PFAS Regulatory Drivers and the Analytical Tools to Support Them

June 2024

Taryn McKnight Vice President, PFAS Practice Leader Eurofins Environment Testing

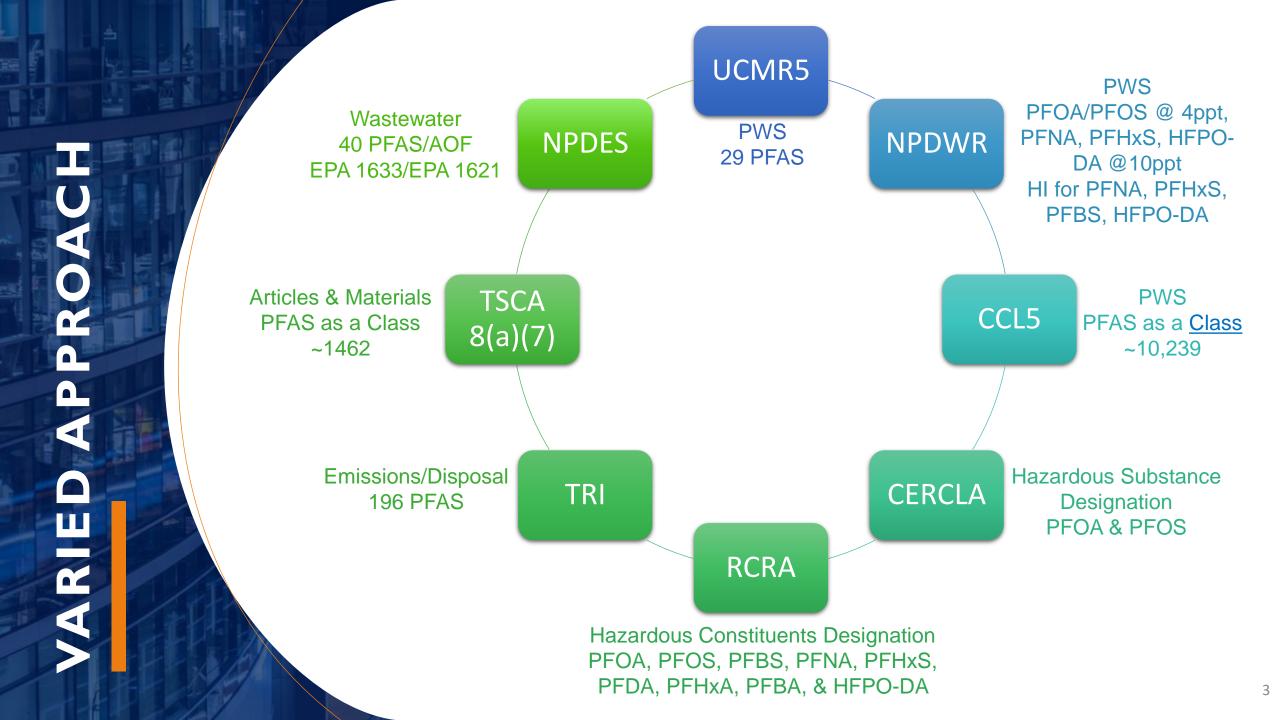
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REGULATORY LANDSCAPE

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DRINKING WATER

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Federal Updates

PFAS Maximum Contaminant Levels (MCLs)

Biden-Harris Administration Finalizes First-Ever National Drinking Water Standard to Protect 100M People from PFAS Pollution

As part of the Administration's commitment to combating PFAS pollution, EPA announces \$1B investment through President Biden's Investing in America agenda to address PFAS in drinking water



April 10, 2024

•PFOA, PFOS, PFHxS, PFNA, HFPO-DA:

Regulate PFOA and PFOS at 4 ppt and PFHxS, PFNA & HFPO-DA at 10 ppt.

•PFNA, PFHxS, PFBS, and HFPO-DA:

Limit any mixture containing one or more of these chemicals using a hazard index calculation.

