



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE  
Chief Engineer and General Manager

September 10, 2018



***Via Electronic Mail***

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**Comment Letter – Proposed PFOS and PFOA  
Revisions to an Amendment to the Policy for Water Quality Control for Recycled Water**

The Sanitation Districts of Los Angeles County (Sanitation Districts) serve the wastewater collection and treatment needs of approximately 5.6 million residents in the Los Angeles Basin, Santa Clarita Valley, and Antelope Valley. The Sanitation Districts have a long history of water recycling, encompassing over fifty years. Currently, almost 900 individual sites served by approximately three dozen water purveyors use over 100,000 acre-feet per year (AFY) of tertiary treated recycled water for non-potable applications such as urban landscape irrigation, agriculture, industrial process water, and potable uses, such as groundwater replenishment. Since the inception of our program in 1962, the Sanitation Districts have delivered over one trillion gallons of recycled water for reuse.

The Sanitation Districts appreciate the opportunity to provide comments on the proposed perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) revisions (Proposed PFOS and PFOA Revisions) to the draft Policy for Water Quality Control for Recycled Water (Proposed Policy), in addition to the comments provided on the Proposed Policy in our letter dated June 26, 2018. As stated in our June 26, 2018 letter, the Sanitation Districts support the State Water Resources Control Board's (State Water Board's) efforts to amend the existing Recycled Water Policy to update and clarify its provisions, in so far as those changes will enhance, rather than unnecessarily impede, future recycled water project development and currently implemented projects. However, the June 26, 2018 letter also expressed our concerns about the proposed changes to the Recycled Water Policy, including the shift in overall focus of the policy, addition of a new goal to minimize ocean discharges of treated municipal water, new provisions relating to wastewater change petitions, new requirements for use of bioanalytical screening tools, and requirements for selection of analytical methods for constituents of emerging concern (CECs). In addition to previously expressed concerns, the Proposed PFOS and PFOA Revisions raise additional concern for the Sanitation Districts about the requirements for selection of analytical methods for CECs as they relate to the method required to be used to conduct PFOS and PFOA analyses.

Attachment A, Section 1.2.1 of the Proposed Policy provides a hierarchical order for choosing analytical chemistry methods for analysis of CECs, including a requirement to use "U.S. EPA-approved methods", if available. While the term "EPA-approved methods" is not defined in the Proposed Policy, it appears to include methods published by EPA that are not formally included in 40 Code of Federal Regulations Part 136. It would therefore include EPA Method 537 for analysis for PFOS and PFOA. The Sanitation Districts have serious concerns about specifying that EPA Method 537 be used preferentially to analyze for PFOS and PFOA over other available methods. EPA Method 537 was developed for finished

drinking water samples, has not been tested on other matrices, and is not a robust method for analysis of matrices with higher levels of suspended solids, as can be exhibited by recycled water. Therefore, it is not appropriate to use EPA Method 537 on recycled water samples.

American Society of Testing and Materials (ASTM) Method D7979 is an example of a superior method for analysis of recycled water samples for PFOS and PFOA. ASTM Method D7979 is a validated method for analysis of wastewater and recycled water, properly corrects for matrix interference, and uses techniques that minimize sample manipulation and the potential for contamination. Use of ASTM Method D7979 would provide more accurate data to the State Water Board than use of EPA 537. Note that ASTM Method D7979 can meet the reporting limits specified in the Proposed Policy.

Additionally, in our June 26, 2018 comment letter, the Sanitation Districts expressed concern that inclusion of the hierarchical analytical methods selection requirements for CECs is inconsistent with the recommendations from the expert panel convened in 2017 and 2018 to develop monitoring recommendations for CECs in recycled water (CEC Expert Panel). The CEC Expert Panel Report (*Monitoring Strategies for Constituents of Emerging Concern in Recycled Water*. Southern California Coastal Water Research Project, April 2018; CEC Expert Panel Report) instead simply listed the standardized methods that have applicability for CECs in recycled water without making a recommendation as to preferential use of any of them.

Therefore, we stress the importance of our recommendation in the June 26, 2018 letter: ***to address the issue of methods to be used for CEC monitoring, the Sanitation Districts recommend that the language in the current version of the Recycled Water Policy, (Attachment A, Section 1.1) be retained.*** This language was developed based on extensive review and comment on this issue during the public comment period, and reflects a reasonable means of choosing appropriate analytical methods.

Again, we thank you for the opportunity to comment on the Proposed PFOS and PFOA Revisions and look forward to providing additional input as the revisions to the Recycled Water Policy move forward. If you have any questions, please direct them to me at (562) 908-4288, extension 2801, or by email at [aheil@lacs.org](mailto:aheil@lacs.org).

Very truly yours,



Ann T. Heil  
Section Head  
Reuse and Compliance

ATH:EB:SMB:ep