

# Pretreatment Committee – Report to BACWA Board

Pretreatment Committee Meeting: 11/2/2023  
Executive Board Meeting: 11/17/23  
Committee Chairs: Casey Fitzgerald, Michael Dunning

**Committee Request for Board Action:** None  
53 attendees from 23 agencies participated virtually

## **Presentation – [Investigation of PFAS Sources to Municipal Wastewater](#)**

Diana Lin from the [San Francisco Estuary Institute](#) presented findings from Phase 1 and Phase 2 of the BACWA-funded Bay Area Regional PFAS Study. Phase 2 involved sampling of residential sewersheds in addition to influent, effluent, and biosolids, which were also sampled in Phase 1. Due to the involvement of Pretreatment Committee members, the Phase 2 study also included sampling of several types of industrial and commercial dischargers: industrial laundries, hospitals, semiconductor manufacturing, chrome plating, pulp paperboard manufacturing, car washes, a jail, and a military site. Residential loading was found to be the dominant source of PFAS to wastewater treatment plants. Among industrial dischargers, the highest PFAS concentrations were found in industrial laundries.

After the presentation, attendees discussed the complexities of sampling industrial discharges for PFAS. EBMUD staff have prepared an industrial sampling plan for their agency and recommended the [State of Michigan’s Sampling Guidance](#) as a reference. This guidance was also used in the [Phase 2 Sampling and Analysis Plan](#) for the BACWA Study.

## **BACWA Updates**

- USEPA is continuing to implement its [PFAS Strategic Roadmap](#), which will include updates to the landfill effluent guidelines and standards under the [Effluent Guidelines Program Plan](#). Due to resource constraints, USEPA currently has no timeline for updating the landfill standards.
- The Nutrient Watershed Permit will be reissued in 2024 and is expected to include dry season (May to Sept.) mass-based effluent limitations for Total Inorganic Nitrogen for all Bay dischargers.

## **Member Updates and Discussion**

- City of Palo Alto staff shared lessons learned from the City’s pretreatment compliance audit recently completed by State Water Board staff. Most of the findings were related to ordinance revisions. City staff shared the pre-audit checklists with the committee.
- USEPA plans to host an upcoming inspector training event at Union Sanitary District.
- Sunnyvale reported increasing copper concentrations that may be related to copper water lines used in new construction. Attendees recommended relocating residential sampling locations to accurately characterize these loads. Also see [BACWA resources](#) related to use of ASTM B813 flux in copper water line installations.
- Attendees discussed permitting of micro-electromechanical systems (MEMS) under part 40 CFR Part 469 (Electrical and Electronic Components) vs Part 433 (Metal Finishing). This [1998 EPA Guidance](#) on semiconductor manufacturing was shared as a potential resource.
- Central San staff shared experiences with setting up [CROMERR](#) using [Shared CROMERR Services](#), which they have recently beta-tested. The conversion will require a change to the District’s ordinance. The group discussed requirements for different types of reports to be submitted through CROMERR and plans to follow up with USEPA for the next committee meeting.

## **Announcements**

- CWEA will be revising the exam for the [Environmental Compliance Inspector Certification](#) program. Attendees with expertise in this topic were invited to participate in updating the exam.
- The next committee meeting is planned for early 2024 and regulators (USEPA, Regional Water Board, State Water Board) will be invited.