

Committee Request for Board Action: None

50 attendees participated remotely, including representatives from 29 BACWA member agencies and the Regional Water Board.

Nitrate + Nitrite and Total Phosphorus Methods using a DR3900

Janette Lugo (City of Petaluma) described how her lab successfully gained ELAP accreditation for analysis of nitrate-nitrite and total phosphorus via a Hach method. This method uses pre-packaged Hach “Test ‘N Tube” reagents with a [Hach DR3900](#) spectrophotometer, which the City recently acquired in lieu of ion chromatography. The Nitrate + Nitrite method (Hach Method 10206) has interference for samples with high COD and cannot be used when COD > 500 mg/L, which means it can only be used reliably for samples of treated effluent, not for influent or process control. City staff performed a thorough investigation of this interference as part of the method validation. The Total Phosphorus method (Hach Method 10209, SM4500-P E-2011) requires persulfate digestion in a separate digestion block. Now that the City has successfully mastered these two methods, they are considering expanding to other Hach spectrophotometric methods. The City is also considering new methods for nitrate that would be more appropriate for process control. After the presentation, the committee members also discussed considerations for disposal of method reagents and the steps required to gain ELAP approval for the method. [Link to Slides.](#)

Chronic Toxicity Screening Study and Test of Significant Toxicity (TST) Updates

Tiffany Ishaya (Silicon Valley Clean Water) provided an overview of her lab’s recent chronic toxicity screening study. Tiffany shared the timeline for completion of the entire study: the study plan was submitted to the Regional Water Board for approval in June 2023; quarterly sampling was completed from March to November 2024; and routine monitoring with the new test species (Topsmelt) began in June 2025. Topsmelt was selected because it had the highest percent effect at the Instream Waste Concentration across the four quarterly sampling events.

BACWA and Regional Water Board staff shared that a recent [State appellate court decision](#) regarding the Test of Significant Toxicity (TST) has resulted in legal uncertainty around the TST. As a result, reissuance of most individual NPDES permits in the region is on hold until about February 2026. Labs should continue to monitor per their NPDES permit requirements, including use of the TST.

Discussion Items and Announcements

- **Uploading Data to CIWQS.** A poll was conducted regarding tools for formatting data for upload to CIWQS. Responses included Johnson Lam’s tool ([eNPDES](#)), [HachWIMS](#), Ethosoft [X-LIMS](#), [Azyura](#) Waterbits, Labworks LIMS, Excel, and manual entry.
- **Audits.** Central San shared the results from a recent audit, including some of the key findings. Central San is in the process of responding to the findings, one of which involves deviations from an oil & grease method. Central San has requested an interpretation from TNI about one of the findings regarding checking volumetric support equipment, and plans to dispute one of the findings regarding control charting for negative controls.
- **Reporting Dry Season Nutrient Loads.** BACWA has prepared [tips for reporting 5-month dry season nutrient loads](#) to CIWQS using the new “seasonal average” data type from the [PET tool](#). TIN Loads are a calculated value and do not require a data qualifier; however, some agencies are electing to use the QA code column in CIWQS to track qualifiers associated with the individual values for Ammonia and/or Nitrate + Nitrite.
- **Upcoming Events:**
 - Register by 10/31 for the [IAS ELAP Symposium](#) to be held in Pleasanton 11/6.

Laboratory Committee
Report to BACWA Board

Committee meeting on 10/14/2025
Executive Board Meeting Date: 12/12/25
Committee Chair: Brittany Rossi
Worthen, City of Petaluma

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| <ul style="list-style-type: none">○ The CWEA Lab Committee is holding a committee meeting 10/30 at Central San, which Hach will also attend. Contact Blake Brown to Register. |
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<p>Next Meeting: Tuesday, December 2nd, 10:30 – 1:30 (Note date change)</p>

<p>Joint Meeting and Holiday Luncheon with BACWA Permits Committee at the City of Petaluma's Ellis Creek Water Recycling Facility</p>
