



Frequently Asked Questions
Per- and Polyfluoroalkyl Substances (PFAS)
13267 and 13383 Investigatory Order WQ 2020-0015-DWQ for
Publicly Owned Treatment Works (POTWs) (Order)
(July 9, 2020)

GENERAL

There are no wastewater facilities listed for Region 2 in Attachment 2 of the Order. Is that correct? Are they being handled differently? Are they not required to conduct the monitoring?

Sampling for PFAS will be occurring at POTWs located in Region 2. They have already performed a study in 2018 and they will be updating that study per a Regional Monitoring Program. Sampling will start in the 4th Quarter of 2020 to coincide with the State Water Board Order.

Will the scope of work and the list of Region 2 POTWs required to be monitored be publicly available?

Since the study is being conducted through our Regional Monitoring Program, everything (scope, results, etc.) will be available to the public. Contact that region for the information.

Does reporting need to be prepared by a registered professional or can this be submitted by city/agency plant operators as self-reporting?

The Order does not require a registered professional to sign or stamp the report.

What does the grey shading represent in Table 1 in the Order?

The grey shading in Table 1 refers to analytes that are optional for laboratory analysis. The POTW agency may consider sampling for these analytes if preferred, but they are not required in the Order.

Is this Order intended for wastewater treatment facilities that have a NPDES permit or discharge to surface water?

The Order is directed to both WDR and NPDES permittees targeting both wastewater discharges to surface water and to land.



Requirements are specific to wastewater treatment plant (influent, secondary effluent, and biosolids) sampling on a quarterly basis beginning Oct 2020. However, the Order's cover letter is addressed to POTW agencies responsible for a recycle water plant, too. Is the intent of this sampling solely for the wastewater treatment plant? Or is it for the recycle plant *and* the wastewater treatment plant?

The Order is intended for the wastewater treatment plant only.

What labs are performing the PFAS analyses for the PFAS POTW Order?

The latest list of accredited labs is located on the Water Board's PFAS website at: <https://www.waterboards.ca.gov/pfas/>. Look in the **What's New!** panel on the right side. This list is updated as new labs for the DoD QSM are accredited for the analytes listed in the Order.

ATTACHMENT 3 – TECHNICAL SAMPLING AND REPORTING REQUIREMENTS

TREATMENT SYSTEM SAMPLING – SECTION B.2

Is this a one-time sampling program or is this an ongoing monthly/quarterly/annual sample to be added to our sampling program/permit?

This Order is for a one-time sampling program that will consist of four quarters of sampling.

Will the sampling of the domestic influent and effluent come from a 24-hour composite or is a grab sample good enough?

Grab samples are acceptable. The Order requires influent and effluent wastewater sampled quarterly for a one-year period starting 4th Quarter 2020.

The Order does not mention testing of recycled water/tertiary treated effluent. Is this not required?

The Order requires the facility to test for PFAS of the effluent (all destinations) for a one-year period. If your facility treats wastewater by tertiary treatment and its effluent is discharged to surface water, land, or is delivered for recycling uses, then its tertiary treated effluent should be collected and tested for PFAS; if your facility has advanced treatment, then the advanced treated effluent should be collected to test for PFAS.

Are samples collected on tertiary for recycled water, as well as, for primary and secondary wastewater?



Yes, but not for wastewater that is being further treated at the facility. Effluent wastewater sampling mentioned in the Order is for those waste streams that are leaving the facility. Therefore, the primary wastewater being further treated within the facility does not need to be sampled. However, if secondary and tertiary treated wastewater is leaving the facility – it would need to be sampled for PFAS.

Are samples of sludge that do not meet Class A or B biosolids to be sampled as part of this Order? The sludge is transported to a local landfill to be used as daily cover.

Yes, any sludge or biosolids that leaves the facility needs to be sampled for PFAS. The intent of the Order is to understand PFAS concentrations from what is coming into the facility (i.e. influent wastewater) and what is leaving the facility (effluent wastewater (e.g. secondary, tertiary), sludge, and biosolids).

Are we required under this Order to follow the biosolids sampling or is this designed specifically for POTWs that process their biosolids and reapply it?

The Order pertains to all POTWs that process biosolids – no matter the destination of the biosolids when it leaves the facility or if it is applied onsite.

Agencies utilizing Surface Disposal for their biosolids only discharge to the final disposition site once or twice a year. Can they conduct all samples and monitor during that period even if it means collecting four samples in one quarter? Note that this is how typical sample collection is done for the biosolids regulation.

For those facilities (> 5 MGD) required to sample quarterly for biosolids and only have their biosolids leave their facility one or twice a year, samples should be taken at those times the biosolids leave the facility.

What does “[a] representative whole sample aliquot (both fractions)” mean (p. 17 of the Order)? Please confirm that it means to include whatever moisture is present in the original sample so that solids and liquid are included. It appears that it doesn’t matter whether they sample high-moisture or drying or dried biosolids, but whatever they sample should be captured as is. Is that what that phrase means?

