

Committee Request for Board Action:

- Consideration of suggestions for Phase 2 of PFAS Regional Study (see [pink text below](#))
- Approval of Chlorine Blanket Permit Amendment comment letter

Regular meeting: 31 attendees (via teleconference only) representing 19 member agencies

Joint meeting with Lab Committee: 55 attendees, including 2 guest speakers

Results of PFAS Regional Study, Phase 1

Miguel Mendez and Diana Lin of SFEI presented the Phase 1 results of the PFAS Regional Study for twelve municipal wastewater dischargers. The slides are available [here](#). The following trends were noted:

- Results from grab and composite sampling were generally comparable to one another.
- Among the municipal dischargers, the sum of PFAS concentrations in influent, effluent, and biosolids were generally comparable for each matrix. By contrast, the industrial discharger included in Phase 1 had significantly higher concentrations than the municipal dischargers. This indicates the study approach of sampling representative POTWs (rather than all POTWs) is an appropriate way to characterize PFAS in municipal wastewater in the region.
- PFAS analytes were higher in effluent than in influent. This is due to the conversion of PFAS precursors to terminal PFAS products within the wastewater treatment process.
- PFAS precursors were quantified in influent and biosolids using Total Organic Precursor (TOP) analysis. In influent, PFAS precursors were about nine times higher than the sum of PFAS analytes. In biosolids, PFAS precursors were about five times higher than the sum of PFAS analytes. This means the influent and biosolids contain a significant presence of unknown PFAS precursors. TOP analysis was not performed on effluent samples in Phase 1, but this could be included in Phase 2.
- For the Phase 1 results, committee members were interested in finding out whether influent concentrations and biosolids concentrations are correlated.
- In September, SFEI, BACWA and the Regional Water Board will discuss and agree on the Phase 2 study objectives. The tentative plan for Phase 2 is to focus on PFAS entering sewersheds by sampling upstream in different service areas (residential, commercial, industrial, etc.), and to conduct sampling in a subset of the 12 agencies that participated in Phase 1.

[For Phase 2, committee members were interested in finding out more about biosolids concentrations and in groundwater underlying biosolids disposal or land application areas](#), since biosolids use represents a theoretical nexus to drinking water supplies via groundwater. SFPUC noted that some information on biosolids land application is available in this [Pima County study](#).

Tentative Order of Chlorine Blanket Permit Amendment

The Regional Water Board has released a [Tentative Order](#) blanket permit amendment that will modify chlorine effluent limits and remove oil & grease monitoring requirements for BACWA members. Comments are due August 20th. A draft comment letter has been distributed to the Permits committee for review. The earliest possible effective date of the blanket permit amendment is November 1, pending OAL and EPA review.

The committee discussed whether any modifications are needed to the Tentative Order to accommodate changes to whole effluent toxicity testing. Laboratory staff should plan to dechlorinate samples prior to conducting toxicity testing (applicable only to agencies that plan to discharge residual chlorine after the permit amendment is effective). Moving the sampling location to upstream of disinfection is another possible compliance strategy. Mary Cousins will reach out to Regional Water Board staff to alert them to this unintended consequence of the blanket permit amendment. Toxicity test impacts will not be included in the comment letter

Alternate Monitoring Requirements

The Regional Water Board has made substantial progress on a blanket permit amendment to replace the 2016 Alternate Monitoring & Reporting Program, and a draft is expected to be available within the next two weeks. The

committee plans to convene a special meeting to discuss the Regional Water Board's proposal, since feedback will be needed before the next regularly scheduled Permits committee meeting.

Statewide Toxicity Policy

- The State Water Board intends to rescind the December 2020 version of the statewide toxicity provisions and re-adopt as a state policy. The adoption hearing is on October 5th. The earliest possible effective date is in early 2022.

Climate Change

- By the end of July, nearly all Bay Area POTWs had completed the Climate Change Questionnaire issued by the Regional Water Board. Many (but not all) POTWs expect impacts from sea level rise and coastal flooding, including impacts to treatment plants, ponds, and collection systems. Many responses noted that power supply reliability improvements have already been completed.
- The Regional Water Board is beginning work on a Shoreline Resilience Basin Plan Amendment. The scope and schedule are identified in the [CEQA scoping materials](#) for the amendment. A draft Staff Report is expected in September 2021. This Basin Plan Amendment may address the use of wastewater in horizontal levees.

Nutrients

- The Regional Water Board is preparing a memo identifying science needs for the 3rd nutrient watershed permit, which will be released for stakeholder community review this fall.
- The Nutrient Strategy Team continues to develop a document describing BACWA's key tenets for the 3rd watershed permit. The effort will be informed by results of nutrient loading data analysis regarding compliance feasibility being conducted by HDR, the results of which will be presented at the next Nutrient Strategy Team meeting scheduled for August 25th.

Biosolids

- Regional Water Board staff plan increased attention to biosolids permitting in Region 2.
- SF Bay Joint Venture is sponsoring a white paper regarding biosolids land application in the Baylands. SFEI is the lead author and the Bay Area Biosolids Coalition, Ducks Unlimited, and Sonoma Land Trust are assisting. The group plans to finalize the white paper by October.

Next BACWA Permits Committee Meeting: October 12, 2021, 12:30 PM via Zoom