• \$1 billion in newly available funding:

To help states and territories implement PFAS testing and treatment at public water systems

https://www.epa.gov/newsreleases/biden-harris-administration-proposes-first-ever-national-standard-protect-communities



Hazard Index Calculation

H.I. = (GenX / 10ppt) + (PFBS / 2000ppt) + (PFNA / 10ppt) + (PFHxS / 10ppt)

Divide the measured concentration by the health-based value

Repeat calculation for each sample collected in the past year for that entry point and calculate the average H.I. for all samples taken in that year. If the running annual average H.I. is > 1, it is a violation of the H.I. MCL. Unregulated Contaminants Monitoring Rule UCMR5

Before conducting your own assessment of the data, please review the UCMR 5 Data Summary Instructions for Accessing Results, and UCMR 5 Data Finder Walkthrough below. The <u>UCMR 5</u> <u>Data Finder</u> allows people to easily search for, summarize, and download the available UCMR 5 analytical results. Results can be filtered using multiple data fields, including PWS, state,

What a difference a decade makes...

SCOPE

2023–2025 4 analytes (537.1) 25 analytes (533) All PWS serving > 3,300 ~800 Systems serving < 3,300

Represents ~35% of total results to be reported

RESULTS TO DATE (from PWS w/ full set)

PFOS Avg >MCL in 7.9% of PWS PFOA Avg >MCL in 6.4% of PWS HFPO-DA >MCL in one PWS PFNA >MCL in three PWS HI Avg >MCL in 0.7% of PWS 4 analytes from 537.1, only one detection



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WASTEWATER

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Effluent Guidelines Program

Program Plan 15

- Propose limits for chemical, plastics, synthetic fiber manufacturers (NDAA June 2024)
- ✓ Expand Textiles study (NDAA June 2025)
- ✓ Revise ELGs for Landfills category (NDAA June 2025)
- Not pursuing action for the Electrical and Electronic Components Category (NDAA June 2025)
- ✓ Will monitor the Pulp, Paper, and Paperboard Category and Airports
- Leather tanning/finishing, paint formulating, and plastics molding categories (NDAA December 2026)



NPDES News

https://www.epa.gov/system/files/documents/2023-01/11143_ELG%20Plan%2015_508.pdf#page=48

https://www.epa.gov/system/files/documents/2023-01/11143_ELG%20Plan%2015_508.pdf



2023 NDAA, SEC. 5883. CLEAN WATER ACT EFFLUENT LIMITATIONS GUIDELINES

The Administrator shall publish in the Federal Register effluent limitations guidelines and standards for priority industry categories, not later than the following dates...

Effluent Guidelines Program

Program Plan 15

- EPA intends to initiate a Publicly Owned Treatment Works (POTW) influent study of PFAS
- ✓ Information Collection Request (ICR) underway. Public comment period closed May 28, 2024
- ✓ Submit to OMB for review
- ✓ Collect data in 2024-2025
- ✓ The sampling would be done using EPA Method 1633 and EPA Method 1621



https://www.govinfo.gov/content/pkg/FR-2024-03-26/pdf/2024-06408.pdf

Addressing PFAS Discharges In State-Issued NPDES Permits

EPA issues guidance to state permit writers and pretreatment authorities to address PFAS

- Monitoring should include the 40 PFAS by method 1633
- 1621 for AOF can be used if appropriate

Tools and Resources

Example Permit Language, State and Local PFAS Strategies, and Other PFAS Permitting Resources

Funding Resources

<u>Clean Water State Revolving Fund Emerging Contaminants</u>

BMP and Source Reduction Resources

Fact Sheet: Pollution Prevention Strategies for Industrial PFAS
 <u>Discharges (pdf)</u> (713.1 KB)

https://www.epa.gov/npdes/industrial-wastewater#pfas



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HAZARDOUS WASTE

CERCLA & RCRA

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EPA has the authority to:

- Order the investigation and remediation of these chemicals, including cost recovery;
- Re-open closed sites;
- Private parties will have a cause of action for cost recovery; and
- PFOA and PFOS will be included in the scope of Phase 1s in order to satisfy the All Appropriate Inquiries Rule

PFOA & PFOS Only



News Releases: Headquarters | Land and Emergency Management (OLEM)

CONTACT US

Biden-Harris Administration Finalizes Critical Rule to Clean up PFAS Contamination to Protect Public Health

EPA action designates two widely used PFAS as hazardous substances under the Superfund law, improving transparency and accountability to clean up PFAS contamination in communities

April 19, 2024

CERCLA Hazardous Substances

"CERCLA does not impose liability on manufacturers of hazardous substances, potentially leaving water suppliers, landfill owners, local fire departments, farmers, and other municipal entities to bear the entire costs associated with investigation and remediation of PFAS contamination."

