

Committee Request for Board Action: None

Regular meeting: 32 attendees (via teleconference only) representing 19 member agencies

Tentative Orders

Amy Chastain from SFPUC explained that the proposed [Cleanup and Abatement Order](#) will result in changes to operations before and during storm events, and also involves 3 major capital projects in areas with high flood risk. The estimated total capital cost is \$600M. The proposed Order has already been approved by SFPUC's governing bodies and is part of a larger negotiation between the city, state, and federal entities.

Napa Sanitation District and Calistoga expect to see draft NPDES permits in the coming months.

Blanket Permit Amendment

On Oct. 12, the Regional Water Board approved the [Revised Tentative Order](#) blanket permit amendment that will modify chlorine effluent limits and remove oil & grease monitoring requirements for BACWA members. The Basin Plan Amendment must be approved by OAL and EPA before the blanket permit amendment becomes effective, so the effective date of the permit amendment is likely to be Dec. 1 or Jan. 1. Once effective, members should plan to upload the highest one-hour arithmetic mean as the daily value reported into CIWQS.

Nutrients Update

A [science program annual update and list of recent work products](#) is available from the Nutrient Management Strategy (NMS) science team. BACWA is working with Mike Connor on a review of select work products. An Assessment Framework update is now expected in December 2021. Lorien Fono shared a presentation regarding the Regional Water Board's current views on impairment and the need for a Basin Plan Amendment (available [here](#), pg. 46-48), and also shared some findings from HDR's data analysis of nutrient loads. Agencies that have made process improvements or implemented recycled water projects should make a note of these changes when uploading data into HDR's forthcoming template for the nutrient Group Annual Report.

NPDES Permit Amendment for Monitoring Requirements

On Oct. 11, the Regional Water Board issued a [Tentative Order](#) to reduce monitoring requirements for some pollutants and to raise supplemental funding for Regional Monitoring Program CECs studies. Mary Cousins has requested that BACWA members provide comments on the Tentative Order by **Tuesday, October 26th**; the final comment letter is due on Nov. 15th. PCB congener monitoring via Method 1668C is not included in the Tentative Order, but monitoring frequencies may be revisited when the Mercury and PCBs watershed permit is reissued in 2022. Although the Tentative Order contains both monitoring reductions and requires Bay dischargers to provide supplemental monitoring for CECs studies, the actions are legally decoupled. The Regional Water Board has authority to pursue either action independently; they are combined in the permit amendment for administrative efficiency. Bay dischargers will see a supplemental fee included in the 2022 RMP invoices.

Microplastics

Lorien Fono reported out on a recent meeting of the RMP microplastics work group, which has established that stormwater contains 300x as many microplastics particles as wastewater, about ½ of which are tire fragments. Wastewater microplastics are predominantly fibers. CCCSD and EBDA are participating in an OPC-funded research project of microplastic removal in wastewater treatment plants.

PFAS

Development of the sampling and analysis plan for Phase 2 of the PFAS Regional Study is underway. Approximately 6 participants from Phase 1 will be involved in Phase 2, and samples will be collected at a greater variety of locations than Phase 1, including within collection systems and groundwater underlying biosolids disposal sites.

Triennial Review

The Triennial Review Staff Report identifies the highest-priority basin planning projects for Regional Water Board staff. BAWA recently submitted a brief [comment letter](#) on the Staff Report regarding the Nutrient Management Strategy, which is second-highest priority item.

SSS-WDR

In December or January, the State Water Board intends to release a public review draft order for sanitary sewer systems for a 60-day comment period.

Next BACWA Permits Committee Meeting: December 14, 2021, 12:30 PM via Zoom