

Committee Request for Board Action: None

Conference call only. 17 attendees representing 10 member agencies.

Upcoming Permits

August – SASM - No issues. Both SASM and Tiburon submitted comments asking that the SSS WDR not be incorporated into their NPDES permits. In response, the Regional Water Board reverted to the language they had used previous to the issuance of the new standard NPDES permit by the Regional Water Board. The updated language is as follows:

~~Collection System Management. The Discharger is subject to the requirements of, and shall 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 shall properly operate and maintain its collection system (see Attachments D and G, section I.D), report any noncompliance with respect to its collection system (see Attachment D, section V.E.1, and Attachment G, sections V.E.1 and V.E.2), and mitigate any discharges in violation of this Order associated with its collection system (see Attachments D and G, section I.C). 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, contains requirements for the operation and maintenance of collection systems and for reporting and mitigating sanitary sewer overflows. While the Discharger must comply with both the statewide WDRs and this Order, the statewide WDRs more clearly and specifically stipulate requirements for the operation and maintenance and for reporting and mitigating sanitary sewer overflows. Implementing the requirements for the operation and maintenance and mitigation of sanitary sewer overflows set forth in the statewide WDRs (and any subsequent order updating these requirements) shall satisfy the corresponding federal NPDES requirements specified in Attachments D and G of this Order for the collection systems. Following the reporting requirements set forth in the statewide WDRs (and any subsequent order updating these requirements) shall satisfy the NPDES reporting.~~

See [revised TO](#).

Tiburon – No other known issues. See [revised TO](#).

October – SFO – Same language about Collection Systems Management as for SASM and Tiburon, above.

Recap from AIR Committee meeting with BAAQMD

The committee had a lengthy discussion about the 8/6 meeting between BACWA's AIR committee and the BAAQMD. At that meeting, BAAQMD presented details on the development of its Basin-Wide Methane Strategy, where we stand in Rule 11-18 implementation, and AB617 Implementation. The major issue that concerned participants was the discussion about the timeline for permitting new projects, as well as the lack of a framework for venting during planned maintenance. One agency discussed the impossibility of submitting a full Authority to Construct permit application without first bidding the project, due to the necessity of using equipment specs in the application. This can cause substantial delays and put projects into jeopardy. The meeting attendees did not feel that the BAAQMD staff present had a satisfactory response to this, and other permitting issues, and would be interested in exploring strategies with BAAQMD management for improving the process.

- 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 July 20, and Regional Water board staff were in attendance. Tom Mumley outlined his preferred strategy for nutrient management actions, which is to impose load caps in 2024 based on 2019 loads, plus a buffer for growth. Agencies could then plan how to incrementally reduce loading over time, or plan large capital projects. Agencies who could not meet their load caps could get a compliance schedule if they could show that they plan to implement a project to reduce nutrient loads. The loads caps may be increased or reduced in the future based on information from the Science Plan. The NST has not yet discussed this strategy without the Water board present.
- c. *Group Annual Report* – Data were due to HDR at the end of July.

CECs

- a. [Updating Monitoring Recommendations for Emerging Contaminants in Coastal Waters](#) – The Ocean protection Council is funding the reformation of the Scientific Panel on CECs in aquatic ecosystems. This could lead to recommendations that restart the State Water Board's efforts to develop a pilot monitoring

program for CECs. BACWA responded to the State's previous Draft Pilot Monitoring Plan with a letter stating that we have a mature program run by the RMP that is tailored to our research needs in the Bay Area.

- b. *BACWA White Paper on Representative POTW participation in CECs studies.* Based on discussions with the CECs leads at the RMP, BACWA will deliver information on the following factors to allow the RMP to request volunteers from "representative" POTWs:
- Location by subembayment
 - Source water – surface vs. groundwater, agricultural impacts?
 - Type of Treatment, including secondary and disinfection
 - Sludge Residence Time
 - Average dry weather flow
 - Flow to Bay
 - Industrial users, number of the following:
 - Airports
 - Military Bases
 - Electroplating Facilities
 - Hospitals
 - Commercial Laundry
 - Pet Groomers (?)
- c. *RMP Presentation to Committee* – Diana Lin will provide a presentation to the Permits committee in October. The committee would like to hear about the results of the pharmaceuticals study, what is known about sunscreens in aquatic ecosystems, tire dust runoff from roads, flea treatments, and PFOS/PFAS.

Satellite Recycled Water Facility Permitting

The proposed amendments to the Recycled Water Policy would terminate R2-1996-011 one year after their adoption, and require all enrollees to get coverage under the State General Order for recycled water. However, the State General Order does not cover production of recycled water, unlike R2-1996-011. This leaves recycled water satellite facilities potentially without coverage, if they are not described in an agency's NPDES permit. The Regional Water Board is considering how to permit these facilities in the future.

Water Board Wetlands Workshop

The Regional Water Board will host a [workshop](#) on revising Wetlands Policy 94-086. BACWA will provide comments in favor of the revision, and that it should be less difficult to obtain a shallow water discharge prohibition exception for wetlands projects. BACWA will also comment on the need to work with other agencies to streamline permitting.

BACWA Workshop on unintended consequences of

SCAP hosted a workshop to provide insight into the technical challenges of designing, managing and operating wastewater treatment plants with rapidly changing conditions as a result of water conservation. BACWA is considering a similar workshop, and committee members indicated they would be interested in attending.

Announcements

- a. Triennial Review Public hearing on September 12
- b. NACWA seeking volunteers for [Cost of Wipes study](#)
- c. Please respond to [2018 Biosolids survey](#) by Aug 17.
- d. BACWA looking into better conference call provider

Next BACWA Permits Committee Meeting: Tuesday September 11, 12 to 2pm, EBMUD Lab Library