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| Permits Committee –  Report to BACWA Board | Permits Committee Meetings on: 8/8/17  Executive Board Meeting Date: 8/18/17  Committee Chair: Chris Dembiczak |

**Committee Request for Board Action: None**

**Regional Water Board Staff in attendance**

**17 Participants representing 10 member agencies**

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| **Upcoming Permits**  ***September*** – *Rodeo Sanitary District* – Rodeo has experienced 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. BACWA did not submit a comment letter on their Tentative Order.  *Vallejo* *Flood and Sanitary District* – The TO includes a requirement to develop a Private Sewer Lateral Ordinance to the Board for consideration. Vallejo already funds a voluntary Upper Lateral Replacement Program, and doesn’t want the Regional Water Board to divert resources from that program to a new effort. It is likely that similar language will end up in the permits of all blending agencies. Vallejo has requested that BACWA submit a comment letter but several committee members suggested that Vallejo explain their current strategy and the unique financial situation in Vallejo to the Regional Board and ask for an individual postponement or waiver.  ***November –*** *Sewer Authority Midcoastside –* They may want BACWA to resubmit comments from last permit on dilution credit. |
| **Mercury/PCB Watershed Permit**  An administrative draft is expected imminently (and was released after the meeting on 8/15). BACWA will request that PCB congener monitoring frequency be reduced to once per year for major dischargers, and once per permit term for minor dischargers. |
| **Chlorine Residual Basin Plan Amendment**  BACWA has contracted with Tom Hall at EOA to support the development of a Basin Plan Amendment work plan. They are looking at a chlorine water quality objective that would be implemented using dilution credit and the SIP procedure. This strategy would only help deep water dischargers. At the same time, they are looking to establish an RL/ML for chlorine via continuous online analyzers, and are soliciting participation in a study that will generate data for this effort. Establishing an RL/ML would help all dischargers. |
| **ELAP Update**  [Preliminary draft regulations](http://www.waterboards.ca.gov/drinking_water/certlic/labs/documents/elap_preliminary_draft_regulations.pdf) have been released for comments. Agencies are concerned that they are not written clearly, and that even though implementation is supposed to be phased through 2022, labs that are not in compliance by 2019 must submit quarterly progress updates. |
| **Toxicity**   1. *State Toxicity Provisions –* No updates since last month, where it was posted that a draft is expected in November. 2. *Toxicity Workshop -* BACWA will hold a toxicity workshop at CCCSD September 18. See [draft agenda](https://bacwa.org/wp-content/uploads/2017/07/Draft-Toxicity-Workshop-Agenda-091817.pdf)**.** The workshop will be aimed at agency staff with a wide range of expertise in toxicity testing. The committee agreed that Regional Water Board staff should be invited. |
| **Bacterial Objectives**  The committee discussed the pros and cons of asking the State Water Board to require dilution in the implementation of bacterial objectives. The committee consensus was to request soft language urging Regional Water Boards use mixing zones in calculating limits in permits, as allowed by their Basin Plans. |
| **Nutrients**   1. *Group Annual Report –* Thirty of thirty-five agencies have reported their data to HDR. 2. *Optimization and Upgrade Studies –* HDR has received comments from all but five agencies. They plan to have the Report finalized by the end of the year. 3. *Second Watershed Permit* – The committee reviewed the tenets of the next permit, which are 1) Individual plant nutrient monitoring and reporting; 2) Group Annual Reporting of nutrient loadings to the Bay; 3) Funding for the Nutrient Management Strategy’s scientific investigations; 4) A regional assessment of feasibility and cost for reducing nutrients through means other than treatment and discharge at the POTW; 5). Establishing a baseline for POTWs that undertake early actions to reduce nutrients; 6) Funding for Monitoring and Modeling at the end of the 2nd WS Permit. The committee requested that the Letter of Intent that BACWA has been working on with the Regional Water Board be circulated via the email list. 4. *Wetlands Report –* Ian Wren, working with SFEI, developed a [wetlands screening report](https://bacwa.org/document/r2-wetland-scoping-report-06-17/) to look at the potential for nutrient removal through treatment wetlands in the Region. The committee will invite Ian to present his finding at a future meeting. 5. *Oro Loma Permit –* Oro Loma is working with the Regional Water Board on its Tentative Order, where they will likely to trade performance-based nutrient limits for permitting a near-shore discharge during peak wet weather, which reduce their reliance on EBDA’s outfall capacity. |
| **BAAQMD** Rule 11-18   * 1. BACWA members to provide nearest distance from source to offsite worker and resident receptors to [Sarah Deslauriers](mailto:SDeslauriers@carollo.com). See [data request](https://bacwa.org/document/proximity-data-request-11-18-7-26-17/).   2. Meeting on 8/17 with BAAQMD staff to discuss TBARCT alternatives |
| **Announcements**   * 1. [State of the Estuary Meeting](http://www.sfestuary.org/state-of-the-estuary-conference/) October 10-11. The RMP Annual meeting will be October 6. |
| **Next BACWA Permits Committee Meeting:** Tuesday September 12 1-3pm, EBMUD. The October meeting date is changed to October 17 to avoid conflict with the State of the Estuary Meeting. |