



Holiday Handout



for

BACWA Lab and Permits Committees

December 10, 2024



B A C W A
B A Y A R E A
C L E A N W A T E R
A G E N C I E S



1. Proposed Schedule for 2025 Meetings

Lab Committee: 10 AM to 12 PM

Permits Committee: 12:30 – 2:30 PM

Meeting Dates: 2nd Tuesdays of Even Months

February 11th

April 8th

June 10th

August 12th – Lab Committee

August 19th – Permits Committee

October 14th

December 9th

Bonus: BACWA Annual Members Meeting – Friday, May 2nd, Berkeley

2. Statewide Toxicity Policy Updates

a. Region 2 Implementation – Are you curious about other dischargers’ chronic toxicity monitoring requirements and effluent limitations? Reference this spreadsheet for Bay Area (Region 2) dischargers, last updated December 2024 <https://bacwa.box.com/s/pkyiia2rdk0dv772ovot8w0q785mpwuf>

b. Statewide Implementation – On November 19th, State Water Board staff presented to the State Water Board members on implementation of the toxicity provisions.

Slides: <https://bacwa.box.com/s/m16fh85ko4wf5pwpke3lyk93jxlu2x8u>

Video: <https://www.youtube.com/watch?v=ZyR-siKs0bw&t=5820s>

Key points:

- *Ceriodaphnia* method is challenging (culture crashes, brood health etc.)
- Initiating 3 tests within a month is challenging

c. TST training - McCampbell will provide training on interpreting results at the February 11th Permits Committee meeting

3. ELAP Updates

Is your lab moving?

ELAP staff attended the November 18th CWEA Lab Committee and verbally provided guidance that if your lab is relocating, you should contact ELAP staff to discuss individualized requirements for your agency to maintain accreditation during / after the move.

Contact info for ELAP: ELAP Main - elapca@waterboards.ca.gov

4. Methods Update Rule (MUR)

MUR 22 was released on December 6th!

- Removes PCB Aroclors Methods (608.3 and 625)
- Adds new PCB Congeners Method 1628

Proposed Methods Update Rule 22

The EPA signed a new proposed **Methods Update Rule (MUR), MUR 22**, on December 6, 2024. This action proposes to promulgate three new EPA methods into 40 CFR Part 136:

- [EPA Method 1633A](#): an analytical method capable of measuring 40 PFAS compounds. This method was the result of a collaboration between the EPA and the Department of Defense.
- [EPA Method 1621](#): an analytical method capable of measuring adsorbable organic fluorine.
- [EPA Method 1628](#): an analytical method capable of measuring all 209 PCB congeners.

This action also proposes to codify analytical methods developed by Voluntary Consensus Standard Bodies (VCSB) as is consistent with the National Technology Transfer Act. These analytical methods include:

- ASTM D8421 measuring the same 40 PFAS compounds as EPA Method 1633A.
- Standard Method 4500-PAA measuring peracetic acid.
- Standard Method 4500-H2O2 measuring hydrogen peroxide.

This action also proposes to withdraw the existing EPA methods for measuring seven Aroclors (PCB mixtures). Finally, the EPA is proposing to simplify the sampling requirements for two volatile organic compounds, acrolein and acrylonitrile, and make a series of minor corrections to existing tables of approved methods.

Source: <https://www.epa.gov/cwa-methods/methods-update-rules>

ChemVal to provide an update on microbiological methods in January 2025 – stay tuned!

5. PCB Congener Reporting

Implementation of this [guidance document](#) from October is up to each discharger. Contract laboratories may provide a lab report with all the available data, leaving it to each discharger to finalize formatting and data entry into CIWQS.

Sample cover letter for submittal: “Results for PCBs congeners are reported according to the San Francisco Bay Regional Water Quality Control Board-approved guidance document *POTW PCBs Sampling, Analysis & Reporting Protocols Using EPA Method 1668C* (Bay Area Clean Water Agencies, October 2024). The laboratory report is included as an attachment to this submittal.”

