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This is the Accepted version of the following publication

Scales, PJ, Wijekoon, K, Ladwig, C, Knight, A, Allinson, M, Allinson, G, Zhang, Jianhua, Gray, Stephen, Packer, M, Northcott, K and Sheehan, D (2019) A critical control point approach to the removal of chemicals of concern from water for reuse. *Water Research*, 160. pp. 39-51. ISSN 0043-1354

The publisher's official version can be found at
<https://www.sciencedirect.com/science/article/pii/S0043135419304233>
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Accepted Manuscript

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PII: S0043-1354(19)30423-3

DOI: <https://doi.org/10.1016/j.watres.2019.05.035>

Reference: WR 14684

To appear in: *Water Research*

Received Date: 26 September 2018

Revised Date: 8 May 2019

Accepted Date: 11 May 2019

Please cite this article as: Scales, P.J., Wijekoon, K., Ladwig, C., Knight, A., Allinson, M., Allinson, G., Zhang, J., Gray, S., Packer, M., Northcott, K., Sheehan, D., A critical control point approach to the removal of chemicals of concern from water for reuse, *Water Research* (2019), doi: <https://doi.org/10.1016/j.watres.2019.05.035>.

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EXAMPLE BARRIER CREDIT SYSTEM FOR CCP

CCP Surrogates

Residual >0.05 mg/L
 Dose >11.7 mg/L
 $CT_{10} > 14 \text{ mg}\cdot\text{min}/\text{L}$
 $T_{10} > 5 \text{ min}$

Feed Water

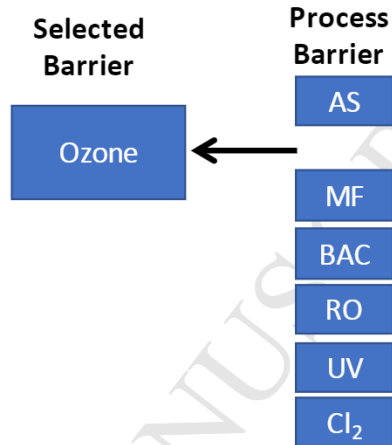
DOC <10 mg/L

Pathogen Credits

	LRV
Virus	2.0
Bacteria	2.0
Protozoa	0.0
Helminths	0.0

Chemical Credits

	LRV
Ozone class 1	0.9
Ozone class 2	0.0
Ozone class 3	0.0
Ozone class 4	0.0



1 **A Critical Control Point Approach to the Removal of Chemicals of Concern from Water for**
2 **Reuse**

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18 **Abstract**

19 The reuse of water in a range of potable and non-potable applications is an important factor in the
20 augmentation of water supply and in improving water security and productivity worldwide. A key
21 hindrance to the reuse of water is the cost of compliance testing and process validation associated
22 with ensuring that pathogen and chemicals in the feedwater are removed to a level that ensures no
23 acute or chronic health and/or environmental effects. The critical control point (CCP) approach is
24 well established and widely adopted by water utilities to provide an operational and risk
25 management framework for the removal of pathogens in the treatment system. The application of
26 a CCP approach to barriers in a treatment system for the removal of chemicals is presented. The
27 application exemplar is to a small community wastewater treatment system that aims to produce
28 potable quality water from a secondary treated wastewater effluent, however, the concepts
29 presented are generic. The example used seven treatment barriers, five of which were designed
30 and operated as CCP barriers for pathogens. The work demonstrates a method and risk
31 management framework by which three of the seven barriers could also include a CCP approach for
32 the removal of chemicals. Analogous to a CCP approach for pathogens, the potential is to reduce
33 the use of chemical analysis as a routine determinant of performance criteria. The operational
34 deployment of a CCP approach for chemicals was augmented with the development of a decision
35 tree encompassing the classification of chemicals and the total removal credits across the
36 treatment train in terms of the mechanistic removal of chemicals for each barrier. Validation of the
37 approach is shown for a activated sludge, ozone and reverse osmosis barrier.

39 Key Words

40 Chemical log reduction value, chemicals of concern, critical control point, advanced water
41 treatment, water recycling

42

43 1 Introduction

44 The recycling of water from wastewater and stormwater for re-use in a range of potable and non-
45 potable applications is an important factor in the augmentation of water supply and in improving
46 water productivity worldwide (Grant *et al.* 2012). Along with demand management, the
47 opportunity exists through recycle to more than double current water resources available for
48 human use in urban environments, referenced by the fact that more than 80% of all urban water in
49 the world is used only once and disposed to the environment at lower quality (UN_WWAP 2017).
50 Recycling some or all of this water would not only reduce pressures on surface and ground water
51 resources but invigorate the use of water sources deemed too contaminated for potable use.
52 Barriers to reuse are significant nonetheless. Pathogen and chemical removal from wastewater and
53 stormwater requires a multiple barrier approach, and the associated chemical and microbial
54 analysis to achieve compliance means that the water is often costlier than traditional source
55 protected surface and groundwater supplies. In addition, there is a social stigma to the planned
56 direct or indirect reuse of wastewater for potable purposes. The outcome is that desalination of
57 seawater is often chosen over wastewater reuse for potable augmentation despite the fact that
58 energy costs are higher and brine disposal limits the opportunity to coastal environments. Cost

59 effective and well-regulated processes for ensuring the quality of water in non-coastal and small
60 communities are therefore critical to water resilience in water scarce environments.

61 A key hindrance to the reuse of water is the cost of compliance testing and process validation
62 associated with ensuring that pathogen and chemicals in the feedwater are removed to a level that
63 ensures no acute or chronic health and/or environmental effects from the reuse of the water. In
64 the case of pathogens, compliance entities have validated a number of processes for the removal of
65 pathogens to minimum levels. An example is the USEPA Long Term 2 Enhanced Surface Water
66 Treatment Rule for the removal of *Cryptosporidium* (USEPA 2018). This validation is deemed
67 compliant by regulatory bodies provided that the equipment associated with the barrier is operated
68 in a consistent manner and continuous or semi-continuous monitoring of surrogates to ensure
69 performance are maintained (Hunter_Water 2005, USEPA 2018). Examples of validated barriers
70 include membrane bioreactors (MBR), UV, ozonation and chlorination as well as nano-filtration (NF)
71 and reverse osmosis (RO) membrane systems (WaterSecure 2018). The process allows the barrier
72 to be operated using, for example, conductivity measurement as a surrogate of barrier integrity in
73 the case of a RO membrane. This process significantly reduces the need for regular (daily)
74 compliance testing using microbial analysis since barrier integrity and compliance validation have
75 already been linked. Less regular (i.e. weekly or monthly) compliance validation is then acceptable,
76 significantly reducing the cost of fit for purpose water production.

77 **1.1 Critical Control Point (CCP)**

78 To define the operational boundaries of the key barriers in a water treatment process, the Critical
79 Control Point (CCP) concept is often used. The CCP approach was first developed by the food and
80 beverage industry as a preventative approach to food safety as distinct from reliance on final

81 inspection. It focused on the removal of biological, chemical and physical hazards from food and
82 the approach was used to determine the key points within the manufacturing process where
83 contamination can occur and be prevented (Ropkins *et al.* 2003). The same approach was then
84 adapted for water quality management and many water regulators now specify the use of the CCP
85 approach as the risk management framework for water treatment systems for managing operation
86 of plants (Hunter_Water 2005, NRMCC 2008). By using the CCP approach, water treatment plant
87 operators and their contracted entities are able to focus resources on monitoring these critical
88 points. These points provide the greatest information and benefit in being able to quickly correct
89 any deviations from acceptable limits and through the risk management framework, significantly
90 reduce the costs of microbial analysis (Laydon. 2011). Along with quantitative microbial risk
91 assessment (QMRA) of the required level of pathogen removal (Barker *et al.* 2013) (usually quoted
92 as a log reduction value (LRV)) to mitigate the risk of acute or chronic illness), the CCP approach can
93 be used to design and operate a multi-barrier treatment process. The basic rules for a CCP are
94 (NHMRC and NRMCC 2011, Barker *et al.* 2013):

- 95 • Operational parameters can be measured and critical limits can be set to define the
96 operational effectiveness of the activity (e.g. a CT measured as a chlorine residual multiplied
97 by a contact time for disinfection)
- 98 • Operational parameters can be monitored frequently enough to reveal any failures in a
99 timely manner (online and continuous monitoring is preferable)
- 100 • Procedures for corrective action (including process shutdown) can be implemented in
101 response to deviation from alert or critical limits.

102 It should be noted here that depending on the circumstances, the claimed LRV for pathogen
103 removal may vary for a given barrier and for the surrogate of performance used to monitor
104 performance. In some instances, a range of surrogate measures may be in place for a particular
105 barrier and indeed, this is the case in one instance herein where a pressure decay test and a
106 measure of residual conductivity are used as surrogates of performance of a reverse osmosis
107 barrier. It is important operationally that neither can over-ride the other in terms of process
108 shutdown. To avoid confusion and reduce the costs of CCP validation for a barrier, it is usual to use
109 one surrogate of performance per barrier with other surrogates used as quality control points
110 (advisory), unless an extra credit for a particular pathogen or chemical is necessary that is not
111 already covered by the single CCP.

112 In addition to pathogens, there are a large number of chemicals that find their way into our
113 waterways and wastewater, and the number and diversity is increasing year on year. Many national
114 regulatory authorities now publish guidelines for the maximum recommended concentrations of
115 chemicals of concern (CoC) deemed to have potential in causing acute or chronic illness. These
116 guidelines usually classify the chemicals into end use categories and although there are in excess of
117 three hundred CoC in for instance the Australian Guidelines for Water Recycling (NRMMC 2008),
118 the list can never be comprehensive in an environment where in excess of 50,000 chemicals and
119 their metabolites are common to many cities and communities. To try and circumvent the issue,
120 regulatory authorities associated with water recycling for potable applications often use a
121 surrogate list of CoC (NRMMC 2008).

