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| Permits Committee – Report to BACWA Board | Permits Committee Meetings on: 7/11/17Executive Board Meeting Date: 7/21/17Committee Chair: Chris Dembiczak |

**Committee Request for Board Action: None**

**Regional Water Board Staff in attendance**

**24 Participants representing 14 member agencies**

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| **Regional Water Board Report-out**Language in attachment G will be overhauled to account for the electronic reporting rule and several other changes that have accumulated over the years.The Regional Board reminded dischargers who blend that justification must be provided during permit reissuances. Blending is a form of bypass, and agencies need to prove that there are no feasible alternatives – that they have done everything feasible to avoid bypass. A blending provision is put into permits for agencies who blend routinely, rather than just in extreme wet weather conditions.Patrick Karinja has been hired as a new permit writer.Richard Looker just got back from vacation and will begin working on the chlorine residual Basin Plan amendment.The Regional Water Board is beginning to work on the next mercury/PCB Watershed permit, which they expect will look similar to the current one.  |
| **Upcoming Permits*****July*** – North San Mateo County Sanitary District – no issues***September*** – Rodeo Sanitary District – They have had a few toxicity hits of greater than 40 TUC using *Ceriodaphnia*. They suspect the cause may be pesticides. They updated their dilution model and were given 75:1 dilution, so their limits are a MDEL of 140 TUc, and an AMEL of 51 TUc.  |
| **Nutrient Trading Framework Presentation**Yuyun Shang of EBMUD provided a presentation on the project looking at sidestream treatment, and a nutrient trading framework for the San Francisco Bay. This work was funded by a grant from the EPA. Further sidestream testing in needed, even with technologies that are well established for mainstream treatment due to the higher strength of the feedwater. The final report is [here](https://bacwa.org/wp-content/uploads/2017/05/EPA-Grant-Sidestream-Nutrient-Removal-Study-Report-04282017.pdf). See also the [paper](https://bacwa.org/wp-content/uploads/2017/07/Nutrient-Trading-2017-Nutrient-Symposium.pdf) that the team prepared on the Nutrient Trading Framework. |
| **Nutrients**1. *HABs Workshop Report-out –* The workshop highlighted research showing that HABs are a concern, but that there is still the question of what conditions lead to HABs and the release of toxins. No relationship was found between chlorophyll and toxins.
2. *June 7 Optimization and Upgrade Workshop –* materials are available [online](https://bacwa.org/document-category/optimization-and-upgrade-studies-workshop-2/).
3. *Progress update –* BACWA submitted the [Progress update](https://bacwa.org/wp-content/uploads/2017/06/2017-Optimization-Upgrade-Status-July-12017.pdf) to the Regional Water Board in compliance with the Watershed permit.
4. *Annual report -*[Data worksheet](https://bacwa.org/wp-content/uploads/2016/06/BACWA_RFI_GAR_20170530.xlsx) from each agency for Group Annual Report is due July 31
5. *Watershed permit reissuance –* BACWA is continuing discussions with its members and the Regional Water Board. The current understanding is that the next permit will include an increase in funding for the science in lieu of load caps. Both EPA and the Regional Water Board will provide documentation of this understanding. BACWA will also ramp up funding for the science in the remaining two years of the permit out of its reserves. There is a continuing discussion about how agencies can get credit for early action. There was a question in committee about whether the delisting of the Petaluma River for nutrients can exempt Petaluma from the permit, but the Regional Water Board’s position is that Petaluma may have less of an impact but must still be considered.
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| **Toxicity**1. *State Toxicity Provisions -* Bill Johnson has been meeting with the State Water Board to discuss Regional Water Board concerns about the latest draft of the provisions, and how they would be difficult to write into NPDES permits. The Regional Water Board would like more discretion on how to implement the Provisions. CASA also met with State Water Board staff who seem less open to changes than they did at the previous meeting.
2. *Toxicity Workshop -* BACWA will hold a toxicity workshop at CCCSD September 18. See [draft agenda](https://bacwa.org/document/draft-toxicity-workshop-agenda-9-18-17/). The workshop will be aimed at agency staff with a wide range of expertise in toxicity testing.
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| **BAAQMD** Rule 11-18 * 1. BAAQMD has moved all POTWs moved to Phase 2, which will give agencies a chance to update emissions factors and do health risk assessments ([See letter](https://bacwa.org/wp-content/uploads/2017/06/BAAQMD-Phase-II-letter.pdf))
	2. BACWA members are being asked to provide nearest distance from source to offsite worker and resident receptors to Sarah Deslauriers. This information will be used by BAAQMD to update proximity adjustment factors for each facility. A formal data request will be sent out soon.
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| **Announcements*** 1. State Water Board adopts [Beneficial Uses and Mercury Objectives](http://www.waterboards.ca.gov/water_issues/programs/mercury/docs/staff_report/hg_staff_report.pdf). It is unclear whether this will have much of an impact on how POTWs are regulated.
	2. ELAP workshop scheduled for August 3 in San Francisco
	3. [Dental Amalgam Rule finalized](https://www.federalregister.gov/documents/2017/06/14/2017-12338/effluent-limitations-guidelines-and-standards-for-the-dental-category). POTWs will need to receive certification forms from dental facilities, but will not be responsible for enforcement.
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| **Next BACWA Permits Committee Meeting:** Tuesday August 8 1-3pm, EBMUD. |