

Pretreatment Committee – Report to BACWA Board

Pretreatment Committee Meeting: 2/14/2024
Executive Board Meeting: 3/15/2024
Committee Chairs: Casey Fitzgerald, Michael Dunning

Committee Request for Board Action: The committee may request funding for training later in FY25. 65 attendees from 20 agencies participated virtually and in-person at EBMUD

Presentation - EBMUD Resource Recovery (R2) Program ([Link to Slides](#))

Paula Hansen provided an overview of EBMUD's [Resource Recovery](#) (R2) program, which began in 2002 and processes trucked waste from around the region -- not just EBMUD's service area. The program has grown over the years, and since 2014, the R2 program has allowed the EBMUD main wastewater plant to produce more energy than it uses. The EBMUD wastewater plant currently receives about 120 trucks/day. Some of the key features of the R2 program that Paula shared include:

- Program participants (the waste generator or an approved hauler) must obtain a permit from EBMUD. As the R2 program has matured, EBMUD has gradually collected more information about the source of the trucked waste associated with each permit, including sample results and, when needed, information typical of sewer SIUs (e.g., process flow diagrams). Trucked waste from categorical industrial users is subject to categorical and local limits, as appropriate.
- EBMUD is not currently accepting blood waste, hazardous waste, or unfiltered metal cutting waste, and they also typically reject hauled waste from generators or haulers that have regulatory compliance issues.
- **If your facility rejects a hauled waste load, they may be headed for EBMUD!
As a courtesy, please contact EBMUD's Paula Hansen at 510-590-0171.**

CWEA Updates

[Norah Duffy](#), CWEA's Director of Certification, shared an update on the [CWEA Technical Certification Program \(TCP\) for Environmental Compliance Inspectors \(ECI\)](#). Norah's slides are available [here](#). CWEA is about 2/3 done with the latest update to the TCP ECI program. The deadline to register for an exam under the current set of minimum qualifications is February 28th. After that, the minimum qualifications will be changing to place greater emphasis on education – qualified staff with the appropriate education and experience will be able (in theory) to reach Grade 4 after just one year. The new handbook will be released in April to coincide with the [CWEA Annual Conference](#) (April 9-12, Sacramento). The new exam will be offered beginning July 1, 2024.

EPA Updates

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

- Beginning December 21, 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. It is not yet clear if this rule will apply to 2025 or 2025 Annual Reports.
- To receive IU reports identified in 40 CFR §403 in electronic form only, you must (1) seek CROMERR approval and (2) modify your approved pretreatment program. It is a “minor modification.” Additional info is available [here](#). Some BACWA members (e.g., Central San) have successfully set this up.
- EPA recently finalized two new Clean Water Act methods for PFAS: [Method 1633](#) for 40 PFAS compounds and [Method 1621](#) for Adsorbable Organic Fluorine. The January 2023 [Effluent Guidelines Program Plan 15](#) calls for development of PFAS standards for landfills, as well as a POTW Influent Study to verify sources of PFAS in wastewater and help POTWs assess the need for control measures at the source. BACWA plans to discuss the findings from the Region 2 PFAS Study with EPA staff soon in order to inform this POTW Influent Study.
- EPA has released proposed effluent guidelines for [Meat and Poultry Products](#) that could establish more stringent effluent limitations for nitrogen and phosphorus. These standards would be brand-new for indirect dischargers; the current rules only cover direct dischargers (e.g., those with their own NPDES permit).

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Water Board Updates

- State Water Board staff are continuing to support pretreatment program audits, inspections, and program reviews. Region 2 is not expected to be a focus area in 2024.
- The State Water Board is currently focused on development of guidance for enhanced source control programs that are required under the [Direct Potable Reuse regulations](#) adopted in December 2023.
- PFAS continues to be a focus area, and the State Water Board is particularly interested in the use of the Adsorbable Organic Fluorine (AOF) assay to characterize industrial wastewater. Sample analysis can be as low as \$250/sample for AOF via Method 1621 (contact Erica Kalve for details).

BACWA Updates

- A [Study Summary](#) is now available for the regional PFAS study conducted by SFEI scientists with funding and sampling assistance from BACWA members.
- The Collection System committee recently hosted a presentation on styrene safety. There are newly available resources from [NASSCO](#) and [LACSD](#).
- The Regional Water Board is currently drafting the 2024 Nutrient Watershed Permit, which is expected to contain dry season effluent load limits for Total Inorganic Nitrogen.
- The BACWA Annual Members' Meeting be held Fri, May 3, in downtown Berkeley.
- Nominate a colleague for the [Arleen Navarret award](#)! Nominations are due March 27th.

Future Meeting Topics and Training Needs

- Case studies for IU categorization is a possible future meeting topic.
- State Water Board staff suggested holding training sessions on baseline legal authority and/or lessons learned from audits.

Announcements

- On February 28th, Central San will host an all-day CWEA training event called "California – The State of Reuse." [Register here](#).