EPA-HQ-OLEM-2019-0341

HAZARDOUS *CONSTITUENTS* DESIGNATION RCRA

EPA Proposes to list PFOA, PFOS, PFBS, PFNA, PFHxS, PFDA, PFHxA, PFBA, & HFPO-DA as RCRA "Hazardous Constituents"

Those chemicals listed are subject to Corrective Action requirements under RCRA at hazardous waste treatment, storage, and disposal facilities.

To be continued....

EPA must undertake a two-step process to categorize PFAScontaminated waste as **hazardous waste** subject to RCRA:

- (1) list PFAS as a Hazardous Constituent in 40 CFR part 261, Appendix VIII
- (2) publish a finding that PFAS-containing waste could pose a "substantial present or potential hazard to human health the environment when improperly treated, stored, transported, or disposed of, or otherwise managed"

Regulation of Hazardous Waste "Cradle to Grave""

Subtitle C gives EPA the authority to control and regulate hazardous waste from "cradle-to-grave, requiring tracking of hazardous waste from generation to disposal. Subtitle C only governs "hazardous wastes".

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RCRA

"RESOURCE CONSERVATION AND RECOVERY ACT"

Corrective Action

The RCRA Corrective Action Program requires facilities that treat, store, or dispose of hazardous wastes to investigate and clean up contaminated soil, groundwater, and surface water.

EPA PFAS Destruction & Disposal Guidance

 ✓ Updated guidance release April 2024

 Addresses utilization of analytica tools for demonstration of mineralization of PFAS in Appendix A

✓ Significant data gaps remain

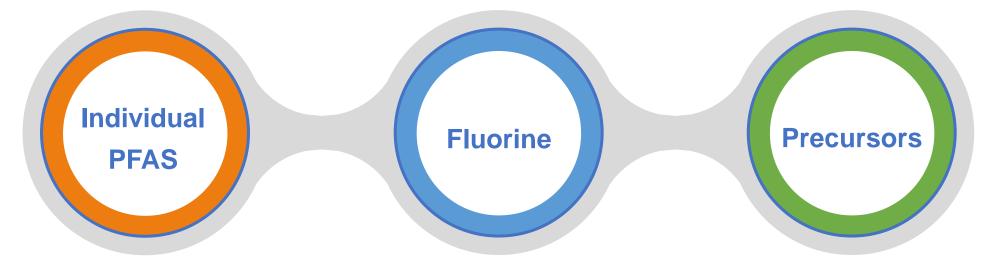
EPA releases OT for Volatile PFA source air emiss

https://www.epa.gov/pfas/interim-guidance-destroying-and-disposing-certain-pfas-and-pfas-contain-pfas-cont

METHOD OPTIONS



Analyzing for PFAS We've got options



Targeted PFAS by LC or GC/MS/MS 537.1 & 533

"537 Modified" EPA 1633

Up to 100+ non-polymer PFAS compounds

Total or Organic Fluorine by CIC

"CIC-TOF"

Total Fluorine (inorganic + organic) Extractable Organic Fluorine (EOF) Adsorbable Organic Fluorine (AOF) (may include polymers)



