

Special Joint Meeting of Lab and Permits Committee: 50 attendees participated remotely and in-person at the City of Petaluma's Ellis Creek Water Recycling Facility. Attendees included representatives from 24 BACWA member agencies and the Regional Water Board.

Whole Effluent Chronic Toxicity - Test of Significant Toxicity (TST) Updates

In November 2025, the CA Supreme Court agreed to hear the State Water Board's appeal of a CA Appellate court opinion regarding the legality of the TST as a Clean Water Act method ([Case Information](#)). The State Water Board recently provided legal guidance to the Regional Water Boards to include TST-based effluent limits in reissued permits, thereby ending the recent pause on permit reissuances caused by the pending court challenges. Three individual NPDES permits with TST-based effluent limits are slated for adoption at the [December 10th Regional Water Board meeting](#).

Nutrients Watershed Permit

- Regional Water Board staff recently issued a [minor modification](#) to the [Nutrients Watershed Permit](#) to specify a new way of calculating the dry season average Total Inorganic Nitrogen (TIN) loads for comparison with the interim effluent limitations. **The effluent limitations have not changed**, only the averaging instructions. [Link to December 5, 2025 Minor Modification](#).
- BACWA is working with HDR to develop a draft survey for this year's Group Annual Report and Compliance Schedule Milestone Report. The draft survey will be circulated soon, then BACWA will host a meeting on December 15th to discuss member feedback. The finalized survey will go out in January, and responses will be due February 13, 2026.
- The Freshwater Trust is continuing to make progress on the water quality trading feasibility study, and is meeting with BACWA members to gather input.

DMR-QA Study 45 reporting

Committee members discussed how to comply with the State Water Board's request for Excel or CSV files in addition to PDF files when reporting results for DMR-QA Study 45. Many (but not all) contract laboratories have figured out a way to provide the requested file formats. This is likely to be a request for future DMR-QA studies, as well.

Bypass Reporting Module in CIWQS

To comply with [federal e-reporting rules](#) for NPDES permits, the State Water Board recently added a new [bypass reporting module](#) and [help guide](#) to CIWQS. The module is to be used for reporting "noncompliant or prohibited" bypasses. The new module is formatted as two different questionnaires, either for an **anticipated bypass** or for an **unanticipated bypass**. The new module also asks users to self-report bypasses that are NPDES permit violations.

At the meeting, Regional Water Board staff recommended using the new reporting module for most bypass situations, but it is not required for bypasses that are specifically pre-approved by an agency's individual NPDES permit. In these cases, the NPDES permit will already provide specific instructions for monitoring and reporting the bypass. For example, permits that authorize blending provide a specific monitoring location and monitoring requirements for blended effluent (e.g., EFF-001B); do not use the new reporting module for such cases. Regional Water Board staff also noted that for anticipated bypasses, agencies should still provide notice to their case manager, consistent with past practice. The new module supplements, but does not replace, direct communication with Regional Water Board staff.

BACWA / SFEI Regional PFAS Study

BACWA recently held a webinar for members related to PFAS regulations, communication strategies, and the forthcoming Phase 3 of a regional study of PFAS in wastewater.

[Link to Slides from Nov 18th PFAS Forum](#)

BACWA and SFEI will hold a kickoff meeting for the Phase 3 study on Tuesday, December 15th. The goal of the Phase 3 study is to support source control efforts and contribute to SFEI's "Sources to Solutions" project. If your agency is interested in participating in the study, [please fill out this form](#).

2023 Chlorine Blanket Amendment Saves Wastewater Treatment Plants \$1 Million

See the December 2025 Regional Water Board [Executive Officer's Report](#) for a short write-up about cost savings for dechlorinating chemicals resulting from the [2023 Chlorine Blanket Permit Amendment](#).

Next Lab Committee Meeting: Wednesday, January 14, 2026 – Tour of Valley Water Lab, San Jose

Next Permits Committee Meeting: Tuesday, Feb 10, 2026, Virtual



Thank You to City of Petaluma staff for providing a tour of the Ellis Creek Water Recycling Facility!