CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

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RESOLUTION NO. R22-XXX

CITY OF LOS ANGELES
APPROVAL OF PROPOSED SPECIAL STUDY FOR
HYPERION WATER RECLAMATION PLANT
AND
TERMINAL ISLAND WATER RECLAMATION PLANT

The California Regional Water Quality Control Board, Los Angeles Region (hereinafter Los Angeles Water Board), finds:

1. The Los Angeles Water Board adopted the National Pollutant Discharge Elimination System (NPDES) permits for the City of Los Angeles' (City's) Hyperion Water Reclamation Plant (HWRP) on February 02, 2017 (Order No. R4-2017-0045), and for the Terminal Island Water Reclamation Plant (TIWRP) on June 10, 2021 (Order No. R4-2021-0095).
2. Both NPDES permits contain a requirement for the City to consult annually with the Los Angeles Water Board and the United States Environmental Protection Agency (USEPA) to determine the need for special studies. Detailed scopes of work for proposals must be presented to obtain Los Angeles Water Board and USEPA approval and to inform the public. Special studies are intended to focus on refined questions regarding specific effects or development of monitoring techniques. Questions regarding effluent or receiving water quality, discharge impacts, ocean processes in the area of the discharge, or development of techniques for monitoring, arising out of the results of core or regional monitoring, may be pursued through these special studies.
3. On January 20, 2022, representatives from the City met with Los Angeles Water Board staff to discuss following proposed special study for 2022: *Constituents of Emerging Concern Work Plan: Development of USEPA Draft Method 1633 for Wastewater Per and Polyfluoroalkyl Substances.*
4. Per- and polyfluoroalkyl substances (PFAS) are a large group of human-made substances that do not occur naturally in the environment and are resistant to heat, water, and oil. PFAS have been used extensively in surface coating and protectant formulations due to their unique ability to reduce the surface tension of liquids. PFAS are persistent in the environment, can accumulate within the human body over time, and are toxic at relatively low concentrations. PFAS can be introduced into the body by eating or drinking contaminated food or drinks (including water) and breathing in or touching products treated with PFAS, such as carpets or clothing.

5. The State Water Resources Control Board (State Water Board) and the nine Regional Water Quality Control Boards (Regional Water Boards) are currently implementing a statewide PFAS investigation, requiring testing of drinking water systems, wastewater systems, and site investigations at high-risk locations. The objective of this statewide investigation is to evaluate PFAS groundwater and surface water impacts and obtain a preliminary understanding of PFAS concentrations associated with different sources. The State Water Board and the Regional Water Boards are evaluating the data collected to make informed decisions in implementing appropriate regulatory action, in anticipation of emerging regulatory standards for PFAS. The State Water Board has been collecting PFAS data for public drinking water wells near high-risk locations, municipal solid waste landfills, large airports, chrome plating facilities, wastewater treatment plants, refineries, and bulk fuel terminals.
6. On July 9, 2020, the State Water Board issued Order WQ 2020-0015-DWQ mandating investigative PFAS sampling at Publicly Owned Treatment Works with a design capacity at or exceeding one million gallons per day (MGD). HWRP and TIWRP have dry-weather design capacities of 450 MGD and 30 MGD, respectively, and therefore, are subject to Order WQ 2020-0015-DWQ.
7. The objective of this proposed special study is to develop and validate the USEPA draft method 1633 for monitoring and determining PFAS concentrations in the influent and effluent of HWRP and TIWRP. Currently, the available quality assurance procedures and analytical methods for PFAS analysis include Department of Defense Quality Systems Manual (DoD QSM) for Environmental Laboratories version 5.1 (or newer) Table B-15, USEPA Method 537.1, USEPA Method 8327 (draft), American Society for Testing and Materials (ASTM) D7979, International Organization for Standardization (ISO) 21675, and USEPA Draft Method 1633. All the aforementioned methods, except for USEPA Method 537.1, may be used for PFAS determination in wastewater. The City's contract laboratory initially used modified USEPA Method 537.1 meant for drinking water in generating PFAS data but have recently used methods compliant with DoD QSM version 5.1 (or newer) Table B-15. In August 2021, the USEPA published Draft Method 1633, a method designed specifically for monitoring PFAS in wastewater and other matrices. Once proposed and promulgated through rulemaking, the USEPA Draft Method 1633 will be the method used for monitoring PFAS in wastewater and other matrices. The City is choosing to use USEPA Draft Method 1633 once promulgated for PFAS analysis in non-drinking water matrices due to the confidence the City has in the protocols and the reliability of the results obtained. This proposed special study will begin in May 2022 and is expected to be completed in May 2023.
8. This proposed special study complements the statewide PFAS investigation described in Finding 5; fulfills the special studies requirement of the NPDES permits; and will enhance the City's ability to collect data to assess the impacts of PFAS on influent, effluent, advanced treated recycled water and the health of Los Angeles Harbor and Santa Monica Bay.
9. This special study proposal also focuses on emerging issues associated with discharges from the City's wastewater treatment plants, notably the City's plans to

transform the Hyperion Wastewater Reclamation Plant to a 100% recycled water facility by 2035 in order to improve the City's water resiliency by reducing its reliance on imported water. The special study proposal can be found on the City's website at: *https://www.lacitysan.org/san/sandocview?docname=cnt073143.*

THEREFORE, BE IT RESOLVED THAT:

1. The City's proposed special study for 2022, *Constituents of Emerging Concern Work Plan: Development of USEPA Draft Method 1633 for Wastewater Per and Polyfluoroalkyl Substances*, is hereby approved.

I, Renee Purdy, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of the Resolution adopted by the California Regional Water Quality Control Board, Los Angeles Region, on April 14, 2022.

Renee Purdy
Executive Officer