CONVENTIONAL TOOLS

TARGETED ANALYSIS

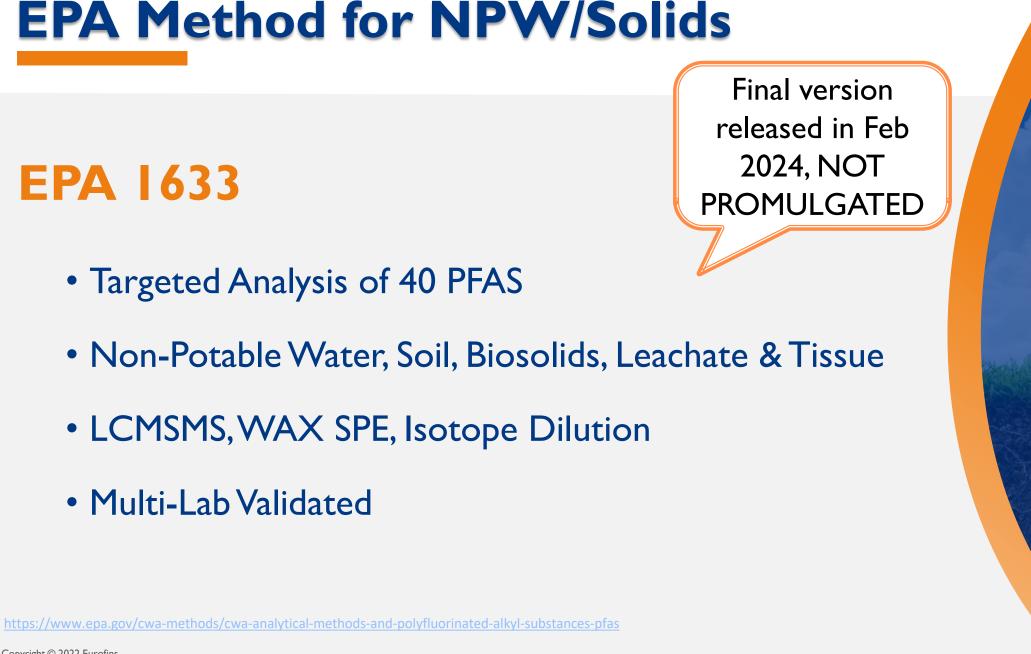
The analysis of specific target analytes with known CAS numbers and analytical reference standards

- EPA Standard Methods
- ASTM Methods
- User-Defined Methods
 - Regulatory derived target analyte lists
 - Laboratory derived target analyte lists

EPA Methods

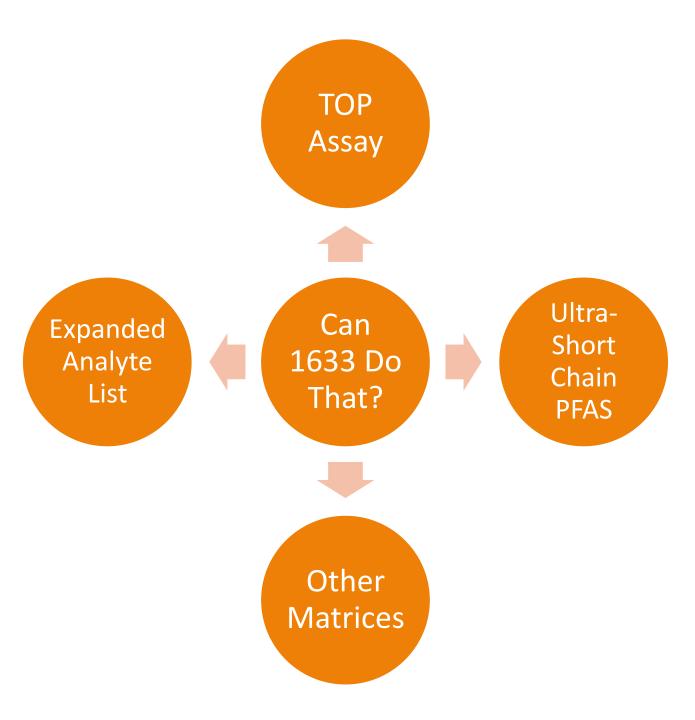
EPA 537.1 EPA 533 EPA 8327 EPA 1633

User-defined Methods "537 Modified" Laboratory SOP



PA Ζ

Scope of 1633 Testing





1633	537M
NPW, Soil, Biosolid, Leachate, Tissue	ALL MATRICES
40 compounds	Up to 100 compounds (lab specific)
Cost: \$\$\$	Cost: \$\$
TAT: Ō	TAT: Ō
SPE WAX	SPE WAX
Hold Time: 28/28 days	Hold Time: 28/28 days
Branched/Linear Isomers -YES	Branched/Linear Isomers -YES
LCMSMS with confirmation ion	LCMSMS - with confirmation ion
Isotope Dilution	Isotope Dilution
Recovery Correction - YES	Recovery Correction – YES
RLs: 2-20ppt	RLs: 2ppt - 20ppt

