



Eurofins Eaton Analytical is pleased to submit recommendations for clarification on the proposed recycled water policy amendments. We have been conducting analysis for these CECs for many years and provided some of the data used by the Blue Ribbon panel to evaluate occurrence data. We have comments on the analytical methods section of the proposal that we believe would significantly improve the quality of the data that would be generated.

Current draft: Analytical methods for laboratory analysis of CECs shall be selected to achieve the reporting limits presented in Table 1 and shall be peer reviewed and published

Comment and recommendation

The analytical methods definitions as proposed are overly vague and do not assure adequate quality. Just because a method has been peer reviewed and published does not ensure that it is accurate, as was amply demonstrated in Water Research Foundation Project 4167 on CEC analysis. In that project there were multiple published methods that were demonstrated to not provide accurate or precise results on various CECs. It is important that the methods used be capable of meeting defined quality assurance requirements.

a) there should be some definition of how reporting limits are demonstrated. We recommend that the same approach for determining and demonstrating reporting limits that is currently incorporated in the drinking water laboratory certification manual, which includes the use of minimum reporting level checks with every analytical batch, with a specified recovery of 50-150%, be a mandatory part of the CEC quality assurance project plans. This would demonstrate that laboratories could meet the required limits on an ongoing basis.

b) methods should either be based on existing EPA drinking water methods which have specified precision and accuracy requirements (examples would be EPA method 521 for NDMA and method 539 for 17B-estradiol) OR be methods that have been subjected to round robin evaluations and demonstrated to produce accurate results for each of the compounds of interest at relevant concentrations. The Science Advisory Panel focused heavily on the requirements for proper quality assurance and validation of methods in their report and we believe this policy as written does not appropriate reflect that emphasis.

c) rather than requiring that each project develop a quality assurance project plan, we believe the Board should propose a uniform set of QA/QC criteria that include specific requirements for the use of lab control standards, field blanks, method blanks, and matrix spikes with specified acceptance limits. This approach was used by SAWPA as a fundamental part of a multi year monitoring program of more than 20 wastewater treatment plants and generated consistently high quality data.

Should you have any questions on our comments please do not hesitate to contact me.

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Our emails have changed. Please update your address book: andyeaton@eurofinsus.com

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