122 In drawing an analogy to the highly successful CCP approach used to operationally mitigate the risk
123 of pathogens in our water supply through a focus on risk assessment and barrier integrity, the

124 surrogate list does not represent a route to significantly lowering the cost of treated water
125 compliance. Whilst useful, it still requires regular chemical analysis and is prohibitive in both cost
126 and logistics for small and remote communities (i.e. regular sampling and transport of these
127 samples to certified measurement laboratories) and restricts the likely uptake of water recycling by
128 those that are often most in need of water resilience. An approach that allows chemicals to use the
129 same CCP criteria as pathogens for a particular barrier using a decision tree that relates molecular
130 characteristics to the mechanism of removal in the barrier would seem more appropriate. The basis
131 for such an approach is already available through extensive work on CoC across various water
132 treatment barriers although the classification has not been formalised, trialled and validated at
133 scale.

134 **1.2 Demographic effect**

135 Further to the above concept, the difference between small and large communities needs
136 consideration. In the case of pathogens, it has been demonstrated that the treatment needs of a
137 small community are significantly greater than for a large municipal purified water recycling plant,
138 since pathogens shed by a few people during a disease outbreak are diluted by the bulk flow for
139 large plants but less so for small communities (Barker *et al.* 2013). Indeed, more stringent pathogen
140 log reduction values (LRV) are required for small communities (between 3-6 log higher) to meet a
141 DALY (Disability Adjusted Life Year) of less than 10^{-6} /person-yr (NRMCC 2008). In the case of CoC, a
142 similar scenario ensues whereby any chemical spills in a small community will be exacerbated since
143 the volumetric buffering capacity of the system is much reduced. As an example, a 100 person
144 community adding 200 L/day/person to the collection system using a treatment process with a
145 hydraulic residence time of six hours will have an effective dilution volume of 5,000 litres. In a

146 community of 100,000 people, the same spill would be diluted to 5 ML, a factor of 1,000 different,
147 albeit there is an implicit assumption of perfect mixing, something that is unlikely.

148 For chemicals that are added as a result of standard domestic activities, for example,
149 pharmaceuticals and personal care products (PPCPs) and their metabolites, there is little difference
150 expected between a large municipal and small community, save for greater variability as a result of
151 demographic, industrial and societal influences that are not homogenized within the small
152 community. In this context, a study on small communities is representative of a worst-case scenario
153 and yet, except for a chemical spill scenario, the feed to a large and small community wastewater
154 treatment plant is expected to be very similar, save for industrial inputs. Testing of a treatment
155 plant for a small community using a large community feed is thus considered viable since a spill
156 scenario can be considered as part of the risk management framework and everyday product
157 concentrations in wastewater feed will be similar.

158 **1.3 Multiple barrier approach**

159 A multiple barrier approach has been applied in the production of potable water for centuries. The
160 selection of barriers seeks to optimise the removal capabilities of different steps in the treatment
161 process. Typically, the barriers include five main functions, namely source water protection,
162 coagulation/flocculation/sedimentation, filtration, disinfection and distribution system protection
163 (Hunter_Water 2005). To monitor the key points in the water treatment chain, the CCP concept is
164 often used. Various guideline document outline that the CCP method is one approach which can
165 successfully assist in reviewing the preventative measures for potable water quality management
166 (NRMCC 2008, Laydon. 2011). The approach also specifies within the preventative measures for
167 recycled water management that CCP analysis can be used in managing effluent quality to ensure it

168 is fit for purpose (DPI 2015). Guideline documents usually detail the criteria that a preventative
169 measure must meet for selection as a CCP, inclusive of operational requirements (NHMRC and
170 NRMCC 2011).

171 Feedwater quality, ozonation, microfiltration, reverse osmosis, ultraviolet radiation, and
172 chlorination were identified as CCP locations for the treatment system designed herein for the case
173 of pathogen removal. A minimum log reduction value (LRV) and the associated operational and risk
174 criteria to achieve the LRV were then considered (Zhang *et al.* 2017). This barrier list is not
175 intended to be exhaustive, just a necessary minimum to achieve potable water with an acceptable
176 risk of pathogen exposure in a small community scenario (Barker *et al.* 2013). The testing and
177 validation of the barriers to achieve pathogen compliance is detailed elsewhere (Zhang *et al.* 2016a,
178 Zhang *et al.* 2016c). The surrogates of performance chosen and the LRV of pathogens associated
179 with each of the barriers was based on pre-validation scenarios from around the world and limited
180 additional validation (Zhang *et al.* 2016c) was performed as part of the activity. For the feed water
181 type involved, the combinations of performance surrogate and claimed LRV are thus considered
182 typical but clearly not exhaustive of the multiple operations across the globe.

183 Besides pathogens, water supplies may also be polluted with trace organic chemicals, metals,
184 nutrients, radionuclides, radioactive tracers and disinfection by-products. The latter are a
185 consequence of oxidation steps such as ozonation, advanced oxidation and chlorination. As many of
186 these chemicals have a potential to cause harm to health and/or the environment, chemical
187 residual concentrations are considered as problematic and are of concern. Since input sources vary,
188 the removal of CoC from water to achieve a fit for purpose quality is very challenging. Published
189 work on the removal performance of CoCs in wastewater mainly focus on specific types of

190 chemicals or the behaviour of specific barriers, however, none of them has used the CCP concept as
191 the approach to test the overall performance of the combined barriers. Also, classification of CoCs
192 according to their end use or broad molecular description (NRMMC 2006, NRMMC 2008), whilst
193 useful in determining the maximum guideline concentration in the product water and the likely
194 route to a particular toxic effect, is not useful in defining whether a molecule would be removed by
195 a particular barrier (Tadkaew *et al.* 2011).

196 **1.4 Advanced water treatment plant (AWTP)**

197 This study comprises the testing of the CCP concept for CoC removal using a small scale (20 m³/day)
198 semi-batch containerised advanced water treatment plant (AWTP) using the secondary effluent of a
199 municipal (50,000 person equivalent) treatment plant as a feed. The AWTP was designed for
200 installation into an Antarctic community of 150 persons (maximum), 20 persons (minimum) and
201 was commissioned and then tested for nine months to determine the suitability for deployment.
202 The variation in feed between summer (150 persons) and winter (20 persons) dictated a need for
203 semi-batch operation. The logistics of regular (daily, weekly or even monthly) water quality
204 monitoring using sophisticated chemical analysis across a broad spectrum of chemicals and
205 surrogates was considered impossible since the community is isolated for at least 7 months per
206 year. Simple on-site laboratory tests and passive sampling were considered achievable. A greater
207 level of sophistication was available during the test period although the key consideration was
208 always the remote operational status.

209 The Advanced Water Treatment Plant (AWTP) for Australian Antarctic Division's (AAD) Davis Station
210 was located at Selfs Point Wastewater Treatment Plant (SPWWTP), Hobart, Australia during the test
211 period. Although only a low capacity plant, it was the actual plant that is now deployed in

212 Antarctica and was used as the testing device herein to demonstrate the performance and
213 reliability in the reduction of CoC using the CCP approach. It was designed especially for potable
214 water production for small communities. The plant consists of seven barriers including ozone,
215 ceramic micro-filtration (CMF), biologically activated carbon (BAC), reverse osmosis (RO), ultra-
216 violet radiation (UV), calcite dissolution and chlorination (Cl_2), and was preceded by a secondary
217 effluent treatment plant (activated sludge (AS)). At the application site in Antarctica, the secondary
218 treatment step also includes an MBR unit with a polymeric ultrafiltration configuration, although
219 the secondary effluent or the results presented here was from a clarifier. Earlier work has shown
220 that except for the calcite filter, which acts as a water stabilizer and the BAC, all the other barriers
221 have LRV claims for pathogen removal and associated CCP criteria, indicating they are all functional
222 barriers for pathogens. These claims are summarised in Table 1.

Barrier	CCP	LRV*		
		Virus	Bacteria	Protozoa
Ozonation	CT	2	2	0
Ceramic MF	PDT	1	1	4
BAC	Turbidity	0	0	0
RO	Conductivity and PDT	1.5	1.5	2
UV	Measured dose	4	4	4
Calcite Filter	pH	0	0	0
Chlorination	CT	4	4	0
Total claimed LRVs		12.5	12.5	10

224 * The LRVs are credited based on the USEPA Long Term 2 Enhanced Surface Water Treatment Rule (USEPA 2018). CT =
 225 residual concentration x contact time, PDT = pressure decay test. For ozonation, the contact time was a T_{10} , namely the
 226 time at which 10% of a surrogate appeared in the effluent.

227 In the assessment of CoC removal, calcite dissolution is considered a water stabilization step and Cl_2
 228 provides no obvious chemical removal (indeed, chemicals are added in both barriers) and molecular
 229 destruction by the UV barrier, whilst possible, was not able to be quantified to a particular class of
 230 chemicals. Therefore, these three barriers are not considered as functional barriers for CoC removal
 231 in this study. It is noted none the less that advanced oxidation (using UV peroxide, UV ozone, or UV

232 hypochlorite) is often used as a key chemical removal step and there is an opportunity to develop
233 protocols and claims for these barriers based on the principles outlined. This means that the seven-
234 barrier process of the AWTP plus the AS, with six barriers functional for pathogen removal, can
235 really only be considered a maximum five barrier process for the quantification of chemical
236 removal.

237 Using a CCP approach and LRV assessment, the AS, ozone, CMF, BAC and RO barriers are
238 investigated as functional barriers for CoC removal in this work. Given that a removal mechanism
239 specific to a class of molecules could not be assigned to the CMF and BAC barriers, analysis of the
240 AS, ozone and RO barriers is completed in detail here. The potential for MBR removal of chemicals
241 is also considered although no validation data is presented since this barrier was not operational
242 during testing. As a consequence of the CCP approach, the maximum feed concentrations of
243 chemicals in the wastewater collection system that would have the potential to cause compliance
244 breaches are also calculated. The results of this assessment are considered generalizable to direct
245 potable water reuse. Also, a decision tree is established for the classification and assignment of
246 total credits for any CoC. The decision tree takes into account the attributes of a particular
247 molecule that would cause it to be removed or indeed generated at a treatment barrier. These
248 attributes include mass, volume, water-oil partition characteristics, bond structure, bond type and
249 charge. This is combined with the guideline limits for potable water to assess the effectiveness of
250 the AWTP barriers.