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Compounds Included in EPA 1633	(RLs
Perfluorobutanoic acid (PFBA)	1
Perfluoropentanoic acid (PFPeA)	1
Perfluorohexanoic acid (PFHxA)	1
Perfluoroheptanoic acid (PFHpA)	1
Perfluorooctanoic acid (PFOA)	1
Perfluorononanoic acid (PFNA)	1
Perfluorodecanoic acid (PFDA)	4
Perfluoroundecanoic acid (PFUnA)	é
Perfluorododecanoic acid (PFDoA)	3
Perfluorotridecanoic acid (PFTriA)	ç
Perfluorotetradecanoic acid (PFTeA)	
Perfluorobutanesulfonic acid (PFBS)	L.
Perfluoropentanesulfonic acid (PFPeS)	ł
Perfluorohexanesulfonic acid (PFHxS)	3
Perfluoroheptanesulfonic Acid (PFHpS)	5
Perfluorooctanesulfonic acid (PFOS)	7
Perfluorononanesulfonic acid (PFNS)	1
Perfluorodecanesulfonic acid (PFDS)	F
Perfluorododecanesulfonic acid (PFDoS)	F
Perfluorooctanesulfonamide (FOSA)	F

= 2-5ng/L)
NEtFOSA
NMeFOSA
NMeFOSAA
NEtFOSAA
NMeFOSE
NEtFOSE
4:2 FTS
6:2 FTS
8:2 FTS
9CI-PF3ONS
11CI-PF3OUdS
DONA
$ \Gamma D \cap D \wedge (C \circ V) $
HFPO-DA (GenX)
3:3 FTCA
3:3 FTCA 5:3 FTCA
3:3 FTCA 5:3 FTCA 7:3 FTCA
3:3 FTCA 5:3 FTCA
3:3 FTCA 5:3 FTCA 7:3 FTCA
3:3 FTCA 5:3 FTCA 7:3 FTCA NFDHA

Target Compounds Not Part of EPA 1633 (RLs = 2-5ng/L)		
10:2 FTS	EVE Acid	
6:2 FTCA	PFO5DA	
8:2 FTCA	PMPA	
10:2 FTCA	PEPA	
6:2 FTUCA	MTP	
8:2 FTUCA	PS Acid	
10:2 FTUCA	Hydro-PS Acid	
PFECHS	R-PSDA	
PFPrS	Hydrolyzed PSDA	
PFPrA	R-PSDCA	
PFMOAA	6:2 diPAP	
PFECAG	8:2 diPAP	
PFO4DA	6:2/8:2 diPAP	
PFO3OA	10:2 diPAP	
PFO2HxA	10:2 FTOH (RL=1ug/L)	
R-EVE	8:2 FTOH (RL=Iug/L)	
NVHOS	7:2 FTOH (RL=Iug/L)	
Hydro-EVE Acid	6:2 FTOH (RL=Iug/L)	
Perfluoro-n-octadecanoic acid (PFODA)	4:2 FTOH (RL=Iug/L)	
Perfluoro-n-hexadecanoic acid (PFHxDA)		

EPA Method 1621

Final version released in Feb 2024, NOT PROMULGATED

- Adsorbable Organic Fluorine (AOF)
- Proxy analysis for 'Total PFAS'

- Applies to aqueous samples
- Multi-lab validated



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THANK YOU



WateReuse Legislative Update, LA Chapter

Phillip Vander Klay

June 18, 2024



Legislative Update

Bills

- SB 903 (Skinner) PFAS Source Control
- Making Conservation a Way of Life bills

The Budget Problem – Resolved?

