



June 26, 2018

**Via email to:** [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

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

### **Comment Letter – Proposed Recycled Water Policy Amendment**

The Southern California Alliance of POTWs (SCAP) appreciates the opportunity to comment on **An Amendment to the Policy for Water Quality Control for Recycled Water**.

SCAP represents 83 public agencies that provide essential wastewater treatment and water supply for 20 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. We strive to assist our public agency members with full regulatory compliance in all sectors. To that end, SCAP seeks cost-effective and attainable regulations that are stakeholder driven for the best protection of public health and the environment.

We strongly recommend removing the references to The NELAC Institute or TNI in the definitions section and in Attachment A. At the southern California workshop hosted by the Southern California Coastal Water Research Project on June 11, 2018 State Board staff acknowledged that ELAP would unlikely be ready to certify any bioanalytical protocols referenced in Attachment A and that ELAP is still working on draft regulations that have not been fully adopted.

For laboratories that are ready to use the bioanalytical assays referenced in Attachment A, those laboratories are using ISO 17025 not TNI. As such, the requirement to use TNI is not consistent with what is available in the near term for those laboratories to analyze data for CECs in Attachment A.

Additionally, TNI has only fully adopted the 2009 TNI standard so reference to the 2016 standard will create unnecessary confusion. Inclusion of TNI by reference is not mature enough for incorporation in this important proposed Policy.

Finally, in reference to the requirement for the submission of a Quality Assurance Project Plan or QAPP. We believe that this is an important component of quality assurance linking field collection with

laboratory analysis and we applaud this requirement for a QAPP. However, QAPPs have been developed by the Surface Water Ambient Monitoring Program (SWAMP), the State Boards Office of Information Management, and the EPA. Inclusion by reference to the significant work already developed will provide guidance and templates that can be instantly utilized.

To summarize, replacement of TNI with reference to accreditation standards in compliance with AB 1438, the law governing ELAP's accreditation standards in combination with reference to the extensive literature on existing QAPPs can only strengthen this Proposed Policy.

If there are any questions or if additional correspondence is desired, please reach me at 760.479.4112 or [sjepson@scap1.org](mailto:sjepson@scap1.org)

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Jepsen". The signature is fluid and cursive, with the first name "Steve" and last name "Jepsen" clearly distinguishable.

Steve Jepsen, Executive Director

Southern California Alliance of Publicly Owned Treatment Works