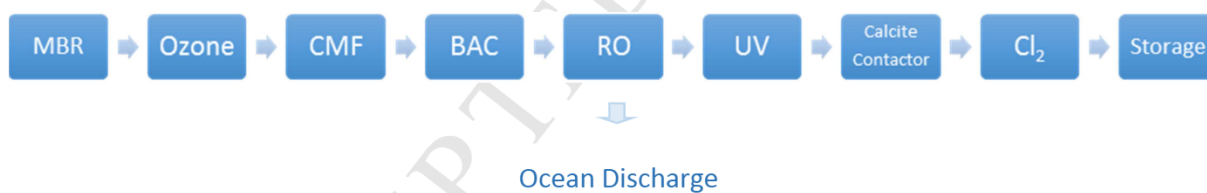
251 The study aims to provide a case study for the use of the CCP approach for the removal of
252 chemicals of concern from water for potable reuse. The case study chosen, that of a small plant
253 associated with a small community, represents the worse-case scenario in risk management terms

254 for the removal of chemicals, although the barriers analysed are generic to a wide range of recycle
255 plants and the analysis of each of these barriers is independent of the scale of the plant. It is
256 acknowledged that the barrier types and conditions are not comprehensive, but the barrier
257 operational conditions chosen are considered applicable to a wide range of scenarios.

258 **2 Experimental Section**

259 **2.1 AWTP operation**

260 The AWTP was located at Selfs Point Wastewater Treatment Plant (SPWWTP), Hobart, Australia.
261 The AWTP had seven process units including ozonation, CMF, BAC, RO, UV disinfection, calcite
262 filtration and chlorination (Cl_2). In its final application state, the AWTP is preceded by an MBR
263 within the secondary treatment plant (AS plant with clarifier as tested here). There were two
264 output streams of the AWTP, namely a RO concentrate and a product stream stored for potential
265 potable use. A schematic of the process flowsheet is shown in Figure 1.



266

267 Figure 1: Schematic of the AWTP flowsheet

268 **2.1.1 Ozone**

269 A packaged ozone system (Wedeco OCS-GSO) and its operation are described elsewhere (Zhang *et*
270 *al.* 2016a). The plant commenced operation with target, alert and critical limits for ozone residual

271 or ozone dose as shown in Table 2. These were taken as critical control point (CCP) limits for the
272 ozone barrier. The target ozone levels were chosen based on pathogen reduction requirements.
273 The CoC reduction criteria and chemical classification, including the propensity of a particular
274 chemical type to be destroyed by ozone (specified as a LRV), were chosen based on the description
275 of Dickenson et al (Dickenson *et al.* 2009) and the feedwater characteristics. Of critical interest
276 here was the concentration of total organic carbon (TOC) in the feed to the ozone barrier. Data
277 from the literature in terms of ozone dose and residual to achieve a given LRV of a particular class
278 of chemical, when compared to that required to achieve the pathogen credits of the barrier (see
279 Table 1) were such that the pathogen based CCP criteria were considered adequate in this instance.
280 Other surrogate and higher order criteria may be required if either a higher chemical or pathogen
281 removal credit is deemed desirable.

282

283 Table 2: CCP values for the ozone barrier, with either ozone residual or an ozone dose as the target
 284 criteria

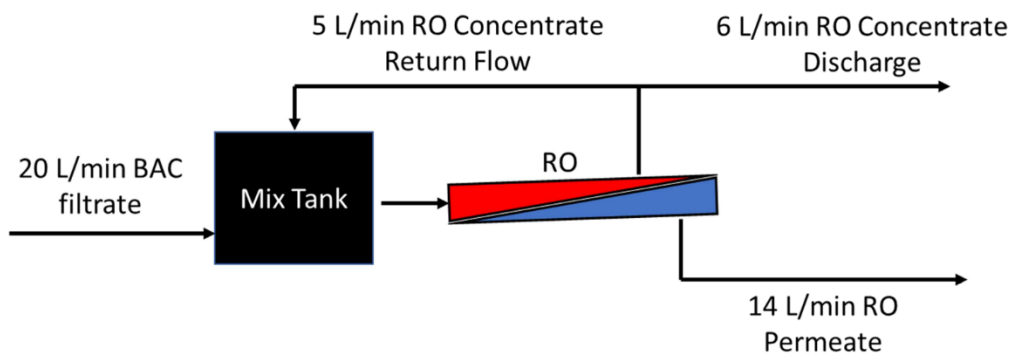
Key Control Measures	Ozone residual (mg/L)	Ozone dose (mg/L)
Target Criteria	0.25	14
Alert Limit	<0.1	<12
Critical Limit	<0.05	<11.7

285

286

287 **2.1.2 Reverse Osmosis (RO)**

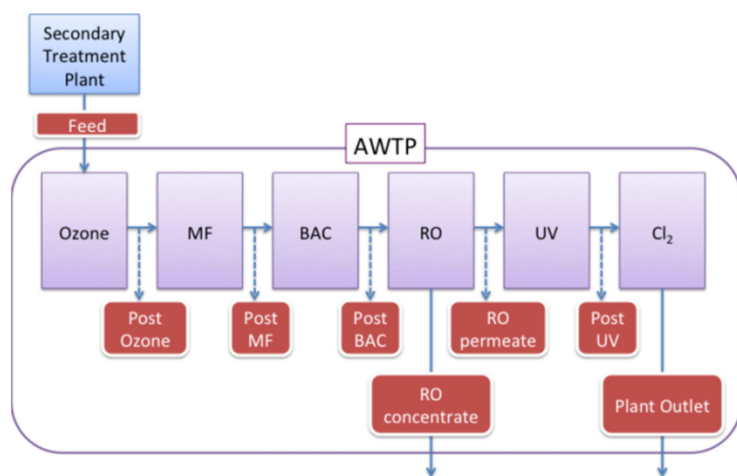
288 The RO system consisted of five 10.2 cm (4") BW30 (Dow Filmtec) membranes in series and is
 289 described elsewhere (Zhang *et al.* 2016a). A simple process flow diagram for the RO barrier is
 290 shown in Figure 2.



291

292 Figure 2: Process flow diagram for RO

294 Unfiltered water samples were collected from 8 locations in the AWTP. These locations were the
295 feed (post AS), post ozone, post CMF, post BAC, RO concentrate, RO permeate, post UV and plant
296 outlet (Figure 3). All outlets were flamed and then flushed before sampling. Additionally, a sample
297 of feed water to the Selfs Point wastewater treatment plant was also taken.



298
299 Figure 3: Summary of sampling locations in the AWTP

300 The samples were sent stored on ice to a laboratory in the School of Chemistry at the University of
301 Melbourne. The analytical analysis of all samples and the subsequent data analysis is described in
302 detail in Allinson et al. (Allinson *et al.* 2018).

303
304 The Limit of Reporting (LOR) were determined according to Method 1030C in Standard Methods for
305 the Analysis of Water and Wastewater (Eaton *et al.* 2005). Where statistical comparisons required
306 all data to have a numerical value, then concentrations less than the LOR values were set at 0.5
307 times the LOR value.

309 **3.1 Critical Control Point identification and LRV credits**310 **3.1.1 Feed assessment and the role of secondary (activated sludge) treatment**

311 The final installation of the AWTP is inclusive of a membrane bioreactor, which is expected to show
312 better performance for the removal of micropollutants compared to a more conventional activated
313 sludge treatment process inclusive of clarification (Clara *et al.* 2005a, Reif *et al.* 2008, Radjenović *et*
314 *al.* 2009), since the membrane acts as a more complete physical barrier to the passage of
315 particulate/suspended solids. The membrane also acts as a barrier to dissolved organic species
316 through adsorption and entrapment in the fouling layer (Steinle-Darling *et al.* 2007, Fujioka *et al.*
317 2013, Fujioka *et al.* 2017). The extended solids residence time (SRT) of an MBR enhances the
318 growth of slow growing microorganisms and prolongs biodegradation of micropollutants (Clara *et*
319 *al.* 2005a, Clara *et al.* 2005b). None the less, a standard activated sludge (AS) process was used
320 during this testing and as with all such processes, including those with an MBR, adsorption of
321 micropollutants onto sludge and/or biodegradation (Clara *et al.* 2005a, Wijekoon *et al.* 2013b) are
322 expected to be the most important micro-pollutant removal mechanisms. Molecules that do not
323 adsorb on to sludge (hydrophilic or less hydrophobic) or that are not readily biodegradable within
324 the hydraulic residence time of the activated sludge process will have a propensity to pass through
325 the barrier.

326 There are few systematic studies of the mechanistic removal of organic pollutants by activated
327 sludge treatment. Tadkaew *et al.* (Tadkaew *et al.* 2011) used a range of challenge additions of
328 organic COCs including endocrine disrupting chemicals (EDCs), pesticides, and pharmaceutically

329 active chemicals (PhACs) to a synthetic wastewater to test a 40nm pore sized MBR. Three molecular
330 features were identified as directly connected to the removal efficiency (Isma *et al.* 2014) and a
331 classification is designated as:

332 **AS Class 1:** Hydrophobicity: all molecules with a hydrophobicity greater than $\log D@pH\ 8$ of
333 3.2 showed >85% removal ($LRV>0.8$) where D is the partition coefficient between a
334 hydrophilic and a lyophilic phase, relative to octanol=8.0

335 **AS Class 2:** Non-Class 1 chemicals with electron withdrawing groups: molecules with electron
336 withdrawing groups such as chlorine, fluorine, bromine or amide are observed to
337 be recalcitrant to removal with <20% removal.

338 **AS Class 3:** Non-Class 1 molecules with electron donating groups: these chemicals are more
339 easily attacked and showed good removal in many cases. This includes a very wide
340 variety of functional groups, exclusive of those in AS Class 2.

