

Report to BACWA Board from AIR Committee (February 2011)

Document Control	Prepared by Sarah Merrill (Project Engineer) Reviewed by Stephanie Cheng (Committee Chair)
Committee Request for Board Action	None at this time.
Committee Agenda Items	None at this time.

Recent Committee Actions:

Recent Committee Actions	<ul style="list-style-type: none"> Committee Meeting was held January 26, 2011 and included in person discussion with BAAQMD Engineering Director, Brian Bateman Meeting highlights are available on the website and regulatory updates are summarized below
AIR Website	http://bacwa.org/Committees/AirIssuesRegulations.aspx

News and Updates:

BAAQMD: Implementing EPA Tailoring Rule	<ul style="list-style-type: none"> USEPA rule published June 3 to bring GHGs into Clean Air Act permitting programs (Title V and Prevention of Significant Deterioration) Implementation will occur in stages: <ul style="list-style-type: none"> Step 1, Jan 2011: Existing Title V sources to address GHGs in new permits and renewals Step 2, July 2011: <ol style="list-style-type: none"> Modifications resulting in potential to emit (PTE) GHGs \geq 75,000 tons/yr CO_{2e} subject to PSD review and Title V Sources that have PTE \geq 100,000 tons/yr will trigger Title V, regardless of non-GHG emissions Step 3, 2017: TBD
	<p><u>BAAQMD Updates:</u></p> <ul style="list-style-type: none"> Three Bay Area WWTPs identified by BAAQMD to obtain Title V Permits <ul style="list-style-type: none"> Exceed the PTE threshold (100,000 T-CO_{2e}/yr) for general stationary combustion However, actual emissions are below the threshold Could avoid Title V with synthetic minor operating permits BAAQMD indicated that they are only looking at combustion emissions and not process emissions January 12, 2011 - EPA to defer the inclusion of CO₂ from biomass for three years <ul style="list-style-type: none"> Includes digester gas, biosolids, or landfill gas EPA has not initiated the rulemaking yet – expected by July 2011. Unclear whether they will defer PSD requirements only, or both Title V and PSD.
For more information	http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES.aspx
BAAQMD: New CEQA Guidelines	<ul style="list-style-type: none"> Effective June 2010 the thresholds of significance were revised for criteria pollutants and precursors, risks & hazards, and GHGs for both operational and construction projects <ul style="list-style-type: none"> New receptors guidelines were put on hold until May 1, 2011 Workshops for Local Government: February 23rd (Oakland) and March 3rd (Mountain View)
For more information	http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Meetings.aspx

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BAAQMD: Reg. 9, Rule 8 Updates	<ul style="list-style-type: none">• CH2M is gathering CO and NOx data for spark-ignited cogen engines of member agencies to compare it to the new thresholds that will take effect in 2012. It appears that many agencies will comply, but several are still concerned. After all of the data has been collected and tabularized, the agencies struggling to meet the thresholds will meet to devise an action plan going forward and possible plans to meet with the BAAQMD.
For more information	http://www.baaqmd.gov/~media/Files/Compliance%20and%20Enforcement/Advisories/Combustion%20Equipment/adv_061008_9-8.ashx

Next BACWA AIR Meeting: Wednesday, April 20, 2011
CH2M HILL Oakland Offices, 10:00am

**BAPPG Committee Report to
BACWA Board**

Meeting Date: February 24, 2011
Prepared By: Sharon Newton, City of San Jose
BAPPG Committee Chair

