



THE CITY OF SAN DIEGO

September 10, 2018



VIA EMAIL TO: commentletters@waterboards.ca.gov

Jeanine Townsend
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: City of San Diego Comments Regarding PFOS and PFOA Revisions to an Amendment to the Policy for Water Quality Control for Recycled Water

Dear Ms. Townsend:

The City of San Diego (City) appreciates the opportunity to comment on the on the revisions to the proposed amendment (revised proposed amendment) to the Policy for Water Quality Control for Recycled Water and the Revised Draft Staff Report. The City provides drinking water to over 1.6 million San Diegans, and treats wastewater from the City of San Diego and 15 other cities and districts from a 450 square mile area with a population of over 2.2 million. An average of 180 million gallons of wastewater is treated by the City every day of the year. The City of San Diego is an industry-recognized leader in water reuse and water recycling is a critical component of ensuring a sustainable and diversified water supply.

Beyond traditional water recycling, the City is under way with Pure Water San Diego, a landmark potable reuse initiative that, when fully implemented in 2035, will supply one-third of San Diego's water from highly-treated recycled water. Pure Water San Diego will provide a drought-proof, locally-controlled, reliable, and cost-effective water supply. It will be the first potable reuse project in California to utilize surface water augmentation, with the first phase of the project set to come online in just three short years (2021), augmenting Miramar Reservoir. The City is extremely proud of Pure Water San Diego and of being at the 'tip of the spear' on advanced water treatment technology and water supply policy.

As a city that has already invested in crucial infrastructure at a time when so much regulatory uncertainty remains, we have one concern that we ask you to consider and address in the Revised proposed amendment, namely that reporting Levels in Table 1 of Attachment A in the Revised proposed amendment should be no lower than the Lowest Concentration Minimum Reporting Level (LCMRL). Table 1 of Attachment A in the Revised proposed amendment requires Reporting Levels of 0.002 micrograms per liter ($\mu\text{g/L}$), which is equivalent to 2.0 parts per trillion (ppt), to be met for both Perfluorooctanoic acid (PFOA) and Perfluorooctane sulfonate (PFOS). In the State Water Resources Control Board Draft Staff Report, which accompanies the Revised proposed amendment, EPA Method 537 is specified as the method to be used for both PFOA and PFOS analyses. However, validation data reported in Table 5 of EPA Method 537 lists the values achieved for the LCMRL at 5.1 ppt for PFOA and 6.5 ppt for PFOS, and also values of 1.7 and 1.4 ppt for the respective MDLs for these two analytes.



Although EPA method 537 specifies that laboratories must determine the applicable Minimum Reporting Level (MRL) based on the EPA procedure using the Prediction Interval of Result, it cannot be expected that MRL results from this determination would be lower than those determined by the LCMRL procedure. In addition, the proposed Reporting Levels for PFOA and PFOS of 2 ppt is only slightly greater than the MDL listed for the EPA Method 537 validation data. As the lowest achievable MRL (regardless of which procedure is used in its determination) are often observed to be at least three-to-five times greater than measured MDL values for many analytical methods, requiring an MRL of 2 ppt appears to be unreasonable.

We strongly recommend that the Reporting Levels for PFOA and PFOS be set at values no lower than those reported for the respective LCMRL from validation data published in EPA Method 537.

Thank you for the opportunity to comment on the Revised proposed amendment. If you have questions, please contact Carolyn Ginno at (858) 654-4286 or at cginno@sandiego.gov.

Sincerely,

Peter Vroom
Deputy Director

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cc: Johnnie Perkins, Deputy Chief Operating Officer, Infrastructure/Public Works
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