Climate Bond – Recycled Water Funding



Regulatory Update

Recycled Water Fees

- Assess fee by volume and use
- Assess fee by volume and recycled water production



Recycled Water Permits Fees Stakeholder Meeting

May 22, 2024

Water Boards

Division of Administrative Services – Fee Branch

Staff Presentation

- Fee Development Timeline
- Recycled Water Permit and Fee Background
- Comments Summary
- Guiding Principles
- Updated Fee Options
- Open Discussion
- Next Steps

Recycled Water Permits Fees Stakeholder Meeting – May 22, 2024

Fee Development Timeline

- April 18 First RWP Stakeholder Meeting
- May 22 Second RWP Stakeholder Meeting
- June 13 Second Water Quality Fees Stakeholder Meeting
- August 1 Third (Final) Water Quality Fees Stakeholder Meeting
- 2nd Sept Board Mtg FY 2024-25 Fee Schedule Proposal

Permitting Staff and Fee Authority

- Regional water boards' staff time to permit and perform ongoing case management on recycled water projects has been absorbed by existing National Pollutant Discharge Elimination System (NPDES) and Waste Discharge Requirement(WDR) program staff.
 - A WDR or NPDES permit takes up to 25% longer to write when non-potable recycling requirements are directly incorporated into the permit, and the existing fees are not commensurate with this workload.
- Prior to 2023, the Water Boards lacked authority to assess fees for individual Water Recycling Requirements (WRRs) or for the additional time and complexity associated with including recycling requirements directly in WDRs or NPDES permits.
- FY 23/24 Budget included a trailer bill to provide fee authority for recycled water permitting.
- FY 23/24 Water Supply Strategy Implementation Budget Change Proposal
 - Water Boards obtained 15 PYs for permitting recycled water projects.

Establishing Fee Authority for Recycled Water Facilities

 Clean-up to Water Code sections 13260 and 13523 to provide explicit authority to assess fees for recycled water facilities to ensure adequate oversight and resources for timely permitting of recycled water projects.

Comments Summary

Spread the Fees Broadly

- In response, staff revised the proposed fee approach to distinguish between permits for recycled water production vs recycled water distribution and/or use.
- Staff is continuing to explore this option.

Design flow is not representative of recycled water production

 In response, staff revised the proposed fee structure to categorize recycled water production permits by size based on the Volumetric Annual Report volumes.

Recycled Water Permits Fees Stakeholder Meeting – May 22, 2024

Duplicative Fees & Fee-for-Service

- In response, staff revised the proposed fee approach to distinguish between permits for recycled water production vs recycled water distribution and/or use.
- DDW's workload for review and approval of Title 22 Engineering Reports is separate and distinct from the regional water board workload to permit recycled water projects.

Inequities in Proposed Fee Structure

- In response, staff revised the proposed fee structure options.
 - Recycled water production permits would be categorized by size based on the Volumetric Annual Report volumes.
 - Recycled water distribution and/or use permits would pay a de minimus \$2,000 annual fee.
 - Proposed size categories include a greater number of size tiers for stakeholder consideration (i.e., four or five tiers of size instead of three).

Guiding Principles for WDPF Program Fees

- Revenue neutral
- Not a "Fee for Service" model
- Implementable statewide
- Indirect and redirected costs are added to direct program expenditures
- Minimize yearly swings

Proposed Program Expenditures

Staff Workload	Statewide PYs	Annual Staff Costs
 Review and process recycled water permit applications and renewals, including updating permits to be consistent with recycled water regulations to protect public health and the environment. Conduct community engagement and outreach related to planning and promoting recycled water implementation. Communicate processes and activities required in permitting recycled water projects to interested parties. Coordinate with agency partners to assist in conservation efforts through sharing recycled water, drinking water, and wastewater data. Coordinate with the Division of Drinking Water, Division of Water Rights, Division of Water Quality, and interested parties on facility permits, consistent with Water Boards racial equity resolutions and related actions. 	 Statewide Total: 15 PYs Regional Board 1 - 1 PY Regional Board 2 - 2 PYs Regional Board 3 - 2 PYs Regional Board 4 - 2 PYs Regional Board 5 - 2 PYs Regional Board 8 - 3 PYs Regional Board 9 - 3 PYs 	Total Staff Costs: \$3,375,000 Target: \$3,375,000

Option D1: Fee by Volume and Distribution/Use

Fee based on reported three-year average of recycled water volume.

Recycled Water Volume Produced (AFY) ¹	Fee
> 10,000	\$40,000
> 5,000 to10,000	\$20,000
> 1,000 to 5,000	\$15,000
≤ 1,000	\$7,000

Recycled Water Distribution and/or Use	Fee
Permits issued for recycled water distribution and/or use only	\$2,000

Option D2: Fee by Volume and Distribution/Use

Fee based on reported three-year average of recycled water volume.

