

Committee Request for Board Action: None

Regular meeting: 28 attendees via Zoom, representing approximately 20 member agencies

Recruitment for Vice Chair The committee is searching for a new vice chair to be promoted to committee chair in mid-2024. Contact Amanda Roa or Mary Cousins if you are able to serve in this role.

Upcoming Permits / Tentative Orders

Recently reissued NPDES permits for deep water discharges to San Francisco Bay no longer contain fecal or total coliform limits based on the shellfish beneficial use per Basin Plan Table 4-2A. This change is the result of a [Basin Plan Amendment](#) related to bacteria approved by the USEPA in 2022. The markup to Table 4-2A of the Basin Plan is shown in this [2021 Regional Water Board Resolution](#). Attendees discussed whether BACWA should pursue a permit amendment for dischargers whose NPDES permits will not be reissued in the near future. BACWA staff will investigate further to determine which permittees would be affected by the proposal.

Chlorine Blanket Permit Amendment

The [Tentative Order](#) blanket permit amendment for residual chlorine is slated for adoption at the November 8th Regional Water Board meeting. The effective date is January 1, 2024. BACWA submitted a [letter of support](#), since the permit amendment will allow reduced dosing of dechlorination chemicals for some dischargers. The committee discussed draft guidance for reporting to CIWQS, including which qualifiers to use (< or DNQ) and which CIWQS sample types to select (one-hour average or daily maximum). BACWA plans to formalize this guidance in coordination with Regional Water Board staff.

Statewide Toxicity Provisions

- [Quality Assurance Guidance Recommendations](#) for chronic toxicity testing using *Ceriodaphnia dubia* are now available from a statewide study led by SCCWRP.
- For newly reissued permits, make sure to check that DMR coding for chronic toxicity is correct.
- Until USEPA approves the Alternate Test Procedures for using a single effluent concentration, dischargers should continue to use the full five-concentration series for testing whole effluent toxicity. There is currently no timeline for this approval.

Basin Plan Amendment to Address NPDES Permitting Needs

The Regional Water Board has issued a [draft Basin Plan Amendment](#) to facilitate NPDES permitting of recycled water projects, including those with reverse osmosis concentrate. The Basin Plan Amendment includes a correction to freshwater water quality objectives, changes to the procedures for issuing dilution credits for cyanide and non-priority pollutants, and changes to the mercury concentration triggers listed in the Mercury TMDL. The draft is open for public comment until Tuesday 11/7.

Nutrients Update

- The committee discussed monitoring requirements for the 2024 reissuance of the Nutrient Watershed Permit. Participants noted that TKN influent sampling often shows anomalies, so frequent sampling is required to obtain reliable values.
- BACWA staff are working on a memo regarding agencies' plans for nutrient load reductions, which will be distributed for review by the Nutrient Strategy Team.

Other Updates

- A final report will soon be available summarizing BACWA's PFAS Regional Study. Legislation banning the use of PFAS in several classes of consumer products was vetoed by the governor (see veto messages for [AB 246](#) and [AB 727](#))
- The [Regional Monitoring Program Annual Meeting](#) was held October 12.
- The December meeting will be held in person and will include a catered holiday lunch.

Next Permits Committee Meeting: December 12, 2023, 10:30 AM in person at Central San in Martinez
(joint with Lab Committee)