|  |  |
| --- | --- |
| Permits Committee – Report to BACWA Board | Permits Committee Meeting on: 1/13/16Executive Board Meeting Date: 2/19/16Committee Chair: Amanda Roa  |

**Committee Request for Board Action: None**

**14 attendees, representing 10 member agencies**

|  |
| --- |
| **Adoption of Permits/Permit Amendments:** **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.**April –** *Petaluma –* Petaluma received an Administrative Draft of their permit which included reduced BOD and TSS limits, similar to the Napa River dischargers. The rationale given was that Petaluma has advanced secondary treatment, and this reflects a performance-based approach to setting limits. There was a discussion in the committee that setting advanced secondary standards should be a Basin Planning issue, rather than policy-by-permit. However, the Tentative Order (released in February) did not reflect these reduced limits. |
| **Microplastics**SFEI has produced a draft manuscript describing the findings from its study of microplastics in wastewater effluent and SF Bay receiving water that was presented at the State of the Estuary meeting. The permits committee had no comments on the manuscript. The RMP is forming a workgroup on microplastics and would like to set aside funds to convene an expert panel in the Summer of 2016. Nirmela Arsem (EBMUD) is BACWA’s liaison to the RMP on this issue. |
| **Monitoring Reductions**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)

The Tentative Order lists the surcharge for each agency, calculated based on the cost per each test that would be charged by a contract laboratory, and the reduction in testing frequency for that agency. ***It is imperative the all agencies review the Tentative Order to verify their monitoring frequencies listed in Tables F-2 and F-3.*** 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. BACWA submitted a comment letter recommending 1) changes in when to report which agencies are participating in the alternative monitoring permit, 2) reduction in PCB Congeners monitoring via 1668C upon reissuance of the PCB/Mercury Watershed permit, and 3) that agencies that opt in should have a fixed cost for the five-year opt-in period. |
| **Nutrients*** + *Data Reporting*
	+ Under the nutrient watershed permit, permittees have been reporting soluble reactive phosphorus results under various names, which complicates data compilation for annual reporting. The Regional Water Board has sent out a [letter](http://bacwa.org/wp-content/uploads/2015/12/Nutrients-SRP-Monitoring-2015-1.pdf) to dischargers specifying that soluble reactive phosphorus must be reported in CIWQS as dissolved orthophosphate (as P). This requirement is effective starting with the January 2016 monitoring report (due March 1, 2016)
	+ The Regional Water Board has sent out a [letter](http://bacwa.org/document/regional-water-board-npdes-flows-clarification-letter-12-19-15/) to dischargers clarifying that effluent monitoring locations in NPDES permits should only represent flows to waters of the United States. Non-NPDES flows (e.g., Title 22 recycled water, treated effluent applied to land or held in storage for eventual land application, and internal recycle streams) must be reported separately in accordance with the permits that regulate those discharges. This clarification will better allow the Regional Water Board and other stakeholders to calculate loads of pollutants that are discharged, rather than diverted via recycled water or other flows.
	+ *Recycled Water –* The consulting team will be requesting information from agencies about their 2015 recycled water use, as well as plans to increase recycled water use in the future. The information will be used to estimate nutrient loads removed through consumptive use. Future recycled water plans will be categorized as either “budgeted”, “master planned”, or “conceptual”.
	+ *Optimization/Upgrade Studies –* The consultant team will be circulating reports for each facility. 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 in Summer, 2016.
 |
| **Announcements*** + *BACWA Annual Members Meeting, January 15* - It was requested that BACWA take and distribute notes on the regulators’ presentations since they don’t typically provide Power Point presentations.
	+ *Proposition 1* - BACWA may collaborate with the Regional Water Board and SFEI to develop a proposal to secure some Proposition 1 funds to study reverse osmosis concentrate management for IPR and other recycled water projects.
	+ *NPDES Compliance Letter* - BACWA submitted the annual [NPDES compliance letter](http://bacwa.org/document/bacwa-npdes-permit-letter-2016/) (attached) to the Regional Water Board on January 22. This letter can be incorporated by reference into agencies’ Annual Reports.
 |
| **Report out from the 12/18 Executive Board meeting**The following discussions from the Executive Board meeting were summarized* Microplastics – covered above
* HDR gave a presentation updating the Board on their progress on the Optimization and Upgrade Studies.
* Darcy Luce of the San Francisco Estuary Partnership (SFEP) provided a presentation on the CCMP. The implementation actions focus on a 5-year timeframe. The initial CCMP was prepared in 2007. The CCMP update process began in 2014 and aims to finish a final draft by Spring 2016. The CCMP includes recycled water and conservation goals and non-regulatory actions. The CCMP can help with collaboration between agencies, and may help with funding. The Board commented that the document needed to recognize the importance of freshwater discharges to the environment, as well as the importance of Reverse Osmosis concentrate management. Additionally, the recycled water committee commented that the IRWM process was not the correct venue for developing recycled water plans, although they could be eventually incorporated into the IRWMP.
* Sarah Deslauriers provided an [update](http://bacwa.org/document/cwccg-issues-update-12-18-15/) on the California Wastewater Climate Change Group. CWCCG is now a part of CASA and is funded by CASA. They are working to identify ways that POTWs can contribute to meeting the Governor’s Greenhouse Gas reduction goals, as expressed by the Climate Change Pillars. They will be engaging BACWA on a wastewater treatment process survey that will help inform a CARB study of process emissions.
* Oro Loma is piloting peracetic acid as an alternative disinfectant.
 |
| **Next BACWA Permits Committee Meeting:** Tuesday, March 8, 1-3pm, at EBMUD Plant Library. Regional Water Board staff to attend. |