

Pretreatment Committee – Report to BACWA Board

Pretreatment Committee Meeting: 06/04/2020
Executive Board Meeting: 06/19/2020
Committee Chairs: Tim Potter, Michael Dunning

Committee Request for Board Action: None

06/04/20 Meeting – 41 attendees representing 21 agencies (remote participation only)

1. COVID-19 Engagement with Regulators – Template Letter

- The June meeting focused on a debrief from a May meeting with committee leaders, BACWA ED, and RWQCB staff. That meeting discussed pretreatment program issues associated with agencies' response to the pandemic. One outcome was the development of a template letter that an agency can consider using, if the response to the shelter in place orders results in the internal approved pretreatment program standards not being met (e.g., a commitment to monthly or quarterly sampling). The letter would notify the RWQCB of this condition and identify that the details of the program changes will be communicated in the required pretreatment program reports. The template letter was shared with attendees ahead of time and discussed during the meeting.
- Committee leaders reviewed the template letter and took questions from attendees. Feedback was positive and the letter was well-received by the group. In brief, the letter covers the following potential issues:

- Suspension of in-person inspections or inspection related to IU surveys
- Suspension of IU sampling

The letter also makes clear that federally-mandated requirements, such as ones listed below, continue to be met.

- Track IU discharge and reporting violations
- Issue enforcement actions
- Respond to any reported accidental discharges or emergency bypass requests
- Continue to issue IU permits
- Committee leaders also noted that RWQCB asked that variations from pretreatment program requirements be noted in the semi-annual and annual reports, and not in the monthly NPDES self-monitoring reports. Standardized text to consider including in the monthly NPDES self-monitoring reports to identify when internal approved pretreatment program standards were not met was discussed. The discussions during the May meeting with RWQCB staff emphasized the use of this text should only be used when the program's internal approved pretreatment program standards were not met during the reporting period and should not be used as a precautionary notification.

2. Round Table: Pretreatment Programs in the Age of COVID-19

Attendees shared their agencies' experiences/ modified operations during the current public health crisis. Some common themes are noted below:

- Many agencies suspended or minimized field activities (inspection and sampling); focusing first and foremost on meeting federally-mandated minimums for SIUs: one inspection and two sampling events (at least one event conducted by agency)
- Emergency call-outs still taking place

- Continue to receive and review IU data and reports
- Rotating staff between working from home/ shifts in the office
- WFH has its challenges (such as accessing internal databases and work files)
- Timely enforcement is challenging; agencies are focusing on high-priority cases
- Some agencies have been conducting virtual inspections – asking IU representative to walk around facility during video call
- On-site inspections are different now: most are announced (partially to make sure IUs are open and have SOPs in place for visitors); masks and social-distancing are required.

3. Next meeting: TBD, third quarter of 2020