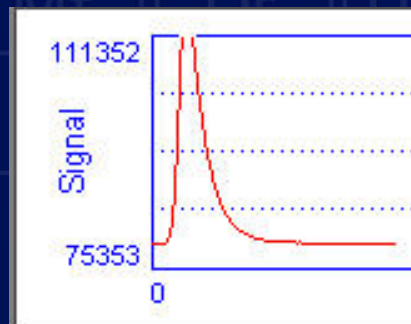
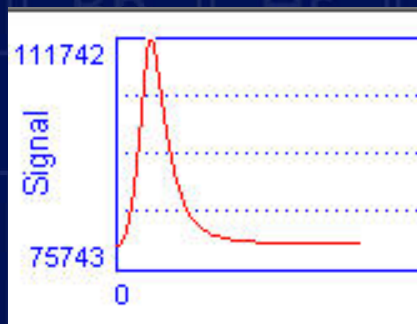
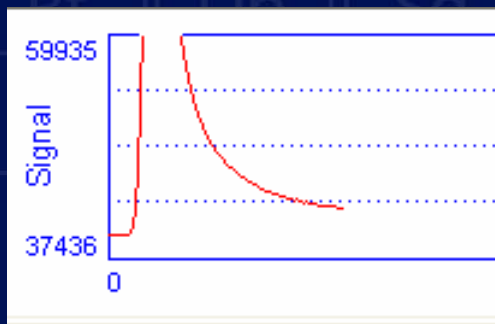
Courtesy of Dr. Mark Bruce,  
Severn Trent Labs

## Other Stumbling Blocks



### • Gold Traps

- Signal must return to baseline
- Delay in appearance time required to establish baseline



**Excessive memory**

**Premature appearance**

**Good**



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## Contaminated Laboratory Air



- **Often misinterpreted as an instrument problem.**

- Sometimes fresh blanks are acceptable.

- Occasional blank signals equal 2 ppt.

- Poor fit for standards

- High standards always appeared low

- Response for a single solution increases with time & handling.

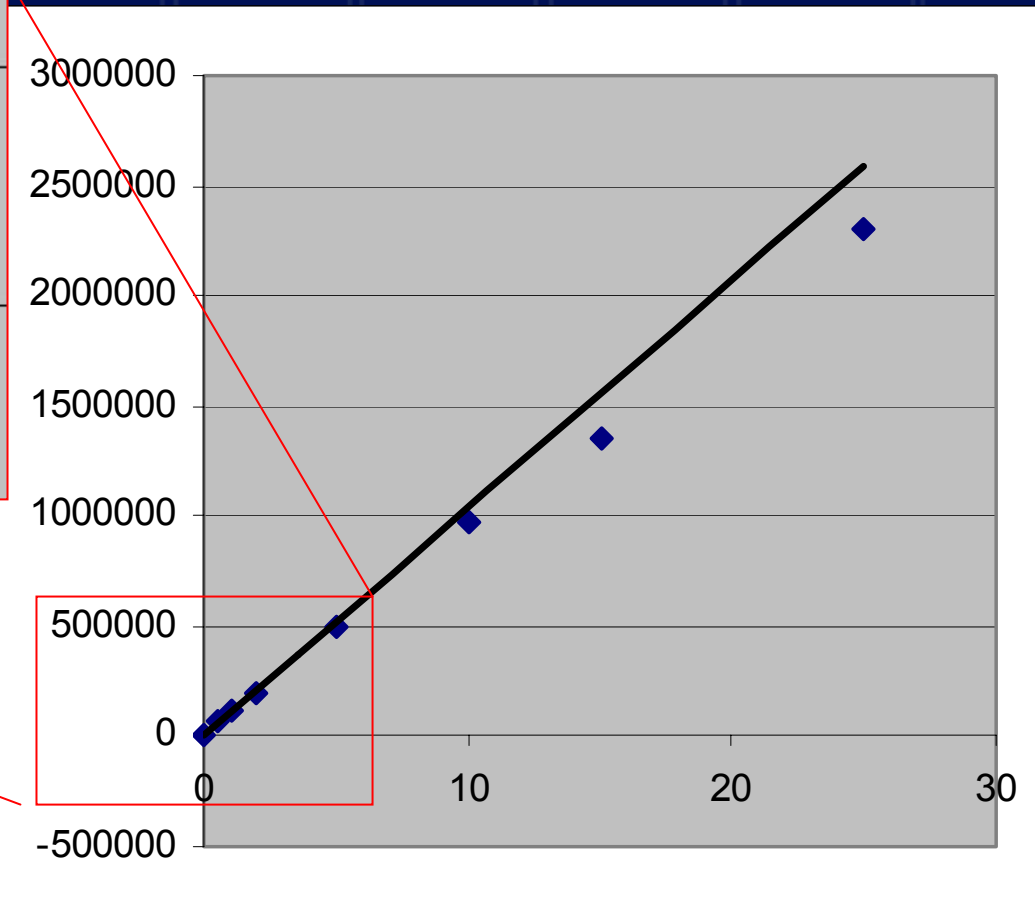
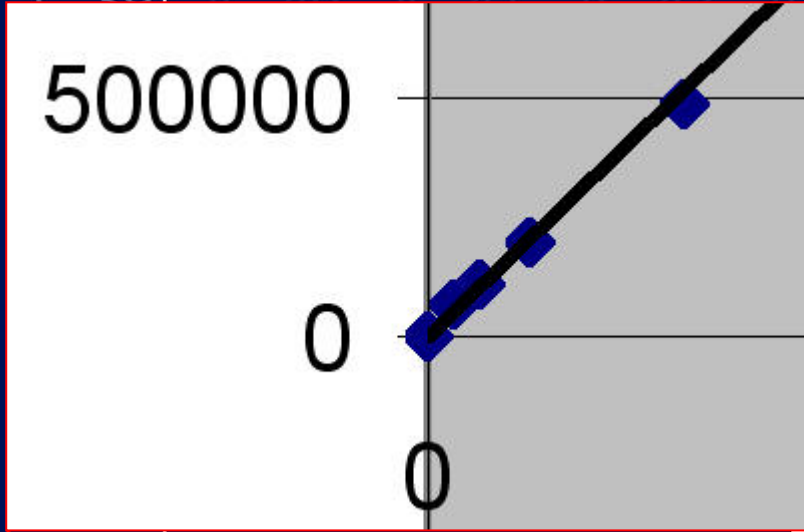


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# Calibration with Contaminated Air Using Calibration Factor



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## Contaminated Laboratory Air (cont.)



### Standards Preparation (w/w dilution)

1. Made two Liters of 5% BrCl blank (diluent)
2. Made 1 ppm Hg intermediate stock from 100 ppm Hg
3. Made 10 ppb intermediate stock from 1 ppm Hg
4. Made 100 ppt intermediate standard from 10 ppb
5. Made 20 ppt working standard from 100 ppt Hg
6. Made 15 ppt standard from 100 ppt Hg
7. Made 10 ppt standard from 100 ppt Hg
8. Made 5 ppt standard from 100 ppt Hg
9. Made 1 ppt standard from 20 ppt working standard
10. Made 0.5 ppt standard from 20 ppt working standard



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**Blank/diluent opened a  
minimum of 10 times.**

## Contaminated Laboratory Air (cont.)



- **Environment**
  - Preparation done outside laminar flow hood
  - Room filled with sample containers & metal racks
  - Air vent directly above balance
- **Counts for BrCl solution before standards preparation**
  - <20,000
- **Counts for BrCl solution after standards preparation**
  - >60,000
- **Temporary solution: balance moved outside building & standard preparation done externally.**



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