Project Updates

Project	Update	Completion Date
Holiday FOG Spanish Radio Advertisement	<p>BAPPG conducted outreach on Bay Area Univision Spanish radio stations between Thanksgiving and New Year's Day. This year a total of 154 spots including 64 radio ads (60 sec) on KSOL and KBRG, 30 online audio streaming ads (60 sec), and 60 free radio PSAs (15 sec) aired on KSOL, KBRG, and KVVJ. The advertisements promote proper disposal of kitchen fats, oils and grease.</p> <p>[Project Lead: Andrea Case, City of San Jose]</p>	December 2010
Pharmaceuticals	<p>BAPPG endorsed the Product Stewardship Statement on Controlled Substances Act delivered at the Jan 19-20 DEA public meeting to discuss procedures for the surrender of unwanted controlled substances by ultimate users and long term care facilities in preparation for development of regulations to implement the Secure and Responsible Drug Disposal Act of 2010. BAPPG also submitted writing comments (attached).</p> <p>BAPPG submitted a comment letter to the Centers for Medicare and Medicaid Services on the proposed rulemaking requiring short cycle dispensing in long term care facilities (attached).</p> <p>[Project Lead: Karin North, Palo Alto]</p>	January 2011
FOG Asian Media Outreach Efforts	<p>O'Rorke issued a media release targeting Asian radio stations around Lunar New Year, Feb 2-16. The effort has resulted in 9 radio station website PSAs, 1 radio PSA, and 1 newsprint story.</p> <p>[Project Lead: Cynthia Royer, Daly City]</p>	February 2011
PCBs	<p>The committee is considering the following PCB related projects for next fiscal year: 1) Coordinate a workshop/training on the source reduction requirements for PCBs under the amended Mercury Watershed Permit, and 2) Incorporate promotion of the EPA fact-sheets on caulk into Stephanie Hughes' presentations to building inspectors. In addition, the City of Richmond intends to share its research findings and fact sheet on street sweeping /maintenance that is scheduled to be completed by next fiscal year. A presentation on the PCBs in Caulk project was given at the February BAPPG committee meeting on February 3, 2011.</p>	Ongoing

Next BAPPG Meeting

April 6, 2011, 10am – 12 pm, 1515 Clay Street, Oakland, CA, Second Floor, Room 12

Attachments

- Comment Letter to the Centers for Medicare and Medicaid Services on the proposed rulemaking requiring short cycle dispensing in long term care facilities
- Comment Letter on Procedures for the Surrender of Unwanted Controlled Substances by Ultimate Users

January 12, 2011

Submitted electronically

Drug Enforcement Administration
Attention: DEA Federal Register Representative
ODL, 8701 Morrisette Drive
Springfield, VA 22152

Re: Docket No. DEA-316

To Whom It May Concern:

The Bay Area Pollution Prevention Group appreciates the opportunity to submit the following comments on the Procedures for the Surrender of Unwanted Controlled Substances by Ultimate Users, Docket No. DEA-316. The Bay Area Pollution Prevention Group (BAPPG) represents 43 publicly-owned wastewater treatment agencies throughout the Bay Area that work together on common pollution issues of concern. Due to the growing body of evidence that indicates the flushing of unwanted medicines threatens public health and the environment, coupled with growing public demand for convenient, secure and environmentally-sound disposal options, BAPPG member agencies have been providing residents with an environmentally-benign solution to the disposal of unwanted medications.

In 2006, the BAPPG spearheaded the first DEA-approved “Safe Medicine Disposal Days,” which won the EPA’s 2007 Environmental Award for Outstanding Achievement. Since 2006, BAPPG members have worked with the DEA, the Environmental Protection Agency, United States Postal Service and reverse distributors to develop a more cost effective way to dispose of all medications including controlled substances. Currently, there are over 100 permanent collection sites for unwanted pharmaceuticals in the Bay Area; unfortunately, many of these locations are unable to accept controlled substances. Therefore, we support the purpose of the Secure and Responsible Drug Disposal Act of 2010 to “allow patients to deliver unused pharmaceutical controlled substances to appropriate entities for disposal in a safe and effective manner consistent with effective controls against diversion.” Effective drug take-back programs encourage the public to dispose of all unwanted medications and ensure secure collection, transportation and destruction.

Safe Disposal Options for Unwanted Controlled Substances

Capturing the largest possible quantity of leftover medications requires that convenient, secure collection opportunities are available. Diversity in the patient and caretaker population, as well as the multiplicity of settings necessitates the availability of multiple collection options. Current drug take-back programs in the Bay Area are managed by different agencies or coalitions. These groups may prefer different types of programs due to factors such as cost; convenience; rural vs. urban settings and the availability, ability, and willingness of key players such as pharmacies, clinics or municipal facilities to participate in collection.

We believe that with government oversight and adherence to security procedures, the following options for collection, transport and destruction of unwanted pharmaceuticals will be secure. All three options allow for tracking of packages from the point of mailing or drop-off through destruction, and should be implemented according to state and local environmental laws. Law enforcement agencies should have the option of implementing drug take-back programs according to their local priorities, but the regulations should not require their participation in the collection, transport or destruction of collected drugs.

