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| Permits Committee – Report to BACWA Board | Permits Committee Meeting on: 12/15/15Executive Board Meeting Date: 12/18/15Committee Chair: Amanda Roa  |

**Committee Request for Board Action: None**

**22 attendees, representing 13 member agencies**

**Regional Water Board staff in attendance**

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| **Adoption of Permits/Permit Amendments:** **January** – *St. Helena –* St. Helena will be required to do a plant upgrade to resolve their Cease and Desist Order and achieve advanced secondary standards. Their shallow water discharge prohibition exception was in jeopardy due to unreliable treatment plant performance, and the upgrade will allow them to demonstrate equivalent protection through advanced treatment.**March -** *Calistoga –* Calistoga has high antimony concentrations along with a couple of trihalomethanes. Spas are a significant source, since many of the older spas that get water from the wells do not have valves to shut down the flow from artesian wells and therefore send significant flows to the sewers. |
| **Monitoring Reductions**BACWA has been working with the Regional Water Board on a proposal to reduce effluent monitoring in exchange for increased funding to the RMP. The Regional Water Board has developed a tentative order for an alternative monitoring program where agencies can reduce their monitoring in exchange for a fee that is paid to the RMP. The fee per reduced test and minimum monitoring frequency is as follows:* Sensitive species screening requirement - $30,000/test; remove requirement
* Dioxin (Method 1613) - $1,000/test; frequency reduced to once per permit term (they are open to dropping dioxin if BACWA compiles all dioxin data since 1990)
* Pesticides and PCBs (Method 608) - $230/test, frequency reduced to once per permit term
* VOCs (Method 624) - $295/test, frequency reduced to once per permit term (once per year for agency with limits)
* BNAs (Method 625) - $545/test, frequency reduced to once per permit term (once per year for agencies with limits)

Agencies would be covered under this permit on a five-year basis, although the RMP fee increase would be annualized. The RMP will send an invoice that includes the fee, and agencies can opt out and continue their permitted monitoring frequencies if they prefer. The Regional Water Board is requesting BACWA’s help in distributing information about this alternative monitoring tentative order. It will likely go before the Board in March 2016. |
| **Microplastics**Following SFEI’s [poster](http://www.sfei.org/documents/microplastic-contamination-san-francisco-bay) at the State of the Estuary meeting, the issue of microplastics has gained a lot of attention. The poster showed large loads of microplastics in POTW effluent, and high concentrations in the San Francisco Bay. BACWA managers are interested in pursuing an in-house study to verify the results of the SFEI report, and to better understand the loads and types of microplastics in wastewater effluent. The BACWA Laboratory committee has assembled a workgroup to develop an analytical method based on a USGS guidance document. They also need to provide a consistent definition of microplastics, which will likely include particles between 125 microns and 0.5 mm. In many studies, particles defined as microplastics were not in fact made of plastic, but were natural materials, so there needs to be a consistent way for staff to identify plastic material. These discussions are preliminary, and it will be a while before the workgroup can make a recommendation to the Executive Board. In the meantime, SFEI is putting together more proposals to do follow-on studies, and the RMP is developing a microplastics strategy, so it is important to coordinate with them. |
| **Dechlorination Alternatives**Agencies that chlorinate their effluent significantly overdose with the dechlorination agent, sodium bisulfite, in order to avoid chlorine residual violations. SFPUC’s Southeast Plant permit requires them to study dechlorination alternatives, and they are willing to share their results with BACWA. However, if BACWA wants a separate work product where the results can be made generic for use by any agency, we will have to pay for that item in the scope. Lorien Fono will follow up with SFPUC’s consultant to discuss next steps.  |
| **Nutrients*** + *Data Reporting –* The Regional Water Board will issue a letter to agencies covered by the Watershed Permit requiring that they report soluble reactive phosphorus as dissolved orthophosphate. They will also fix a bug in the CIWQS SMR code for dissolved orthophosphate, which has led to data being misdirected. The Regional Water Board is also developing a letter requiring permittees to report flows that are diverted from the effluent, such as recycled water flows. This will allow them to correctly quantify nutrient loads to the Bay, since some agencies were only reporting total plant flows, rather than net flows to the Bay. Water Board staff will try to combine these two letters and distribute them in the next few weeks.
	+ *HDR Information Request –* HDR is requesting information about recycled water flows to better understand recycled water’s contribution to nutrient load reduction. They will also be submitting a request to agencies to ask about possible plans for nutrient treatment, so that BACWA understands where we’re at for negotiations for the next watershed permit.
	+ *Optimization/Upgrade Studies –* The consultant team will be circulating reports for each agency by early May. These facility reports will be used as appendices for the Group Final Report. Agency Points of Contact will need to sign off on their facility report before it is included in the Final Report, a draft of which is expected by early July.
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| **Beaches Bacteria TMDL** The Regional Water Board is preparing a bacteria TMDL that targets beaches around San Francisco’s east shores. San Francisco is considering commenting that the Water Board should expand the scope of the TMDL. |
| **Announcements*** + BACWA Annual Members Meeting, January 15. [Please RSVP](https://docs.google.com/forms/d/1CTNDxg0C2jUQhMFl49Xrgbkiuf9UWmP_yr6CEuVWa_M/viewform?c=0&w=1). The agenda will be posted in the next few weeks.
	+ [Triennial Review](http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/docs/Triennial_Review/2015%20triennial%20review%20staff%20report.pdf) Board Hearing 12/16 – Dave Williams will comment on behalf of BACWA.
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| **Report out from the 11/18 Executive Board meeting, and the 12/1 Joint meeting with the Regional Water Board*** There was a follow-up discussion from the Pardee retreat concerning the next nutrient watershed permit
* There was a discussion on the BACWA [comment letter](http://bacwa.org/wp-content/uploads/2015/12/Diquat-Dibromide-Registration-Comment-Letter-11-24-15.pdf) concerning the reregistration of diquat dibromide
* Dave Senn gave a debrief from the Nutrient Technical Workgroup meeting on 11/5
* The Collection System Committee will be conducting a survey on agencies’ private sewer lateral ordinances requiring inspection and/or repair by homeowners
* The Regional Water Board has asked BACWA to develop criteria for “good performing” collection systems to help in assessing mandatory minimum penalties (MMPs). They would like the definition to include asset management criteria in addition to SSO outcomes. There was a discussion about whether MMPs can provide some protection against third-party lawsuits.
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| **Next BACWA Permits Committee Meeting:** Tuesday, January 12, 1-3pm, at EBMUD Plant Library.  |