

Committee Request for Board Action: Consider funding consultant support for comment letter on pesticides.

17 attendees representing 14 BACWA member agencies

Adoption of Permits/Permit Amendments:

May – *Sonoma Valley County Sanitation District* – See March Board Report on performance-based ammonia limits imposed in the absence of reasonable potential

June – *Palo Alto* There is new language in recent Fact Sheets stating “*I.B. The Discharger must file a petition with the State Water Resources Control Board (State Water Board), Division of Water Rights, and receive approval for any change in the point of discharge, place of use, or purpose of use of treated wastewater that decreases the flow in any portion of a watercourse. The State Water Board retains the jurisdictional authority to enforce such requirements under Water Code section 1211. “The committee is concerned that this is an unnecessary burden for Bay dischargers, since dischargers generally don’t have downstream water rights claims. It will also disincentivize increasing recycled water use. BACWA submitted a [comment letter](#) asking the language be removed or modified. (Note: Delta Diablo’s new Administrative Draft Order does not contain this language). Other changes to Palo Alto’s TO include a new ambient monitoring site, higher dilution credit for copper, and a change in toxicity species from *ceriodaphnia* to fathead minnow.*

Benicia- Benicia’s previous dilution credit was based on an old, low-tech study. They have since updated their study which results in a higher dilution value under normal conditions. They were not allowed to use the new dilution to calculate higher ammonia limits due to anti-backsliding concerns. However, the new dilution is memorialized in the Fact Sheet and can be referenced when dilution credit is assigned for toxicity testing in the future under the Toxicity Plan. Benicia also had blending removed from their permit, since it is deemed unlikely they will need to blend or bypass for less than a 10-year storm. Benicia submitted a comment letter requesting a decrease in monitoring frequency for pollutants parameters required in the Pretreatment Program monitoring table that are of low concern.

There was a general discussion about the value of holding a special workshop on dilution at a future meeting where participants can discuss successes and pitfalls in negotiating dilution credit. The 6/8/14 meeting may be possible if available on critical participants’ schedules.

July – None for BACWA Members.

Executive Board Report-out

Key issues from the 4/16 Executive Board meeting were:

- *Pilot Studies for Nutrient Removal and Energy Production* – Rob Collison gave a presentation on the benefits of anamox/zeolite for nutrient removal. There was also discussion of the Stanford proposal to build mobile process trailers that can be used at different facilities for pilot testing. Both projects are seeking participation from individual POTWs. These projects are both included in BACWA’s Nutrient Proposition 84 Proposal, but due to the drought funding round of proposals, the nutrient proposal will be delayed until late in the year or next year.
- *Citizen Lawsuit White Paper* – BACWA is providing funding to support a CASA sponsored project for an academic white paper on Citizen Lawsuits against agencies with SSOs.
- *NACWA Blending Panel* – NACWA is seeking participant for a national panel on blending. Ben Horenstein of EBMUD will represent our region.
- *Budget* – The fiscal year 2015 budget was approved
- *Risk Reduction* – BACWA and WSPA agreed to a joint \$75K proposal to provide matching funds for a DPH grant application to EPA.

Nutrients

- *Final Watershed Permit* – The [Watershed Permit](#) final order was adopted on April 9, effective July 1, 2014. Some Water Board members did express concern that not enough was being done quickly enough to address nutrients. Water Board staff responded to many concerns about stakeholder participation by deferring to the Steering Committee's function.
- *Optimization/Upgrade Studies* – The contract management group (CMG) is finalizing the RFP, which will be posted soon. Agencies are requested to contact Alexandra Gunnell this week to confirm that they will be participating in group reports and Nutrient Surcharge. Except for the monitoring and CIWQS reporting that is required by the permit, individual agencies do not need to take any action on permit compliance until contacted by BACWA for information.
- *Steering Committee* – The first meeting was held on 4/22, and the next meeting is scheduled for 6/25. The initial meeting focused on logistics with a summary of the current science with subsequent meetings expected to shift to technical/science topics.
- *Nontechnical Nutrient Presentation* – Nontechnical nutrient presentation for agency staff is [available](#) for agency use. Two agencies reported having used it to make successful presentations.
- *Technical Nutrient Workgroup* – The next NTW meeting is scheduled for 5/28, time and location to be announced. This group is part of the governance structure and will provide technical feedback on the assessment framework and other issues. It is open to all stakeholders.

Volunteers needed for CECs testing in effluent

- At least five volunteer POTWs from our Region are needed to participate in the [statewide study](#), and eight are needed for the RMP special studies that are planned. POTWs will not be anonymous. The RMP is hoping to get good diversity of volunteers in terms of size, service area and location. So far, eight POTWs from four subembayments have volunteered. More volunteers are needed for the RMP studies to ensure adequate representation of different variables (e.g. geographic area, plant size and processes, population served).

Revision to Statewide Bacterial Objectives for REC-1

- The State Water Board is holding focus group meetings to develop state-wide bacterial objectives for inland waters and the Ocean. They have released a [Fact Sheet](#) outlining these plans. The focus group meeting is invitation-only. Cynthia Royer volunteered to represent BACWA as part of this effort.

Informational Items/Announcements

- *Stormwater Diversion Update* – A report on diversions has been submitted to the Regional Water Board as a Municipal Regional Permit requirement for the Bay Area stormwater agencies. The main conclusion is that even in hot spots, the amount of PCBs captured by diversions is so low as to make this an extraordinarily expensive control practice. Next steps for BACWA are to wait for Tom Mumley's response to the report.
- *Basin Plan Amendment* - A [Basin Plan Amendment](#) hearing is scheduled for 6/11/14. The proposed amendment would incorporate State Board's 2012 onsite wastewater treatment system (OWTS) Policy, amend the Basin Plan's existing wet weather overflows policy, update information on graywater systems, and update a table of POTW discharge locations. Members submitted minor corrections to details of their facility details.
- *Recycled Water General Order* – There is a State Board meeting on 6/3 and written comments are due 5/27. This is an opt-in order, and appears to be based on Region 2's Order 96-11, which is generally well-liked. WaterReuse is commenting on the General order.
- *Toxicity Plan Update* – EPA sent a letter to the State Water Board in March 2014 approving the use of the TST as an alternative test method. Melissa Thorne is following up to see what the implications of this letter are, if any, other than paving the way for the next iteration of the Toxicity Plan. There was a discussion about whether to go to PERL for a training session on TST testing, and it was agreed we should wait until the next draft. Ocean dischargers are already getting TST in their permits.
- *General Permits on Pesticide Applications* – There are two Statewide General Permits being considered: Aquatic Weed Control for Residual Aquatic Pesticide application, hearing on 5/20; and Biological and Residual Pesticide Dischargers from Vector Control Applications (Comments due 6/9, Public Hearing 7/1). These could both have significant impacts on water quality, and BAPPG does not have the resources to address them. Tim Potter will raise this issue at the next Executive Board meeting.
- *Flushable Wipes* – Tim Potter attended a meeting on flushable products with INDA. Instead of simply proposing flushability standards, POTWs would like to see a product stewardship approach, since these products will ultimately end up in the effluent and/or biosolids.

Next BACWA Permits Committee Meeting: Tuesday, June 10, 2014, at EBMUD Plant Library, Water Board staff to attend. Tim reminded the group that Meg Herston will be assuming the Chair Responsibilities in July so next month will be his last meeting as Chair.