1. **Collection at retail pharmacies.** Not all pharmacies may choose to collect unwanted pharmaceuticals. However, those willing and able to do so according to strict security procedures are well-placed in many communities to provide a convenient drop off location. We believe security protocols, such as those developed in Washington; provide a valuable starting point for the DEA's consideration of security protocols applicable to collection in a pharmacy setting. Some of the key security protocols are listed below:
 - All drugs should be handled together, whether controlled or not, to reduce costs as well as to reduce diversion. Comingled drugs are not as attractive as controlled substances alone.
 - Professional pharmacists must be licensed and their facilities must be inspected by State Boards of Pharmacy.
 - Inventory will not be sorted beyond representative sampling for data collection purposes. This will help ensure that no diversion occurs since comingled drugs are not as attractive as controlled substances alone.
 - Containers in the public area of the pharmacy will be locked to ensure that no member of the public can access disposed material.
2. **Mail-back from the home.** Pilot programs around the country, most notably in Maine, provide the opportunity for patients to mail their unwanted drugs in non-descript envelopes. Envelopes should be tamper-resistant and tamper-evident. Track and trace technology should be used through to the point of destruction.
3. **Collection at other community facilities (including both on-going collection and collection events).** The same security procedures applied to pharmacies could be implemented in other community locations. Many law enforcement offices currently collecting pharmaceuticals could continue to do so under these procedures. Fire stations, clinics and hospitals could provide a collection service under the same types of procedures. The same procedures should be applied for a one-day collection event as for an on-going collection.

Obstacles to the Disposal of Controlled Substances

Obstacles to the disposal of controlled substances in the San Francisco Bay Area could occur if the following options are not approved: (1) transportation and disposal options (2) flexible collection options and (3) collection of controlled substances along with all other medicines.

1. Transportation and Disposal.

Options for disposal of controlled substances by medicine take-back programs would be improved and facilitated by authorization of additional providers of pharmaceutical transport and disposal services. The new regulations need to:

- a. Provide for environmentally-sound disposal options – according to California’s Medical Waste Management Act, medical waste incinerators are the only disposal option for waste pharmaceuticals, BAPPG suggests that residential pharmaceuticals should be handled as medical r.
- b. Create a new license specifically for the disposal of unwanted household medications so that DEA-licensed Hazardous Waste Disposal Companies, DEA-licensed Reverse Distributors and commercial carriers (UPS, Federal Express, etc.) can legally transport and dispose of medicines collected in a medicine return program.
- c. Allow authorized medicine take-back programs to turn collected medicines over to DEA-registered disposal companies who can dispose of the medicines as hazardous waste.
- d. Allow for cost-effective witnessed destruction procedures at the incinerator.
- e. Allow for options in choosing a shipping company, if utilized, such as the U.S. Postal Service or common carriers such as Federal Express and UPS.

2. Flexible Collection Options. Medicine return programs need flexible options for disposal that enable them to secure the most cost-effective and safest disposal methods for their communities. These options were mentioned in page 2 of our letter (in the safe disposal options section). The Bay Area has a wide variety of communities and one size will not fit all the needs locally or throughout the nation.

3. Combined Collection and Disposal of Controlled Substances with Other Medicines. For a medicine take-back to be cost-effective and convenient for consumers, all medicines, including controlled substances, need to be collected together at the same locations. They should not have separate tracking or routes of disposal. It is not reasonable to expect residents to distinguish between medicines that are controlled and non-controlled substances. Relying on a pharmacist to sort the controlled from the non-controlled increases the demands on the pharmacist’s time and increases the costs of the collection program. If the medicines are all collected together and then sorted afterwards, this also increases costs. Controlled substances need to be collected along with non-controlled medicines and destroyed together at the same disposal facilities, without sorting or segregation at any stage.

Considerations for Secure Drug Disposal at Long-term Care Facilities

New regulations should include options for long-term care facilities to dispose of drugs securely without flushing them. The following comments apply to the development of regulations applicable long-term care facilities.

