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September 10, 2018

ELECTRONIC MAIL

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814



Dear Ms. Townsend:

COMMENT LETTER – PROPOSED RECYCLED WATER POLICY AMENDMENT

The City of Los Angeles (City) Bureau of Sanitation (LASAN) appreciates the opportunity to provide comments on the State Water Resources Control Board's (State Water Board) proposed amendment to the Policy for Water Quality Control for Recycled Water. The proposed amendment would add perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) to the monitoring list for potable recycled water projects.

LASAN submits the following comments for the State Water Board's consideration:

1. Per the proposed amendment, analytical chemistry methods for laboratory analysis of PFOS and PFOA are to achieve reporting limits (RL) of 0.002 ug/L (2 ng/L) for both compounds (Table 1 on page A6). The City will most likely be unable to meet these RLs. EPA Method 537, which is used to analyze both compounds, has RLs of 6.5 ng/L (PFOS) and 5.1 ng/L (PFOA). Similarly, Eurofins, an international laboratory that provides analytical testing services, can only achieve RLs of 5 ng/L (PFOS) and 5 ng/L (PFOA).

The City has acquired a liquid chromatography/tandem mass spectrometry (LC-MS/MS) instrument capable of achieving much lower levels. However, detection limit(s) and RL(s) are always compromised due to interference in the LC-MS/MS system and the ambient environment.

2. Per the proposed amendment, recycled water project proponents and recycled water producers are required to *"Comply with the management and technical requirements applicable to their operations in accordance with The National Environmental Laboratory Accreditation Conference Institute (TNI) 2016 Standard Volume 1, Module 2 – 7"* (section 1.1.1 on page A2). This should

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not be made a requirement at this time as the California Environmental Laboratory Accreditation Program (ELAP) has yet to adopt the TNI standard.

If you have any questions, please contact Mr. Hassan Rad, Regulatory Affairs Division Manager, at (213) 847-5186 or by email at hassan.rad@lacity.org.

Sincerely,



ENRIQUE C. ZALDIVAR, P.E.
Director and General Manager
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