

Pretreatment Committee – Report to BACWA Board

Pretreatment Committee Meeting: 6/02/2022
Executive Board Meeting: 07/15/22
Committee Chairs: Casey Fitzgerald, Michael Dunning

Committee Request for Board Action: None

Introductions

Casey Fitzgerald was announced as the new pretreatment committee cochair, taking over from Tim Potter

PFAS

BACWA's Executive Director [provided an update](#) on the Bay Area Regional PFAS Study, as well as recent development on PFAS by EPA that may impact PFAS regulation.

EPA has a [strategic roadmap](#) for PFAS and has been taking a very active role regarding PFAS response. One of the major elements of that roadmap is to use the federal pretreatment program to reduce industrial loading of PFAS. In April, EPA announced a few actions related to this roadmap. First, they have issued a draft method for adsorbable organic fluorine, which is part of building the toolbox for assessing PFAS concentrations in wastewater. Second, they released draft water quality criteria for PFAS in fish. These draft aquatic life criteria are just one example of the water quality criteria that are going to be rolling out. These particular limits are to protect the fish themselves, not the people that eat the fish, and they are fairly high limits. EPA is also planning to developing drinking water MCLs for PFOA and PFOS, and the California Division of Drinking water has also issued drinking water response and notification levels for PFOS, PFOA, and PFBS. Drinking water MCLs are not applicable to Bay discharges, but these limits will affect inland dischargers. Eventually there may also be criteria that apply to human consumption of fish, and those would be applicable to Bay discharges.

Also in April, [EPA issued a memo](#) about how they will roll out new PFAS related requirements into NPDES permits where they are the pretreatment program control authority, which is not true for California. The memo was shared with the committee because it may indicate the direction we are headed.

Recent PCI/PCA experiences

Committee members gave updates on their recent audit and inspection experiences with Water Board staff. The Committee would like to hear from regulators about their priorities.

Industrial User Categorization

Several agencies have experienced pushback from industries upon being categorized as a new industrial user. There are R&D exemptions from categorization, and members discussed what kinds of operations could qualify for those exemptions. The group would like to follow up with the Water Board on how the handing businesses doing business as other businesses.

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CROMERR Update (EPA Electronic Reporting)

Some agencies reported their experiences transitioning to EPA's CROMERR system. There was a discussion about whether it was worth the effort and resources to get approval. Some agencies like to have the electronic backup for file storage and extra security. This item will be agenzized for future meetings.

COVID Impacts

Most agencies reported that they have resumed inspections, although some work elements have not yet resumed due to the pandemic. Several agencies announced that they had significant turnover, with up to 50% new staff.

General Discussion

The committee felt that its role should be the following:

- Updates from BACWA
- Host training sessions (there was a discussion that there are video archives of Greg Arthur's Pretreatment Training on the [committee webpage](#))
- Training by committee members
- Permit writing

It was noted that we need to update the committee list, due to high turnover by agency staff.

Next meeting: TBD – attendees expressed interest in scheduling an in-person meeting. Region 2 and EPA will be invited to a winter meeting.