- **Drugs shipped via general carrier for the purpose of disposal should be tracked through using track and trace technology.** Track and trace technology that has been

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developed to ensure the security of valuable materials via general carrier should be used whenever drugs are shipped for disposal, whether from an individual's home or from a long-term care facility or collection point.

- **The DEA-mandated processes and procedures for drug take-back programs and long-term care facilities should be clear and consistent throughout the country.** State and local requirements may vary, but it is important that DEA requirements be communicated clearly and consistently around the country to reduce confusion. We recommend that the regulations and corresponding guidance for complying with the regulations be posted on the DEA's website and disseminated via the regional offices.

BAPPG member agencies have worked for the better part of a decade to remove the current barriers that limit the safe collection and disposal of all unwanted pharmaceuticals. In the future, we hope that pharmaceutical manufacturers will lead the effort on collecting and disposing of unwanted medications, as they do in many other countries such as Canada, Europe and Australia. Currently, pharmaceutical manufacturers use the Controlled Substances Act requirements as a barrier to collect and manage the pharmaceuticals that they profit from.

Thank you for the opportunity to comment on Procedures for the Surrender of Unwanted Controlled Substances by Ultimate Users. If you have any questions, please feel free to contact, Karin North at Karin.north@cityofpaloalto.org or (650) 494-7659 or Jennifer Jackson at jacksonj@ebmud.com or (510) 287-0818.

Sincerely,



Sharon Newton, Chair
Bay Area Pollution Prevention Group

January 11, 2011
Sent electronically

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-4144-P
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: CMS-4144-P

Dear Centers for Medicare & Medicaid Services:

The Bay Area Pollution Prevention Group is grateful for the opportunity to submit the following comments regarding CMS-4144-P, the Medicare Program; Proposed Changes to the Medicare Advantage and the Medicare Prescription Drug Benefit Programs for Contract Year 2012 and Other Proposed Changes as defined in 42 CFR Parts 417, 422, and 423.

The Bay Area Pollution Prevention Group brings together representatives from 43 wastewater treatment facilities around the San Francisco Bay and beyond that work to prevent pollution in San Francisco Bay. We strongly support initiatives that provide the public and institutions with opportunities to reduce wastes that might otherwise be disposed of via the sewer.

Thank you for considering 7-day dispensing of pharmaceuticals to Medicare Part D patients in long-term care settings. While we strongly support dispensing in 7-day increments because of the potential for reducing the number of drugs that go unused and therefore must be disposed of, we urge you to include generic drugs as part of this rulemaking. Generic drugs represent a larger volume of drugs prescribed and wasted than brand name drugs and should therefore be included in this proposed rule. If necessary, this rulemaking could delay implementation for generic drugs, but a specified timeline should be included.

We also support the focus on long-term care facilities in both the statute and proposed rulemaking. However, we believe short-cycle dispensing could also reduce waste in other settings, particularly with prescriptions received by mail which are frequently dispensed in 90 day supplies. We encourage CMS to investigate further the potential to require similar reforms in other settings. While the 7-day dispensing practice would be inconvenient in the residential setting, there are other options to consider: (1) a 30-day cycle could be applied to some or all drugs covered by Medicare Part D (possibly limited to those delivered via mail-order), or (2) an initial prescription limitation could be considered for medications reimbursed by Medicare Part D or Medicaid programs (as is currently being applied to a small but growing subset of drugs in Maine).

Centers for Medicare & Medicaid Services
January 11, 2011
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We also support CMS's interest in collecting data about the quantity and types of pharmaceuticals that become waste. However, it is our experience that documenting all leftover pharmaceuticals is extremely labor intensive. We support the environmentally protective management of unwanted drugs from long-term care facilities, but believe data collection can be done directly from the facility without involving the pharmacy. We also believe that the management of pharmaceutical waste from long-term care facilities should be governed by the most stringent of the applicable federal, state, or local waste regulations and applicable to all drugs in the facility, as opposed to only those reimbursed by Medicare Part D, which we understand to be the sole focus of the proposed rule.

We encourage CMS to continue to investigate other opportunities to reduce the waste of pharmaceutical drugs reimbursed through Medicare and Medicaid programs. Thank you for the opportunity to provide these comments. Please do not hesitate to contact Jennifer Jackson at jacksonj@ebmud.com or (510) 287-0818 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Sharon Newton". The signature is written in black ink on a white background.

