

# Pretreatment Committee – Report to BACWA Board

Pretreatment Committee Meeting: 9/30/2021  
Executive Board Meeting: 11/19/21  
Committee Chairs: Tim Potter, Michael Dunning

## **Committee Request for Board Action:** None

43 attendees representing 19 agencies (remote participation only)

The committee welcomes nomination of a new co-chair to replace outgoing co-chair Tim Potter.

### **PFAS**

BACWA's Regulatory Program Manager provided an update on the Bay Area Regional PFAS Study, including highlights from [SFEI's presentation](#) on Phase 1 findings and plans for Phase 2. A preliminary compilation of statewide POTW influent and effluent data provided to the Clean Water Summit Partners [4<sup>th</sup> PFAS workshop](#) does not reveal a significant contribution from industrial loading – concentration in predominantly residential and commercial areas were just as high or higher than areas with industrial contributions. BACWA's Phase 2 study is likely to include sampling within one or more POTW collection systems to investigate further. It is premature to establish technically-based local limits based on water quality objectives in the Bay, although the Regional Water Board has adopted interim draft [Environmental Screening Levels](#) for two analytes (PFOA and PFOS) based on ecotoxicity that could be useful. EPA also provided a link to [treatability information](#).

### **NPDES Permit Amendment for Monitoring and Reporting to Support CECs Studies**

A proposed permit amendment will modify influent, effluent, and biosolids monitoring frequencies relevant to pretreatment programs. The group discussed the importance of properly classifying and reporting the number of significant industrial users (SIUs) within the annual report, since monitoring requirements will now reflect the SIU count.

Each agency uses slightly different criteria for classifying SIUs, as appropriate for each service area. This may be a topic for future committee training.

### **Regional Water Board Updates**

Jessica Watkins and Michael Chee attended from Regional Water Board. They will soon be recruiting for a new scientist with pretreatment and pollution prevention responsibilities. The Regional Water Board has received contractor support to complete a Pretreatment Compliance Audit (PCA) for Napa in October. Mike Chee continues to serve as the main point of contact for pretreatment questions, and he confirmed that it is acceptable to provide an agency's own research and interpretation when asking questions.

### **State Water Board Updates**

Erica Kalve, Olivia Magana, and Arnold Wong attended from State Water Board. Agencies were requested to copy the State Water Board on questions and program changes, as this will allow their staff to more quickly come up to speed on pretreatment matters. Contact info for the State Water Board's new Pretreatment and CECs Unit is shown below:

Erica Kalve, Statewide Pretreatment Coordinator, [erica.kalve@waterboards.ca.gov](mailto:erica.kalve@waterboards.ca.gov)

Arnold Wong, [arnold.wong@waterboards.ca.gov](mailto:arnold.wong@waterboards.ca.gov)

Olivia Magana, [olivia.magana@waterboards.ca.gov](mailto:olivia.magana@waterboards.ca.gov)

# Pretreatment Committee – Report to BACWA Board

Pretreatment Committee Meeting: 9/30/2021  
Executive Board Meeting: 11/19/21  
Committee Chairs: Tim Potter, Michael Dunning

## **EPA Updates**

Amelia Whitson of EPA Region 9 attended and provided a comprehensive update on electronic reporting, effluent limitations guidelines for PFAS, the Methods Update Rule, and resource recovery (see slides [here](#)). EPA will be completing a PCA of Livermore, and recently completed 2 industrial user audits. There was a brief discussion about the use of method-based limits; it is better to define industrial user limits using specific analytes rather than to define limits using methods (i.e., list each target analyte in your code, rather than “sum of all chlorinated hydrocarbons by Method XXX”). EPA will no longer serve as the main point of contact for pretreatment questions; see State Water Board contact information above.

Pretreatment programs will need to submit a program update to respond to the new electronic reporting requirements, but it is considered a non-substantial program change. Information about the two-step process for obtaining CROMERR certification is available from EPA [here](#). Amelia confirmed that only federally mandated submittals (e.g. SIUs and CIUs permit applications and reports, one-time dental certifications) per federal guidance must submit with CROMERR certification. Other agency-specific reports (such as food service facilities, groundwater permits, etc.) do not have to be CROMERR-compliant. The pretreatment program ordinance needs to be modified to enable electronic reporting under CROMERR and may need to be modified to accept local mandated submittals electronically.

## **COVID Impacts**

Most agencies reported that they have resumed inspections. Some permitted users (e.g., federal sites) are now requesting proof of vaccination or negative test results for inspectors.

**Next meeting: TBD**