

Pretreatment Committee – Report to BACWA Board

Pretreatment Committee Meeting: 3/22/2023
Executive Board Meeting: 04/21/23
Committee Chairs: Casey Fitzgerald, Michael Dunning

Committee Request for Board Action: None

53 attendees (27 participating in-person and 26 participating remotely) from 21 member agencies plus the Regional Water Board, State Water Board, and USEPA.

BACWA Updates

- Results from Phase 2 of the Bay Area Regional PFAS Study s are expected in the April – June 2023 timeframe. For context, see [Phase 1 Memo](#) and [Phase 2 Sampling and Analysis Plan](#).
- Due to the harmful algae bloom that occurred in summer 2022, it is likely that the Nutrient Watershed Permit to be reissued in 2024 will include dry season load limits for Total Inorganic Nitrogen. More information is available in this [Nutrient Fact Sheet](#).
- The BACWA Annual Members Meeting will be held May 5, 2023 in Berkeley.

EPA Updates

Amelia Whitson (Pretreatment Coordinator, US EPA Region 9) provided National Pretreatment Updates. Her slides are available [here](#). Announcements included:

- Beginning in 2025, Annual Pretreatment Reports and semi-annual IU compliance reports will have to be submitted electronically. This information will go into a database – it will not merely involve submittal of PDF files. To participate in a technical workgroup on the rollout of these requirements, including beta-testing of forms, contact [Carey Johnston](#), EPA Office of Compliance.
- To receive IU reports identified in 40 CFR §403 in electronic form only, you must (1) seek CROMERR approval and then (2) modify your approved pretreatment program. Additional info is available [here](#). Some BACWA members (e.g., Central San) have successfully set this up.
- EPA is accepting comments on the [2023 Clean Water Act Methods Update Rule](#) until April 24th.
- [Effluent Guidelines Program Plan 15](#) was published in January 2023. EPA plans to revise effluent limitations guidelines and pretreatment standards for landfills because PFAS is found in landfill leachate. Landfills are not currently subject to federal pretreatment standards.
- In December 2022, EPA released a [guidance memo](#) on addressing PFAS discharges through pretreatment programs.

State Water Board Updates

Erica Kalve (Pretreatment and CECs Unit Supervisor, State Water Board) provided state pretreatment updates. Her slides are available [here](#).

- The State Water Board’s view is that investigation of PFAS sources should take into account all potential PFAS compounds by using a method such as Adsorbable Organic Fluorine ([EPA Draft Method 1621](#)). The State Water Board does not plan to require pretreatment programs to implement EPA’s December 2022 guidance memo (see link above) which specifies use of [EPA Draft Method 1633](#) for 40 PFAS Compounds.
- Enhanced Source Control is one of the aspects of regulatory development for Direct Potable Reuse. Draft regulations will be released by the State Water Board for public comment in approximately April 2023. More information is available [here](#).

Pretreatment Committee – Report to BACWA Board

Pretreatment Committee Meeting: 3/22/2023
Executive Board Meeting: 04/21/23
Committee Chairs: Casey Fitzgerald, Michael Dunning

Regional Water Board Updates

Mike Chee (San Francisco Regional Water Quality Control Board) announced that going forward, local limits studies should be uploaded into CIWQS.

The Regional and State Water Board target is for agencies to have 2 PCIs and 1 PCA every 5 years, although recently they have not been able to meet this target due to staffing limitations. BACWA members were encouraged to maintain lines of communication with Water Board staff even if a PCI or PCA is not being conducted at your agency.

Member Discussions on Industrial User Permitting

- One member shared an experience with discharge permitting for human alkaline hydrolysis. Soap stock in the effluent caused interference with the oil & grease analysis, so oil & grease monitoring cannot be conducted for this discharger. Several other members noted that they ban this type of discharge due to public perception issues. There are only a handful of such facilities on the west coast.
- Members discussed how to permit a nonferrous metals forming discharger that is a zero-discharger for certain subsections of category 471 Part D. EPA staff noted that whether or not a discharger is eligible to receive production standards for a certain subpart depends on whether the waste for that unit is off-hauled or whether it skipped (if a production step is skipped, rather than off-hauled, then the production-based credits may still apply because the pollutant may be introduced in a downstream unit).
- Members discussed considerations for establishing limits for Total Petroleum Hydrocarbons. After the meeting, Ross Steenson (San Francisco Bay Regional Water Quality Control Board) provided additional information for member use on solubility of TPH (see [email from Ross Steenson, 3/27/23](#))

Next meeting: Members agreed to meet approximately 3x/year going forward, using a combination of online and in-person meeting formats. The next meeting is targeted for mid- to late-August.