341 Kovalova *et al.* (Kovalova *et al.* 2012), in their study on micropollutant removal from hospital
342 wastewater provided consistent results to Tadkaew *et al.* (Tadkaew *et al.* 2011). Based on a range
343 of literature reviewed in Kovalova (Kovalova *et al.* 2012) and the Tadkaew (Tadkaew *et al.* 2011)
344 studies, it was concluded that the only claim that could be made for the removal of CoC that was
345 consistent across all literature for a standard secondary activated sludge process or for an MBR
346 system was for the class of chemicals determined to be hydrophobic ($\log D @ pH\ 8>3.2$) (**AS Class**
347 **1**). This chemical grouping was expected to be consistently removed to better than 85% ($LRV>0.8$)
348 (Tadkaew *et al.* 2011, Kovalova *et al.* 2012) and the main removal mechanism for this chemical
349 grouping was adsorption to the biomass that in turn assisted prolonged biodegradation or

350 transformation (Clara *et al.* 2005a, Radjenović *et al.* 2009, Wijekoon *et al.* 2013b). A key difficulty
351 with a AS with clarifier or an MBR system is to define an operational surrogate that can be used to
352 set alert and critical control points in a CCP system. It is usual to set multiple criteria in this
353 instance. Examples include turbidity of the clarified overflow (since AS Class 1 molecules are
354 adsorbed to the biomass) and a combined measure of the reduction of either DOC or nitrogen. The
355 latter is a performance surrogate in terms of hydraulic residence time and biological activity.

356 Although no MBR was operational during testing, the CoC removal mechanism was tested assuming
357 that the clarification system was a worst-case scenario mimic of an MBR whereby feedwater
358 turbidity was taken as a CCP. In cases where the turbidity exceeded 5 NTU, the plant was not
359 operated. Samples of the feed to the Selfs Point plant (primary wastewater) were filtered through
360 standard Whatman filter papers and analysis completed using the AIQS-DB methodology. Many of
361 the semi volatile chemicals in the feed sample to the plant saturated the GC-MS detector and non-
362 volatile compound levels were so high that they saturated the LC-MS column completely, which
363 negated further work. As a result, 34 chemicals that were within the measurement range in the
364 primary influent were chosen for further analysis. Dilution of the feed to the GC-MS and LC-MS was
365 not performed to rectify the saturation issue as the initial detection analysis is quite time
366 consuming for the AIQS-DB method and the saturation was not confirmed until more than a month
367 after the initial run. Among the 34 chemicals, the K_{ow} (LogD) data for 21 chemicals is available from
368 the on-line “ChemSpider” database (Royal Society of Chemistry 2019). For a further 11 straight
369 chain alkane chemicals, the K_{ow} was assumed (based on chemical structure) to be greater than 10.
370 Only 3 chemicals had a K_{ow} less than 3.2. The removal efficiency across the secondary waste water
371 treatment plant was then assessed through sampling of the secondary waste water clarifier (feed to

372 the AWTP). Samples were taken under high and low flow conditions although the hydraulic
373 residence time was not significantly different across any 24-hour period. The data and associated
374 analysis are shown in the supplementary information (Table S1) for one primary feed sampling
375 event. It should be noted that the clarifier overflow of the secondary treatment plant (feed to the
376 AWTP) was sampled weekly for a period of nine months as well as specifically for high and low flow
377 periods of operation (as detailed in Table S1).

378 Although only 3 of the 34 chemicals considered here had a Log D value below 3.2, a minimum LRV
379 of 1.25 was measured for all chemicals across the secondary (AS) treatment process that was the
380 feed to the AWTP. Therefore, the operational data indicate this minimum LRV was not restricted to
381 chemicals with a Log D >3.2, as chemicals with a Log D < 3.2 were also removed to similar extent
382 (Tadkaew *et al.* 2011). However, the removal mechanism for the Log D < 3.2 chemicals is not
383 singular or well defined. Other characteristics such as the presence of electron donating or
384 withdrawing groups and their strengths (Tadkaew *et al.* 2011, Wijekoon *et al.* 2013b), and the
385 extent to which the molecule is assimilable makes assessment difficult. Molecules of LogD <3.2 with
386 strong electron donating groups tend to biodegrade easily while molecules with strong electron
387 withdrawing groups would be expected to be retained in the clarifier overflow. The data here is
388 limited, since the number of molecules in the feed analysis was limited. Indeed, over seventy
389 chemicals were detected regularly in the feed to the AWTP and many of these were beyond the
390 saturation limit of the detector in the sampling associated with the feed to the Selfs Point plant.
391 Taking both the consistency of the analysis data in this study and the literature data into account, it
392 would seem that a claim of an LRV of 0.8 for organic chemicals with a Log D >3.2 is justified, since
393 the main mechanism of removal is associated with particle attachment and this is enhanced for an

394 MBR. The operational CCP for the MBR in Antarctica is <0.1 NTU with a critical limit of 0.2 NTU to
395 achieve pathogen removal requirements. The CoC removal criteria should be easily achieved at this
396 operational state.

397

398

399 Other chemicals of interest include nitrogen and radiolytic compounds. Since total nitrogen (TN) is a
400 feed water quality control parameter of the AWTP, it was monitored on-line in the feedwater.
401 Removal to an LRV of greater than 1 was observed across the 9 months of operation. Radiolytic
402 compounds such as particulate radioactive tracers were not measured and although good removal
403 would be expected, no data is available from this study.

404 A conservative LRV of 0.8 for AS Class 1 chemicals and 1.0 for TN for a AS system is supported based
405 on the data from the Selfs Point Waste Water Treatment Plant and previous literature. This will be
406 considered further later and although not validated, is an important consideration in the treatment
407 of chemical spills to small community wastewater treatment plants where the water is being re-
408 used.

409 **3.1.2 Ozone**

410 Using the experimental results and protocols developed by WaterVal for pathogen control
411 (WaterSecure 2017a), protocols for chemical control for ozonation were formulated and validated.
412 The WaterVal procedure provides a recommended approach to validation that is based on the
413 following nine elements (originally written for pathogens but reformulated here),

414 1. Identification of the mechanisms of chemical removal by the treatment process unit,

- 415 2. Identification of target chemicals and or surrogates that are the subject of the validation
416 study,
- 417 3. Identification of factors that affect the efficacy of the treatment process unit in reducing the
418 target chemical,
- 419 4. Identification of operational monitoring parameters that can be measured continually and
420 are related to the reduction of the target chemical,
- 421 5. Identification of the validation method to demonstrate the capability of the treatment
422 process unit,
- 423 6. Description of a method to collect and analyse data to formulate evidence-based
424 conclusions,
- 425 7. Description of a method to determine the critical limits, as well as an operational monitoring
426 and control strategy,
- 427 8. Description of a method to determine the LRV for each chemical group in each specific
428 treatment process unit performing within defined critical limits,
- 429 9. Provision of a means for revalidation or additional onsite validation where proposed
430 modifications are inconsistent with the previous validation test conditions
- 431 Data for the removal of organic CoC across the AWTP barriers, as measured by GC-MS and LC-MS
432 (Kadokami *et al.* 2005) according to the AIQS-DB methodology as a composite of monthly data (for
433 9 months) is reported in detail in an earlier publication (Allinson *et al.* 2018) as well as removal of

434 DOC and TN across barriers for an average of 30 weekly sampling events (Zhang *et al.* 2016b, Zhang
435 *et al.* 2017).

436

437 From the operational data of the AWTP (Allinson *et al.* 2018), an overall 60% reduction in CoC was
438 achieved across the ozone barrier. However, for chemicals inclusive of TN and total DOC in solution,
439 ozone showed little or no effect (Zhang *et al.* 2017). This is expected since mechanistically it is
440 difficult to envisage mineralisation of organic chemicals, but it is expected that there should be
441 significant fragmentation. Assimilable organic carbon is produced during ozonation hence DOC
442 reduction is not expected, however, following ozonation, barriers such as activated carbon,
443 biologically activated carbon, membranes and sand filtration have been used to reduce the
444 concentration of assimilable organic carbon (Hollender *et al.* 2009, Zhang *et al.* 2016a).

445 Ozonation has been identified as an effective process of removing a wide spectrum of CoC both in
446 wastewater treatment and water treatment (Ternes *et al.* 2003, Snyder *et al.* 2006, Broséus *et al.*
447 2009, Margot *et al.* 2013). Effective removal is mainly attributed to the high oxidation potential of
448 OH radicals. Huber *et al.* (Huber *et al.* 2005), reported between 90-99 % removal of eleven
449 commonly found pharmaceutical and personal care products (PPCPs) in a pilot scale wastewater
450 treatment system, at an ozone dose 2-5 mg O₃/L. This dose level is significantly below the critical
451 limit of the ozone barrier of the AWTP but it has been shown that the absolute dose is not a
452 preferred criterion since the dose should reflect the initial ozone demand (IOD) in the feed water
453 (Dickenson *et al.* 2009, Wert *et al.* 2009). A CCP criteria that includes both a dose relative to the
454 IOD and a CT may be indicated.

455 In the presence of an excess of ozone and a sufficient reaction time, chemicals with tertiary amino
456 groups and aniline moieties (e.g., diclofenac and sulfanamides) and chemicals with an activated
457 aromatic ring and double bonds (e.g., carbamazepine and trimethoprim) can be significantly
458 reduced during ozonation at a relatively low ozone dose of as little as 2-3 mg O₃/L (Hollender *et al.*
459 2009). The efficiency of ozonation, especially at low ozone dose, is attributed to the high rate
460 constants for the reaction of those chemicals with ozone, low DOC concentration (<5 mg/L), an
461 absence of competitors such as nitrite (~0.05 mg/L) and a neutral pH, which leads to high ozone
462 stability (Hollender *et al.* 2009). The target ozone dose for the AWTP was 14 mg/L. This was
463 designed to be high relative to the TN and DOC concentration so as to ensure the presence of OH
464 radicals, not just ozone, for the destruction of CoC.

465 Analysis showed that nitrosamines including NDMA, NDEA and 9 other new molecules were
466 produced after ozone oxidation, mainly aliphatic chemicals (6 aliphatic, 3 aromatic). The occurrence
467 of reactive inorganic nitrogenous intermediates such as hydroxylamine and dinitrogen tetroxide
468 (N₂O₄) are mainly attributed to the formation of nitrosamines during ozonation (Lei *et al.* 2009).
469 NDMA is a known disinfection by-product of ozonation (Gerrity *et al.* 2015) and was under
470 continuous concentration detection through each barrier. NDMA can be effectively removed by
471 biodegradation due to the presence of an electron-donating group (i.e. dimethyl amine) (Krauss *et*
472 *al.* 2009, Wijekoon *et al.* 2013a). The data is presented in an earlier publication (Allinson *et al.* 2018)
473 and shows that a small reduction in NDMA was achieved after the biological activated carbon
474 barrier but that the RO membrane system was critical in the reduction to non-detectable levels.