Both fractions meaning both water and solids. Because biosolids, or sewage sludge, typically contain both liquid and solid fractions, as a general rule, samples should be collected with the highest solids content possible. In order to achieve optimal analytical results, the laboratory performing the analysis may have guidelines for biosolids



samples, such as solids content percentage thresholds. For this reason, the laboratory performing the analysis should be consulted prior to sampling.

GROUNDWATER MONITORING WELL SAMPLING – SECTION B.3

Under Attachment 3, Section 3 – Groundwater Monitoring Well Sampling and Analysis; under the second roman numeral i – it states “After the Regional Board approves the PFAS groundwater monitoring proposal, monitoring shall commence during the next groundwater monitoring period specified in the POTWs existing groundwater monitoring and reporting program but no sooner than the Fourth Quarter 2020 sampling period (October-December).” Does this mean if our proposal is approved during the 4th Quarter of 2020, our program can then begin during the 1st quarter of 2021?

Yes, monitoring can commence in the next quarter or within the existing quarter if the facility is able to conduct monitoring.

Does this Order pertain to existing groundwater monitoring wells installed to monitor where wastewater effluent is applied (reuse application) and where biosolids are stored and applied?

If the monitoring is being performed to assess groundwater concentrations at the facility due to application of wastewater effluent, biosolids ponds/piles, or other types of ponds, then yes, sampling is required.

Does the groundwater monitoring requirement apply to wells associated with surface disposal units? The Order was sent to NPDES permit holders, and our understanding is that GW monitoring was to be focused on wastewater effluent discharges to land. However, the Order is ambiguous regarding whom must analyze groundwater.

If the surface disposal units are located on the facility, yes, the groundwater monitoring requirement applies. If the surface disposal units are located off-site at another location (example, a farmer’s field), that has monitoring wells as part of MRP, then the groundwater monitoring requirement in the Order does not apply.

Section B.3.b.ii of Attachment 3 of the Order specifies sampling from a minimum of three wells. Do the Regional Boards have discretion to allow sampling from less wells? If so, what is the process to document this?



Yes. If the facility has less than 3 groundwater monitoring wells, then the Regional Board can approve fewer monitoring wells to sample and it will be compliant with the Order.

Does the PFAS Order apply to groundwater wells used for potable drinking water?

No, the Order does not include the sampling of water supply wells that may be at the facility.

TABLE 1 - PFAS ANALYTES SUBJECT TO ANALYSIS AND THEIR RESPECTIVE REPORTING LIMITS

The PFAS POTW Order references a listing of reporting limits on Table 1 in Attachment 3 and on the Water Board's PFAS webpage at <https://www.waterboards.ca.gov/pfas/>. The reporting limits for biosolids do not match between tables. Which table should I use?

There was a typo on Table 1 in the Order referring soil and biosolids as having the same reporting limits but were only for soil. Table 1 located on the Water Board's PFAS webpage and is available at https://www.waterboards.ca.gov/pfas/docs/reporting_limits_dod_qsm_v5_1_or_later_july_22_2020.pdf. Table 1 lists the reporting limits for biosolids, as well as the other matrices mentioned in the Order, and is the most current location for reporting levels for the ELAP accredited laboratories.

QUESTIONNAIRE – SECTION D

Question 1(a) and 1(b): Is the question asking for normal flow for the time period or the peak flow average?

The questionnaire is asking for normal flow.

Question 2(b), page 27: Under the column "2019-Estimated Industrial Total Volume by Percentage (>5% of the total volume)", are we supposed to report only the volume if it exceeds >5% of total volume? What does "total volume" mean? Does it mean the total influent flow to the treatment plant?

Yes, please report only the flows for each category that are > 5% based on the total industrial flow into the facility. If you would like to add the smaller volume percentages so that the total industrial flow equals 100%, that would be acceptable but is not required.



Question 3(a), page 28: Please define storage basins? One of our plants discharges tertiary treated water into man-made lakes and then to the river. Does this qualify as a storage basin? One of our plants also discharges tertiary treated water into a man-made pond prior to the river. Does this qualify as a storage basin?

If those lakes and ponds allow the treated wastewater to percolate down to groundwater, please consider them as storage basins for this question. Please add a comment in 3 (d) to indicate so.

Question 5(a), page 29: Two of our plants are upstream plants discharging into a terminal plant which has solids handling facilities (anaerobic digestion, dewatering, hauling and disposal). Does the term "Sewage Sludge" refer to the waste activated sludge that is discharged back into the sewer collection system into the terminal plant for further solid treatment?

For this question, we are interested in the sewage sludge or biosolids that leave the facilities for other applications (e.g. land application, landfill disposal). Waste activated sludge that is returned into the system for treatment is not part of this question.

Question 6(b), page 31: What does "Years Accepted" mean? Does it mean the number of years since the plant has been receiving leachate? For example, if the plant has been receiving leachate since 2000, then the entry should be "2000 to 2020"?

Yes, "years accepted" means the number of years since the plant has started receiving leachate.