Recycled Water Volume Produced (AFY) ¹	Fee
> 30,000	\$80,000
> 10,000 to 30,000	\$30,000
> 5,000 to10,000	\$20,000
> 1,000 to 5,000	\$14,000
≤ 1,000	\$7,000

Recycled Water Distribution and/or Use	Fee
Permits issued for recycled water distribution and/or use only	\$2,000

Option E1: Fee by Volume and Type and Distribution/Use

Fee based on reported three-year average of recycled water volume and distinguishes between potable and non-potable.

Recycled Water Volume Produced (AFY)	Potable Fee	Non-Potable Fee
> 10,000	\$78,000	\$38,000
> 5,000 to 10,000	\$24,000	\$18,000
> 1,000 to 5,000	\$18,000	\$15,000
≤ 1,000	\$10,000	\$7,000

Recycled Water Distribution and/or Use	Fee
Permits issued for recycled water distribution and/or use only	\$2,000

Option E2: Fee by Volume and Type and Distribution/Use

Fee based on reported three-year average of recycled water volume and distinguishes between potable and non-potable.

Recycled Water Volume Produced (AFY)	Potable Fee	Non-Potable Fee
> 30,000	\$75,000	\$65,000
> 10,000 to 30,000	\$51,000	\$26,000
> 5,000 to 10,000	\$28,000	\$20,000
> 1,000 and 5,000	\$20,000	\$16,000
≤ 1,000	\$10,000	\$7,000

Recycled Water Distribution and/or Use	Fee
Permits issued for recycled water distribution and/or use only	\$2,000

Option D: Fee Example (High)

Fee based on reported three-year average of recycled water volume.

Discharger A	FY 23-24 Fee	Proposed Fee	FY 24-25 Fee
Option D1 (> 10,000 AFY)	\$904,107	\$40,000	\$944,107
Option D2 (> 30,000 AFY)	\$904,107	\$80,000	\$984,107

Option E: Fee Example (High)

Fee based on reported three-year average of recycled water volume and distinguishes between potable and non-potable.

Discharger B	FY 23-24 Fee	Potable Fee	FY 24-25 Fee
Option E1 (> 10,000 AFY)	\$645,876	\$78,000	\$723,876
Option E2 (> 30,000 AFY)	\$645,876	\$75,000	\$720,876

Discharger C	FY 23-24 Fee	Non-Potable Fee	FY 24-25 Fee
Option E1 (> 10,000 AFY)	\$904,107	\$38,000	\$942,107
Option E2 (> 30,000 AFY)	\$904,107	\$65,000	\$969,107

Option D: Fee Example (Low)

Fee based on reported three-year average of recycled water volume.

Discharger D	FY 23-24 Fee	Proposed Fee	FY 24-25 Fee
Option D1 (≤ 1,000 AFY)	\$1,873	\$7,000	\$8,873
Option D2 (≤ 1,000 AFY)	\$1,873	\$7,000	\$8,873

Option E: Fee Example (Low)

Fee based on reported three-year average of recycled water volume and distinguishes between potable and non-potable.

Discharger E	FY 23-24 Fee	Potable Fee	FY 24-25 Fee
Option E1 (≤ 1,000 AFY)	\$30,000	\$10,000	\$40,000
Option E2 (≤ 1,000 AFY)	\$30,000	\$10,000	\$40,000

Discharger F	FY 23-24 Fee	Non-Potable Fee	FY 24-25 Fee
Option E1 (≤ 1,000 AFY)	\$1,873	\$7,000	\$8,873
Option E2 (≤ 1,000 AFY)	\$1,873	\$7,000	\$8,873

Open Discussion

Next Steps

Feedback due by June 13 to FeeBranch@waterboards.ca.gov

Last Board of Trustees Meeting: May 3, 2024

WRA Executive Director's Report

2024 WateReuse Symposium - Denver

• 39th Annual Symposium March 11-14th

Water Week – Washington, DC

• Huge Thanks to those representing WateReuse!

