

Committee Request for Board Action: None

37 attendees participated remotely from 19 member agencies.

Dilution Study Requirements in SF Bay NPDES Permits

Mitch Mysliwicz ([Larry Walker Associates](#)) provided a comprehensive training session on dilution modeling for NPDES permits in the San Francisco Bay region. Dilution modeling is a requirement to obtain dilution credits for pollutants with water quality-based effluent limits, such as copper, ammonia, and chronic toxicity. Mitch’s presentation covered the technical foundations of dilution modeling for shallow water and deep water discharges, considerations for selecting model software, and information to include in reports to the Regional Water Board. The presentation distinguished between formal requirements for dilution modeling ([Basin Plan](#) and [SIP](#)), guidance documents (e.g., the [USEPA TSD](#); [Ocean Plan](#)) and customary practices within the San Francisco Bay region. For example, many acute dilution models in the region assume an average ambient (Bay) ambient velocity within a 1-hour window 30 minutes before and after slack tide. However, this is not a strict requirement, and other approaches may be technically defensible. [Link to Slides](#). [Link to Video](#).

Upcoming NPDES Permit Reissuances / Court Decision on the Test of Significant Toxicity

There is currently legal uncertainty about the Test of Significant Toxicity (TST) due to a recent [court opinion](#), which the State Water Board has appealed to the State Supreme Court. Regional Water Board staff do not plan to reissue any NPDES permits with toxicity effluent limitations until the legal uncertainty is resolved. The most recent (October 2025) [NPDES Wastewater Permit Reissuance Schedule](#) indicates that no major municipal wastewater permits are currently scheduled for reissuance. Agencies should continue toxicity monitoring per their NPDES permits.

Nutrients Watershed Permit Implementation

- **Basin Plan Amendment.** BACWA is preparing comments on a draft Basin Plan Amendment that would provide more than ten years for agencies to complete “qualifying” nutrient removal projects required for compliance with the Nutrients Watershed Permit. The comments will be discussed at an upcoming Nutrient Strategy Team meeting on Wednesday, November 5th.
- **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](#).
- **Agency Planning.** Staff from Central San and San Leandro shared information about nutrient load reduction planning at their respective agencies. **Central San** is moving forward with a full-scale MABR demonstration project (8 MGD). Baffle walls and structural supports for the MABR cassettes are currently being installed, and the MABR cassettes are planned to be installed in 2026. Central San is also continuing to evaluate conventional treatment options, recycled water, and nature-based solutions. [More info](#). **San Leandro** is working on project that will divert about 20% of the plant’s effluent to a containerized MABR (for nitrification) followed by denitrification in a woodchip bioreactor and discharge through a shallow water outfall (see [NPDES Permit](#)). Construction of the wetland recently began, and will continue through 2026. The MABR is expected to be online in 2027. San Leandro is working with a consultant on treatment for the main liquid treatment train; the current concept is to aerate RAS in an existing aeration basin, and route the nitrified RAS to headworks to achieve denitrification.

Regional Monitoring Program – California Toxics Rule (CTR) Monitoring

NPDES permitting requires information about background concentrations of priority pollutants in San Francisco Bay. The Regional Monitoring Program (RMP) conducts this monitoring on behalf of wastewater agencies. Bay water samples are collected every 10 years and analyzed for CTR

pollutants. Monitoring at three sites was included in the RMPs dry season 2025 water cruise. The existing data set goes back to 1993 and analytical methods and Bay water quality have changed since that time. Therefore, the committee plans to propose dropping data older than the most recent two sampling runs (e.g., keep 2015 and 2025 data; drop older data). BACWA will develop a draft written proposal for consideration by the committee before pursuing the idea further.

Climate Change Questionnaire

BACWA has worked with member volunteers to propose an update to the [2021 Climate Change Information Request](#). BACWA plans to share the updated version with the Regional Water Board for their consideration.

NPDES eReporting Rule

The State Water Board plans to roll out at CIWQS reporting module for anticipated and unanticipated bypasses to comply with the federal [NPDES eReporting Rule](#). More information was shared after the meeting in an October 21st [announcement from the State Water Board](#) about CIWQS reporting of bypasses.

Next Meeting: Tuesday, December 2nd, 10:30 – 1:30 (Note date change)

Joint Meeting and Holiday Luncheon with BACWA Laboratory Committee at the City of Petaluma’s Ellis Creek Water Recycling Facility