

Committee Request for Board Action: None

Conference call only. 17 attendees representing 11 member agencies.

Upcoming Permits

August – SASM - No issues, satellite agencies have not been included in permit. SASM does not frequently blend, and owns part of its collection system. Its satellite systems also have private sewer lateral ordinances. Both SASM and Tiburon submitted comments asking that the SSS WDR not be incorporated into their NPDES permits (see Collections Systems Issues, below)

Tiburon – No known issues.

October – SFO – SFO had some questions about how stormwater would be permitted – via Attachment S or the Stormwater Industrial General Order.

State Recycled Water Policy

BACWA submitted written [comments](#) on the Proposed Amendments to the State Recycled Water Policy, and provided oral comments at the June 19 state Water Board hearing on the following topics:

- Goal to minimize effluent discharges to ocean and enclosed bays – The State Water Board is open to reframing this goal in another section of the Policy.
- Transitioning from 96-011 to the State Water Order – BACWA is concerned about loss of coverage, and would like a blanket transition to the State General Order, but the Water Board chair is concerned about “old” engineering reports.
- Wastewater Change Petitions – BACWA is concerned that the requirement for another application will further impede projects, but State Water Board thinks the problem is agencies aren’t submitting Wastewater Change Petitions early enough in the process.
- Reporting – BACWA thanked the State Water Board for removing priority pollutant monitoring requirements.
- SNMPs – BACWA recommended that SNMPs should be housed under SGMA, but the Water Board Chair doesn’t agree.

Collection Systems Issues

a. *SAMC Lawsuit and incorporation of SSS WDR into NPDES permits* – In Region 2, the SSS WDR is incorporated by reference into most NPDES permits, leaving agencies exposed to civil liability if they violate the SSS WDR. Proposed changes in language could include the following:

The Discharger is subject to the requirements of, and shall separately comply with, State Water Board Order No. 2006-0003-DWQ, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, as amended by State Water Board Order No. WQ 2013-0058-EXEC and any subsequent order updating these requirements. [Additional language could also be added, such as: “The requirements of the Statewide WDRs are not incorporated by reference into this permit, but satisfying the reporting requirements set forth in the statewide WDRs (and any subsequent order updating these requirements) shall satisfy the NPDES reporting requirements for sanitary sewer overflows specified in Attachments D and G.”]

b. *Exfiltration* – The San Diego RWB is looking at sewer exfiltration as source of human fecal matter to watershed – see [SCAP/CASA comments](#):

c. *SSS WDR* - CASA is developing redlines on SSS WDR to deliver to State Water Board on the following issues –

- Streamlined Reporting
- Audit Schedules
- De Minimus Threshold Language
- Climate Change Language/Considerations
- SSMP Change Log
- Other Potential Assistance

Nutrients

- a. *Optimization/Upgrade Studies* – The [Optimization and Upgrade final report](#) was submitted to the Regional Water Board on June 26. BACWA is planning a workshop to go over the Report with the Regional Water Board, and will produce a short brochure summarizing the studies for agencies to share with their Governing Boards and the public.

- b. *NST meeting* – The Nutrient Strategy Team met on June 16 to discuss elements of the second watershed permit - the Regional Study as well as concepts for encouraging early actions and reducing the risk of agencies that plan to implement Capital Projects to reduce nutrients. The group has moved away from the “credit” concept and towards an idea of getting certainty that they won’t have stranded assets if they choose to invest in nutrient removal upgrades. There was also agreement that contributing to an existing effort on wetlands, through SFEI or SFEP, would be a good way to address a regional study of non-greyscape means of nutrient removal.

USGS Report on Selenium

In 2016, EPA proposed selenium objectives for the San Francisco Bay. BACWA commented that the objectives did not take into account data relevant to the South Bay. The USGS has reviewed South Bay data and developed recommendations for water column selenium objectives of 2 ug/L, which is still lower than selenium levels observed in many locations in the South Bay. The committee was interested in hearing from the Regional Water board whether this study will impact the timeframe for the South Bay selenium TMDL.

Announcements

- a. RWB soliciting nominations for 2018 P2 Award – email [Debbie Phan](#) by July 13
- b. NACWA seeking volunteers for [Cost of Wipes study](#)
- c. [Bacterial Objectives](#) scheduled for adoption by State Water Board on Aug 7
- d. Please respond to [2018 Biosolids survey](#)
- e. Regional Water Board wetlands policy workshop Aug 14

Next BACWA Permits Committee Meeting: Tuesday August 7, 12 to 2pm, EBMUD Lab Library