If you are having issues, please contact Mary (mcousins@bacwa.org) and Blake (bbrown@centralsan.org).



6. Triennial Review

Adoption was scheduled for December 11th but was deferred to a future date. The delay will allow the Regional Water Board to respond to two letters received from a law firm on behalf of the Ecological Rights Foundation regarding these and related issues:

- Candidate project to incorporate Clean Water Act section 304(a) criteria into the Basin Plan did not rank high enough to receive staff resources.

See the [Triennial Review Staff Report](#), pg. 16.

The State Water Board survey also includes a question about Clean Water Act 304(a) criteria (see page 8)

- Basin Plan beneficial use designations for recreational and sport fishing

7. Nutrient Watershed Permit

- Preparation of the **Group Annual Report** for 2024-2025 is underway. HDR will contact individual agencies to confirm data compilation. Edits will be due **Jan 10th**.
- **Support for Implementation of Special Provisions:**
HDR will continue to support BACWA for the 2024 Nutrient Watershed Permit with:
 - Group Annual Reporting due each April 1st.
 - Compliance Schedule Milestone Reporting due each April 1st
 - Scoping Plan for Regional Planning Effort due July 1, 2025
 - Regional Dashboard? (Optional task)
- **Statewide Compliance Schedule Amendment** – Regional Water Board is working internally on this task and there is no update to share. Draft materials related to a hypothetical schedule for project implementation is in the [BACWA Board Packet](#). These materials are to demonstrate why more than 10 years is needed for compliance.
- **Science Planning** for 2025-2029 is underway. BACWA is meeting frequently with the SFEI science team and Regional Water Board to discuss the science work plan and management questions. BACWA is advocating for an approach that recognizes long planning horizons to facilitate capital planning.



8. State Water Board Survey on Statewide Policies

The State Water Board is conducting a survey to prioritize its work on amending water quality plans and policies over the next 3 years.

Clean Water Act section 304(a) criteria are also included in the survey.

304(a) criteria potentially applicable to SF Bay are much lower than existing CTR for criteria for many organic compounds such as bis(2-ethylhexyl)phthalate, butylbenzyl phthalate, and pentachlorophenol.

https://www.waterboards.ca.gov/plans_policies/2024_review.html
https://www.waterboards.ca.gov/plans_policies/docs/2024/survey-notice-fact-sheet-review-plans-policies-2024.pdf

The survey consists of an open-ended response for each policy, including the compliance schedule policy. **Please respond!**
Survey is open now through December 23, 2024

State Water Quality Control Plans:

- Bay-Delta Plan
- California Ocean Plan
- California Thermal Plan
- Enclosed Bays and Estuaries Plan
- Components of the Inland Surface Waters, Enclosed Bays, and Estuaries Plan

State Policies for Water Quality Control:

- Antidegradation Policy
- Aquatic Toxicity Provisions
- Cannabis Policy
- Compliance Schedule Policy
- Consolidated Cleanup Plan
- Enclosed Bays and Estuaries Policy
- Guidance for Toxic Hot Spot Policy
- Impaired Waters Policy
- Instream Flows Policy
- Investigation and Cleanup and Abatement of Dischargers under Water Code Section 13304
- Listing Policy
- Low-Threat Underground Storage Tank Closure Policy

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- Municipal Solid Waste Policy
- Nonpoint Source Pollution Enforcement Policy
- Once-Through Cooling Water Policy for Coastal and Estuarine Waters
- Once-Through Cooling Water Policy for Inland Waters
- Pollutant Policy Document for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary
- Recycled Water Policy
- Sources of Drinking Water Policy
- State Implementation Policy
- State Wetland Definition and Procedures for Discharges of Dredged or Fill Materials to Waters of the State
- Supplemental Environmental Projects Policy
- Water Reclamation Policy

In addition to reviewing these State Plans and Policies, the 2024 Review of State Plans and Policies will include a review of the federally promulgated water quality standards for California (40 C.F.R. §§ 131.36, 131.37 and 131.38) and Clean Water Act section 304(a) recommended criteria.

