

Committee Request for Board Action: None

65 attendees from 22 agencies participated remotely.

Recent Pretreatment Compliance Audit

Adam Kern (EBMUD) shared insights from a recent Pretreatment Compliance Audit led by staff from USEPA Region 9 with assistance from the State Water Board. Before this audit, the most recent audit had been in 2019. The EBMUD team had about two weeks' notice for the audit. The audit took place over three days and included four industrial inspections, two led by EBMUD staff and two led by USEPA staff. The audit also involved extensive file review, including files related to the classification of dischargers and other core pretreatment program documents. The last day included a debrief with a synopsis of the auditors' findings. EBMUD expects to receive a formal audit report soon.

Committee members discussed that in-house mock audits and other training can be helpful ways to prepare for formal audits. Resources include this [USEPA video on Industrial Pretreatment Program Audits](#) and [tips from the State Water Board](#) previously shared at the committee's June 2025 meeting.

Roundtable Discussion on Training

Casey Fitzgerald led a roundtable discussion on training, with a particular focus on training new inspectors that may be new to the industry. Some of the strategies discussed included:

- **Get out in the field.** New inspectors can gain experience by shadowing a more experienced inspector. Attendees suggested shadowing an inspector at a neighboring agency, since neighboring agencies may have a larger/different selection of commercial and industrial users, and cross-training across agencies could lead to more consistency for wastewater customers. Attendees also suggested participating in visits to commercial users in addition to industrial users.
- **Record** in-house training sessions so that they are immediately available for new hires to watch.

Training topics and opportunities recommended for new staff included:

- Regulatory hierarchy (agency authority over industrial users; USEPA and Water Board authority over the agency); General enforcement training with local police, fire department, fish / wildlife agencies, or County environmental crimes task force; cross-training with your local CUPA; and training from the [California Hazardous Materials Investigators Association](#). YouTube can offer insights into specific industries.
- USEPA, CWEA, and NACWA also offer various trainings throughout the year. NACWA will host a virtual pretreatment conference December 9-11 ([register here](#)).

After the meeting, co-chair Casey Fitzgerald shared example staff training plans for the City of San Jose's Environmental Inspectors and Assistant Environmental Inspectors.

BACWA Updates – [Link to Slides](#)

- **PFAS Regulatory Updates:** The Regional Water Board's Site Cleanup Program recently issued updated [Environmental Screening Levels](#), including 16 PFAS compounds. The Environmental Screening Levels document can be a useful resource for pretreatment programs. The Regional Water Board has also issued a [draft general permit](#) for groundwater dischargers with technology-based effluent limits for PFAS set to the EPA's current drinking water MCLs (some of which [may be rescinded](#)).
- **QACS Updates:** If your agency has experience monitoring or tracking sources of Quaternary Ammonium Compounds, please contact BACWA staff.
- **Bay Area Pollution Prevention Group Update:** Social media and other digital graphics for the Fall FOG campaign now available at <https://bacwa.org/bapppg-fog>. The committee has selected FOG and PFAS for future public outreach campaigns in FY27.