Sharon Newton, Chair
Bay Area Pollution Prevention Group

Committee Request for Board Action:

None.

Highlights of New Items Discussed and Action Items

Annual SSO Reports Due March 15

Bay Area municipal collection systems have been advised they should submit their Annual sanitary sewer overflow (SSO) Report to the Regional Water Board by March 15.

New Reporting Approach for Annual SSO Reports on Hold

BACWA Collection Systems Committee leaders have been working with Regional Water Board staff on 13267 letter that would change requirements for Annual SSO Reports. Due to a Regional Water Board staff maternity leave that was extended, this work effort is currently in a holding pattern and is not expected to be implemented for the 2010 reporting year.

Regional Water Board Staff Request Committee Information

In December, 2010, Lila Tang requested a list of attendees and meeting summaries for the last several months. After discussion among BACWA collection systems leaders (including the executive director), this information was provided. In particular, the attached list attendees was provided, and the last three BACWA Collection Systems Committee Reports to the BACWA Board were provided.

Regional Water Board Staff to Participate in Committee Meeting March 3

Lila Tang of the Regional Water Board will attend the next BACWA Collection Systems Committee meeting. She will provide an update on Regional Water Board activities related to collection systems.

“Tech Topics” Ranked by Committee Members

In order to plan future committee meeting for 2011, committee members brainstormed potential topics for discussion in late 2010 and ranked them at the January 2011 meeting. The ranked topics are attached to this report, and the top-ranked issue, Easement Maintenance, will be discussed at the March committee meeting.

Changes Coming to State-wide SSO WDR

Revisions to the state-wide SSO Waste Discharge Requirements (WDR) are currently expected to be released in a draft form in late February, 2011, with a comment deadline in late March, and a State Water Board workshop scheduled for April. State Water Board action to adopt the new permit is expected in June.

Next BACWA Collection Systems Committee Meeting

This meeting is scheduled for Thursday, March 3, 2011, at the Boy Scouts facility in San Leandro.

BACWA Collection Systems Committee Attendance

September - December 2010

Albany, City of
Bay Area Clean Water Agencies
Belmont, City of
Berkeley, City of
Burlingame, City of
Castro Valley Sanitary District
Central Contra Costa Sanitary District
Corte Madera, Town of
Delta Diablo Sanitation District
East Bay Dischargers Authority
East Bay Municipal Utilities District
Fairfield, City of
Fairfield-Suisun Sewer District
Hayward, City of
Las Gallinas Valley Sanitary District
Livermore, City of
Milpitas, City of
Mountain View Sanitary District
North San Mateo County Sanitation District
Oakland, City of
Oro Loma Sanitary District
Piedmont, City of
Pittsburg, City of
Redwood City, City of
San Francisco Public Utilities Commission
San Francisco, City of
San Jose, City of
San Leandro, City of
San Mateo, County of
Santa Clara, City of
Stege Sanitary District
Sunnyvale, City of
Tamalpais Community Services District
Union Sanitary District
Vallejo Sanitation and Flood Control District
West Bay Sanitary District
West Valley Sanitation District

**BACWA Collection Systems Committee
Tech Topics Ranking, January 2011**

Score	Tech Topic
52	Easement maintenance issues
48	Field automation (e.g., use of laptops in trucks, other communication tools, etc.)
34	Lift/pump stations: manufacturers, applications, air values, maintenance
30	CCTV vendors/equipment
28	Computerized maintenance management systems (CMMS) and their use
20	Data collection (SSOs, response time, clean-up and coverage)
18	Large force main failure contingency planning
16	Pigging force mains
14	Effective connections at manhole (to prevent future roots)
14	Use of GIS
11	Siphon cleaning
7	Funding options
5	Sewer testing - air, water, CCTV, etc.
5	SSO prevention by using smart covers
5	Trenchless repairs
5	Organization -- scheduling and prioritizing preventive maintenance (paper or computer)
5	Succession planning (finding staff to fill current and future positions)
5	Getting government bodies to understand collection systems issues/needs
4	Lower lateral maintenance
4	SOP writing and updating process
4	Collection system management overview
3	Emergency response equipment
3	HOA (private) collection systems
2	Stopping manhole leaks
0	FOG removal
0	Odor control
0	Corrosion control
0	Contract maintenance
0	Natural disaster planning
0	Back-up radio communication system in natural disaster
0	Hinged manhole covers (including information regarding composite lids)
0	Peer review program of SSMPs (Work Order System, SOPS, Training, Condition Assessment Program, Sewer Cleaning Program)
0	SSMP training for update audits
0	Communication with press and media
0	Use of social media (e.g. Facebook, for communication with the public)
0	Security for vandalism

