

## State Water Resources Control Board

Division of Drinking Water

December 20, 2018

Deborah J. Smith, Executive Officer  
Regional Water Quality Control Board  
Los Angeles Region  
320 W. 4th Street, Suite 200  
Los Angeles, CA 90013

Dear Ms. Smith

### **DIVISION OF DRINKING WATER'S REQUEST TO UPDATE MONITORING AND REPORTING PROGRAM OF SELECT GROUNDWATER REPLENISHMENT REUSE PROJECTS WITH PERFLUOROOCTANOIC ACID, PERFLUOROOCTANE SULFONIC ACID AND 1,2,3-TRICHLOROPROPANE**

Division of Drinking Water (DDW) recommends the Santa Ana Regional Water Quality Control Board update the respective Monitoring and Reporting Plans (MRPs). These changes precipitate a submittal of a revised OOP to DDW for review pursuant with Title 22, Section 60320.122 and 60320.222.

#### Notification Levels

California Code of Regulations, Title 22, Section 60320.120 and 60320.220, requires Groundwater Replenishment Reuse Projects (GRRP; Title 22, Section 60301.390) to conduct quarterly monitoring of the recycled municipal wastewater for DDW specified chemicals having notification levels (NL). The DDW-specified chemicals having NLs are listed in a document, titled *Drinking Water Notification Levels and Response Levels: An Overview* provided on the State Water Resources Control Board (SWRCB) website<sup>1</sup>. This document was updated on July 13, 2018, and the SWRCB added two new chemicals to the NL list, Perfluorooctanoic acid (PFOA) and Perfluorooctanesulfonic acid (PFOS). PFOA and PFOS are fluorinated organic chemicals that are part of a larger group of chemicals referred to as per- and poly-fluoroalkyl substances (PFASs). DDW has identified EPA Method 537.1<sup>2</sup> as a validated analytical method for detecting perfluorinated compounds in drinking water. The SWRCB's Environmental Laboratory Accreditation Program (ELAP) is in the process of accrediting laboratories statewide for this method. Please note that reporting per EPA Method 537.1 needs to be in the acid form of the

<sup>1</sup> Drinking Water Notification Levels and Response Levels: An Overview

[https://www.waterboards.ca.gov/drinking\\_water/certlic/drinkingwater/documents/notificationlevels/notification\\_levels\\_response\\_levels\\_overview.pdf](https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/notificationlevels/notification_levels_response_levels_overview.pdf)

<sup>2</sup> Method 537.1: Determination of Selected Per- and Polyfluorinated Alkyl Substances in Drinking Water by Solid Phase Extraction and Liquid Chromatography/Tandem Mass Spectrometry (LC/MS/MS)

[https://cfpub.epa.gov/si/si\\_public\\_file\\_download.cfm?p\\_download\\_id=537290&Lab=NERL](https://cfpub.epa.gov/si/si_public_file_download.cfm?p_download_id=537290&Lab=NERL)

compound (i.e. Perfluorooctane sulfonic acid instead of Perfluorooctane sulfonate). Please refer to the chart below for CAS No. for both compounds.

Acronym	Name	CAS No.
PFOA	Perfluorooctanoic acid	335-67-1
PFOS	Perfluorooctane sulfonic acid	1763-23-1

### 1,2,3-Trichloropropane

California Code of Regulations, Title 22, Section 60320.112 and 60320.212 requires GRRPs to conduct quarterly monitoring of the recycled municipal wastewater for regulated chemicals. In addition, California Code of Regulations, Title 22, Section 60320.114 and 60320.214 requires projects to ensure diluent water sources do not exceed a primary maximum contaminant level (MCL). 1,2,3-Trichloropropane (1,2,3-TCP) primary MCL was effective December 14, 2017. The Sanitation and Radiation Laboratories (SRL) method, which was published in February 2002, has Environmental Laboratory Accreditation Program (ELAP) test method designation, SRL524M, is capable of 1,2,3-TCP quantification at the Detection Limit for Purposes of Reporting (DLR). The SRL method is certified by ELAP for Field of Testing 104, Volatile Organic Testing of Drinking Water. Additional information is available on the SWRCB website<sup>3</sup>.

### Monitoring Locations

Monitoring for some chemicals may be performed downstream with DDW approval. For the DDW-specified chemicals having NLs (such as PFOA and PFOS), recharge water (including recharge water after surface application) may be monitored in lieu of recycled municipal wastewater if the fraction of recycled municipal wastewater in the recharge water is equal to or greater than the average fraction of recycled municipal wastewater in the recharge water applied over the quarter pursuant with Title 22, Section 60320.120(b) and 60320.220(b). In addition, Project Sponsors of GRRPs are required to ensure that the diluent water does not exceed a MCL (such as 1,2,3-Trichloropropane), a secondary MCL upper limit (if not historically used to recharge the basin), or a notification level (NL), and are required to implement a DDW approved water quality monitoring plan for DDW-specified contaminants to demonstrate compliance with the primary MCLs, secondary MCLs (except turbidity, color, and odor), and NLs pursuant with Title 22, Section 60320.120(b) and 60320.220(b).

### DDW Request

DDW recommends the Los Angeles Regional Water Quality Control Board update the respective Monitoring and Reporting Plans (MRPs) for these chemicals (PFOA, PFOS and 1,2,3-TCP) for the Montebello Forebay Groundwater Recharge Project (Order No. 91-100, R4-2009-0048, R4-2009-0048-A-01), Leo J. Vander Lans Water Treatment Facility and Alamitos Barrier Recycled Water Project (R4-2014-0111), Harbor Water Recycling Project-Dominguez Gap Project (R4-2016-0334), and West Coast Basin Barrier Project (R4-2006-0069). In addition, the respective Project Sponsor(s) for these GRRPs must update their Operation Optimization Plan (OOP) to include monitoring and reporting of PFOA, PFOS, and 1,2,3-TCP and submit the revised OOP to DDW for review pursuant with Title 22, Section 60320.122 and 60320.222.

<sup>3</sup> 1,2,3-Trichloropropane (1,2,3 - TCP)

[https://www.waterboards.ca.gov/drinking\\_water/certlic/drinkingwater/123TCP.html](https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/123TCP.html)

If you have any questions regarding this letter, please contact Faraz Asad, P.E. at (714) 558-4708 or via email at [Faraz.Asad@waterboards.ca.gov](mailto:Faraz.Asad@waterboards.ca.gov) or me at (619) 525-4022 or via email at [Randy.Barnard@waterboards.ca.gov](mailto:Randy.Barnard@waterboards.ca.gov).

Sincerely,



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