

Committee Request for Board Action: The committee will request funding for training in FY25 or FY26. 56 attendees from 20 agencies participated remotely.

Committee Leadership – Volunteers Welcome!

If you're able to volunteer to help lead the committee, contact the current chairs or BACWA staff.

PFAS Updates - BACWA staff provided regulatory, legislative, and science updates related to PFAS:

- USEPA is planning to complete a [POTW Influent PFAS Study](#) as part of [Effluent Guidelines Program Plan 15](#). All agencies with permitted dry weather flow > 10 MGD will be required to fill out the survey. A [draft survey](#) is now available for a preview. The survey will require information about Significant Industrial Users (SIUs) and non-SIUs that are suspected sources of PFAS. USEPA will require a subset of agencies to conduct sampling. USEPA is also working on effluent limitations guidelines for PFAS manufacturers and expects rules for metal finishers and landfills to follow (see [USEPA Strategic Roadmap Progress Report, November 2024](#)).
- California's Department of Toxic Substances Control (DTSC) continues to identify certain consumer products containing PFAS, such as carpets, rugs, and artificial turf, as [priority products](#). Per [AB 347](#), DTSC now has new tools for enforcement of existing product bans for textiles, juvenile products, and food packaging. A product ban for menstrual products also recently passed ([AB 2515](#)).
- USEPA may soon release draft human health criteria for fish consumption. Fish consumption criteria are likely to be the driver for PFAS effluent limitations for San Francisco Bay wastewater dischargers.
- The final report for the [BACWA regional PFAS study](#) is now posted online and has also been published in a scientific journal ([link](#)). BACWA plans to continue studying PFAS sources to wastewater as part of the larger grant-funded [PFAS Sources to Solutions](#) project. A recent [UC Irvine](#) study found that urine, showers, and laundry were the main contributions to residential loads.

Attendees discussed that direct engagement with **metal finishers** and **landfills** would be useful to understand the impact of expected USEPA rules on these industrial categories.

Electronic Reporting

USEPA's NPDES electronic reporting rule will eventually require that annual pretreatment reports be submitted electronically in tabular format (i.e., not a PDF file). Pilot testing is underway now. The State Water Board expects to roll out the reporting in California no sooner than 2026 (for 2025 reports).

Program Benchmarking

The group discussed the need to share information about one another's pretreatment programs, and discussed potential categories of information such as number of staff, number and type of industrial users, and budget. Delta Diablo staff previously compiled limited information in summer 2024; the committee will use this as a starting point. BACWA staff will solicit responses from committee members. BACWA staff also shared a [link](#) to 2023 Pretreatment Program Reports as a resource.

Training Needs

The group discussed potential training ideas. Suggestions included data handling; groundwater permitting (dewatering and/or remediation); general program implementation including mandatory vs. discretionary permits and permitting non-industrial users; traffic control during sampling; customizing your program to fit your agency's needs; and having report-outs from individual agencies on their program highlights.

Updates on Constituents of Emerging Concern (CECs)

- DTSC has issued a new rule for laundry detergents with [nonylphenol ethoxylates](#), which could be found in specialized industries (e.g., hotels, hospitals).
- This year's Regional Monitoring Program [Pulse of the Bay](#) and [Annual Meeting](#) provide a resource on CECs for general audiences

BACWA Updates

- BAPPG will be discussing FOG outreach to food trucks at the next meeting on Wednesday 12/4
- New resources include the [Baywise](#) website, a [Baywise map](#) of agency service area boundaries, and an org chart of [Bay Area water quality agencies](#)
- The reissued [Nutrient Watershed Permit](#) went into effect on October 1. Interim, performance-based limits apply beginning in the 2025 dry season, and final limits apply beginning in the 2035 dry season. Going forward, nitrogen loading should be considered in pretreatment program local limits analyses and rate studies.

Member Discussion

- Attendees shared that it was useful to conduct an internal program audit to be prepared for a formal compliance audit. Consulting firms are available to assist with this work, if desired.
- Central San shared that they have put in their application with CROMERR. Once the application is approved, their staff can share tips with the committee.

Announcements

Registration is now open for CWEA's [P3S Conference](#) Feb 3-5, San Jose. The Monday session will feature a panel on pretreatment compliance audits, with speakers from the BACWA pretreatment committee.