

**Committee Request for Board Action:** None

Virtual meeting format with 38 attendees representing 23 member agencies and the Regional Water Board

**Recruitment for Vice Chair** – The committee is recruiting for a Vice Chair to begin immediately and serve as chair in summer 2025. Interested members should contact BACWA staff or current chair [Meg Herston](#).

**Upcoming Permits / Tentative Orders** – Palo Alto's NPDES Permit is scheduled for fall 2024 and is no longer expected to include requirements related to a previously planned groundwater recharge project.

**Nutrient Watershed Permit Implementation**

- The Nutrient Watershed Permit ([R2-2024-0013](#)) was reissued by the Regional Water Board on July 10<sup>th</sup> and has an effective date of October 1<sup>st</sup>. The Regional Water Board concurrently adopted a resolution ([R2-2024-0014](#)) to identify a way to extend compliance schedules beyond 10 years for agencies that may require more time to meet the final effluent limitations. BACWA staff are consulting with BACWA member agency volunteers and coordinating with Regional Water Board staff on this effort.
- Most monitoring requirements are the same as the 2019 permit, except (a) if your agency previously qualified for a waiver of influent nitrate-nitrite monitoring, you may still qualify; see footnote in Table E-2 and (b) total phosphorus monitoring frequency has been reduced; see Table E-4.
- The 2024 permit requires reporting the dry season average mass load of total inorganic nitrogen (kg N/day) to demonstrate compliance with interim and effluent limitations. Robert Schlipf from the Regional Water Board joined the meeting to discuss electronic reporting, which is not specifically called out in the permit. The group discussed that electronic reporting would be best done in annual eSMRs in CIWQS (due February 1<sup>st</sup>) and in annual DMRs. The CIWQS PET tool will require a new “sample type” that is likely to be called “5-month dry season average” (or similar). This reporting will not be required until the interim effluent limitations take effect for the 2025 dry season.
- BACWA will continue to lead preparation of the Group Annual Report and will also lead the Regional Planning task required by Provision 6.3.4 of the Permit. BACWA plans to issue an RFP for consultant support for these two tasks in fall 2024.
- For agencies that are not “early actors,” Table 5 of the permit requires agencies to identify preliminary alternatives for meeting final effluent limits by April 1, 2025. BACWA will request this information prior to the April 1 due date so that it can be compiled for the Group Annual Report.

**Basin Plan and Ocean Plan Updates**

- The [Basin Plan Amendment to Address NPDES Permitting Needs](#) has been approved by OAL and now awaits USEPA review.
- The Basin Plan Amendment on Climate Change and Aquatic Habitat Protection, Management, and Restoration is awaiting State Water Board approval.
- Regional Water Board staff have initiated the [2024 Triennial Review](#) and are planning a formal comment period starting in September.
- The State Water Board is planning to conduct an [Ocean Plan Review](#) in 2025.

**PCB Congener Reporting**

Committee members discussed proposed changes to the 2013 version of the [POTW PCBs Sampling, Analysis and Reporting Protocols](#) used for reporting PCB congeners analyzed via EPA Method 1668C. BACWA plans to request a new version of this document to reflect current laboratory practices.

**Announcements**

- Use the new address [permits@lists.bacwa.org](mailto:permits@lists.bacwa.org) to reach committee members. The Google Group has been discontinued.
- BACWA has prepared a [Sewer System Management Plan guidance document](#) for use by enrollees in the statewide [Sanitary Sewer Systems General Order](#).

**Next Permits Committee Meeting: October 8, 2024, 12:30 PM on MS Teams**