

Committee Request for Board Action: None

Regular meeting: 40 attendees via Zoom (including 13 attendees from the Laboratory Committee and 2 guest speakers), representing approximately 20 member agencies

New Vice Chair The committee welcomes Meg Herston to the role of Vice Chair.

Upcoming Permits / Tentative Orders

The [Millbrae tentative order](#) is scheduled for adoption on March 13th. The permit contains new template language for the Prohibition related to dilution (instead of identify a specific dilution factor, it now refers to dilution information listed in the Fact Sheet). Oro Loma's wet weather permit is scheduled for reissuance in May.

Chlorine Blanket Permit Amendment

The Chlorine Blanket Permit Amendment went into effect on January 1st. BACWA has prepared a [guidance document](#) on monitoring and reporting. Some agencies recently reported issues with DMR data entry. Most agencies should be able to report a one-hour average value for the "EG" monitoring location in their DMR.

Statewide Toxicity Provisions

- The BACWA Lab Committee will discuss chronic toxicity screening studies at its April 23rd meeting.
- Resources related to the recently completed *Ceriodaphnia dubia* study are available from the [State Water Board](#) and from [CASA](#). Refer to [Appendix E of the SCCWRP Report](#) for performance metrics.

PCB Congener Reporting

The committee discussed issues related to reporting results for PCB Congeners via Method 1668C as required by the [Mercury and PCBs Watershed Permit](#). Confusion has arisen due to recent changes at contract laboratories. Most attendees reported using [Enthalpy Analytical](#) (which recently acquired both Vista and Frontier) for analysis via Method 1668C. Two representatives from Enthalpy Analytical joined the conversation. BACWA plans to propose changes to this [2013 Guidance Document](#) to clarify these issues.

- Enthalpy staff explained that an Estimated Detection Limit (EDL) -- which is also known as a Sample-Specific Detection Limit (SSDL) -- is only generated in cases where an analyte was not detected. Table E-5 of the Permit clearly requires that SSDLs be reported when there is a ND result. Table E-5 also requires a DNQ flag when "The concentration is greater than the SSDL but less than the method-specified ML," but this is not possible for a detected result – there is no SSDL in that situation.
- Enthalpy is currently reporting detected values lower than the MDL as DNQs. The committee discussed whether to instead report these as non-detects, which would be consistent with the practice for other pollutants.
- Attendees discussed whether to use the ML or RL as the high cutoff for flagging DNQs. Table E-5 of the Permit says to use the ML, but Enthalpy's default is to use the RL (which is much lower than the ML).
- Attendees also discussed handling of Estimated Maximum Possible Concentration (EMPC) values, with a preference for reporting these as NDs.

Some agencies noted that their DMRs require a summation of PCB congeners, but this is a DMR coding error. The Permit (p. E-4) specifically states that "a summation for total PCBs as congeners is not required."

Other Announcements

- **PFAS.** A [study summary](#) from BACWA's PFAS Regional Study is now available. Method 1621 and Method 1633 [have been finalized](#) by USEPA as Clean Water Act methods. [SB 903](#) (Skinner) was recently introduced to ban non-essential uses of PFAS in California.
- **Basin Plan Amendment.** The Regional Water Board recently adopted a [Basin Plan Amendment](#) to facilitate NPDES permitting of recycled water projects, including those with reverse osmosis concentrate. The State Water Board will consider approval at its March 19th meeting, after which it will receive OAL and EPA.

- **Air Toxics.** BACWA will conduct outreach to members soon regarding participation in a statewide pooled emissions study for air toxics being led by CASA.
- **Nutrients.** The [Group Annual Report](#) with new data for Oct 22 - Sept 2023 is now available. BACWA's Nutrient Strategy Team is preparing for several upcoming discussions about the draft version of the 3rd Nutrient Watershed Permit. The permit is scheduled for an adoption hearing on June 12th.
- The [303\(d\) List for Region 2](#) was approved by State Water Board in February 2024
- The [February 2024 BACWA Regulatory Matrix](#) is now available
- [OPC Draft Sea Level Rise Guidance](#) is available for public comment through March 8.
- [Arleen Navarret Award](#) Nominations are due March 27
- The [CWEA Annual Conference](#) will be held April 9-12 in Sacramento.
- The [BACWA 2024 Annual Members Meeting](#) will be held May 3rd in Berkeley.

Next Permits Committee Meeting: April 23rd, 2024, 12:30 PM on MS Teams