

# SUMMARY OF CHANGES TO THE AUGUST 27, 2018 DRAFT OF ATTACHMENT A OF THE AMENDMENT TO THE RECYCLED WATER POLICY

## PURPOSE

The purpose of this document is to provide a summary of the substantive revisions to Attachment A of the Recycled Water Policy since the August 27, 2018 draft. Staff considered feedback from two public comment periods and scientific peer review and revised Attachment A as appropriate. Staff also made non-substantive changes to move content to improve organization and flow, delete duplicative content, and make editorial changes. This document includes a summary of the substantive changes to Attachment A.

## SUMMARY OF SUBSTANTIVE REVISIONS TO ATTACHMENT A OF THE AMENDMENT

### Section 1. Quality Assurance/Quality Control

- Removed references to The National Environmental Laboratory Accreditation Institute (TNI).
- Clarified Recycled water producers are required to submit a Quality Assurance Project Plan (QAPP) to address CEC Monitoring Parameters in Attachment A for approval by the regional water board or State Water Board.
- Removed hierarchical analytical method selection. Laboratories can use any analytical method that has been validated and approved for the analytes in the applicable matrix and can meet the reporting limits.
- Recycled water producers must use labs that have been accredited by ELAP for the analytical test method or analytes in Attachment A, if such ELAP methods or analytes are accredited by ELAP at the time monitoring is required to begin. If ELAP accreditation is unavailable, the recycled water producer shall use a laboratory that has been accredited for a similar analytical method, instrumentation, or analyte until ELAP accreditation becomes available, unless otherwise specified by the regional water board or State Water Board.

### Section 2. CEC Monitoring Parameters

- Revised the header of Section 2 of Attachment A to “CEC Monitoring Parameters,” which are defined as the health-based CECs, performance-based CECs, surrogates, and bioanalytical screening tools. This is to correct the terminology since “CEC monitoring requirements” is a broader term than “CEC Monitoring Parameters.” The CEC monitoring requirements will be specified in the permit for the recycled water treatment plant and will include the parameters, monitoring locations, monitoring frequency, phased monitoring requirements, and data evaluation.

### *Reporting Limits*

- Added a definition for reporting limit.
- Increased the reporting limits for PFOS and PFOA in Table 1.
- Added a footnote to Table 1 to allow the regional water board to approve higher reporting limits in certain circumstances.

#### Section 4. Phased Monitoring Requirements

- Allows the regional water board in consultation with the State Water Board to approve the use of existing data to meet the requirements in the initial assessment and baseline monitoring phases for recycled water treatment plants with approved Title 22 Engineering Reports.

#### *Bioanalytical Screening Tools*

- Added a one-year grace period from the time the Amendment is adopted to the start of bioanalytical monitoring. This will be implemented through the order to be issued by the Executive Director after the adoption of the Amendment.
- The initial assessment monitoring phase was extended from one year to three years for the bioanalytical screening tools in Table 3. No response actions are required in the initial assessment monitoring phase.
- The baseline monitoring phase was reduced from three years to one year with quarterly rather than semi-annual monitoring for the bioanalytical screening tools in Table 3. Response actions are required in the baseline monitoring phase.
- The monitoring frequency for bioanalytical screening tools in Table 5. Baseline Monitoring Phase Requirements was updated to quarterly to ensure adequate data to evaluate the results prior to the Standard Operation Monitoring Phase.
- The monitoring frequency for bioanalytical screening tools in Table 6. Standard Operation Monitoring Requirements was updated to “Semi-Annually or Annually” to be consistent with the health-based and performance-based CECs.

#### Section 5. Evaluation of CEC, Surrogates, and Bioanalytical Screening Tool Monitoring Results

- Table 8 was revised to replace “immediately” with “within 72 hours of notification of the result.”
- Added the following footnote to Table 8, “If a CEC also has a notification level, additional follow-up monitoring may be required by the State Water Board or regional water board per requirements in California Code of Regulations, title 22.”
- Bioanalytical screening tools must be evaluated consistent with Table 10 in the baseline monitoring phase and the standard operation monitoring phase, but not during the initial assessment phase.
- Table 10 was revised to “If BEQ/MTL ratio is consistently less than 0.1 for ER- $\alpha$  or 1.0 for AhR,” and “If BEQ/MTL ratio is greater than 0.1 and less than or equal to 10 for ER- $\alpha$  or greater than 1.0 and less than or equal to 10 for AhR” to provide an achievable ratio for AhR.
- Table 10 was revised to replace “immediately” with “within 72 hours of notification of the result.”
- Table 10 was revised so that if the BEQ/MTL ratio is consistently less than 0.1 for ER- $\alpha$  or 1.0 for AhR after the baseline monitoring phase, the regional water board can consider decreasing the monitoring frequency or removing them from the monitoring program.

#### Miscellaneous

- Added a discussion of the Bioanalytical Advisory Group to section 4.14.2 of the Staff Report with SED.