9. CECs White Paper

Finally complete!

<https://bacwa.org/wp-content/uploads/2024/11/POTW-Participation-in-CECs-Studies-White-Paper-2024-Update.pdf>

White Paper updates:

- Updated statistics about Bay Area treatment plants (population, flow, pretreatment, recycled water)
- Treatment technology, including nitrogen removal (NEW), filtration, and disinfection
- New section summarizing recently completed studies (2019-2024)

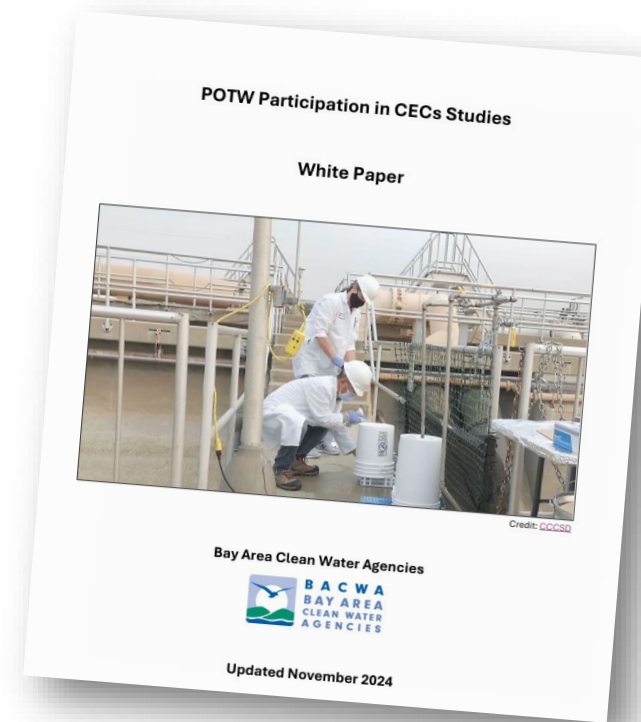


Table A3. Treatment Technologies for POTWs Discharging to SF Bay

AS = Activated Sludge; DAF = Dissolved Air Flotation; TF = Trickling Filter; MBR = Biological Membrane Reactor; NDN = Nitrification + Denitrification

POTW	Secondary Treatment Type	Nitrogen Removal	Disinfection Type	Advanced Secondary / Filtration? (Y/N)
American Canyon	MBR	Nitrification	UV	Y
Benicia	AS and Rotating Biological Contactor	--	Sodium Hypochlorite	N
Burlingame	AS	--	Sodium Hypochlorite	N
CCCSD	AS	--	UV	N
CMSA	TF/AS	--	Sodium Hypochlorite	N
Delta Diablo	TF/AS (in parallel)	--	Sodium Hypochlorite	N
DSBSD	TF and/or AS	--	Sodium Hypochlorite	N

10. PFAS

USEPA has released a new progress update on their PFAS Strategic Roadmap.

https://www.epa.gov/system/files/documents/2024-11/epas-pfas-strategic-roadmap-2024_508.pdf

Key Updates:

- Coming Soon – Draft **human health criteria** for fish consumption
In parallel, California OEHHA is also working on fish consumption advisory levels ([link](#)). Once finalized, federal or state fish consumption would likely affect San Francisco Bay wastewater discharges in the coming years, potentially via a 303(d) listing.
- Coming Soon – Draft risk assessment for PFOA and PFOS in **Biosolids**
This is just a risk assessment, not regulations. If and when regulations are finalized, they are likely to affect Bay Area biosolids end uses in the coming years.
- Nationwide Study of PFAS in influent and sewage sludge is coming!
 - **Extremely likely** your agency will need to fill out the survey
 - **Possibly** your agency will need to sample influent, effluent, domestic sewage, and up to 10 IUs

