

Committee Request for Board Action: Consideration of Comments on EBDA Tentative Order NPDES Permit (if needed, TBD in May)

Regular meeting: 27 attendees via Zoom representing about 15 member agencies.

Tentative Orders

The Regional Water Board has issued a tentative order NPDES permit for [Central Contra Costa Sanitary District](#) and the [City of American Canyon](#). Both permits have oil & grease effluent limits and monitoring requirements removed, because the Oil & Grease section of the [2020 Basin Plan amendment](#) is now effective even though the chlorine sections are not. Both tentative orders also have reduced monitoring requirements for acute toxicity (1/quarter instead of 1/month). The Central San permit continues to contain ammonia mass loading limits, but these limits would sunset if nitrogen load limits are included in the 3rd Nutrient Watershed Permit.

EBDA also recently received their administrative draft NPDES permit, which is scheduled for July adoption. EBDA may seek changes to the Attachment A definitions and, if so, the proposed edits would be shared with the Permits Committee.

There was a general discussion about the confusing requirements related to recycled water volumetric data that goes into Geotracker. Additional review and discussion with NPDES Division staff could be helpful to understand and minimize duplicative requirements for Geotracker and CIWQS reporting.

Chlorine Blanket Permit Amendment

There is no near term anticipated effective date for the [blanket permit amendment](#) modifying chlorine effluent limits and removing oil & grease monitoring requirements. The supporting [Basin Plan Amendment](#) has been delayed by the EPA review process. As noted above, the oil and grease language is being implemented permit-by-permit.

Implementation of [Statewide Toxicity Provisions](#)

In February, BACWA submitted comments to the Regional Water Board on NPDES permit implementation language for the statewide toxicity provisions. Once finalized, the language will be added permit-by-permit upon reissuance of NPDES permits. The effective date is anticipated to be summer 2022. A [Ceriodaphnia study](#) is also underway; lab work may occur this summer to attempt to reduce inter-laboratory variability.

[Mercury and PCBs Watershed Permit](#)

The Mercury and PCBs Watershed Permit will be reissued towards the end of 2022, which means the Regional Water Board will prepare the permit in late spring and summer. BACWA will assist with PCB data compilation.

Climate Change Permit Amendment (NEW!)

The Regional Water Board has released a proposed [Climate Change Basin Plan Amendment](#) and accompanying [Draft Staff Report](#) that mainly addresses dredge and fill requirements. Comments were due 4/22. BACWA plans to submit comments supporting the Basin Plan Amendment and noting the need for addressing NPDES permitting of horizontal levees that have wastewater discharges. Regional Water Board staff recently shared a guidance document on NPDES Permitting of Nature-Based Solutions, which has been shared with the committee. (Note, finalized comments were submitted after the Committee meeting and are posted [here](#))

Nutrients Update

Science program update – One of the current focuses of the science team is the Assessment Framework, which is described in this [January 2022 Work Plan](#).

3rd watershed permit – On April 28th, the Nutrient Strategy Team will convene to discuss a potential statistical method for establishing baseline loading conditions for the 3rd watershed permit.

PFAS Regional Study

Development of the [sampling and analysis plan for Phase 2](#) of the PFAS Regional Study is complete. PFAS results from the statewide investigative order were recently presented to the State Water Board (see [recording](#)), and generally agree with results from BACWA's Phase 1 study.

Next BACWA Permits Committee Meeting: June 14, 2022, 12:30 PM via Zoom