475 As noted, literature data for molecular changes solely across ozone barriers under operational
476 conditions are very limited. The data is usually for combined ozone-BAC scenarios (Hubner *et al.*

2015) although the study of Lee *et al.* looks at removal both before and after BAC and provides detailed information on the ozone dose to DOC ratio in an operational plant (Lee *et al.* 2012). In addition, ozone dose and contact time reported in literature are for their own specific cases and are often not reported and/or are very different from the operational scenario of the AWTP. Ozonation efficiency for the removal of CoC is significantly affected by the instantaneous ozone demand (IOD), wherein a higher ozone dose than the IOD assures occurrence of OH radicals to oxidize recalcitrant chemicals. Whilst an ozone dose below the IOD destroys molecules susceptible to ozone oxidation, it is hard to quantify removal unless there is an excess of OH radicals. At an O₃ dose equal or higher than the IOD, significant OH formation takes place. As indicated earlier, the organic concentration strongly influences the available OH radical concentration. At an ozone:TOC ratio of 0.6 or higher, substantial OH formation can always be assumed (Dickenson *et al.* 2009, Wert *et al.* 2009). For higher ratios, almost all organic molecules, not depending on their structure, are removed efficiently, often below the detection limit. With increasing ozone contact time, the chemical removal increases and typically the reaction completes after a few seconds to minutes (EPA 2011).

In Dickenson *et al.*'s pilot study (Dickenson *et al.* 2009), the ozone dose was varied across a range of 2.1 to 7.0 mg/L to give an ozone/TOC ratio from 0.3 to 1.0 mg/mg with data reported predominately (Snyder *et al.* 2006, Wert *et al.* 2009) for the 0.6 to 1.0 range. The contact time varied from 2 to 18 minutes. Using the extended integrated method based on the ozone residual concentration at outlet and T₁₀ in the reactor, the calculated ozone CT₁₀ value was between 4 and 11 mg.min/L (Rakness *et al.* 2005). The T₁₀ in the reactor was measured using tracer studies. No CT₁₀ value is given for the study by Lee *et al.* but contact times between 5 and 15 minutes and ozone/TOC ratios of 0.4 to 2 are reported (Lee *et al.* 2012). In the AWTP, the ozone dose was such

499 that the ozone/TOC ratio was always >1.0 and the CT_{10} was >14 mg.min/L at a minimum contact
500 time > 5 minutes for all operational times where an ozone residual was detected. There was a
501 period of operation where this was not the case although no change in performance against
502 pathogen or chemical LRV's was noted in this period. In the pilot study of Dickenson *et al.*
503 (Dickenson *et al.* 2009), they investigated the response to ozone of different molecular types. By
504 assuming the instantaneous ozone demand (IOD) had been exceeded, they categorized the
505 ozonation potential of chemicals into four key molecular groups. The groupings are outlined in
506 Table 6.

507

Class	RE (%)	Molecular Characteristics	Other indicators
Ozone 1	>90	Electron rich aromatic systems with hydroxyl, amino, acylamino, alkoxy or alkyl groups Deprotonated amines Nonaromatic alkenes	Ozone second order reaction rate $>10^3 \text{ M}^{-1} \text{ s}^{-1}$
Ozone 2	>50 <90	aliphatic alkane, ketone, alcohol, acid, ether, and amide or and nitro aromatic chemicals	
Ozone 3	>25 <50	Nitrosamines	Formation and removal are competitive.
Ozone 4	<25	Halogen containing aliphatic and aromatic chemicals	Strong electron withdrawing groups (EWG's)

509

510 An analysis was completed on the nine data sets accumulated over the monthly sampling events in
 511 the AWTP using GC-MS and LC-MS analysis as well as a separate nitrosamine study. The feed and
 512 post ozone data were compared and categorized using the Dickenson *et al.* classification. The

513 detailed results are provided in Table S2 of the supplementary information. A summary of the data
514 is shown in Table 4.

515

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Class	RE (%)	Removal observations	Exceptions
Ozone 1	>90	N=24 chemicals >90 % N=20 50-90% N=1 increased N=3	50-90% - 4-Methyl-2,6-di-t-butylphenol(BHT) Increased - Fenubucarb, Dimethyl phthalate, Benzyl alcohol
Ozone 2	50-90	N=19 chemicals >90% N=7 50-90% N=2 25-50% N=3 <25% N=2 increased N=5	25-50% - Cholestanol, 24-Ethyl coprostanol, Stigmastanol <25% - Methyl myristate, beta-Sitosterol Increased Tris(1,3-dichloro-2-propyl) phosphate, Octanol, 9Z)-9-Tetradecenoic acid, methyl ester, Coprostanone,
Ozone 3	25-50	N=2 chemicals Increased N=2	Increased - NDMA, NDEA
Ozone 4	<25	N=10 chemicals >90% N=8 25-50% N=1 increased N=1	Increased - Tris(2-chloroethyl) phosphate

518 Chemicals in the Class 1 categorisation (Table 4), nominally electron rich aromatic molecules and
519 non-aromatic alkenes, were removed very effectively by ozone, often to the point of non-detection
520 and all were well below guideline values associated with the Australian Drinking Water Guidelines
521 (ADWG) and the Australian Guidelines for Water Recycle (AGWR) (tabulated information is shown
522 in the supplementary information). The three chemicals that increased in concentration were still
523 well below guideline values and can be classed as either an ozone by-product in the case of
524 dimethyl phthalate and as possible anomalies in the other two cases since these were not observed
525 in the feed and detected only once in the effluent in nine samplings. The concentrations in each
526 case were close to the LOR. Therefore, 21 out of 24 chemicals in Class 1 were reduced in
527 concentration and all to substantially below guideline values. The latter is not a criterion for
528 operation of a CCP, just a necessary outcome if no other barriers exist for chemical removal. The
529 average removal efficiency of the 21 chemicals was >98.6% with a range of 86.6-100%. This was
530 consistent with literature expectations for the role of ozone at doses greater than the IOD and with
531 a high CT_{10} as measured by the extended integration method (Kadokami *et al.* 2005). Therefore, the
532 data is consistent with the claim that the ozone barrier, operated under CCP criteria to remove
533 pathogens, could be operated under the same criteria to remove chemicals where the classification
534 is systematic with the Class 1 designation of Dickenson *et al.* Under these conditions, an LRV for
535 electron rich aromatic chemicals of 0.9 is indicated for this barrier. The performance of the barrier
536 for the other classes of compound was also consistent with literature and the mechanistic
537 removal/formation classification, but the LRV is too low and inconsistent to make a claim for LRV
538 credits under CCP operational conditions.

540 3.1.3 Reverse Osmosis (RO)

541 Using experimental results and protocols developed by WaterVal (WaterSecure 2017b) for
542 pathogen control, protocols for chemical control for reverse osmosis were formulated and
543 validated. The nine elements of the WaterVal validation protocol were listed earlier.

544 The operational data from the AWTP shows a good rejection of both organic (Allinson *et al.* 2018)
545 and inorganic species including DOC, TN and NDMA (Zhang *et al.* 2016a) across the RO barrier. The
546 general mechanisms of RO rejection of chemicals are size exclusion and steric hindrance for all
547 kinds of molecules and electrostatic interaction and rejection for ionic species (Bellona *et al.* 2004a,
548 Kimura *et al.* 2004, Alturki A.A. *et al.* 2010). To a lesser extent, adsorption to the membrane and
549 hydrophobic-hydrophobic interactions take place and influence the rejection rate (Kiso *et al.* 2001,
550 Bellona *et al.* 2004a, Nghiem *et al.* 2004). For uncharged molecules, size exclusion is the most
551 important rejection mechanism. Electrostatic interactions lead to high rejection, even for very small
552 ions (Kimura *et al.* 2004).

553 Despite the myriad of possible mechanisms, the principal mechanism to remove chemicals with a
554 molecular weight greater than the molecular weight cut off (MWCO) of the membrane is size
555 exclusion. The MWCO of RO membranes is typically in the range of 100–300 Dalton (Da) for organic
556 molecules with a rejection of 96.5 % (LRV 1.5) and up to 99 % (LRV 2.0) or greater for inorganic ionic
557 solutes (Ahrens *et al.* 2010). However, the MWCO provides an estimate of the sieving effect only
558 and does not take into account the hydrophobicity, charge and geometry of the molecule,

559 temperature and flux effects, all of which can also affect rejection (Kiso *et al.* 2001, Bellona *et al.*
560 2004b).

561 Several studies indicate that the molecular weight and consequentially derived molecular weight
562 cut-offs are not particularly reliable predictors for chemical rejection (Drewes *et al.* 2003, Agenson
563 and Urase 2007, Alturki *et al.* 2010, Doederer *et al.* 2014). Only at a certain molecular weight
564 significantly higher than the MWCO do molecules seem to be always rejected by the membrane
565 due to size exclusion. A better predictor of exclusion is the molecular diameter or width, which was
566 successfully used by Alturki *et al.* (Alturki A.A. *et al.* 2010) and Doederer *et al.* (Doederer *et al.* 2014)
567 to predict rejection. However, this information is not directly available in common databases and
568 has to be calculated. A good surrogate appears to be the molar volume which can be obtained in
569 databases for every chemical (i.e. <http://www.chemspider.com/>).

570 Charged molecules possess a hydration shell, which makes the combination of actual ion and
571 hydration shell too bulky to pass the membrane. Therefore, all charged molecules are rejected
572 efficiently, albeit there are indications that positively and negatively charged chemicals can behave
573 differently, possibly due to adsorption. Alturki *et al.* (Alturki A.A. *et al.* 2010) demonstrated that
574 rejection of hydrophobic molecules by RO is not as effective as ionic and hydrophilic species, but a
575 combination of 40 TrOCs ranging in partition coefficient (1.21 to 6.19@pH 8) and size (151 to 454
576 MW) were removed to below detection limits from an initial dose of 2 g/L. This represents a LRV>2
577 for a Limit of Reporting (LOR) of 0.005 g/L.

