CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

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RESOLUTION NO. R23-002

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 and United States Environmental Protection Agency (USEPA) Region 9 adopted the National Pollutant Discharge Elimination System (NPDES) permits for the City of Los Angeles' (City's) Hyperion Water Reclamation Plant (HWRP) on February 23, 2023 (Order No. R4-2023-0033), 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 March 2, 2023, representatives from the City met with Los Angeles Water Board staff to discuss following proposed special study for 2023-2025: *Development Of USEPA Draft Method 1633 for Solids Per- And Polyfluoroalkyl Substances (Biosolids & Sludge Application).*
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 December 5, 2022, The United States Environmental Protection Agency (USEPA) issued a memorandum addressing PFAS discharges in NPDES permits, and pretreatment and monitoring programs. The USEPA recommends PFAS monitoring for publicly owned treatment works be conducted in the influent, effluent, and biosolids. The USEPA also recommends that monitoring include each of the 40 PFAS parameters detectable by USEPA draft method 1633.
7. The objective of this proposed special study is to 1) expand and validate the scope of USEPA Draft Method Draft 1633 for determining PFAS concentrations at HWRP and TIWRP to include solid matrices, namely biosolids and 2) utilize the laboratory capabilities of the City to investigate the chemistry, transport, and possible transformations of PFAS within the wastewater treatment processes by acquiring PFAS concentration data at various points throughout the processes at HWRP and TIWRP. Currently, the available quality assurance procedures and analytical methods for PFAS analysis are DoD QSM version 5.1 (or newer), USEPA Method 537.1, USEPA Method 533, USEPA Method 8327, ASTM D7979, ISO 21675, and USEPA Draft Method 1633. Only two of the aforementioned methods, USEPA Draft Method 1633 and a DoD QSM version 5.1 (or newer) compliant method, may be used for PFAS determination in solid matrices. 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). 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 another method used for monitoring PFAS in wastewater and other matrices. This proposed special study will begin in May 2023 and is expected to be completed in May 2025.
8. This proposed special study complements the USEPA's guidance regarding PFAS monitoring for publicly owned treatment works described in Finding 5; fulfills the special studies requirement of the NPDES permits; and will enhance the City's ability to assess the impacts of PFAS on biosolids and to investigate the chemistry, transport, and possible transformations of PFAS within the wastewater treatment processes.

9. The special study proposal can be found on the City's website (https://lacitysan.org/san/sandocview?docname=cnt086743).

THEREFORE, BE IT RESOLVED THAT:

1. The City's proposed special study for 2023-2025, *Development Of USEPA Draft Method 1633 for Solids Per- And Polyfluoroalkyl Substances (Biosolids & Sludge Application)*, is hereby approved.

I, Susana Arredondo, 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 27, 2023.

Jenny Newman
Digitally signed by Jenny Newman
Date: 2023.06.13 16:58:59 -07'00'
Water Boards

for Susana Arredondo
Executive Officer