Budget

- Budget for FY25 is being prepared
- Securing contractor to perform technology tools assessment

2024 Membership Renewal Status

• Cancelled: 19, Outstanding: 8, New: 6





Last Board of Trustees Meeting: May 3, 2024

Continuation of Water Recycling Funding Summary Contract

 John Robinson Consulting (JRC) to continue providing a list of federal, state, and local recycled water funding opportunities for WRCA

Continuation of Jennifer West LLC Consulting Services

- Provide strategic advice to the Managing Director of WateReuse California (WRCA), Brenley McKenna
- Assist in the messaging to the WRCA membership and other stakeholders about the expected adoption of the Making Conservation a California Way of Life regulations;
- Assist the Managing Director and the Regulatory Director in writing a California Section
 2024 summary end of year report that can be used for marketing and member retention.





APPROVED



Last Board of Trustees Meeting: May 3, 2024

Administrative Coordinator Staff Position

To assist the managing director and senior staff with supporting the core administrative and communication functions of the association.

Key Functions

1. Scheduling

3. Data Entry

2. Social Media

- 4. Committee Support
- 5. Administrative Duties
 - 6. Event Support
 - 7. Coordination with WateRuse Association Staff

Benefits

• Health, Dental and Vision as outlined in the employee handbook

Salary

• \$66,000-\$80,000

Last Board of Trustees Meeting: May 3, 2024

Strategic Planning & Summer Board of Trustees Meeting

- **Vision**: "A nation in which every community Uses water Recycling to safeguard public health and achieve environmental an economic resilience."
- **Mission:** "To empower communities and businesses to embrace water recycling as a cornerstone to safe, resilient, and sustainable water source."
- Strategic Goals and objectives divided into 3 categories
 - **1.** Advocacy,
 - 2. Programs & Communications,
 - **3.** Membership, Sections and Operations



Last Board of Trustees Meeting: May 3, 2024

Strategic Planning & Summer Board of Trustees Meeting

Market Findings:

- Geographical Growth
- Industrial Reuse Growth
- Market Forecast

Operational Findings

- Member Value
- Staff Resource Challenges
- Program Optimization
- Technology Assessment.

Plan projects slow growth toward the overall goal and allows adaption to economic landscape and admin goals.









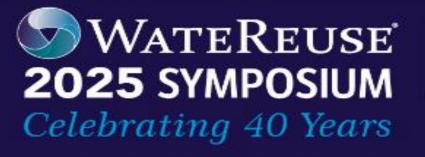


WATEREUSE STRATEGIC PLAN

Last Board of Trustees Meeting: May 3, 2024

Turning the Tide Towards Water Reuse

- Celebrating 40 years of the WateReuse Symposium!
- Presentation Deadline: August 16, 2024
- Focus areas include and not limited to...
 - Policies and Regulations Advancing Water Recycling
 - Planning, Operations, Maintenance, and Management of Water Reuse systems
 - Water Reuse around the World



MARCH 16-19 JW MARRIOT TAMPA WATER STREET







Last Board of Trustees Meeting: May 3, 2024

Legislative and Regulatory Committee

- State Budget and Climate Update Bond Status
 - California budget is in a deficit.
- Recycled Water-Potable Reuse "Conservation is a way of Life"
 - WRCA attended the California way of life Workgroup Kickoff meeting.
- Major Provisions of California's DPR Regulations
 - New Organizational Structure
 - Highest level of Operating Certifications
 - Enhanced source controls
 - Rigorous chemical and pathogen controls
- California DPR Regulations making international News!





LA Chapter Updates



- Communications Chair: Oliver Slosser
 <u>oslosser@lvmwd.com</u>
- Rising Professionals Committee Chair: Seto Cherchian Scherchian@BrwnCald.com
- Technical Topics Chair: *Alex Franchi* <u>alex.franchi@aecom.com</u>
- Agricultural Committee: (Volunteer Opportunity) Seto Cherchian <u>Scherchian@BrwnCald.com</u>
- Recycled Water Users Manual: John Lockett

- Meeting Summaries: (Volunteer Opportunity) Thank you! Karina Gonzalez and Annie Chen, LA Sanitation & Environment
- Ad Hoc Urban Irrigation Manual Update Committee: Co-chairs: Monica Sanchez/LACSD, Erika Bensch/LACSD, Jesus Gonzalez/LADWP



Member Agency Roundtable