



Toxicity Permitting in Region 2

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Status quo in San Francisco Bay Region

- ▶ Historically, POTWs were given chronic toxicity triggers, and acute toxicity limits
- ▶ At EPA's urging, agencies with Reasonable Potential are now also being given chronic toxicity limits
 - ▶ No TST in Region 2 yet

Region 2 under the new State Toxicity Provisions

- ▶ BACWA has held discussions with the Regional Water Board throughout this process
 - ▶ Acute toxicity will likely be dropped for agencies with chronic toxicity limits
 - ▶ Dilution credit, as allowed by the State Provisions
- ▶ Toxicity Provisions likely to be implemented as permits are renewed, not as a blanket amendment

Next steps

- ▶ Public draft of Toxicity Provisions and public comment period scheduled to begin in November 2017
- ▶ POTW community will internally discuss response through CASA, and BACWA's Lab Committee and Permits Committee
- ▶ BACWA will provide support once Toxicity Provisions are adopted. Stay tuned via:
 - ▶ Permits Committee
 - ▶ Lab Committee
 - ▶ BACWA Bulletin

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