Permits Committee –
Report to BACWA Board

Reporting Date: 2/17/11
Executive Board Meeting Date: 2/24/2011
Committee Chair: Jim Ervin

Committee Request for Board Action: None.

Upcoming Permits/Permit Amendments –

Feb – Napa Sanitation District
Mar – PCBs Permit Amendment
Mar – Attachment H Permit Amendment (Pretreatment)
Apr – Sanitary District No. 5 of Marin County, Paradise Cove

eSMR:

State Water Board staff held a training on eSMR in the Regional Water Board auditorium on 20 January. Many BACWA members attended. Regional Water Board staff will also be scheduling training for 1-3 agencies at a time, starting in March for the larger agencies beginning to report to eSMR by 1 April.

The BACWA Permits and Lab committees held a joint meeting on February 8 to accommodate a presentation by Johnson Lam. Johnson presented a software module for the ERS reporting system that will download data to the eSMR reporting format. The Regional Water Board intends to cease all support for the ERS system later this year. Johnson presented the information independently, i.e. not representing the Regional Water Board. Johnson plans to provide support for ERS as an independent contractor, but has not determined a price for his support. He indicated that he would like a proposal from BACWA and/or WSPA to provide support for his new software.

PCBs TMDL: BACWA submitted an extensive comment letter on the tentative order for the PCBs permit amendment to the Mercury Watershed Permit on 31 January. The PCBs amendment is scheduled for adoption by the Regional Water Board on 9 March. Ten comment letters were received by the Regional Water Board.

Whole Effluent Toxicity (WET) Assessment and Control Policy: BACWA signed a letter developed by CASA / Tr-TAC on the proposed WET testing policy. Several BACWA members participated in preparing the letter. The final letter was submitted to the State Water Board on 21 January, a 2-month extension to the original deadline. The State Water Board has indicated that a workshop will be scheduled after comments are received, but no meetings have yet been scheduled (as of 2/17/11).

Test of Significant Toxicity (TST) Training: The State Water Board provided training on the proposed TST method for chronic toxicity testing on 8 February in Sacramento. Some BACWA members attended. USEPA staff explained and promoted the method at the training.

State Board – SFB Basin Plan Amendment for Bacteria Objectives: This Basin Plan Amendment was adopted by the Regional Water Board on April 15, 2010. It is now up for approval by the State Water Board. Written comments on this amendment are due to the State Water Board on 3 March, 12 noon. It was discussed that BACWA may prepare a comment letter with similar points as in the comment letter for the Regional Water Board adoption. The public hearing for State Water Board approval has not yet been scheduled.

Numeric Nutrient Endpoint. A stakeholder advisory group workshop for the San Francisco Bay portion of the State Water Board's Numeric Nutrient Endpoint development project was held at the Water Board offices on 4 Feb. The goal of the meeting was to discuss the draft nutrient numeric endpoint conceptual framework prepared by SCCWRP in April, 2009, including science review, indicator selection, and process for developing thresholds.

Sediment Quality Objectives: The State Water Board has proposed amendments to the Water Quality Control Plan for Enclosed Bays and Estuaries Plan for sediment quality objectives (SQOs). The amendment adds objectives for wildlife and resident fish populations, in addition to the existing public health objectives. Implementation is still expected to occur through regional monitoring. Comments are due 14 March. Adoption hearing will be 6 April.

Pretreatment Reporting Requirements. Comments on the tentative order for a permit amendment to improve pretreatment reporting requirements were due to the Regional Water Board on the tentative order for Attachment H on 27 January. The permit amendment is expected to be adopted by the Regional Water Board at the 9 March hearing.

Next BACWA Permits Committee Meeting

Tuesday, March 8th, 2011, at EBMUD Wastewater Treatment Plant Library. Water Board staff will attend.