

**Committee Request for Board Action:** None

63 attendees from 21 agencies participated remotely and in-person at the Regional Water Board's offices in downtown Oakland.

**Committee Leadership Transition**

The committee recognized the service of outgoing co-chair Michael Dunning (Union Sanitary District), and welcomed incoming co-chair Adam Kern (EBMUD).

**State Water Board Presentation on Pretreatment Compliance Audits** - [Link to slides](#)

Olivia Magaña (State Water Board) provided tips for pretreatment programs to be prepared for a successful pretreatment compliance audit (PCA) -- or to improve their programs even if they do not receive an audit. The State Water Board is currently prioritizing PCAs for facilities with water recycling programs, particularly potable reuse. The PCA includes electronic file review and in-person components. The PCA often involves a visit to specific industrial users (IUs) to see agency staff carry out IU inspections. The presentation stressed the importance of the following pretreatment program elements:

- Periodically reviewing documents such as the Sewer Use Ordinance, multijurisdictional agreements, enforcement response plans, and local limits to ensure they are kept up-to-date. When updating local limits, provide the Regional Water Board with a copy of relevant calculations in spreadsheet format.
- Maintaining a **Fact Sheet** for each IU permit that explains the logic behind permit terms like federal categorizations, effluent limits, and monitoring requirements. Some agencies keep a historical record as part of the Fact Sheet, while others focus on current conditions. Either approach is workable. Several agencies (Santa Rosa, San Jose, Petaluma) reported out that they use Fact Sheets.
- Developing **relationships with IUs** and ensuring adequate IU staff training on pretreatment topics.
- Responding to PCA findings in a timely manner. Substantial modifications may require regulatory authority approval.

**USEPA Updates** - [Link to slides](#)

Amelia Whitson (USEPA Region 9) shared federal pretreatment announcements, including the following:

- Electronic Reporting rules go into effect in December 2025 and could apply to 2025 Annual Reports due in 2026. Additional information is needed from the Water Boards regarding implementation in California (the state may request an extension). The first year will require effort to input all annual report information into an electronic database, but subsequent years should require less effort.
- Combatting PFAS contamination continues to be a high priority for EPA. No schedule update is available for the [influent study of POTWs](#), which EPA staff previously piloted with a few agencies. [Effluent Limitation Guidelines](#) for PFAS are under study or development for a few industries.
- There is a need for greater interaction between recycled water and pretreatment programs as potable reuse projects are developed. Many drinking water agencies are unaware of pretreatment programs!

**Agency Information-Sharing**

- Bay Area pretreatment program information is being compiled in this [shared document](#). Committee members should update the information for their specific agency.
- Agencies that accept hauled waste recently convened to discuss best practices. To join the group, contact [Martin St. George](#) (Santa Rosa) or [Paula Hansen](#) (EBMUD).
- Casey Fitzgerald (San José) shared information about his agency's pretreatment program, which includes about 200 IUs and 900 dental practices. He shared some current efforts for pretreatment program staff, such as considering the potential for streamlining the dental program, supporting development of a direct potable reuse program with Valley Water, fine-tuning the training program for pretreatment staff, and developing outreach materials (such as a newsletter) for IUs.

## Pretreatment Committee

Report to BACWA Board

Committee meeting on June 4, 2025

Executive Board Meeting Date: August 15, 2025

Committee Chairs: Casey Fitzgerald (San José),  
Adam Kern (EBMUD)

### Updates from [NACWA Pretreatment Conference](#)

Attendees reported that there are many new technologies available for collection system monitoring to support pretreatment program activities.

### BACWA Updates

- No PFAS regulations are yet in effect for San Francisco Bay, wastewater effluent, or biosolids. Most PFAS in Bay Area wastewater is likely derived from residential sources, and BACWA is supporting source control efforts and scientific research on this pathway. Pretreatment programs should continue to be alert to potential industrial sources of PFAS.
- Resources from BACWA's Annual Members Meeting are now available on the [BACWA website](#).
- BACWA has changed its member fee structure for affiliates. Agencies located out of the San Francisco Bay Area can now join all BACWA committees for one fixed membership fee (rather than paying committee-by-committee).
- The State Water Board has developed a [pre-inspection questionnaire](#) for sanitary sewer system agencies that reminds operators to be aware of "known industrial discharges." Pretreatment programs and sanitary sewer system operators will need to collaborate to meet this compliance expectation.