



September 10, 2018

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Via e-mail to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: Comment Letter – Proposed Recycled Water Policy Amendment**

Dear Chair Marcus and Members of the Board:

The Sacramento Regional County Sanitation District (Regional San) appreciates the opportunity to provide comments on the State Water Resources Control Board's (State Water Board's) Proposed Perfluorooctanesulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Revisions to the Recycled Water Policy Amendment (Draft Policy Amendment). Regional San commented on the previous version of this policy on June 26, 2018, and is supportive of the State Water Board's continued incorporation of the Science Advisory Panel's recommendations into the Draft Policy Amendment. However, Regional San is concerned with the proposed reporting level (RL) for PFOS and PFOA in the Draft Policy Amendment and urges the State Water Board to spend additional time to ensure the RL and test method are achievable for recycled water applications.

In their August 7, 2018 memorandum to State Water Board Staff, the Science Advisory Panel states that "Based on a query to a commercial laboratory in California, an MRL of 2 ng/L seems possible for both PFOA and PFOS following EPA method 537" (at p. 2). Regional San has a number of concerns with the State Water Board proceeding with establishing the RL for these analytes at 2 ng/L. Regional San contacted 5 accredited laboratories in California and 4 out of 5 stated that they could meet an RL of 2 ng/L with the fifth one having an RL of 20 ng/L. However, 2 out of the 4 laboratories had their method detection limit (MDL) practically the same as their RL which shows that the sensitivity is poor at the RL level. Although laboratories say they can meet an RL of 2 ng/L, the accuracy and precision of the measurement at 2 ng/L will need to be evaluated for each matrix.

Additionally, the laboratories that can meet the 2 ng/L MDL are running a modified version of EPA method 537. Regional San does not know what the modification is or if it is consistent across different laboratories, so we are concerned with the consistency of any results reported at this low level. Furthermore, there is currently no standard method for running PFOS or PFOA in wastewater. Due to the complexity of the wastewater matrix, it is likely to have interference at such low detection levels.

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Lastly, contamination seems to be another major factor for these analytes since these compounds are found in many common laboratory supplies. Per the EPA method, contamination comes from the instrument itself, the extraction cartridges, auto samplers, reagents, sample containers, and preservative. Given the extent of the potential contamination, the quality of the data measured at such a low level becomes questionable since it is hard to differentiate between the background contamination and the real value in the sample. In light of this, we strongly urge the State Water Board to reconsider the proposed RL and consider a study to determine the appropriate RL for the recycled water matrix.

If you have any questions please contact me at 916-876-6092 or ([mitchellt@sacsewer.com](mailto:mitchellt@sacsewer.com)) or Rebecca Franklin at 916-876-6030 or ([franklinre@sacsewer.com](mailto:franklinre@sacsewer.com)).

Sincerely,



Terrie L. Mitchell

Manager, Legislative & Regulatory Affairs