578 Conductivity across the process was used for on-line verification in the AWTP and was a CCP
579 monitoring parameter for pathogen reduction. Typical operational LRV data for ionic species
580 (predominately inorganic salts) is reported elsewhere (Zhang *et al.* 2016a).

581 The data for operation of the AWTP indicated that the DOC in the feed to the RO was reduced from
582 an average value across all samplings of 6.27 mg/L to a value of <0.26 mg/L, a reduction of 95.8% or
583 LRV of 1.38. For TN, the average feed concentration was 6.89 mg/L. This was reduced to an average
584 of 0.28 mg/L (n= 30 weeks of readings), a reduction of 95.9% or LRV of 1.39.

585 The classification of CoC varies across the world, but commonly, the classification is based on end
586 use and the human response of the molecules. One example is the classification used in the the
587 AGWR (NRMMC 2008) where molecules are classified as: inorganic chemicals; disinfection by-
588 products; pesticides; fragrances; pharmaceuticals and metabolites; fire retardants; dioxins and
589 dioxin like chemicals; miscellaneous organic chemicals – PCB's, PAH's, phthalates, organotins, etc.;
590 radiological; and chelating agents .

591 Based on the operational data from the AWTP over nine-months of operation along with literature
592 analysis (NRMMC 2006, Snyder *et al.* 2006), the classification of molecules used in the AGWR is not
593 considered useful in determining whether a molecule would be removed by a particular barrier, as
594 there was often a range of molecular attributes within a particular class. A new classification based
595 on the mechanistic propensity of a particular compound to be removed by the RO barrier is
596 suggested. Similar to the designation of hydrophobicity as a key determinant of removal for the
597 activated sludge barrier and the presence of an electron rich moiety for removal by ozone, a set of
598 criteria were considered for RO. This classification was for polyamide (PA) based RO membranes
599 with a NaCl rejection of greater than 96.5 % (as was used here).

600 RO Class 1: Organic ionic species. Mechanism of removal: (a) electrostatic interactions between
601 charged solute and the negatively charged membrane surface (Bellona *et al.* 2004a, Alturki A.A. *et*
602 *al.* 2010) and (b) electrostatic repulsion of negatively charged hydrophilic solutes (Kimura *et al.*

603 2004, Alturki A.A. *et al.* 2010). The pH must be at least one above or below the pK_a or pK_b of the
604 molecule respectively.

605 RO Class 2: Organic neutral molecules, molar volume $> 120 \text{ cm}^3$, Mechanism of removal: size
606 exclusion and steric hindrance (Bellona *et al.* 2004a, Kimura *et al.* 2004, Alturki A.A. *et al.* 2010)

607 RO Class 3: Organic neutral molecules, molar volume $< 120 \text{ cm}^3$, electron withdrawing groups,
608 Mechanism of removal: not reliable due to small size (Bellona *et al.* 2004a, Kimura *et al.* 2004,
609 Alturki A.A. *et al.* 2010)

610 RO Class 4: Organic neutral molecules, molar volume $< 120 \text{ cm}^3$, only electron donating groups or
611 electron donating and electron withdrawing groups. Mechanism of removal: not reliable due to
612 small size (Bellona *et al.* 2004a, Kimura *et al.* 2004, Alturki A.A. *et al.* 2010)

613 RO Class 5: Inorganic ionic species, Mechanism of removal: (a) electrostatic interactions between
614 charged solute and negatively charged membrane surface (Bellona *et al.* 2004a, Alturki A.A. *et al.*
615 2010) and (b) electrostatic repulsion of negatively charged hydrophilic solutes (Bellona *et al.* 2004a,
616 Kimura *et al.* 2004)

617 RO Class 6: Inorganic non-ionic species. Mechanism of removal: poorly removed due to extremely
618 small size and hydrophilicity (Kezia *et al.* 2013)

619 RO Class 7: Particulate radioactive tracers. Mechanism of removal: size exclusion, similar to the
620 removal of viruses and particulates

621 Literature data is now presented alongside data from the AWTP. As noted earlier, in excess of
622 seventy organic molecules were found regularly in the feed to the AWTP across the 9 month test

623 period. Many of these were removed in the first three barriers to below the LOR. The cumulative
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624 DOC removal was consistently in the range 55-60% across the ozone, CMF and BAC barriers.

625 Figure 4 shows data from previous literature (Comerton *et al.* 2008, Alturki *et al.* 2010, Appleman *et*
626 *al.* 2014, Fujioka *et al.* 2015, Zhang *et al.* 2017) for RO Class 1 chemicals (organic ionic). The
627 literature data was for similar RO membranes in terms of surface layer and MWCO (polyamide,
628 rejection >96.5%). A minimum LRV = 1 is observed for all chemicals of this group, with most
629 rejected to a considerably higher level. There is no data from the AWTP here as although there
630 were RO Class 1 chemicals in the feed (Allinson *et al.* 2018), , they were not detected in the
631 permeate of the RO membrane and their concentration in the feed was not greater than 5x the
632 LOR. Under these circumstances, any LRV calculation would be an underestimate of the actual LRV
633 and may imply a poor rejection. This would be inaccurate.

634

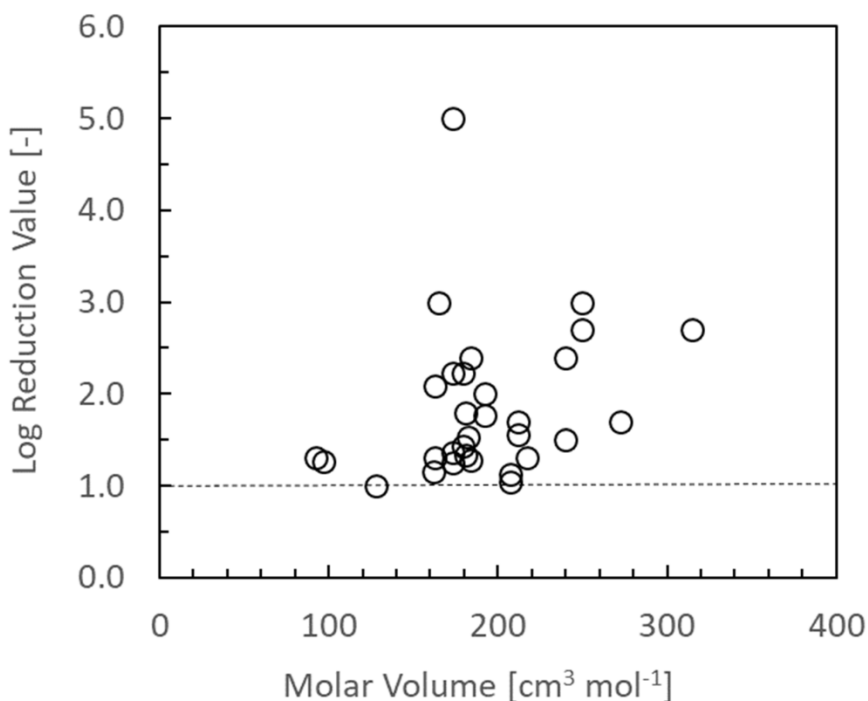
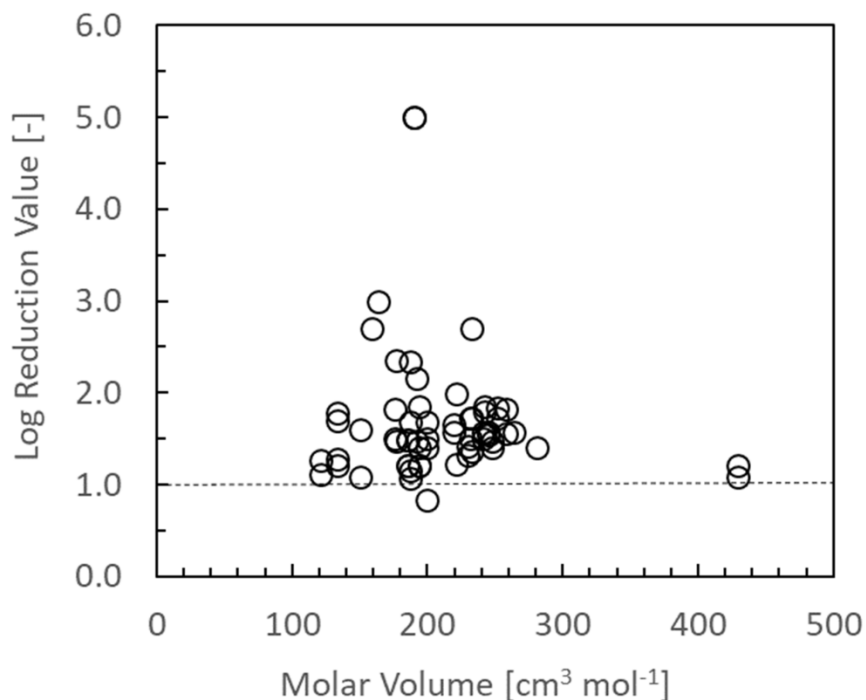


Figure 4: Performance of rejection of Class 1 molecules for an RO barrier of the type used in the AWTP and operated such that NaCl rejection was >96.5% (LRV 1.5).

635 Data for RO Class 2 molecules is shown in Figure 5. They have a molar volume above the limit of
636 $120 \text{ cm}^3 \text{ mol}^{-1}$ and although one might expect rejection rate to improve with molar volume, the
637 literature (Comerton *et al.* 2008, Alturki *et al.* 2010, Appleman *et al.* 2014, Doederer *et al.* 2014,
638 Altalyan *et al.* 2016) is not supportive of this expectation. However, a large number of the
639 molecules in the literature were rejected to the extent that they could not be detected in the RO
640 permeate. A lack of knowledge of the LOR in these systems meant that an LRV could not be
641 determined in many cases. For the AWTP data, a rejection of between 90-99 % is observed,
642 regardless of molar volume, however the criteria for inclusion in the data set was, as for the Class 1
643 molecules, not met. This is an issue with results where the input concentration is not controlled
644 and reflects a dilemma of all field scale work where spiking of chemicals is not an option for a wide
645 range of pollutants. It is noted that wherever the criteria for LRV determination was met, an LRV of
646 > 1 was observed for all chemicals in this class except for one data point (LRV=0.84) for bisphenol A
647 from the laboratory scale work of Alturki *et al.* (Alturki *et al.* 2010).



