



BACWA Tips for Reporting Dry Season Total Inorganic Nitrogen Loads to CIWQS for the 2024 Nutrients Watershed Permit

Updated December 8, 2025

Municipal wastewater dischargers listed in Table 1 of the 2024 Nutrients Watershed Permit ([R2-2024-0013](#)) are required to comply with monitoring and reporting requirements for flow and nutrients. With assistance from a consultant team, BACWA compiles this information into a [Group Annual Report](#). BACWA has contracted with the engineering firm HDR to assist with completion of the Group Annual Reports for 2026-2029.

Interim Effluent Limitations for Total Inorganic Nitrogen (TIN) went into effect beginning with the 2025 dry season (May 1 to September 30). Going forward, dischargers with Interim Effluent Limitations as listed in Table 3 of the Nutrients Watershed Permit are expected to report a **5-month-average dry season TIN load** into CIWQS with the annual self-monitoring reports (SMRs). Annual SMRs are typically due on February 1 or March 1. Dischargers should check their individual NPDES permit to find the due date.

To facilitate preparation of the Group Annual Report and other permit compliance activities, dischargers with Interim Effluent Limitations should follow the instructions below.

Step 1. Calculate the 5-month dry season TIN load using the instructions in the Permit

Use the Averaging Instructions from the [December 2025 Minor Modification Letter](#):

“Mass loads shall be determined by calculating the daily average total inorganic nitrogen load from the average daily flows (i.e., total discharge volume from May 1 through September 30, divided by 153 days) and average concentration, and rounding to two significant figures” (page 8, R2-2024-0013 as modified by the [December 5, 2025 letter](#) from the Regional Water Board).

Examples of loads rounded to two significant figures:

4.67 kg/day → 4.7 kg/day; 312 kg/day → 310 kg/day; 1,865 kg/day → 1,900 kg/day

BACWA Tip: All TIN concentrations should receive equal weighting in the seasonal average calculation. Additional information about calculating daily loads, including handling of Not Detected (ND) values, is in Table E-3, Footnotes [1] and [2] of the [Nutrients Watershed Permit](#).

Data Points to Exclude:

“[1] Samples need only to be collected when discharging (i.e., seasonal Dischargers shall collect samples only during the discharge season). For compliance monitoring (between May 1 and September 30), samples shall be representative of dry season conditions. If effluent flows are higher than normal due to unseasonal wet weather that increases flows to the treatment plant or results in reduced recycled water demand the Discharger shall exclude these flow and concentration results from the dry season average used for compliance determination and shall include documentation in the transmittal letter of its monthly self-monitoring report that explains effluent flows during that period were higher than normal due to wet weather.” (page E-4, Footnote 1, Table E-4 of R2-2024-0013, as modified by the [December 5, 2025 letter](#) from the Regional Water Board).

BACWA Tip: Include a note in both your monthly self-monitoring report and your annual self-monitoring report if the dry season average excludes specific daily load values from the calculated average. This will help ensure consistency between the Group Annual Report and CIWQS data set.

Compliance Determination

Compare your 5-month dry season TIN load to the interim effluent limitations listed in Table 3 of the 2024 Permit. If your agency becomes aware that your 5-month dry season TIN load exceeds your interim effluent limitation, include a note about the violation in the cover letter of your agency’s next monthly self-monitoring report. Please also provide courtesy notice to BACWA.

Step 2. Report the 5-month dry season TIN load to CIWQS with your Annual Self-Monitoring Report due February 1 or March 1

As of July 2025, the [CIWQS PET Tool](#) (v4.2) has been modified to include the new data type “**Seasonal Average**”. Please report the 5-month dry season average as “Seasonal Average.”

*BACWA Tip: **Do not** report the dry season average as an “Annual Average (Mean)”, “Annual Loading,” or any other data type other than “Seasonal Average.”*

Step 3. Review the Draft Group Annual Report before April 1st to Ensure Consistency with Annual Self-Monitoring Report

As in past years, BACWA will prepare a Group Annual Report that summarizes regional TIN loads to San Francisco Bay. Beginning with the Group Annual Report due on April 1, 2026, individual dischargers will need to take steps to ensure that the dry season TIN loads

reported to CIWQS match those summarized in the Group Annual Report. If there is any discrepancy, the values reported to CIWQS will serve as the official version.

Steps 1, 2, and 3 are listed in the context of other activities in the workflow table below.

Workflow for Reporting Dry Season Total Inorganic Nitrogen Loads

ACTIVITY	ESTIMATED DATE
Dischargers collect and analyze samples. Dischargers report monthly to CIWQS.	May to September; September results are due to CIWQS by October 31
Step 1. Calculate the 5-month dry season TIN load using the instructions in the Permit If the load exceeds your agency's interim effluent limitation, provide notice to the Regional Water Board in your next monthly self-monitoring report, and also provide a courtesy notice to BACWA.	October
HDR compiles monthly CIWQS data, and calculates dry season TIN loads for each discharger	November
HDR prepares draft table of dry season TIN loads for Group Annual Report; shares with dischargers	December
Step 2. Report the 5-month dry season TIN load to CIWQS with your Annual SMR. Report it as data type "Seasonal Average." <i>Dischargers should verify that the dry season TIN load they have calculated matches the HDR value. If it does not match, Dischargers should coordinate with HDR on next steps.</i>	Annual SMRs are due February 1 or March 1 (see individual NPDES permit)
HDR prepares the rest of the draft Group Annual Report; shares with dischargers	February
Step 3. Review the Draft Group Annual Report before April 1st to Ensure Consistency with Annual Self-Monitoring Report <i>If the Draft Group Annual Report does not match the values submitted to CIWQS with the Annual SMR, Dischargers should coordinate with HDR on next steps.</i>	February - March
HDR finalizes Group Annual Report, then BACWA submits Group Annual Report to Regional Water Board.	Group Annual Report is due April 1