648

649 Figure 5: Performance of rejection of Class 2 molecules for an RO barrier of the type used in the
 650 AWTP and operated such that NaCl rejection was >96.5% (LRV 1.5).

651

652 Data for RO Class 3 molecules are shown in Figure 6. The data (Doederer *et al.* 2014, Altalyan *et al.*
 653 2016, Allinson *et al.* 2018) confirms, including that from the AWTP, that most chemicals in this class
 654 are rejected to some extent but once the molar volume decreases significantly below $120 \text{ cm}^3 \text{ mol}^{-1}$
 655 ¹, for molecules that do not have a negatively polarised centre (caused by the presence of an
 656 electron withdrawing group), neither a reliable minimum removal nor a mechanism for rejection
 657 can be claimed. There is also evidence that rejection of some molecules in this class is increased by
 658 fouling and others where fouling is detrimental to removal. Operating the barrier according to the
 659 protocols defined earlier ensured that cleaning was always performed once the trans membrane

660 pressure reached a fixed value. As such, the data reported here is for unfouled or weakly fouled
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661 membranes.

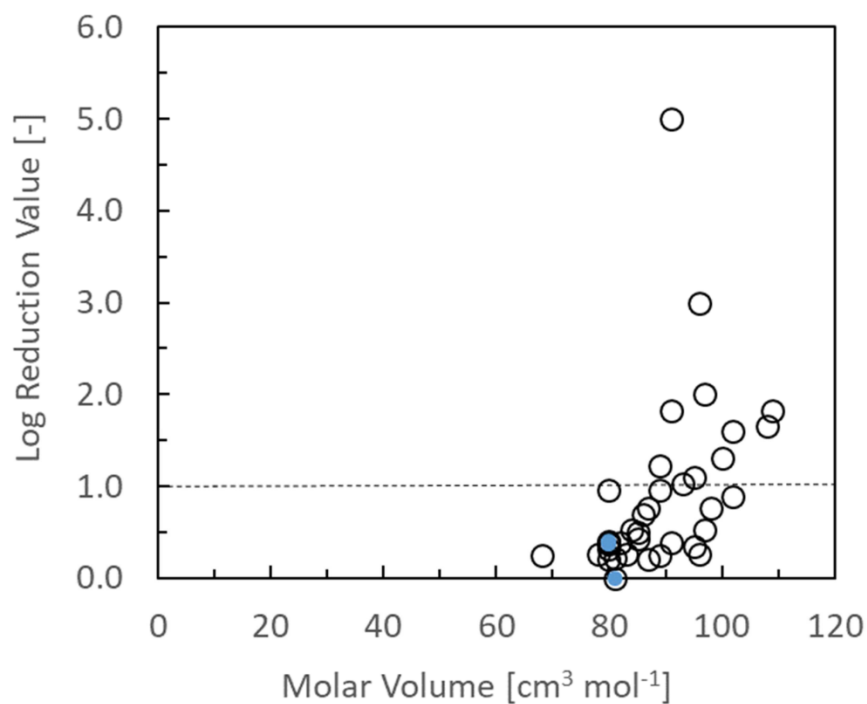
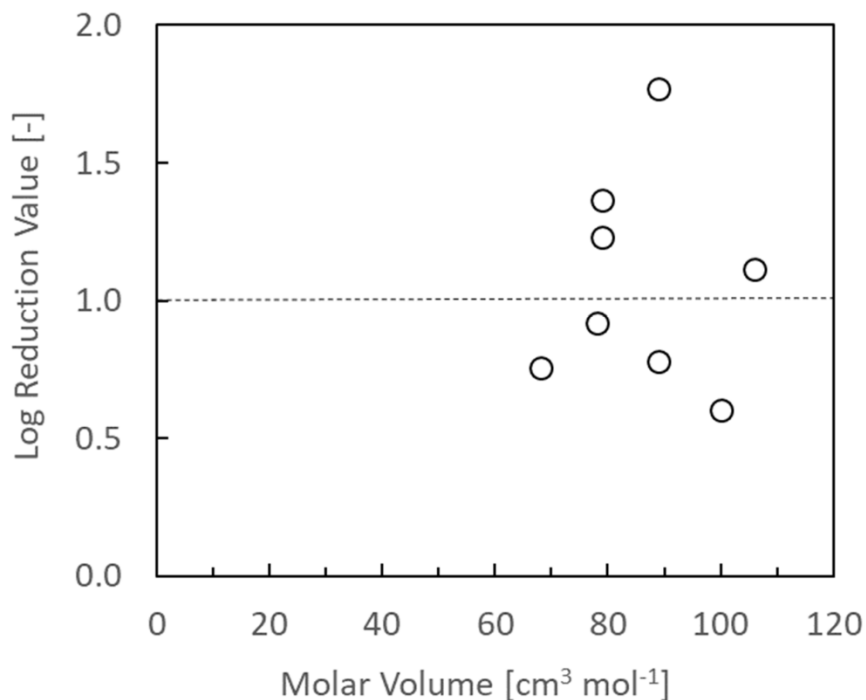


Figure 6: Performance of rejection of RO Class 3 molecules for an RO barrier of the type used in the AWTP and operated such that NaCl rejection was >96.5% (LRV 1.5). Filled data points are from the AWTP.

662 Data for RO Class 4 molecules is shown in Figure 7. The list of molecules in this class, for which data
663 is available, is not extensive and includes halo-methanes and halo-ethanes amongst others. The
664 rejection of molecules of this type would need to be specifically validated and preferably by the
665 supplier of the RO unit (i.e. pre-commissioning) since many are harmful to health. An LRV of 0.5 is
666 deemed possible with appropriate validation. The results of all validated data found in the

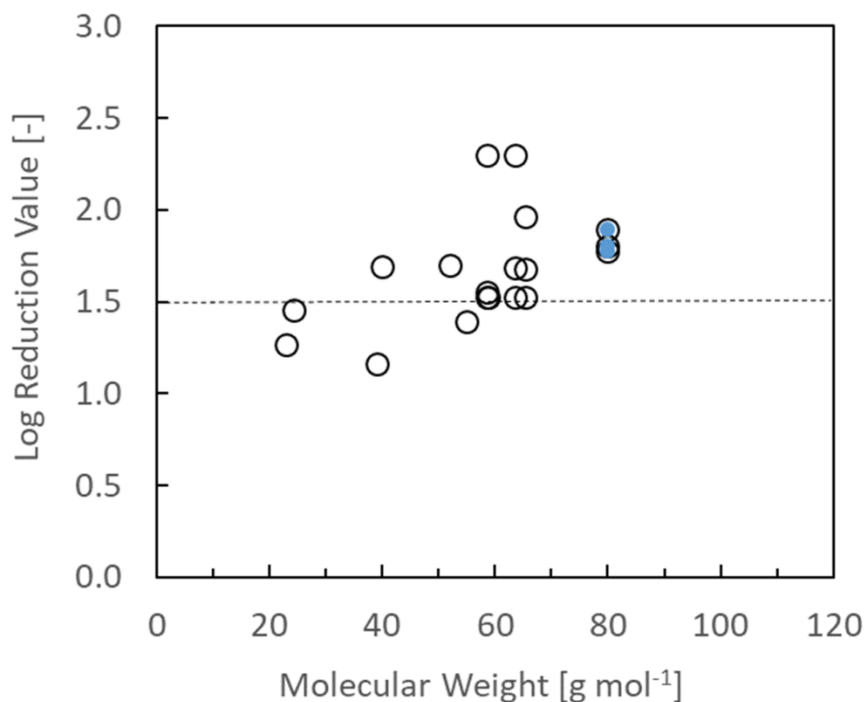
667 literature (Altalyan *et al.* 2016) are from one source. There was no data from the AWTP in this
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668 class.



669
670 Figure 7: Performance of rejection of RO Class 4 molecules for an RO barrier of the type used in the
671 AWTP and operated such that NaCl rejection was >96.5% (LRV 1.5).

672 The performance for RO Class 5 molecules is shown in Figure 8. The data indicates that all inorganic
673 ions are rejected to an LRV>1 and most to an LRV>1.5. Only the smallest positively charged species
674 are removed to less than an LRV of 1.5, although the study that reported the data (Malamis *et al.*
675 2012) for sodium, potassium, magnesium and manganese is at odds with the standard validation of
676 most RO membranes using seawater and NaCl rejection as the criteria for operation. In general, an
677 LRV of > 1.5 is achieved. The results of all data found in the literature (Ozaki *et al.* 2002, Ipek 2005,
678 Mohsen-Nia *et al.* 2007, Malamis *et al.* 2012, Zhang *et al.* 2015) are shown in Figure 8. Since a CCP
679 using conductance as the surrogate of performance across the RO barrier of the AWTP (Zhang *et al.*

680 2016a) showed greater than LRV 1.5 performance for the entire operation, the AWTP data is
681 consistent with a proposed credit for RO Class 5 molecules and ions of LRV 1.5. The data from the
682 AWTP was for bromate, bromide and iodide.



683
684 Figure 8: Performance of rejection of RO Class 5 molecules for an RO barrier of the type used in the
685 AWTP and operated such that NaCl rejection was >96.5% (LRV 1.5).
686 RO Class 6 is a for water soluble uncharged inorganic ions. Boron is the obvious member of this
687 class. Because of its extremely small size and strong hydrophilicity it can neither be rejected due to
688 size exclusion nor due to adsorption. It is poorly rejected (Kezia *et al.* 2013) and no LRV claim would
689 seem appropriate. RO Class 7 is for particulate radioactive tracers. Qualitative data shows good
690 rejection since the systems of interest are the same or greater in size to viruses and as such, a
691 similar rejection is assumed. Validation with a particulate surrogate would be required, albeit with a
692 sub-micron sized particle. Other radionuclides fall into the other classes depending on their
693 molecular or atomic structure.

694 As the result of mechanistic studies and literature research, along with the data from the AWTP, a
695 range LRVs (shown in Table 5) would be deemed achievable under CCP operational conditions for a
696 polyamide RO membrane operating with a NaCl rejection >96.5% (LRV 1.5). Given that the highest
697 claim is for inorganic ionic species (RO Class 5) and this class is of itself validated continuously with
698 on-line conductivity measurement, it is expected that these figures are robust to non-membrane
699 failures (o-ring or glue line leaks) since such leaks should be detected with sufficient sensitivity to
700 identify when the CCP was close to alert or alarm levels.

701 Table 5: Proposed achievable LRV for RO Class 1-7 molecules, ions, atoms and particulate
702 radioactive tracers based on literature data and new data presented herein.

RO Class	LRV
1: Organic ionic species	1.0
2: Organic neutral species, MV > 120 cm ³ /mol	1.0
3: Organic neutral species, MV < 120cm ³ /mol, EWG	0.0
4: Organic neutral species, MV < 120 cm ³ /mol, EDG/other	0.5
5: Inorganic ionic species	1.5
6: Inorganic non-ionic species	0.0
7: Particulate radioactive tracers	1.5

703

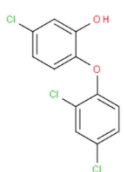
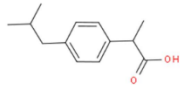
704

706 Triclosan and ibuprofen, two common molecules that fall into the category of Pharmaceutical and
 707 Personal Care Products (PPCP) found in the discharge in the secondary effluent of wastewater
 708 treatment processes, were taken as examples to exemplify how a barrier credit process or decision
 709 tree for achieving a total credits for a particular molecule would work in an analogous manner to
 710 the allocated credits for pathogens (as per Table 1). A summary of the credits allocated to each
 711 barrier chemical classification is shown in Table 6. A comparison on their characteristics and the
 712 proposed credits is shown in Table 7, along with the calculated value for the maximum
 713 concentration in the feed and the maximum spill volume. The characteristics (sometimes multiple)
 714 of each molecule in terms of its mechanism of removal has been associated to a classification and
 715 the associated removal credit for each barrier (i.e. a decision tree system) in Table 7. For example,
 716 the charge state, hydrophobicity, molecular size and the electron withdrawing or donating nature
 717 are critical to the classification across the RO, AS, RO and ozone barriers respectively since they are
 718 directly related to the dominant mechanism of removal.

719 Table 6: Overview of LRV credits proposed for each class of chemical across each of the AS, ozone
 720 and RO barriers. NB: Each classification is not the same for each barrier. Refer to earlier sections.

Chemical Class	BARRIER	LRV	BARRIER	LRV	BARRIER	LRV
1	AS	0.8	OZONE	1.0	RO	1.0
2	AS	0.0	OZONE	0.0	RO	1.0
3	AS	0.0	OZONE	0.0	RO	0.0
4			OZONE	0.0	RO	0.5
5					RO	1.5
6					RO	0.0
7					RO	1.5

721 Table 7: Proposed classification and LRV credits and comparison of Triclosan and Ibuprofen

Name	Triclosan	Ibuprofen
Structure		
General Classification	Aromatic (EWG)	Aromatic (EDG)
pKa and charge at pH 8	7.9 (neutral)	5.2 (negative)
MW	289.542	206.281
Kow	4.76 (hydrophobic)	2.23 (hydrophilic)
AGWR max value ($\mu\text{g/L}$)	0.35	400
AS Class and (LRV)	1 (0.8)	3 (0.0)
Ozone Class and (LRV)	4 (0.0)	1 (0.9)
RO Class and (LRV)	2 (1.0)	1 (1.0)
Total LRV	1.8	1.9
Maximum WWTP feed concentration ($\mu\text{g/L}$)	22.1	31,773

722

723 In addition to the LRV credit for each barrier, the influence of a spill into the small wastewater
724 treatment system can be predicted and a dilution factor into the waste treatment system
725 calculated. This can be added to the LRV value in terms of the management of risk. For additions
726 that are ubiquitous and part of normally daily activities, this is not appropriate. In this scenario, the
727 process allows a calculation of the maximum allowable concentration in the feed, a parameter that
728 is easier to measure than in product waters where the concentrations are quite often close to the

729 LOR (Allinson *et al.* 2018). These values are shown in Table 7 and can be nominally calculated for
730 any chemical where a prescribed guideline limit is known or where a human health value can be
731 calculated (Allinson *et al.* 2018).

732 For a spill, any calculation needs to consider the hydraulic residence and volume of the system. For
733 the AWTP, this was 6 hours and 5,000 L at a person equivalent of 140 L per day for 150 people. The
734 small volume of the system and lower than typical water use represents a worse-case scenario
735 relative to larger treatment systems. A dilution factor or equivalent LRV can be assigned based on
736 the concentration per litre in the spill and the spill volume relative to the volume of the treatment
737 system.

738 Triclosan is a commonly used additive in disinfectants, soaps, toothpastes and mouthwashes at a
739 concentration of 0.1-1%, typically 0.5%. A 2 mL triclosan based disinfectant and/or toothpaste use
740 per person per day would supply around 0.01 g of triclosan per person to the wastewater system.
741 At 140 L of water use per day, this would result in a feed concentration of 71 $\mu\text{g/L}$. This is more
742 than triple the maximum calculated value in Table 7. Alternatively, a spill of 20 mL of triclosan
743 disinfectant solution into the waste water system (5 g/L equivalent concentration), would see a
744 dilution factor of 250,000 based on the hydraulic residence time and system volume for a small
745 community model (5000 L wastewater holding volume). This would result in a concentration in the
746 feed of 20 $\mu\text{g/L}$. This is in line with the maximum calculated value for removal to guideline limit
747 values. In both scenarios, source control is indicated. The data from the AWTP study reflects a
748 higher removal rate than (LRV 1.8) but from a regulatory perspective, operation of a CCP barrier
749 model for chemicals suggests that without specific validation for chemicals of concern (too
750 expensive for small communities), that source control and extra barrier measures are indicated. As

751 an example of performance, the data in the supplementary information section shows that
752 triclosan was actually removed quite effectively by the ozone barrier with an LRV of 1.24 (as against
753 a claim of 0.0). This is not unexpected for such a barrier operating at ozone dose levels well above
754 the IOD whereby it is expected that the presence of the OH radical will result in indiscriminate
755 molecular destruction.

756 Ibuprofen is a drug used for treating pain, fever, and inflammation. It is typically supplied as tablets
757 containing 200mg active ingredient. The calculated value in Table 7 to achieve regulatory guideline
758 limits is 31,773 $\mu\text{g/L}$. With ubiquitous use of say 5 tablets per person per day (close to the
759 recommended maximum daily dose) and no metabolic destruction in-vivo, the feed concentration
760 to the waste water treatment plant would still only be 7200 $\mu\text{g/L}$. Indeed, it would take over 1000
761 tablets solubilised into the waste collection system to cause an issue (5000L wastewater holding
762 volume), which was unlikely to happen. In this instance, source control is not indicated, although
763 measurements of the feed concentration at periodic intervals would be required to identify a
764 maximum concentration for the barrier system for removal of this chemical. Indeed, the suitability
765 of a particular single or multiple barrier system operating to CCP principles could be evaluated for
766 any chemical to a maximum desirable discharge concentration.

767 **4 Conclusions**

768 A detailed investigation of barrier performance and CCP classification of chemicals around a
769 activated sludge, ozone and reverse osmosis barrier has been performed using the operational data
770 from an Advanced Water Treatment Plant (AWTP) operated at Self Point Wastewater Treatment
771 Plant in Tasmania, Australia as well as (predominately) data from published literature.

772 The seven barriers associated with the AWTP were evaluated as well as an activated sludge process
773 that preceded the AWTP. No credible chemical removal was associated with five of the seven
774 AWTP barriers, although the microfiltration (MF), biologically activated carbon (BAC) and to a lesser
775 extent, UV barriers, were observed to be effective in the reduction of trace organic chemicals.
776 However, the mechanism of removal of trace organic chemicals for these barriers was not well
777 defined and the data did not allow classification of the removal to a particular class that would
778 likely satisfy a regulatory authority that there was a known and systematic relationship between
779 mechanism of removal, a specific molecular attribute (i.e. molar volume, state of charge,
780 hydrophobicity, etc.), operating conditions and the removal achieved. The BAC was effective in the
781 removal of assimilable organic carbon (AOC).

782 The individual chemical classifications developed for each of the activated sludge, ozone and
783 reverse osmosis barriers were reflective of the molecular mechanisms of removal of a particular
784 chemical by the barrier in the scenario considered herein. The classification is nominally generic
785 and not based on the end use of the chemical. On this basis, the study is considered a first
786 demonstration of the use of a multi-barrier chemical decision-tree based approach to the
787 classification of the removal of a chemical by a treatment plant under CCP constraints. It is
788 acknowledged none the less that further testing across a broader set of conditions (i.e.
789 temperature, different water hardness) is essential to establishing the efficacy of the approach,
790 including limitations across a broad set of water conditions.

791 A log reduction value for the removal of each chemical class of each barrier was then assigned
792 based on operational data for the barrier operating to a CCP condition for the water type and CCP
793 conditions considered here. This approach allows an operational plant to be designed with a clear

794 knowledge of the likely removal of a particular chemical to a regulatory standard such as a
795 maximum permissible guideline limit, based only on a knowledge of feed concentrations. It is
796 envisaged that after validation across a broader set of water and operational conditions, the
797 implementation of this process will substantially reduce the need for chemical analysis on product
798 water from treatment plants since a plant operated to CCP limits for each barrier should then only
799 need periodic verification of barrier performance.

800 **5 Acknowledgements**

801 Funding from the Australian Antarctic Division of the Australian Government and from the
802 Australian Water Recycle Centre of Excellence is gratefully acknowledged. NDMA analyses
803 associated with the work were performed by Stuart Khan and James McDonald at the University of
804 New South Wales Water Research Centre. Their input is gratefully acknowledged.

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Highlights

- A critical control point approach for the removal of chemicals in water recycle is presented
- The critical control point approach is detailed for three barriers
- A combined chemical log reduction value credits approach is demonstrated for a multi-barrier plant

Editor

Water Research

Dear Editor

I confirm that the authors do not have a conflict of interest in presenting the work and that it is not been submitted elsewhere for publication.

Yours sincerely

Peter Scales

